

ARCHITECTURAL HERITAGE IMPACT ASSESSMENT

PROPOSED RESIDENTIAL DEVELOPMENT

CROSS GUNS BRIDGE
133 PHIBSBOROUGH ROAD
DUBLIN 7

January 2021



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CONTENTS

1.0 INTRODUCTION

2.0 RECEIVING ENVIRONMENT

3.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

4.0 ARCHITECTURAL HERITAGE IMPACT ASSESSMENT

5.0 SUMMATION

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1.0 INTRODUCTION

This report has been prepared by Molloy&Associates Conservation Architects on behalf of Bindford Limited to assess architectural heritage impacts arising from the proposed redevelopment of the former bakery site at Cross Guns Bridge, 113 Phibsborough Road, Dublin 7.

The proposed development will consist of the following:

a Strategic Housing Development for Build -To-Rent apartments and will comprise the demolition of all derelict buildings on site and the construction of a new residential development comprising 3 no. blocks ranging in height up to 12 storeys consisting of 205 no. dwellings and associated residential amenities, basement and surface carparking with vehicular and pedestrian access from the eastern end of the site off Phibsborough Road. Additional pedestrian only accesses to the north of the site off the Royal Canal Way. A new café/ retail area will be located at ground floor level of block C along with a new public open space to the east of the site. All associated site development works, landscaping and boundary treatment, children's play area, cycle parking, bin stores, substation, and services provision. A full description is set out in the statutory notices.

1.1 Architectural heritage considerations

The site previously formed part of the North City Flour Mill complex on the south bank of the Royal Canal. None of the buildings within the applicant site are protected structures, however, the site aligns with the Royal Canal Conservation Area.

This report appraises the anticipated impact of the proposed development on all heritage buildings in the vicinity and specifically on the protected structure, RPS Ref.6732, the former Iron Foundry, later North City Mills, which is positioned adjacent to the eastern boundary of the subject site. This building was converted to residential use in the 1990s.

A second consideration is the potential impact on the industrial heritage landscape, including the various locks, boundary walls and structures associated with the Royal Canal Conservation Area.

A third consideration is the potential impact on the wider architectural heritage environs, including the setting of 19th century residences to the immediate south of the development site and visual impacts on approach from Phibsborough Road, Prospect Road and the banks of the Royal Canal.

1.2 Existing site character

The site's present character is defined by its former industrial use. It is a brownfield site occupied by low and mid-rise warehouses and a tower grain silo, which is approximately 27.5 m high. The site has been vacant since the closure of the North City Flour Mills in the 1980's.

The northern boundary is a masonry wall presenting onto the tow path of the Royal Canal's south bank. The southern boundary of the site is similarly enclosed by rubble limestone wall which, in this instance backs onto a laneway behind a 19th century residential development, which is predominantly comprised of terraced rows of two storey, red brick housing. The aforementioned 19th century mill, RPS Ref. 6732, is positioned to the east of the site. A second former mill building, Shandon Mills RPS Ref. 6733, is positioned to the west, approximately 90m from the applicant site.

1.2 Assessment methodology

This architectural heritage impact assessment was compiled with reference to a desktop study of archival and cartography sources within and in the immediate environs of the proposed development area. A field survey of the site environs area was undertaken. The buildings were not inspected internally.

This assessment is based on detailed drawings and images of the proposed development provided by the project architects O'Mahony Pike Architects, consultant engineers Waterman Moylan and informed by CGI's prepared by Modelworks.

2.0 RECEIVING ENVIRONMENT

2.1 Statutory Context

2.1.1 *Relevant Conservation Areas and Architectural Conservation Areas*

The northern boundary of the site is aligned with the Royal Canal Conservation Area. See Fig. 1 for reference. The Phibsborough Architectural Conservation Area is located approximately 400m south of the proposed development.

2.1.2 *Structures in the vicinity included in the RPS and the NIAH (where applicable)*

There are no protected structures within the subject site, but the northern boundary wall, pertaining to the Royal Canal infrastructure is of industrial heritage significance, and aligns with the boundary of the Royal Canal Conservation Area.

All structures included in the Record of Protected Structures of the Dublin City Development Plan (2016-2022) in the immediate vicinity of the applicant site are scheduled in Table 1 below. Where applicable, an NIAH reference number is included for reference.

