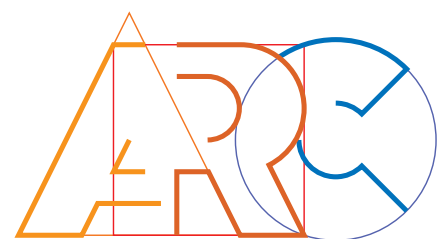


**PROPOSED STUDENT ACCOMMODATION, 21-23 BLACKPITTS, DUBLIN 8**  
**ARCHITECTURAL HERITAGE IMPACT ASSESSMENT**

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**JULY 2025**

This Architectural Heritage Impact Assessment (AHIA) has been prepared by ARC Consultant to examine potential impacts on architectural heritage that might arise from the development of proposed Student Accommodation at 21-23 Blackpitts, Dublin 8.

## Project Description

Planning permission is sought for a Large-Scale Residential Development delivering 217 student bed spaces (209 No. single rooms and 4 No. twin rooms, 213 No. rooms in total), within one block. The block ranges in height up to 6 storeys with a basement below. All associated internal and external amenity space, including the provision of restaurant/café, on street carparking, cycle parking, landscaping, bin stores, service provision and all other associated site development works.

## The Site of the Proposed Development

The site of the proposed student accommodation is located just west of the Clanbrassil Street corridor in part of a strip of the City that lies between Clanbrassil Street and Blackpitts. The site faces onto Blackpitts on its west side and onto Donovan Lane on its north side. Donovan Lane slopes down to Blackpitts from the higher ground of Clanbrassil Street. The subject site is bounded on its east and south sides by the Greenville Place Apartments development.

## LRD Opinion

It is noted that in the LRD Opinion dated the 13th of February 2026, DCC Reference No: LRD6077/24-52, the following concerns are raised in relation to the development:

*a) The Planning Authority raise concern regarding the height, scale and massing of the building and the undue negative visual impact of the proposal on the wider vicinity of the site. A reduction in height and massing should be explored given the site context, the infill nature of the site & Z1 zoning of the site.*

*b) Images 10 & 12 of the submitted visualisations show the significant impact of the proposal on the receiving environment. The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from opposite the site on Greenville Parade.*

*c) The Planning Authority has serious concerns regarding the overbearing impact the proposed building would have given its scale and bulk in close proximity to neighbouring sites. While the small set back at the front southern corner and slightly reduced element is welcomed, it does not go far enough to address the concerns. A further reduction should be explored which extends across the entire building.*

Under Item 6. Conservation in the LRD Opinion the following is stated by DCC Conservation Division:

*a) It is important that the CGI views convey the impact that the new building will have on the existing neighbouring modest houses, and that sufficient 3D images are provided (b) to facilitate a proper understanding of the proposed development within the receiving environment.*

*c) It is suggested that the Applicant includes a section/elevation along Hammond Street indicating the eaves and ridge height of the 1 and 2 storey buildings and the side elevation of the end house on Greenville Parade, across Blackpitts and through the new building and the 4 storey buildings at the rear to demonstrate the difference in scale between the receiving environment and the proposed new building.*

*d) The exemplar included by the Applicant in their Architectural Design Statement page 16 of David Chipperfield's 11-19 Jane Street, New York is noted - 5 storeys would be much more preferable in this site context.*

*e) Recommended that at least 1 storey (preferably more) would be removed from the building to reduce the impact on the residential buildings in the area.*

It is understood that the above comments from DCC were based on a 7 storey version of the Student Accommodation scheme and that the applicant now proposes to reduce the height to 6 storeys, which results in a quite significant reduction in the massing of the proposed development.

I have now been asked, as a conservation architect of long experience, to prepare an Architectural Heritage Impacts Assessment (AHIA) that might discuss and address some of the issues raised in the LRD Opinion.

I have walked the streets of the area in the last few weeks as part of an assessment of the heritage character of the areas surrounding the subject site. I also used to live in the area and I have been familiar with the area for many years. My final year thesis for my degree in architecture in 1970 was housing in the Liberties and I had been studying and photographing the Liberties for some years before that. I worked for a number of years with the Liberties association and I contributed to a book on the Liberties published in 1973.

