

**SOUTH DUBLIN COUNTY COUNCILS
ARCHITECTURAL CONSERVATION OFFICERS REPORT
RE: SD22A/0355 – EDMONDSTOWN MILL, EDMONDSTOWN ROAD,
RATHFARNHAM, DUBLIN 16.**

Record of Protected Structures

Edmondstown Mill is referred to in the Council's Record of Protected Structures - Schedule 2 of the South Dublin County Development Plan 2022-2028 under Map Ref. No. 351. Under Section 2 of the Planning and Development Act 2000, the term 'structure' means *"any building, structure, excavation, or other thing constructed or made on, in, or under any land, or any part of a structure so defined, (a) where the context so admits, includes the land on, in or under which the structure is situate, and (b) in relation to a protected structure or proposed protected structure, includes (i) the interior of the structure, (ii) the land lying within the curtilage of the structure, (iii) any other structures lying within that curtilage and their interiors, and (iv) all fixtures and features which form part of the interior or exterior of any structure or structures"*. Therefore, the entire site is a protected structure, including all existing buildings on site including their exteriors, interiors, fixtures and fittings. The Protection also extends to the lands of the site and as such come under the provisions of the Planning and Development Act 2000.

Appraisal

This is an application for amendments and changes to a previous grant of permission under SD17A/0407. The current application seeks to apply for a material change of use from previously granted GF car part to one-bed and two-bed apartments. The removal of previously granted pitched roof to allow for the construction of two additional levels above the previously granted second floor level. On the proposed third floor there will be 3 two-bed apartments and 1 one-bed apartment with balconies and the proposed fourth floor will act as a penthouse level, consisting of 3 one-bed apartments and one two-bed apartment with roof terrace balconies. Associated elevational changes throughout to include the provision of 2 windows to the north elevation and south elevation and new door to proposed bike storage at GF level. Further works include the relocation of the existing water tank from the roof of building C to the North side of Building A next to the vehicular entrance to the site and proposed new signage to be erected on the relocated water tank. In addition, it is proposed to provide an extra 24 new external surface parking spaces to the already granted 19 surface parking.

Under the previous application granted under SD17A/0407 the overall application presented a high quality and sensitive adaptive reuse of the existing Industrial Buildings which are Protected Structures. The previous application allowed for the proposed to restoration, conversion and extension of the main buildings which make up the Mill complex, into residential use containing a total of 25 apartment units. The proposed development consisted of the change of use to residential, renovation and conversion of existing buildings with 4 no. apartment units being proposed outside the footprint of the existing structures within the site.

Under the previous application a very comprehensive conservation report was provided which allowed a full and proper assessment of the architecture and original built fabric of the Protected Structures. An overall impact assessment was also provided with regard to the proposed conversion, modifications and re-use of the existing structures detailed within a Schedule of Work in summarising proposed works for each building.

It should be noted the applicant has failed to submit a Conservation Report to reflect the proposal under the current application. Although an Architectural Impact Assessment has been submitted with the current planning application, it does not provide and include for the proposed changes required to the existing building with regard to overall interventions and requirements to allow for a significant new addition to the existing building.

The Architectural Impact Assessment includes excerpt taken from the Molloy Associates original Architectural Impact Assessment with regard to proposed works to Building C, however it is considered as the proposal has now changed with regard to Building C in allowing for a Change of Use and additional floors therefore a new Conservation Report to include a full Schedule of Works and assessment of impacts based on the works required to facilitate the proposed development is required. The applicant has failed to provide the level of detail and assessment required for development of a Protected Structure and within a Protected Structure site.

As part of the development previously granted at Edmondstown Mill Complex the works described for Building C also included for the repair and retention of the existing Water Tower. Under the current application it is proposed to relocate the existing water tower from the roof of Building C to the North side of Building A next to the vehicular entrance to the site.

It is considered that the overall design proposed for the new façade of Building C fails to provide a sensitive design allowing the rejuvenation of the existing building. The overall design, use of materials and additional height along Edmondstown Road has moved completely away from the original design previous granted under SD17A/0407.