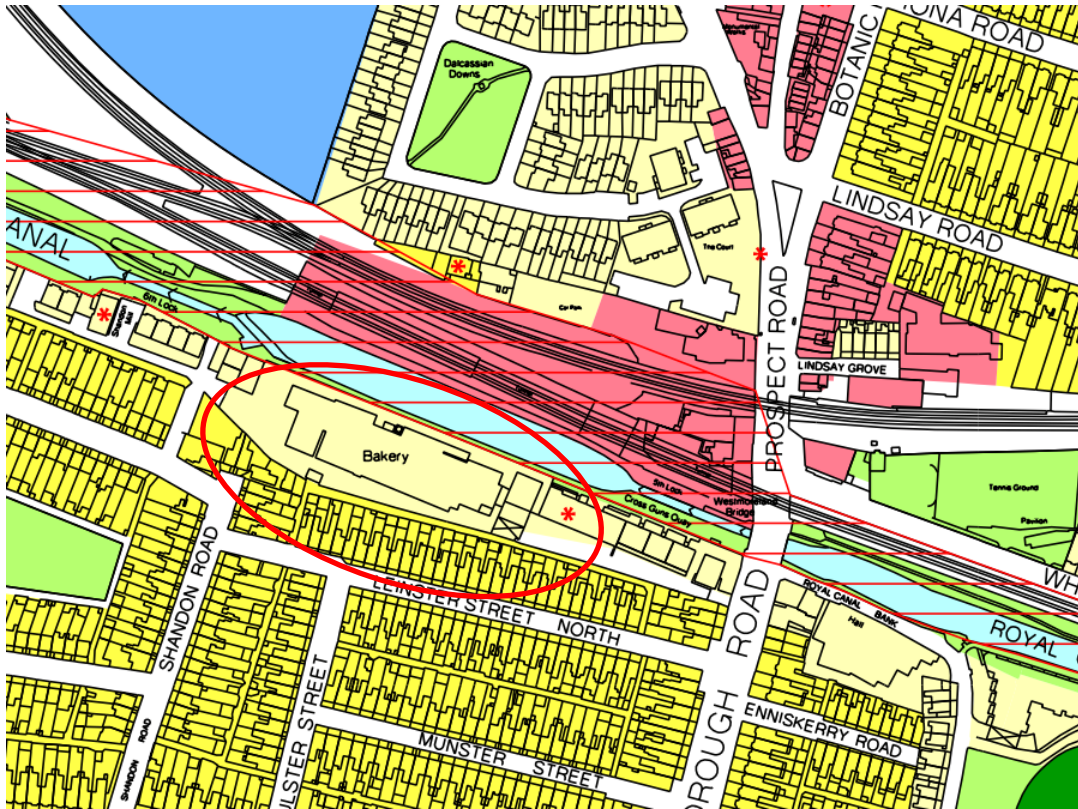


Fig. 1 Extract from Mapset E of the Dublin City Development Plan (2016-2022). Note the Royal Canal Conservation Area denoted by a RED hatch. Position of applicant site circled in RED.

| RPS Ref.No. | Description | NIAH Register No. | Location relative to the subject development site (m) |
|-------------|---|--|---|
| 803 | Entrance gates, railings and perimeter stone walls at Blessington Street Basin, including stone wall to Royal Canal Bank. | 50060184 – 5 th Lock 50060182 – 6 th Lock 50060185 – Guns Cross Bridge 50060112 – Guns Cross Railway Tunnel | The subject development site is positioned between the 5 th and 6 th Locks. |
| 6732 | Cross Guns Quay: multi-storey stone former mill building | 50060183 | Located adjacent the eastern site boundary. |
| 6733 | Shandon Mills on the 6 th lock of Royal Canal | N/A | Located on the canal, approximately 90m west of the site. |
| 8698 | Railings and gates of Former St. Vincent's Orphanage, now Dalcassian Downs. | N/A | Located on Prospect Road, 200m NE of the site. |
| 2097 | Prospect Lodge, Two storey Georgian style house, Dalcassian Downs (Off Prospect Road), Dublin 11. | N/A | Accessed from within the Dalcassian Downs estate, on the opposite site of the canal, 90m N of the site. |

Table 1 Structures in the vicinity included in the RPS and/ or NIAH.

2.1.3 Relevant Planning history

The development site has been subject to four applications since 2006. A summarised account of the planning history prepared by McGill Planning is included within the planning report.

2.1.4 Archaeological Overview

An archaeological assessment of the subject site has been undertaken by Jacqui Anderson of Irish Archaeological Consultancy Ltd. and is separately submitted. In summary, it is considered that the archaeological potential is considered to be low, but it remains possible that ground disturbances associated with development the site may have an adverse impact on previously unrecorded archaeological features or deposits that may survive beneath the current ground level. As a mitigation strategy it is therefore recommended that all ground disturbances associated with developing the site are subject to archaeological monitoring.

2.2 Brief account of the historical development of the site

The applicant site was shaped by the construction of the canal network in the late 18th century and subsequently the arrival of the railway in the 19th century. It was these major infrastructural developments that instigated the development of the mill buildings at this location.

2.2.1 Cartographic analysis

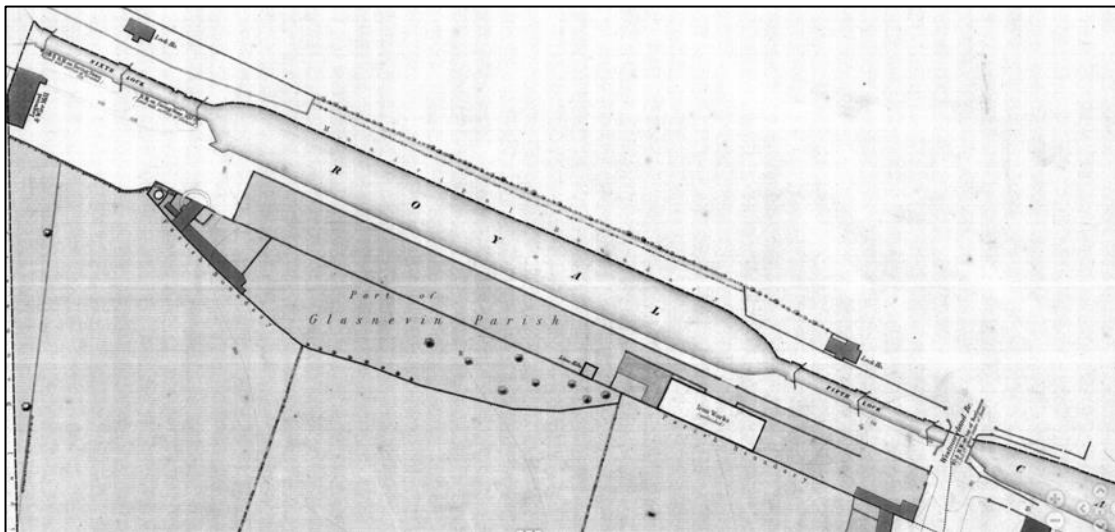
The following text and accompanying images provide an overview of the historical development site from the 18th century to the present day.