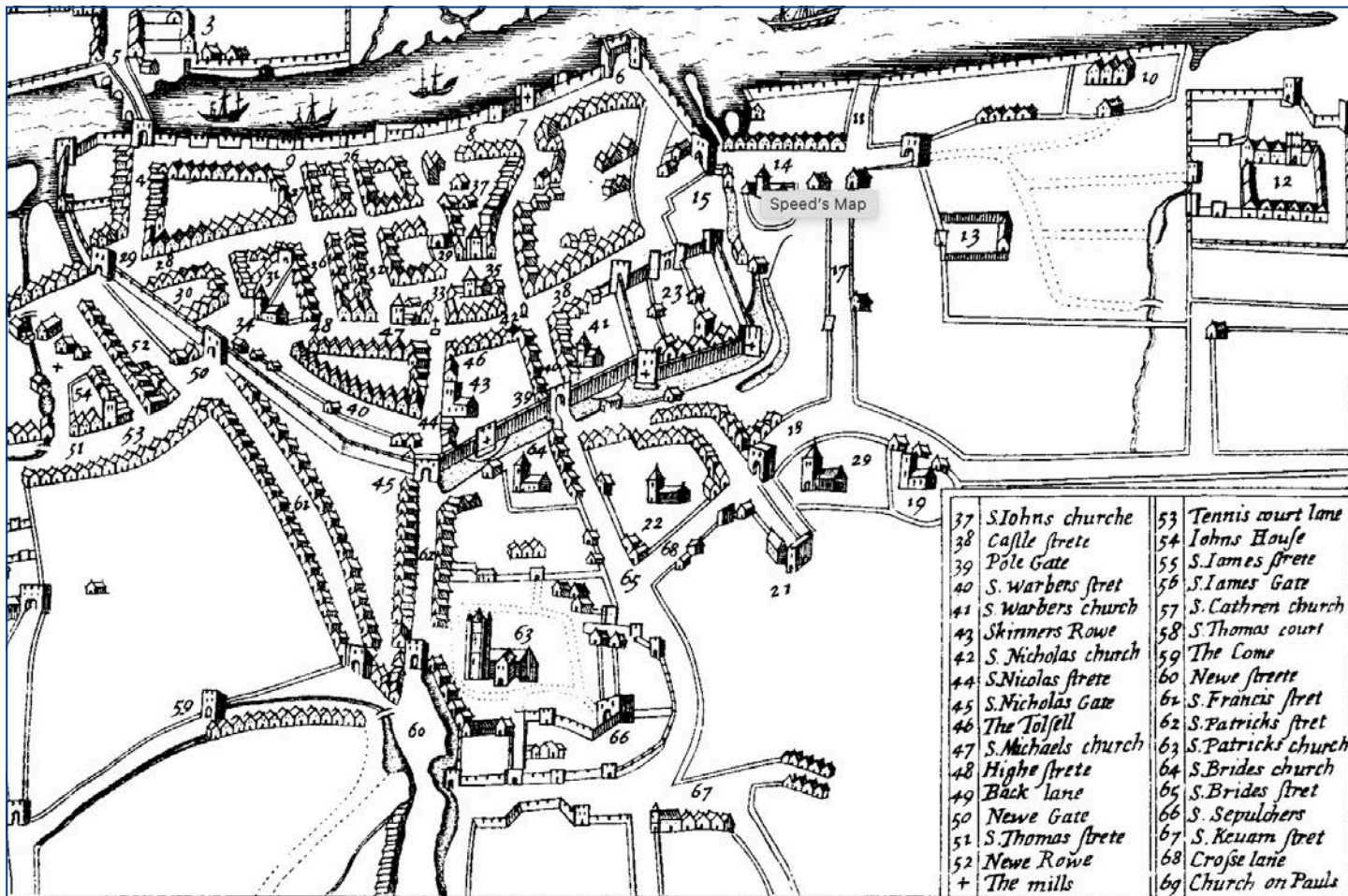
## Overview • Executive Summary

Below is a summary of matters discussed in more detail later in this AHIA. The comments below are based on the 6 storey reduced scheme.

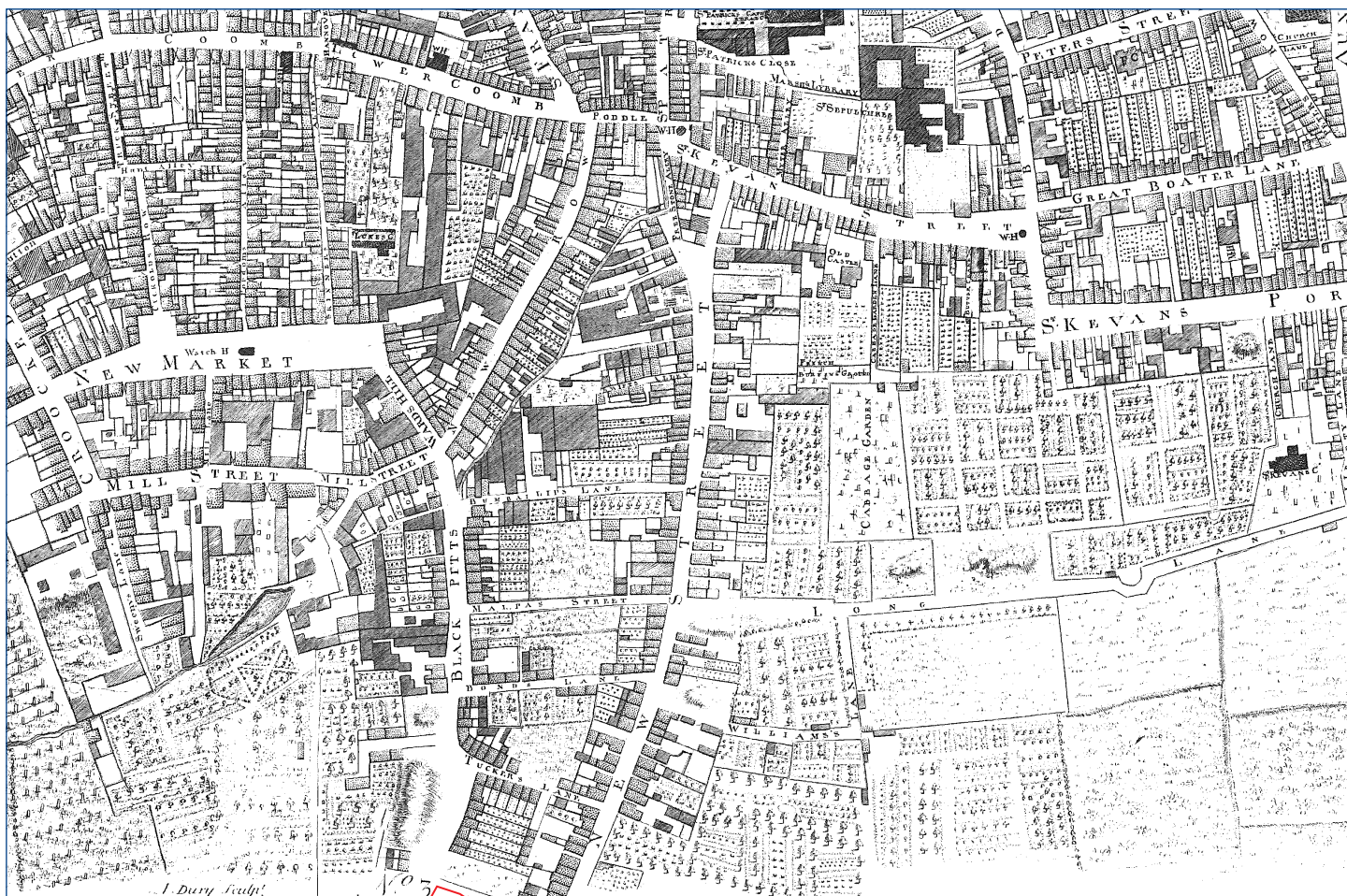
- The greatest heritage asset in Dublin is Dublin itself, the whole City not just separate isolated parts of it.
- Development that consolidates the City sustains the City into the future and in doing so protects the overall heritage of the City.
- The LRD Opinion seems to focus on the local area and not on the potential for new development to consolidate the City and thereby protect the City's heritage.
- There are more than 20 streets of small scale mainly single storey houses in the areas around the subject site, most built between 1866 and 1882.
- The whole of the surrounding small scale residential areas, including the Z2 Residential Conservation Areas, are within 1 kilometre of St Patrick's Cathedral, some parts as close as 500 metres. That housing of such low density could have been built so close to the centre of a European capital city is astonishing.
- This is particularly so since large scale urban development was continuing in the Townships outside the Canal
- The small scale areas so close to the centre of the City are the built realisation of pitiful failures in city planning. We must not let the failures of the past dictate the future of our City.
- The LRD Opinion speaks of '*undue visual impact*', inferring that the proposed development will be widely visible from the surrounding area. But this is simply not the case. Anyone who walks through the many nearby streets will soon realise that the potential for the proposed development to be visible is very limited.
- The **height** of the proposed development is of course greater than that of individual little single or two storey houses in the area.
- At 6 storeys, the height of the proposed development will not be the tallest building in the immediate area. There is a modern 7 storey building with a more extensive footprint just 200 metres to the north along Blackpitts.
- It cannot be true to say that the **scale** of the proposed development, a single building on quite a small site, is greater than terrace after terrace of houses, street after street after street lined with the continuous façades of little buildings. There is strength in numbers. The little houses are often delightful, but together, even as a single terrace or street, they have an overwhelming visual presence, far greater than the proposed development could ever have.
- The proposed development is urban in character, a city building. In that, it differs from the nearby tiny cottages. They would be more at home in a rural village.







Extract from John Speed's map 'Dubline' of 1610. The map shows that 'Newe Streete' had been laid out by that date.