The form and design now proposed under the current application fails to meet the high design standards and architectural interest of the previous application. The proposed development detracts from the overall quality and architectural character and industrial style of the Protected Structures. The increased height of Building C to accommodate additional floors and the treatment of the new proposed front elevation does not reflect the architectural quality of the existing buildings and does not represent the high-quality design and building type which was previously granted permission.

The previous proposal for Building C, proposed a new façade remodelled to provide balconies, energy efficient windows, high thermal performance cladding and to accommodate photovoltaic panels on the inclined roofs. The original design of the modified façade took cognisance of the industrial setting incorporating a saw-tooth roof profile and retaining the water tank as a feature overhead. The current application fails to deliver on the above items and the proposal allows the existing Protected Structure to be compromised. The overall design which provides a block with set back at penthouse level and proposed height allows a negative impact on the existing building and the existing streetscape setting.

The proposed re-location of the existing Water Tower which has been identified as a landmark feature is completely unacceptable. The previously granted application under SD17A/0407 allowed for the repair and retention of the water tower in its original position and was incorporated into the overall design of the new elements which is not the case under the current application.

It is considered that the proposed revisions to Building C including additional floors results in a block form which is not in keeping with the existing Industrial buildings. The design, quality and use of materials fails to achieve the overall requirements that were sought and presented in the previous granted permission. The proposed design for this element has not been achieved in a clear and appropriate manner in providing a high-quality design which reflects the site context within the curtilage of Protected Structures and their Industrial quality and architectural style.

The visual impact on the existing Building C and adjacent to the other earlier Industrial Buildings (Protected Structures) fails to minimise the overall visual impact and provide architectural interest through good quality contemporary additions and interventions, as such the proposals has a negative overall impact on the character of the existing protected structures and streetscape setting.

Recommendation

It is considered that the proposed development is unacceptable for the following reasons:

1. The form and design now proposed under the current application fails to meet the high design standards and architectural interest of the previous granted of permission SD17A/0407. The proposed development detracts from the overall quality and architectural character and industrial style of the Protected Structures. The increased height of Building C to accommodate additional floors and the treatment of the new proposed front elevation does not reflect the architectural quality of the existing buildings and does not represent the high-quality design and building type which was previously granted.
2. It is considered that the proposed current revisions to Building C, including additional floors, results in a heavy generic block form which is not in keeping with the existing Industrial buildings. The design, quality and use of materials fails to achieve the overall requirements that were sought and presented in the previous granted permission. The proposed design for this element has not been achieved in a clear and appropriate manner in providing a high-quality design which reflects the site context and their Industrial quality and architectural style.

The visual impact on the existing Building C and adjacent to the other earlier Industrial Buildings (Protected Structures) fails to minimise the overall impact and provide architectural interest through good quality contemporary additions and interventions, as such the proposals has a negative overall impact on the character of the existing structures and streetscape setting.

3. It is considered that the overall design proposed for the new façade of Building C fails to provide a sensitive design allowing the rejuvenation of the existing building. The overall design, use of materials and additional height along Edmondstown Road has moved completely away from the original design previous granted under SD17A/0407.

4. The applicant has failed to submit a Conservation Report to reflect the proposal under the current application. Although an Architectural Impact Assessment has been submitted with the current planning application, it does not provide and include for the proposed changes required to the existing building with regard to overall interventions and requirements to allow for a significant new addition to the existing building. An assessment of the relocation of the existing Water Tower has not been included in the Impact Assessment which is considered to be a landmark and integral feature within the existing Industrial Complex.

5. The proposed re-location of the existing Water Tower which has been identified as a landmark feature is completely unacceptable. The previously granted application under SD17A/0407 allowed for the repair and retention of the water tower in its original position and was incorporated into the overall design of the new elements, which is not the case under the current application.

Irenie McLoughlin
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South Dublin County Council

20th October 2022