P 1 Roques Map, with approximate location of site circled in RED.

On Roques 1756 Map of Dublin, Plate 1, 'Cross Guns' is identified near the fork in the road at Prospect Avenue, and a linear cluster of buildings are indicated aligning the road to the east of the subject site. The surrounding lands are depicted as being predominantly in agricultural use.

A 1798 'Modern Plan of the City and Environs of Dublin' by William Wilson (not reproduced in this report) depicts the Royal Canal and the Broadstone branch, complete with locks and tow paths. No buildings are shown along the newly constructed canal on the subject site by the time of publication of this map.



P 2 City of Dublin, Ordnance Survey, Sheet 1, 1847.

The 1847 Ordnance Survey Map, Plate 2, depicts the Iron Works (RPS Ref. 6732), which is labelled as being 'unfinished' as it was still under construction at the time. The firm of R & J Mallet¹ built this foundry at Guns Cross², which was referred to locally as Mallet's Folly. The firm was regularly employed on a regular basis by Trinity College from 1836 or earlier until 1850.³ However, the business began to decline and after the firm failed to secure the contract for supplying pipes and castings for the extension of the Dublin Corporation waterworks, it was closed down circa 1860.

The lock-keeper's houses on the north bank and the Pin Mill (RPS Ref. 6733) are also shown on the 1847 map. The northern boundary wall of the subject site along the tow path has an opening in it which is aligned with the new foundry building. On the applicant site, there are two lime kilns identified and a building is shown against the south-west boundary, incidentally also the parish boundary.

¹ John and Robert Mallet, Dictionary of Irish Architects

² Christine Casey, The Buildings of Dublin: Ireland (205), 285-6.

³ Trinity College muniments, MUN/P/2/266-7, 287, 295, 297, 299, 301, 303, 306, 309, 311, 314, 317



The slightly later map of 1864, Plate 3, shows some significant developments. The foundry has been enlarged and repurposed as the 'North City Flour Mills'. An octagonal plan chimney, reported to be the largest mill chimney in Dublin at the time⁴, is shown connected to the west of the building. The structure aligned with the south western boundary has also been extended.

Notably, the railway has been constructed, with a branch extended over the canal to serve the flour Mill. There are two adjacent lines on the south bank, to allow for loading and the engine to pass. There is an earth embankment depicted to the south of the tracks.

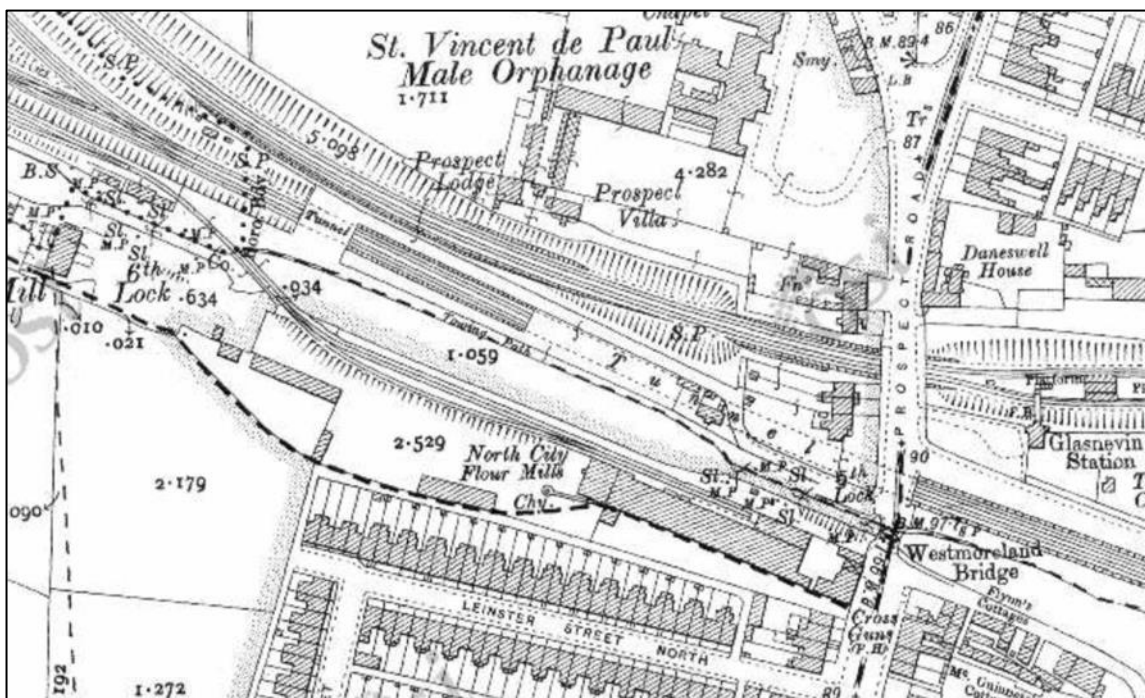


⁴ Exhibition: Ranks: A Limerick Industry, The Hunt Museum.

By 1886, Plate 4, the Mill building has been extended again. By the end of the 19th century, the mills were producing 2,500 barrels of wheat and 500 quarters of corn and had granaries for storing 20,000 barrels of wheat.⁵

The buildings on the applicant site adjacent the southern boundary have been demolished and replaced by free-standing, rectangular plan buildings. Thirty-four pairs of stones were driven by steam engines with four pairs water powered to manufacture flour and meal. The millwright machinery was manufactured in Wexford by Peter Murphy (engineer and millwright) and the steam engines supplied by John Rowan & Sons of Belfast.⁶

To the south of the site, Leinster Street has been laid out, but only the first pair of terraced residences have thus far been constructed.



P 5 City of Dublin, Ordnance Survey. Sheet 26, Revised c1907.