Extract from John Rocque's Map of 1756, showing the south edge of the map. The subject site is just off the map

The location of the subject site is indicated by a red outline

## Receiving Environment

### History and Development of the Surrounding Area

The strip of land between New Street and Blackpitts has been part of the built up area of the City of Dublin since mediaeval times. New street is shown and named on Speed's Map of 1610. Both 'Black Pitts' and New Street appear on John Rocque's map of the City of Dublin of 1756. This latter map shows the block immediately north of the site of the proposed Student Accommodation almost entirely built up with houses facing east onto New Street, west onto Blackpitts and north onto Tucker's Lane. On later maps Tucker's Lane is called Dowker's Lane and is now called Clanbrassil Terrace.

It should be noted that, as is shown on older maps, New Street originally ran as far as the South Circular Road and that Clanbrassil Street was the section between the South Circular Road and the Grand Canal. Historic mapping shows that part of New Street north of the South Circular Road became Lower Clanbrassil Street some time between 1847 and 1864.

John Taylor's Map of the City of Dublin of 1816 shows the City extending southward only as far as the line of Long Lane, except for a wedge-shaped built up area between Blackpitts and New Street. The location of the subject site is shown built up at the south end of that wedge. Otherwise the areas to the east and to the west are shown as open lands south as far as the Grand Canal. The arc of the Grand Canal around the south of the City was constructed in 1791 and there are plaques on several bridges bearing that date.

The First Edition Ordnance map of circa 1837 shows a strip of development extending south out of the City between New Street / Clanbrassil Street and Blackpitts, and this strip extending south from the City as far as the Grand Canal. On the map the line of Blackpitts is extended southwards as far as the South Circular Road by a 'Rope Walk'. There is what appears to be an orchard beside location of the current subject site and the eastern part of the subject site extends into where that orchard once was. The c1837 map shows open and largely undeveloped lands both east and west of the built up strip of development between New Street / Clanbrassil Street and Blackpitts. The larger scale 1847 Ordnance map shows little change.

What the maps listed above reveal is that in the area between Richmond Street and Dolphin's Barn, north of the Grand Canal, there was little or no development until the second half of the 19th century. A sequence of historic maps is provided in this document starting with Speeds Map of 1610, and includes Ordnance maps of c1837, 1847, 1864, 1882 and c1907. These Ordnance Maps are all reproduced at the same scale so that they can be compared and the progress of development in the area can be understood. The site of the proposed Student Accommodation is shown as a red outline on the maps

Though for most of thwe 19th century there was little development in the areas surrounding the subject site. South of the Grand Canal it was quite another story. Along both sides of the Upper Baggot Street / Pembroke Road axis and along the Rathmines Road axis large scale development outside the Grand Canal had been forging ahead since the early 19th century. From the mid 19th century these areas were established as autonomous townships independent of Dublin Corporation.

In a book entitled *Dublin through Space and Time* edited by Joseph Brady and Anngret Simms there is a chapter by Joseph Brady headed *Dublin at the Turn of the Century*, that referring to the beginning of the 20th century. In that chapter Joseph Brady discusses the creation of the townships, as follows:

*'Exclusive suburbs were in existence in Dublin by the middle of the nineteenth century but were no more than one or two miles (3.2km) from the city centre; their exclusivity protected by the peculiarities of local government boundaries. In the Dublin of the period there was certainly plenty of incentive to move out, since the decline of the city in the years*







A Lawrence Collection view looking south along Rathmines Road from circa 1905, showing the unmistakably urban character of Rathmines, with the three and four storey over basement Georgian Terrace along the east side of the road.



Extract from John Taylor's Map of Dublin of 1816. The location of the subject site is indicated by a red outline. The location of the subject site is shown built up at that date, whereas the areas to the east and west are still open lands. In contrast, development in Rathmines was well under way by that date.

after the Act of Union was characterized by disrepair and physical dereliction as well as a distressed and unhealthy population. By moving to healthier surroundings the middle classes also avoided the financial costs of the city's workhouse, hospitals and police. The increasing demand for suburban housing was also a reflection of the expanding middle class population.

The exodus was such that there was little building of first class housing in the city during the first half of the nineteenth century. Rather, in selfgoverning townships like Rathmines and Pembroke, developers created fine residential environments, where the 'Protestant and unionist Dublin middleclass could evade the unpleasant reality that they were a minority which was increasingly losing political control in both Ireland and in the city of Dublin' (Daly, 1988, p. 123). The most successful townships were the Pembroke and Rathmines townships that had about half of the suburban population between them.

#### Pembroke Township

The 1592 acres (644 ha) which formed the Pembroke township lands comprised an area east of Leeson Street to the coast (including Irishtown) and south to include Ballsbridge, Donnybrook and Merrion. The expansion of housing into this area was almost inevitable following the late eighteenth-century growth of the Merrion Square area. As further vacant land in the city proved unsuitable, development flowed beyond the canal. The township was created in 1863 and was not incorporated into the city until 1930. Although managed by commissioners it was firmly under the control of the Pembroke family.

#### Rathmines and Rathgar Township

Rathmines, Ranelagh and Rathgar comprised the second major township south of the Liffey. There had been development along the routeways into Dublin in the eighteenth century but Rathmines formally became a township in 1847. It was extended in 1862, 1866 and 1880 by which time it included Rathgar and Milltown in a land area of 1712 acres (700 ha). The township had a population of 37,840 in 1911, up from 32,602 people at the turn of the century.'