The 1907 Ordnance Survey Map, Plate 5, does not indicate any significant change to the buildings on the subject site, however the increased urbanisation of the surrounding environs is evident. The residential terrace on Leinster Street adjoining the southern boundary is complete and the residential suburbs have been constructed along Prospect Road, north of the canal.

During the 20th century, a series of improvement and modernisation works were undertaken at the North City Flour Mill. Circa 1952, the imposing concrete grain silos were constructed.

⁵ The Irish Times, 11th October 1873

⁶ Ibid

A summarised account of the history of the Mill Complex is outlined in Section 2.2 below.

2.3 Chronological development of the Mill Complex- summary note

c1847 The firm of R & J Mallet⁷ built a new foundry, which was closed by 1860.

1860 The building was acquired by Murtagh Brothers, who built and set up a milling industry. They had 19 working millstones and a kiln for drying corn. The mill chimney was reported to be the highest in Dublin at the time. Power was supplied by a steam engine and water.

1873-5 The Dublin North City Milling Company was formed.

1907 Mill was converted to a double expansion steam engine; the roller system for flour milling was introduced and after the War (1946/7) it became converted to electricity. The Royal Canal was used for transport until c. 1939. The imported wheat for milling was taken along the canal in barges. The route from Alexander Basin to the Mill took approximately 10 hours.

1933 A new flour mill was installed by a German engineering Company M.I.A.G.

1952 The concrete silo was built at the mill by Paul & Co, Dublin and machinery was installed by the same German engineering company M.I.A.G.

1957 The North City Milling Company became part of Ranks Ireland Ltd., who also had mills in Limerick, Cork and Buncrana.

1983 The Mill was closed.⁸

2.4 Critical description of site

There are multiple warehouses on the subject site. The low and mid-rise sheds are constructed in concrete block with a corrugated cladding finish in areas and typically finished with corrugated metal roofs, all of which are in poor condition.

The most visually prominent element on the site is the reinforced concrete grain silo structure, which is testament to its former industrial use. Constructed c1952, the Mouchel-style silos are of some technical merit, but on a more modest scale than those constructed at the city centre docklands in the same era. The window openings in the tower element have multipaned, metal frames with pivot openings, and the glazing is broken throughout.

⁷ John and Robert Mallet, Dictionary of Irish Architects.

⁸ A Grain of truth, Magill Magazine Archive.

The existing building complex is of interest in so far as it contributes to the understanding of the former industrial heritage of the site, but the structures in themselves are not considered to be of sufficient significance to warrant retention when assessed in term of the criteria as defined under Section 51 (1) of the Planning and Development Act 2000.



P 6 View of the concrete silos and warehouses from the north bank of the Royal Canal, with tow-path wall in front.

The southern boundary wall which is depicted on the historic maps aligns with the parish boundary. Inspection of the fabric was limited due to extensive vegetation growth, but based on initial assessment it is considered to be structurally stable.

The northern boundary wall along the tow path has been modified on multiple occasions. The length of wall in front of the former mill, to the east of the subject site, had piers and metal railing added to it when the structure was converted to residential use. The piers are finished with rubble limestone framed with modern brick with pyramidal cap stones.



P 7 Modified tow path wall in front of the former Mill building, incorporating masonry piers and metal railings.

At the boundary between the former mill and the subject site, the composition of the wall changes. Refer to Plate 8 below. A section of the wall (approximately 5m in length) has been reconstructed using concrete block which crudely adjoins the original rubble wall.

The tow path wall has been previously increased in height using mass concrete. Metal uprights are embedded in the top of the wall with barbed wire between. A pebble dash concrete render has been applied to the wall, presumably in an attempt to create a more homogeneous finish, and it is cracked and broken in several areas.

There is a single opening in the wall close to the centre of the site, which is presently infilled with concrete blockwork. The opening does not appear on the historic maps but the shaping of the limestone surrounds suggest that it is contemporaneous with the canal infrastructure works.

The entirety of the wall is disfigured by graffiti.

O' Mahony Pike Architects have submitted a survey drawing no. 1723A-OMP-ZZ-ZZ-DR-A-3006 and 1723A-OMP-ZZ-ZZ-DR-A-3007 of the existing wall, recording the various conditions described within this report.



P 8 Detail of the tow path wall at the boundary (see arrow) between the former mill and the subject site; the brick framed pier was added in the 1990's when the former Mill building was converted to residential use. To the right of the pier, in front of the subject site, the wall is comprised of concrete blocks.



P 9 The boundary wall, along the tow path is comprised of limestone rubble, concrete block infill and approx. 1m high section of mass concrete poured across the top of the wall.



P 10 The infilled opening in the wall into the tow path.



P 11 Detail of the cut limestone with chamfered edge on door surround, partially covered with cement render and disfigured with graffiti.

3.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

3.1 The proposed development

The proposal is for a Strategic Housing Development for Build -To-Rent apartments and will comprise the demolition of all derelict buildings on site and the construction of a new residential development comprising 3 no. blocks ranging in height up to 12 storeys consisting of 205 no. dwellings and associated residential amenities, basement and surface carparking with vehicular and pedestrian access from the eastern end of the site off Phibsborough Road. Additional pedestrian only accesses to the north of the site off the Royal Canal Way. A new café/ retail area will be located at ground floor level of block C along with a new public open space to the east of the site. All associated site development works, landscaping and boundary treatment, children's play area, cycle parking, bin stores, substation, and services provision. A full description is set out in the statutory notices.

3.2 The characteristics of the proposed development as it will relate to its environs

The proposed development has been designed with due regard for the heritage value of the site. The development seeks to respect the setting of the adjacent protected structure and Royal Canal Conservation Area. The scale and massing of the scheme has been considered with the intention of protecting the primary views of the former Mill, RPS Ref. 6732 and the Royal Canal environs.

The proposed redevelopment of this brownfield site will have a significant impact on the character of the site and the Conservation Area. The former industrial use required a diverse range of building types and form, and any proposed redevelopment of the site will naturally alter its appearance. This contemporary architectural design is intended to positively contribute to the Conservation Area whilst respecting established urban context and complementing the materiality of the existing built fabric.

3.3 Physical interventions

3.3.1. Demolitions

It is proposed to demolish all existing buildings on the site, none of which are protected structures.

3.3.2 Works to retained boundary walls

Calp limestone was a material that was in plentiful supply in the 19th century and the material provided an economic means of securing industrial sites throughout the city. The robust, sombre, building stone of the high boundary walls was constructed using traditional methods and contributes to the industrial character of the canal Conservation Area and residential laneway to the south of the site. Proposed interventive works to the walls are described in Sections 3.3.2.1 and 3.3.2.2 below.

3.3.2.1 Canal tow path wall

This section to be read in conjunction with OMP Architect drawing No. 1723A-OMP-ZZ-ZZ-DR-A-3006 and 1723A-OMP-ZZ-ZZ-DR-A-3007 which are survey drawings of the existing wall.

The northern boundary of the subject site is formed by a 19th century rubble wall, aligned with the tow path of the Royal Canal. As previously described in Section 2.3, the length of wall impacted by the proposed development has been previously modified on multiple occasions. Some sections have been inappropriately reinstated in concrete blockwork and part of the wall has been increased in height using mass concrete. An extensive part of the structure is finished in a concrete-based, pebble-dashed render.

A construction methodology for the construction of the proposed development has been prepared by Waterman Moylan, the consultant engineers. Section 6.0 of the Outline Demolition and Waste Management Plan describes the proposed methodology to mitigate against disturbance to the tow path wall and adjoining Royal Canal infrastructure. The foundations of the proposed development are to be piled to c.9m, which is below the depth of the canal. All new vertical and lateral loads from the proposed buildings on site will be directed to lower depths via piles; the Canal and Tow Path will not be subjected to new loads. It is noted that the attenuation tank is positioned approximately 10m away from the canal edge and 8m from the tow path wall. All elements of the proposed development will be supported independently of the existing historic fabric.

Please refer to Appendix A, Drawing NO, 20-011-WMS-ZZ-DR-S-21001 of Waterman Moylan's Outline Construction and Methodology Report for further details.

It is proposed to lower the existing wall to a height of 1.45m above the tow path and to install a metal railing above, in the interest of improving security by way of introducing passive surveillance and introducing a visual connection with the Royal Canal environs. This approach is generally consistent with the treatment of the modified section of wall in front of the former Mill building, adjacent the applicant site. The new development proposes to install simple metal railings, with vertical uprights above the extant wall, clearly delineating between the original historic fabric and the contemporary intervention. The retained wall base (1.45m high) will be repaired and repointed where necessary to match the original masonry walls along the Royal Canal. Where historic interventions occur in the retained section, they will be retained as a testament to the past use of the site. Removed building stones will be carefully set aside as a salvage repository for repair or possible reuse elsewhere within the site.

It is proposed to introduce a generous pedestrian opening within the wall to improve the permeability through the site connecting the proposed landscaped areas to the amenity of the Canal network. It is not intended to replicate historical detailing at thresholds. Instead the new opening will be simply formed in a modern style to complement the contemporary development.

It is proposed to remove pebble-dash render from the retained section of wall and to subsequently repoint the masonry wall in accordance with the outline method statement below, subject to inspection post removal of the cement render.

3.3.2.2 Southern boundary wall

The southern boundary of the site is enclosed with a rubble limestone wall, which afforded security to the former industrial use. Significantly, the wall is aligned with the Parish Boundary evident on historic maps. It is proposed to retain this boundary wall, and integrate it into the new residential scheme. Retention of this wall will also minimise the visual impact of the development on the 19th residences that back onto the site. Conservation works to the boundary wall are described below.

3.3.2.3. Proposed outline methodology for the proposed works to the 19th century boundary walls

Inspection:

- Inspection of the southern boundary wall (at the rear of the Leinster Street properties) was limited by extensive vegetation growth. It is proposed to reinspect the fabric post removal of the vegetation, however initial assessment by the structural engineers show this wall to be stable.
- Any biological growth embedded within walls will be removed, and the joints raked out to a sufficient depth to remove developed root system. The suitability and efficacy of each particular product shall be tested on a sample of calp limestone.

- A trial sample will be required to determine the best method of removing the cement render, where it exists, to avoid unnecessary damage to the substrate.
- The extent of loose or friable masonry to be determined by close range inspections. Loose or eroded stone may require careful removal. The surrounding (intact) masonry will be brush-cleaned of debris and dampened down.

Cleaning:

- Methodology to be agreed with specialist sub contractor.