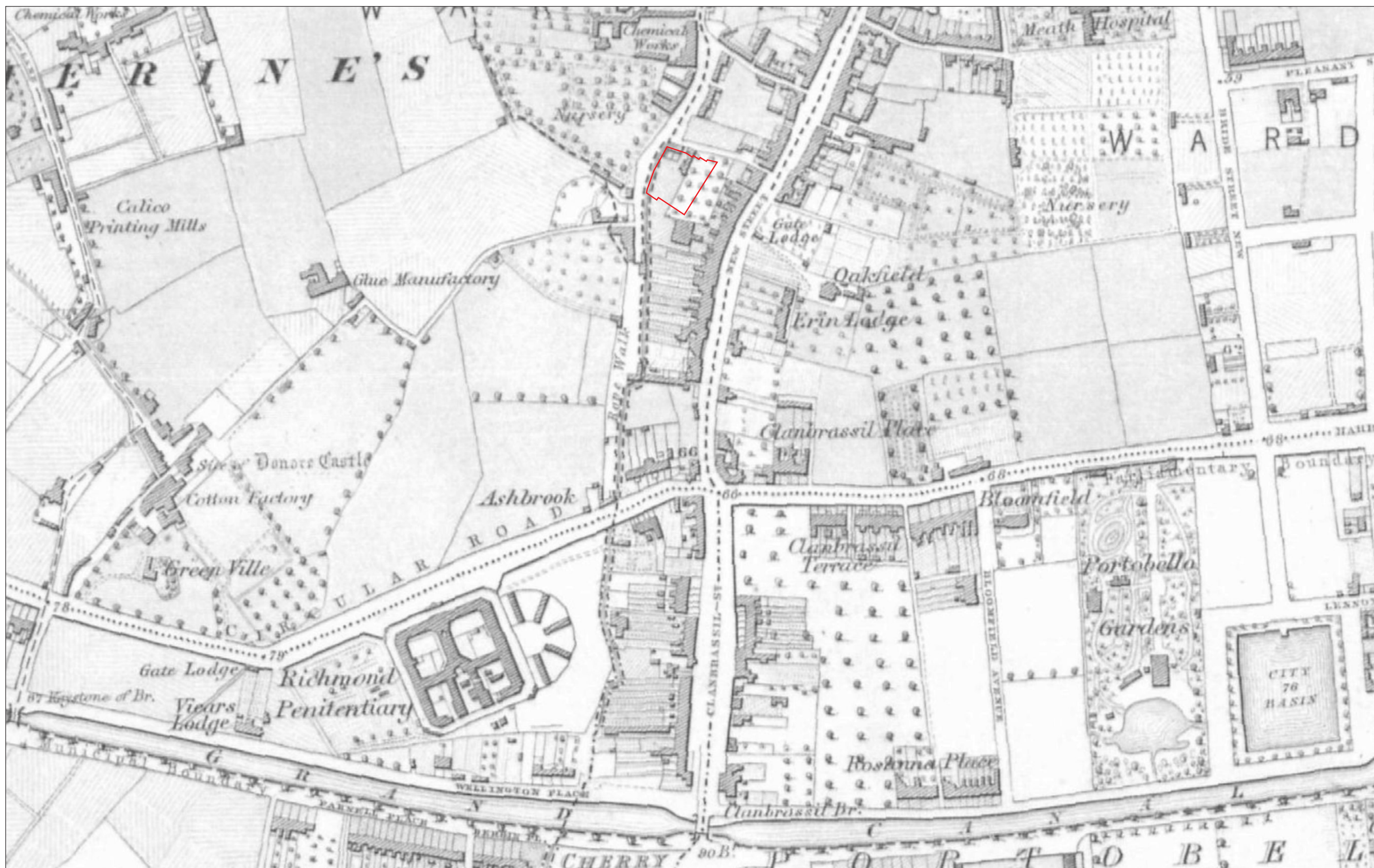
The Royal Irish Academy (RIA) has published an *Irish Historic Town Atlas • Dublin Suburbs* that discusses Rathmines it is Authored by Séamus Ó Maitiú. In that publication the course of development in Rathmines is set out as follows:

'The demand for suburban housing can be inferred from the regularity with which Rathmines occurs in the Registry of Deeds. Before 1800, Rathmines crops up infrequently, but there is a huge surge in land transactions from the first decade of the nineteenth century that continued into the 1820s and 1830s. Many villa owners in the area began selling off land for housing. William Bernard of Williams Park began disposing of whole fields, and two acres of meadow came on the market between Rathmines Road and Mountpleasant Avenue in 1817. Grimwood's, a large nursery concern at the junction of Rathmines Road and Rathgar Road, sold off for house-building the greater part of their nursery land fronting the road, as a result selling off thousands of oak, elm, ash, beech and fruit trees. A number of notable speculative builders and developers were associated with particular areas: these were William Bernard (Williams Park), John Butler (Leinster Square), Frederick Jackson and Frederick Stokes (Leinster Road area); John Holmes (Holmeville and Castlewood Avenue), Michael Murphy (Kenilworth Square) and Patrick Plunkett (Belgrave and Palmerston Roads).

As the link roads were built, a process of infill ing with houses took place, with further adjacent roads opening up more land This also facilitated the creation of squares, a notable feature of Rathmines. Mountpleasant Square, developed by Terence Dolan, was the first in the area. This was followed by Leinster Square, begun in the 1830s, and Belgrave Square begun in the mid-1840s. Kenilworth Square followed in the 1850s and Grosvenor Square from the mid-1850s to the mid-1870s. Some squares and roads were gated, such as Mountpleasant Square, Leinster Square and Leinster Road. In 1867, John Butler wrote to the Rathmines township commissioners requesting that they take charge of the roads in Leinster Square. They agreed on the condition that he remove the gates and provide a financial contribution, citing a precedent set when they took over Leinster Road from its developers.'







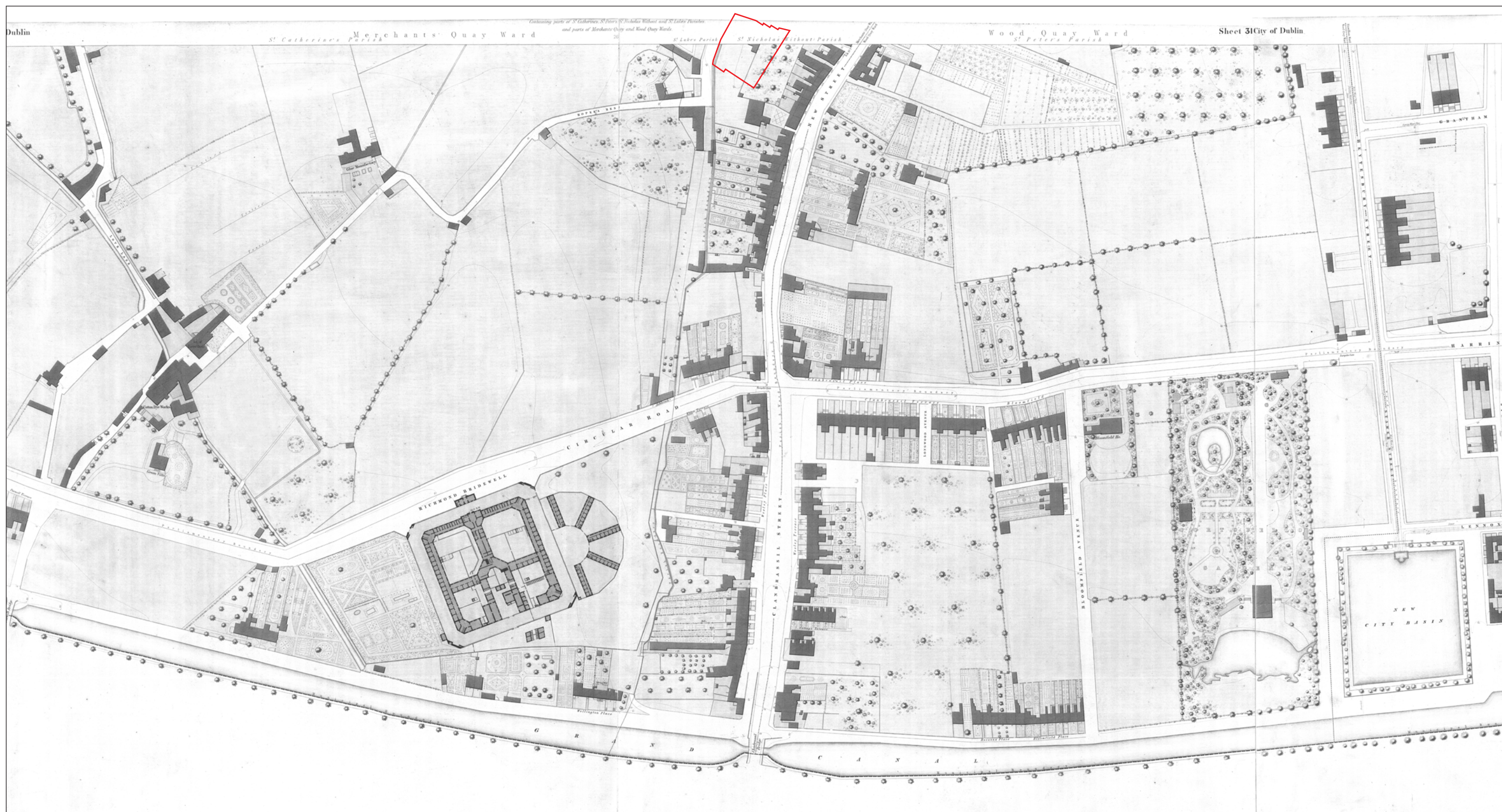
Extract from an Ordnance maps of circa 1837.