Removal of upper courses and regularisation of new topstones:

- Upper courses to be removed, by hand, to required height.
- The new wall top is to be regularised to achieve a regular alignment. Any barbed-wire, razor wire, metal uprights or embedded glass will be removed.
- In preparation for this work, any loose stones will be carefully sourced and set aside for re-use. The surrounding (intact) stone will be brush-cleaned of debris and dampened down.
- The exposed core is to be made good and packed out as the work proceeds.
- Stones shall be laid on their natural bed on a full even bed of mortar with all joints filled. Different shapes, sizes and colours shall be evenly distributed throughout the face of the wall to give a consistent overall appearance and good bond with no long continuous vertical joints.
- Replacement / supplemented stone to be provided from stone salvaged from site.
- Cutting, dressing, laying and jointing of stone shall be carried out by skilled masons. Evidence of previous experience and details of work previously carried out shall be provided.
- The stonework shall be kept clean during construction until Practical Completion.
- Ensure that no mortar encroaches on face when laying.
- The new re-pointing mortars to the rubble masonry will consist of a fine to medium-grained lime-based mortar mix, formulated for stone rubble fabric in a moderately exposed location, in a moderate to severe environment. Sands will be local, and primarily consist of local limestone. The sand used will comply with current standards including BS 1200, BS 882, BS 1200:1976, BS 4551-1:1998, BS EN 998-2:2002, and the European normative references EN 1015-1. All works will be carried out complying with BS 7913:1998 Guide to the Principles of the Conservation of Historic Buildings. The proposed lime mortar will comprise a mix of 2.5 parts aggregate to 1-part NHL2 lime. The work is to be carried out by operatives skilled in the use of lime mortars, with samples agreed between the operative and conservation architect.
- A 100mm minimum cut will be required to remove the depth in totality. However, if the original depth is deeper, remove the entire section.

Repointing:

- At this stage, local repointing and repointing of altered sections is anticipated only, subject to

close inspection.

- Cement and another repair render will be carefully removed. The substrate will then be inspected by the conservation architect, prior to repointing in lime mortar.
- All open mortar joints are to be re-pointed using a lime-based mortar. This will include the raking out of loose mortar and material prior to re-pointing.
- Prior to the application of repair mortar, the stonework will be wetted down with a fine water mist using a hand sprayer in the first instance. The lime mortar will be trowelled into the joints. The contractor will use small round stones and pins (i.e. long wedge-shaped pieces of stone) to reduce the areas of mortar in large joints. These infill pieces will be tapped into place by hand. Any displaced mortar from the joints will be carefully removed using a trowel. The contractor will carry out re-pointing to a trial section of the wall at high level for agreement with the conservation architect before re-pointing elsewhere.
- The new re-pointing mortars to the rubble masonry will consist of a fine to medium-grained lime-based mortar mix, formulated for stone rubble fabric in a moderately exposed location, in a moderate to severe environment. Sands will be local, and primarily consist of local limestone. The sand used will comply with current standards including BS 1200, BS 882, BS 1200:1976, BS 4551-1:1998, BS EN 998-2:2002, and the European normative references EN 1015-1. All works will be carried out complying with BS 7913:1998 Guide to the Principles of the Conservation of Historic Buildings. The proposed lime mortar will comprise a mix of 2.5 parts aggregate to 1-part NHL2 lime. The work is to be carried out by operatives skilled in the use of lime mortars.
- The work will include grouting and deep tamping of existing open and dry joints and voids; and to consolidate sections of the wall where voids are suspected within the core. The grouting material will be lime-based with a suspension aid (such as bentonite). It is important that the final strength of the grout will not exceed that of the stone rubble masonry, that it be similar in permeability, low in shrinkage and have a good flow rate for effective penetration.
- The contractor will provide details of the proposed operatives who will carry out the lime mortar repairs together with evidence of their previous experience on similar projects to the satisfaction of the conservation architect.
- A trial sample will be carried out at the outset to facilitate agreement on the work methods and repointing style with the conservation architect.

Removal of metal and other redundant fixings evident:

- Allow for removal of all fixings and holes plugged.
- All fixings shall be removed in their entirety. The surrounding blocks of stone and adjacent blocks shall not be damaged in the removal procedure.

Workmanship:

- All works to be executed by competent heritage professionals.

3.3.2.3. Justification for the proposed works to tow path wall

It is acknowledged that the proposed works may result in a degree of loss of the original 19th fabric, however, it is considered that the proposed intervention will have an overall positive impact on the Royal Canal conservation Area. The present appearance of the tow path wall, which is topped with barbed wire and covered in graffiti has a negative visual impact on its environs. The proposed modifications and introduction of an active frontage is welcomed as improving access to and safe use of this amenity.

3.3.3. Recording and documentation of industrial heritage

All works, including demolitions, will be recorded and documented in accordance with the ideals of Article 16 of the Venice Charter and Articles 31-32 of the Burra Charter, with as-built documentation and progress related photographs submitted to the Authority upon completion for archival purposes. Any historic machinery surviving on the site will be recorded and considered for incorporation into the public realm.

4.0 IMPACT ASSESSMENT

The following is a description of the anticipated heritage impact of the proposed development.

4.1 Impact on the existing building range

It is proposed to demolish all the existing buildings on the applicant site to facilitate construction of the proposed residential development.

Justification for demolition of existing building range

The existing warehouse buildings are of low architectural interest. All buildings on the site are vacant, in poor condition and subject to vandalism.

The concrete silos are a legacy of the site's industrial heritage, but as previously stated, are not of sufficient significance to warrant retention. Their design is highly specific to their use and as a consequence inconducive to purposeful retention. Proposals to integrate them into a residential scheme is considered impractical and would preclude purposeful reuse of the site.

Their intended use is long extinguished, and it is appropriate that this infill site is redeveloped. It is recommended that a photographic survey of the buildings be undertaken prior to demolition and a copy submitted to the Irish Architectural Archives for future reference. It is further recommended that the building range is recorded with detailed measured drawings.

The existing building range should be inspected for the presence of bats so that appropriate mitigation measures can be planned.

4.2 Impact on the boundary walls

4.2.1. *Impact on the southern boundary wall*

It is proposed to retain the existing southern boundary wall. It is noted that the condition of this wall requires further assessment post removal of the vegetation. The wall will be gently cleaned down, vegetation removed and the wall will be regouted and repointed as required, to match the original repointing style as described in Section 3.3.2.4 above. The proposed works will have a positive impact on the 19th century boundary wall.