The site of the proposed development is indicated by a red outline

Source: Tailte Eireann





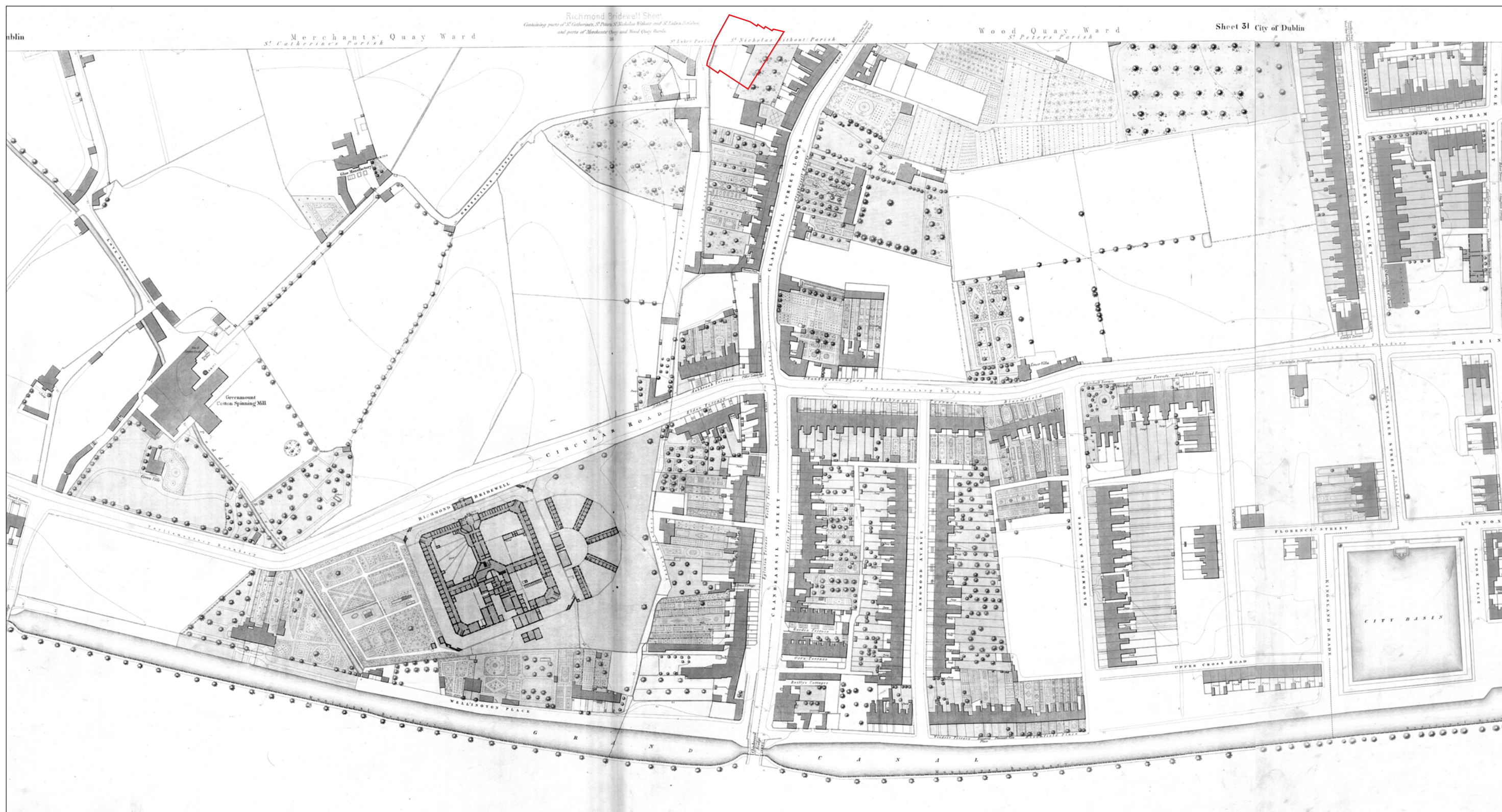


Extracts from Ordnance maps of 1847.  
The site of the proposed development is indicated by a red outline

Source: UCD Digital Library.







Extracts from Ordnance maps of 1864.  
The site of the proposed development is indicated by a red outline

Source: UCD Digital Library.





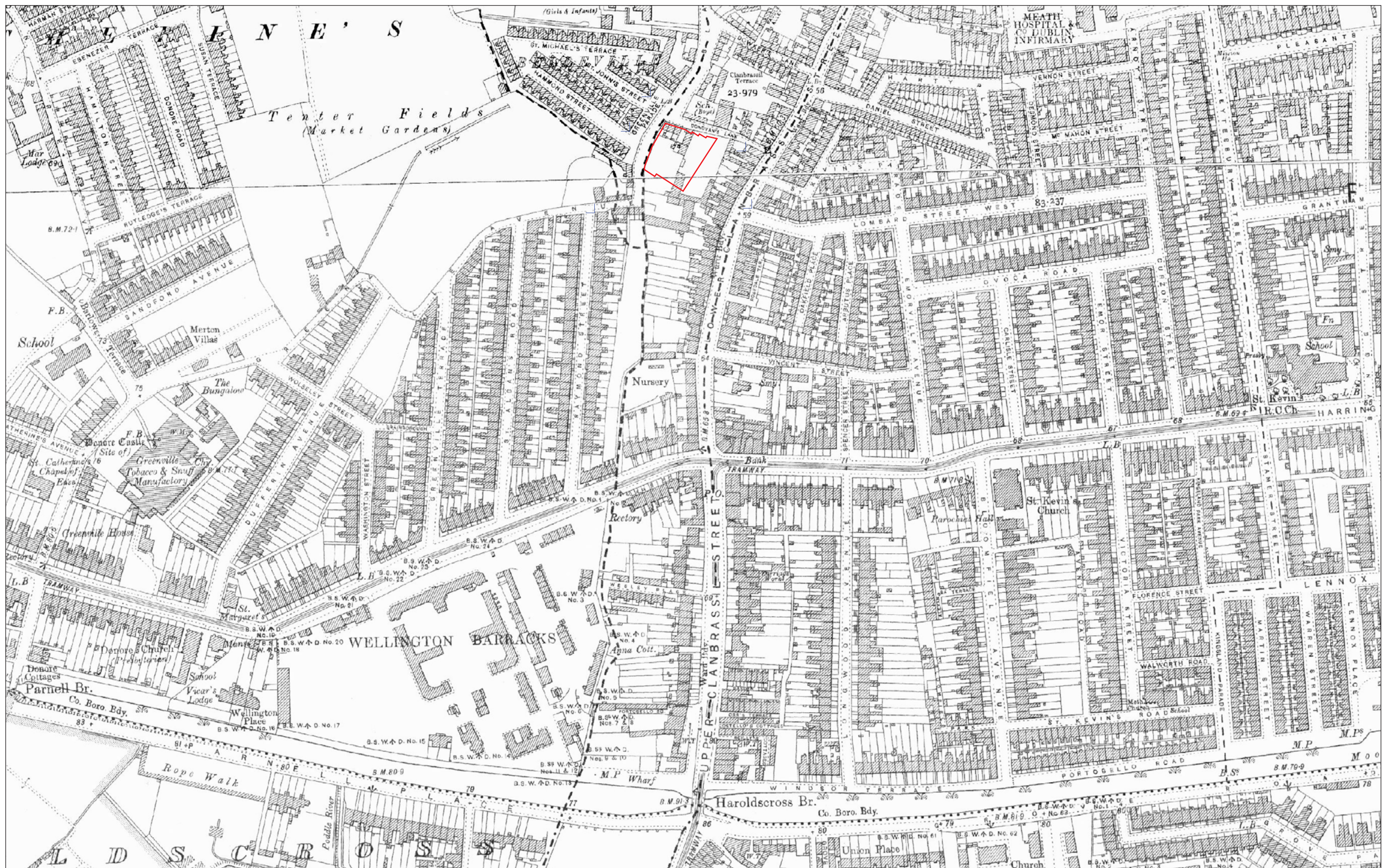


Extracts from Ordnance maps of 1886, top, and 1882, bottom.  
The site of the proposed development is indicated by a red outline

Source: TCD Map Library, top; UCD Digital Library, bottom







Extract from an Ordnance maps of circa 1907.

The site of the proposed development is indicated by a red outline

Source: Tailte Éireann.







Arnett Street looking south into Curzon Street and on towards the South Circular Road. Most of the houses have red brick façades, some rendered. Most are single storey, some with basements. This location is some 360 metres east of the subject site. There is no potential visibility of the proposed development from this location. This is within a Z2 Residential Conservation Area.



Lombard Street West looking south at façades on the south side of the street. Most houses on this street are single storey, some like the house on the left have basements. This location is some 300 metres east of the subject site. There is no potential visibility of the proposed development from this location. This is within a Z2 Residential Conservation Area.

For almost the entire period discussed above there was almost no development of the areas either side of the New Street-Blackpitts-Clanbrassil Street corridor; though some development is shown on the 1864 Ordnance map on Heytesbury Street and in a small area near the Canal to the east of Upper Clanbrassil Street. This situation has changed completely by the time of the 1882 Ordnance map. Between 1864 and 1882, street after street of single storey and some 2 storey houses have been laid out between Heytesbury Street and Clanbrassil Street / New Street and to the west and south west of Blackpitts.

These new houses are all small, some very small. They were clearly not aimed at the well-to-do middle class that bought into the Rathmines and Pembroke townships. It seems much more likely that they were aimed at workers and their families, at artisans; though the Dublin Artisan's Dwelling Company (DADC) do not appear to have built any of them, nor did Dublin Corporation, or the Iveagh Trust.

If not these organisations, then it would appear that they were built by developers for profit. Why would that be the case after 1864 but not earlier?

The pattern of development and the character of the various houses on these streets suggest that there was not just one developer but many. Small red brick terraced houses, mostly single storey are the dominant form, but they differ from each other. There might be two, three, perhaps five houses in a row that are the same, and then the houses change. This strongly suggests that a whole series of developers acquired small plots and built a few houses. Between 20 and 25 streets of these little houses were built in a very short number of years. How did that come to pass?

A book by Joseph Brady and Ruth McManus entitled *Building Healthy Homes - Dublin Corporation's First Housing Schemes 1880-1925* suggests a possible answer. The book was published by Dublin City Council in 2021. As the title indicates the book traces the development of a number of Dublin Corporation housing schemes of the late 19th and early 20th century. The book begins by outlining the state of the City:

*The crisis in housing provision for the working classes grew slowly during the nineteenth century and it had not peaked by the time the twentieth century dawned. Dublin Corporation laboured throughout most of that century to deal with the issue. The genesis of the problem lay in a complex interaction of a number of forces. Dublin during the nineteenth century grew strongly from immigration from a poor countryside; people who had either the intention but not the means to travel further and people for whom Dublin, though offering very little, promised at least the prospect of a life better than was available where they lived. Birth rates were also high and though so too was the death rate, there was sufficient dynamic in the population to ensure growth.*

*There was limited demand for a labouring class in Dublin. Dublin never developed the labour-intensive heavy industry of the midlands of the UK. Its main industries were connected with brewing, distilling, food, textiles and linen. These were important, even vital, sources of employment, but were never of the scale needed to provide decent, secure employment to a great mass of the city's population. These subsisted on a variety of insecure and irregular employments often connected with distribution and service provision to the better off. ....*

*This population needed housing but their means were very limited. In UK cities, large areas of working class housing were provided by speculators in close proximity to their places of employment. In Dublin, speculators could not see any economic return from such ventures given the depth of poverty in the city.*

The book goes on to outline how Dublin Corporation began to look for strategies to address the housing issue:

*Dublin Corporation had developed an association with the Dublin Artisan's Dwelling Company in the clearance and redevelopment of unhealthy areas, using the provisions of Artisans' and Labourers' Dwellings Act 1875 (as amended). However, by 1881, the Corporation was considering a different approach by adopting the Labouring Classes' Lodging Houses and Dwellings Act (Ireland) 1866 as a suitable vehicle for providing working class houses. The Public Health*





Lombard Street West looking east away from the site of the proposed development. Most houses on this street are single storey. Trees play an important part in shaping the character of the street. This location is some 150 metres east of the subject site. There is no potential visibility of the proposed development from this location. This is within a Z2 Residential Conservation Area.



Oakfield Place looking south towards flats on St Vincent Street South and the backs of houses on the north side of that street. Most houses on this street are single storey. There are no trees. This location is some 120 metres east of the subject site. There is no potential visibility of the proposed development from this location. This is not within a Z2 zoning. Is that because there are no trees?

Committee prepared a report (129/1881) which set out their thinking.

....

The 1881 report noted that the 1875 Act had been practically applied to two areas - the Coombe and Plunket Street. What prompted reconsideration of the 1866 Act was that the operation of the 1875 Act was proving both limiting and expensive. Additionally, the 1866 Act did not limit construction to houses and therefore shops, workshops and other uses could be considered in a development. So, the Public Health Committee recommended to the Council that the 1866 Act be adopted but used only in a limited way. Therefore the Public Health Committee recommended as follows:

*That the Labouring Classes’ Lodging Houses and Dwellings Act, 1866, affords to owners of premises important facilities for carrying its provisions into effect; and that as the Corporation of Dublin are possessed of lands and premises eminently suited for this purpose, their adoption of this Act, by the erection of dwellings and lodging houses on their property known as the Oxmantown, be strongly recommended to them, as the site not only presents unusual facilities for the purpose, but also because it affords a reasonable prospect of it proving financially successful.*

The final phrase is instructive because at this time, there was a belief that an income could be derived from such housing.