4.2.2. *Impact on the towpath wall*

Having regard to the information provided by the consultant engineers Waterman Moylan, it is considered that the new development can be constructed without compromising the structural integrity of the historic canal fabric, including the tow path wall.

The proposed lowering of the towpath wall to 1.45m above the level of the path is justifiable on two accounts. In the first instance, the wall has been previously modified on multiple occasions. The present height is a consequence of the addition of an in situ concrete to the top of the 19th century masonry, which likely occurred in the early 20th century. The wall has also been partially refinished with a cement based pebble-dash render and is disfigured by graffiti. Consequently the present condition of the wall visually detracts from the conservation area. Although the proposal to remove the upper part of the wall will constitute the loss of a limited amount of 19th century fabric, it is considered that this section has already been previously compromised by later alterations and that its removal and the removal of the cement render from the entire wall will have a nett positive impact on both this boundary wall and the wider historic setting.

Secondly, the lowering of the wall is required to optimise the quality of the ground floor residential units, maximising natural daylight penetration into the residences and facilitating outward views of the canal whilst maintaining adequate levels of privacy and security. The design consideration informing the design rationale for this lowering of the wall is detailed in OMP's accompanying Design Statement.

The proposed introduction of two gated openings within the tow path wall is required to facilitate access to the Canal Environs from the proposed public space and between Blocks A and B. Historically, the wall contained openings, as evidenced in the attached photo record. It is considered that the limited loss of original wall fabric is justified to facilitate pedestrian connections to the new development and constitutes a nett benefit to the conservation area. It is considered that the consequential improved passive surveillance of the canal environs and the increased activity along the banks will positively impact the conservation area.

4.3 Impact on the Royal Canal Conservation Area

This infill development has been designed cognisant of the historic industrial landscape and is found to be consistent with the objectives of the Phibsborough / Mountjoy LAP; which recognises the need to develop the site in a manner that is sympathetic to extant industrial heritage in the vicinity. The Royal Canal has been repurposed as an amenity; serving as an urban park and protected as an urban wildlife habitat, rendering the proposed residential use of the site harmonious with that character.

The proposed development is taller than the existing warehouses and silos on the subject site, but the scale of the buildings is comparable to nineteenth century mill buildings that are dispersed along the canal network. The three buildings that comprise the new development transition in scale from 3 to 12 storeys in height. The tallest of the blocks, Block C, is positioned on the approximate footprint of the extant silo towers, reinstating its memory on the skyline. The roof ridges of the lower blocks, Block A and Block B, are comparable to the ridge height of the former Mill building.

The proposed building form is sympathetic to the adjoining Mill, a protected structure. The gable wall, viewed on approach from the west along the Royal Canal banks, has a strong vernacular building form reminiscent of traditional mill buildings and sits comfortably within the former industrial context.

Although it is presently poorly presented, the original tow path wall has the potential to positively contribute to the conservation area and is found to contribute to the legibility and understanding of the historical development of the canal environment. To retain the significance of this masonry wall, the proposed development has been set back behind it, akin to the historic Mill building. The wall will be modified, as described in Section 4.2.2, to the benefit of the wider public realm, and reconsolidated to ensure the long-term preservation of the unique character of the canal environs.

The proposed regeneration of the site is considered to have a positive impact on the Royal Canal Conservation Area in the substitution of dereliction with an animated residential function that will enliven its environs.



P 12 Existing view from the canal bank opposite the subject site, depicting the negative impact of the existing northern boundary, the tow path wall on the boundary of the CA .



P 13 CGI of proposed view describes the integration of the original wall into the proposed residential scheme to the benefit of the canal environs.

4.4 Impact on setting of the former Mill (RPS Ref 6732)

The repurposed Mill building adjacent the subject site is seven storeys tall and positioned at the prominent corner site adjacent the Cross Guns Bridge. Consequentially it is highly visible on approach from all primary routes from Glasnevin, Phibsborough and Whitworth Road. The construction of the concrete grain silos in the 1950's did not diminish the prominence of this structure and similarly, the dominance of its form will endure post development on the subject site.

The simple form of the new development is sympathetic to the traditional building. The scale of the lower blocks are comparable with the protected structure and the taller element is evocative of the extant grain silos which punctuate the skyline. Furthermore, the selected materials harmonise with the 19th century industrial landscape. Buff coloured brick is proposed on the lower

floors to relate to the grey tones of the existing mill building. The upper floors are predominantly glazed with zinc cladding to complement the muted material palette.

The setting of the protected structure will inevitably be altered by the proposed redevelopment; however, the residential scheme has been designed to respect its character and to safeguard its setting which is presently marred by vacancy and vandalism.

It is proposed to construct a public plaza along the eastern boundary, which will provide a visual buffer between the gable of the protected structure and the proposed development and have the benefit of increasing the visibility of the protected structure. It is considered that the improvement of the public realm and immediate setting of the former Mill building will have a positive impact on the protected structure.