So if Dublin Corporation, ever a cautious body, thought that income could be derived from providing dwellings for the Labouring Classes then it seems likely that others may have come to the same conclusion and that the existence of the *Labouring Classes’ Lodging Houses and Dwellings Act (Ireland) 1866* may have prompted the development of the streets of little houses in areas near to site of the proposed Student Accommodation. This would coincide with the mapping evidence that no development of these little houses took place until after 1864. Not exactly a gold rush, but perhaps a dainty dwelling rush.

What is most significant about the *Labouring Classes’ Lodging Houses and Dwellings Act (Ireland) 1866* is that it provided the cash. The Heads of the Act are as follows:

Short Title	<i>An Act to encourage the Establishment of Lodging Houses for the Labouring Classes in Ireland. [28th June 1866.]</i>
	<i>WHEREAS it is desirable for the Health, Comfort, and Welfare of the Inhabitants of Towns and populous Districts to encourage the Erection and Establishment of Lodging Houses and Dwellings for the Labouring Classes in Ireland: Be it therefore enacted by the Queen’s most Excellent Majesty, by and with the Advice and Consent of the Lords Spiritual and Temporal, and Commons, in this present Parliament assembled, and by the Authority of the same, as follows:</i>
	<i>1. In citing this Act for any Purpose it shall be sufficient to use the Expression “The Labouring Classes Lodging Houses and Dwellings Act (Ireland), 1866.”</i>

Section 8 of the act states as follows

Commissioners of Public Works may advance Monies to Companies, Societies, or Persons.	<i>8. For the Purposes herein-after mentioned the Commissioners of Public Works in Ireland may, out of the Funds from Time to Time at their Disposal, advance on Loan to any such Council or Town Commissioners as aforesaid, or to any Company, Society, or to Companies, Person as herein-after mentioned, namely, any Railway Company, or Dock or Harbour Company or Commissioners, or any other Company, Society, or Association established for Trading or Manufacturing Purposes in the course of whose Business or in discharge of whose Duties Persons of the Labouring Class may be employed, any private Person or Persons entitled to any Land held in Fee Simple or Fee Farm, or for Lives renewable for ever or for any Term of Years whereof not less than Eighty Years shall be unexpired, and all such Advances by way of Loan shall be applied towards the Purchase of Land or Buildings and the Erection, Alteration, and Adaptation of Buildings to be used as. Dwellings for the Labouring Classes, and in providing all Conveniences which may be deemed by the Commissioners of Public Works proper in connexion with such Dwellings, and in the Case of Loan to any such Council or Town Commissioners as aforesaid the Term “Dwellings” in this Section shall include Lodging Houses formed or erected by them under the Authority of this Act.</i>
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St Alban's Road looking south east. Most houses on this street are single storey, some two storey, some have basements. Trees play an important part in shaping the character of the road. This location is some 150 metres east of the subject site. There is little or no potential visibility of the proposed development from this location. This is within a Z2 Residential Conservation Area.



Raymond Street looking south east. Most houses on this street are single storey; some have basements. Trees play an important part in shaping the character of the road. This location is some 110 metres east of the subject site. There is little or no potential visibility of the proposed development from this location. This is within a Z2 Residential Conservation Area.

So it would appear that the numerous little houses built to the east and to the west of the New Street-Blackpitts-Clanbrassil Street corridor were built for the 'Labouring Classes', but were most probably built for profit. It would seem that any altruistic motive was that of the Westminster Parliament. Hopefully the building of these little houses did actually benefit the families from the 'Labouring Classes' that lived in them. But in 1882 when these little houses first appeared on Ordnance maps Dublin City was still suffering endemic poverty.

Set against the comfortably well off Townships, the state of the inner City was a frightening contrast. This is discussed by Ruth McManus in an early chapter of *Dublin, 1910-1940: Shaping the City & Suburbs*, published in 2002. The following are short extracts:

*'Our story begins in 1913, a memorable year for the city of Dublin. This was the year of great labour unrest which culminated in a lock-out of workers who were members of the Irish Transport and General Workers Union (ITGWU). Indeed, the success of Jim Larkin's union was said by many to relate to the impoverished conditions of the workers. In a letter to the Irish Times at the height of the lockout, E.A. Aston eloquently expressed this view:*

*'Twenty thousand families - one third of the people of Dublin - live in one-room tenements. How many of our federated employers after 12 months of life under such conditions would think of abstract considerations of citizenship or industrial prosperity? Are they sure that their children would not learn to throw bottles at the police if society had condemned them to the reeking nursery of the tenement house.'*

*(E.A. Aston, letter to the Irish Times, 3 September 1913)*

*Although profits were kept to a minimum, the very poor could not afford to rent the new accommodation, while the scale of building was too small to contribute much to central renewal. Indeed accusations were often levelled that these enterprises merely exacerbated the problem, because it was impossible to re-house all those displaced by their schemes. Therefore, despite some small-scale efforts at improvement, the condition of the housing of the working classes of Dublin remained an enormous problem well into the twentieth century.*

*The bulk of Dublin's population lived in tenements or in tiny cottages in courts and alleys behind the main streets. In his 1913 volume of reminiscences, Sir Charles Cameron, Dublin's Medical Officer of Health, discussed the plight of the tenement dwellers:*

*'In the case of one-room tenements, the occupants are usually very poor, and unable to pay for more accommodation. The wages of unskilled labourers are rarely more than £1 per week; many earn only from 15s. to 18s. weekly. Even when the labourer is a sober man, and has a small family, he cannot enjoy much comfort on the higher rate of wages. When he is of the inferior order, has a large family, and precarious employment, it is easy to imagine his deplorable condition.'*

*(Cameron, 1913, p. 166)*

*Poor living conditions were not restricted to the general labouring classes. Cameron noted that many thousands of families had weekly incomes not exceeding 15s., while in some cases the income was as low as 10s.*

*'A family, man and wife, resides in Dame Court. His occupation is that of a tailor, but he can only earn 10s. a week. His rent is 2s. 6d., which leaves 7s. 6d. for food, fuel, light, clothes, bedding, etc. Their breakfast consists of dry bread and tea. They have only another meal, dinner and supper combined: it consists of dry bread and tea and herrings, occasionally porridge. It may appear strange that a tradesman could earn only 10s. per week; but such is often the case owing to irregular employment and the poor payment for the making of the cheaper kind of clothes.'*

*(Cameron, 1913, p. 168)*



Methodology

The author of the Architectural Heritage Impact Assessment (AHIA) has lived in the area surrounding the proposed development, has been familiar with the area for many years and has carried out assessments of the potential impacts of several projects in the area in recent years. The author visited the area in May and June 2025 specifically for the purpose of this assessment. A desktop study of the *Dublin City Development Plan 2022-2028* and of the policies therein was carried out to identify structures and places of architectural heritage value in the vicinity of the proposed development and policies relating to the protection of Dublin’s historic environment. As part of this assessment ARC carried out considerable research sourced from relevant books, historic documents and historic mapping.