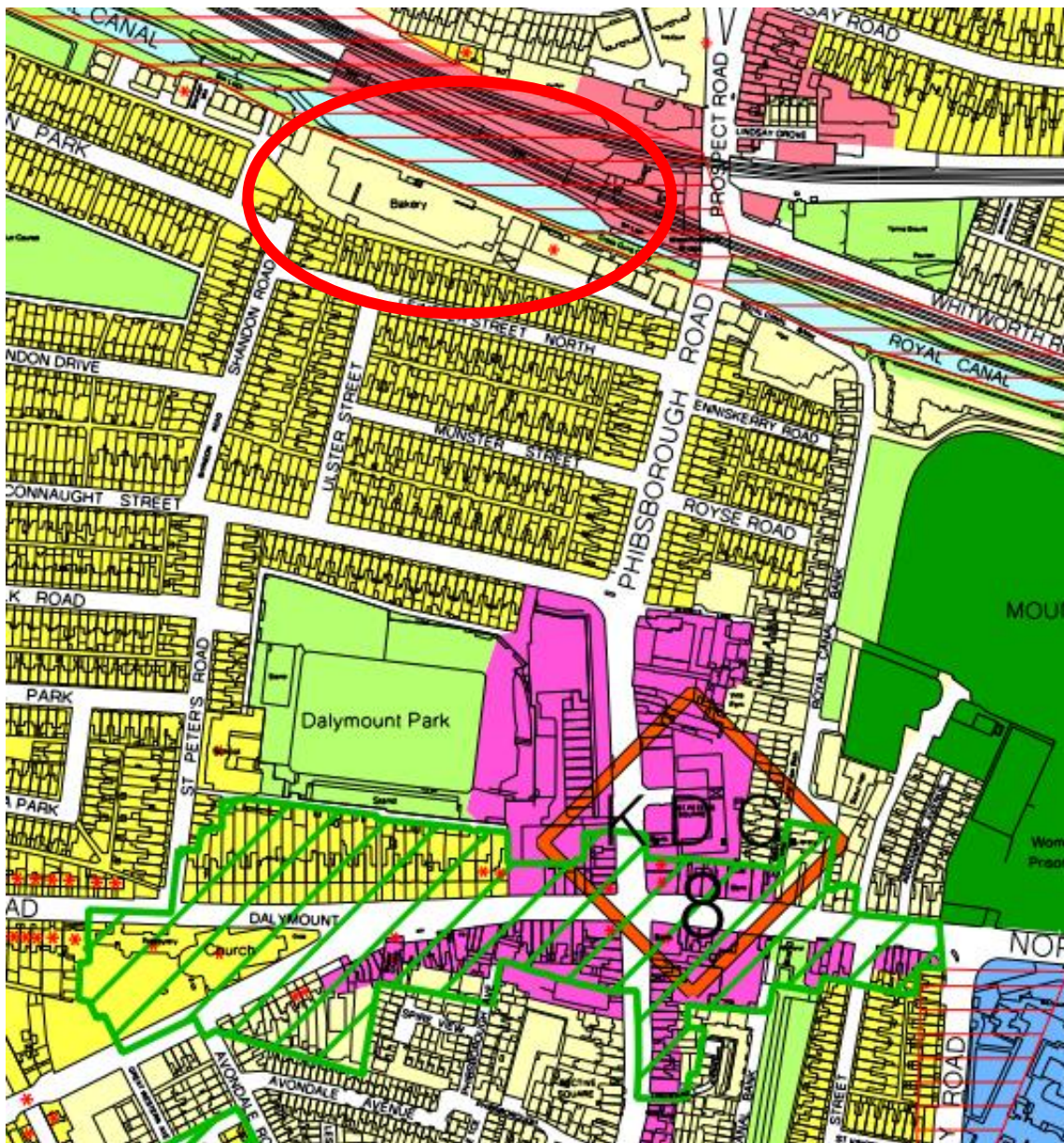
P 14 CGI of proposed development from the 6th lock on the Royal Canal. Source: Modelworks



P 15 CGI of the proposed development in the context of the former Mill building from Cross Guns Bridge.

4.5 Impact on the Phibsborough Architectural Conservation Area

The Phibsborough ACA is positioned approximately 400m south of the proposed development site. See Plate 16 for extent of boundary.



P 16 Extract from Map E of the Dublin City Development Plan identifying Phibsborough ACA, with a green hatch, approximately 400m south of the subject site, circled in red.

The profile of the existing concrete silos is just visible on the skyline approach from the Phibsborough Road, on the boundary of the Phibsborough Architectural Conservation Area. It is possible that the silhouette of the industrial silos may have influenced the design of the office tower of the Phibsborough Shopping Centre, designed by David Keane in 1968, as there is a discernible dialogue between the two forms as viewed on approach from the Phibsborough junction. Notwithstanding this possible visible link to the shopping centre, it is considered that the proposed development will have no impact on the setting of the ACA, owing to the distance between the

entities. Furthermore, it is noted that a proposal to redevelop the site of the Phibsborough Shopping Centre has been approved by Dublin City Council and is currently under consideration by An Bord Pleanála.



P 17 Existing view from the Phibsborough Road on the northern boundary of the Phibsborough ACA, with the grain silos visible on the skyline.



P 18 Proposed view from the Phibsborough Road on the northern boundary of the Phibsborough ACA, with the grain silos just visible on the skyline.

4.6 Impact on the wider historic urban landscape

Presently, the concrete silos are visible above the rooftops of the two-storey Victorian residences to the south of the site. The proposed development will be visible above existing rooflines on Leinster Street and Ulster Street. To minimise impacts on the terrace, the proposed buildings have been set back from the southern site boundary and a green buffer introduced between the two. Lightweight perforated metal screens have been integrated into the south

facing façade of the proposed buildings to mitigate against overlooking and the selected materials of brick and zinc complement the existing red brick residences.



P 19 Existing view from Ulster Street.



P 20 CGI of proposed view from Ulster Street.

5.0 SUMMATION

The proposed infill development will regenerate what is presently a vacant brownfield site. The proposed residential building range will alter the setting of the Royal Canal Conservation Area, but proposed scale and forms are comparable with the vernacular mill buildings adjacent to the site. The proposed development will have no adverse impact on the setting of the adjacent protected structure. The Royal Canal is recognised as an important industrial and engineering heritage asset and this proposal will improve the present frontage onto its towpath and positively contribute to the continued regeneration and enjoyment of this amenity.