This assessment of effects on Architectural Heritage had regard to the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency (2022), and to Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the likely effects of certain public and private projects on the environment. This assessment also had regard to the *Architectural Heritage Protection Guidelines for Planning Authorities (2011)*. The EPA Guidelines are statutory guidelines prepared under the provisions of the EPA Act 1992 (as amended), and the Architectural Heritage Protection Guidelines are statutory guidelines prepared under the provisions of the Planning and Development Act 2000 (as amended). The purpose of a impact assessment is, taken together with the full range of other documents lodged as part of a planning application, to assist in informing the decision making process.

The Guidelines and Directives require that impact assessment be carried out in a manner that is systematic, impartial, objective and independent. In carrying out assessment ARC Consultants act as independent assessors and do not act as part of any design team. It is not the purpose of assessment to promote or advocate for the development. The Guidelines and Directives mentioned above are broad in their scope and require a degree of interpretation in how they might be applied to specific assessments. This assessment relates solely to effects on Architectural Heritage, and does not concern itself with other effects, beneficial or adverse.

The list of definitions given below is taken from *Table 3.4: Descriptions of Effects* contained in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency. Some comment is also given below on what these definitions might imply in the case of architectural heritage. The definitions from the EPA document are in italics.

- **Imperceptible:** *An effect capable of measurement but without significant consequences.* The definition implies that there would be minor change to an aspect of the heritage interest of a structure, but not one that would be readily noticeable to the casual observer; and not a change that would materially alter the overall heritage interest of the structure.
- **Not Significant:** *An effect which causes noticeable changes in the character of the environment but without significant consequences.* The definition implies that there would be changes to aspects of the heritage interest of structures or historic settings capable of being noticed by an observer who is actively assessing the effects of changes to the heritage interest for the purposes of planning consent, and, although there may be changes to aspects of the heritage interest of a structure or historic setting, these changes would not be considered material with reference to planning consent.
- **Slight:** *An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.* The definition implies that there would be changes to aspects of the heritage interest of a structure or of part of a structure or of an historic setting. However, apart from such changes, the overall heritage interest of a structure or place would remain substantially intact.
- **Moderate:** *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.* In this case, there would be material changes to the heritage interest of a structure or place; and these changes are consistent with a pattern of change that is already occurring, or has occurred.
- **Significant:** *An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the*

*environment.* The definition implies that there would be material changes to aspects the heritage interest of a structure or place; and these changes would not be consistent with an acceptable pattern of change that is already occurring.

- **Very Significant:** *An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.* The definition implies that the heritage interest of a structure or place would be changed to a considerable degree and these changes would not be consistent with an acceptable pattern of change that is already occurring or has occurred. For example, a ‘very significant’ effect would occur where the heritage interest of a structure would be substantially removed as a result of a proposed development, though parts of the structure might remain intact.
- **Profound:** *An effect which obliterates sensitive characteristics.* The definition implies that a development would result in the loss of the heritage structure, or all of the heritage significance of a structure or place.

The loss of a structure of heritage interest, even a minor structure, will result in a profound negative effect on the architectural heritage of structure itself, though perhaps only a slight negative effect on the architectural heritage of the surrounding area. It is possible that the removal of a heritage structure or part of it might give rise to a range of potentially significant beneficial effects in terms of planning gain and sustainable development; but these are not of themselves positive effects on architectural heritage and are not evaluated as part of this assessment.

Relevant Statutory Provisions

The Dublin City Development Plan 2022-2028 in Chapter 1, Strategic Context and Vision states the following:

1.2 Strategic Approach – Achieving a Sustainable, Climate Resilient Dublin

*The development plan sets out the strategic approach to meet the needs and aspirations of citizens of Dublin and the country, not only for the six-year life of the plan, but for the long term.*

*The overarching strategic approach of the plan is to develop a low carbon, sustainable, climate resilient city. The costly implications of not doing so are indisputable and the benefits of a more sustainable city are numerous*

The core objective of the Development Plan that might achieve ‘low carbon, sustainable, climate resilient city’ is the consolidation of the City. This is expressed in Chapter 4 of the Plan Shape and Structure of the City :

4.5 Policies and Objectives

*It is the Policy of Dublin City Council:*

*SC1 Consolidation of the Inner City*

*To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.*

The proposed Student Accommodation development is consistent with this policy

In Chapter 11: Built Heritage and Archaeology, the following is stated about Z2 residential Conservation Areas:

Z2 and Z8 Zonings and Red-Hatched Conservation Areas

*The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as Protected Structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application.*

*Designated Conservation Areas include extensive groupings of buildings, streetscapes and associated open*





*spaces and include (parts of) the medieval/walled city, the Georgian Core, the 19th and 20th century city and the city quays, rivers and canals. The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas.*

### Potential Impacts on Architectural Heritage

The site of the proposed student accommodation is located just west of the Clanbrassil Street corridor in part of a strip of the City that lies between Clanbrassil Street and Blackpitts. The site faces onto Blackpitts on its west side and onto Donovan Lane on its north side. Donovan Lane slopes down some 2 metres to Blackpitts from the higher ground of Clanbrassil Street. The subject site is bounded on its east and south sides by the Greenville Place Apartments development. The site is zoned Z1: To protect, provide and improve residential amenities.

The site is surrounded by residential development. To the east along Clanbrassil Street this development varies from 4 to 5 storeys in height. To the north across Donovan's Lane residential development is 3 to 5 storeys in height but climbs to 5 to 7 storeys in height some 160 metres further north along Blackpitts. To the west, across Blackpitts, the residential development is mainly 2 storey, but a little further to the west and south west there are terraces of single storey cottages. To the immediate south the residential development at Greenville Place is 3 to 4 storeys, rising to 5 storeys immediately south of Greenville place.

In the LRD opinion the Planning Authority states concerns about the potential *overbearing impact on.... neighbouring sites*. The closest neighbouring site is that of the 4 storey apartments on Clanbrassil Street. The ridge level of these apartments is 30.330 OD. The parapet level of the nearest upper part of the proposed development, some 15 metres back from the apartments, is 30.470, only 140 millimetres higher. By no stretch of the imagination could that be called overbearing. A further 10 metres back from the Clanbrassil Street apartments the main 6 storey parapet level of proposed development is 33,120, 2,790 higher than the apartments but some 25 metres away. Again this could not possibly be described as overbearing.

But my understanding from reading the LRD opinion and from notes of the LRD pre-planning meeting, is that the real concern of the Planning Authority, and of the DCC Conservation Division in particular is, as is stated in the LRD opinion:

*'the undue negative visual impact of the proposal on the wider vicinity of the site'*

It is my understanding that this relates to impact of the *'modest houses'* in the surrounding area. As has been set out above in this report, the wider area is dominated by streets and terraces of single storey, and in places small two storey, terraced houses, small scale low density development very close to the centre of Dublin City. It is astonishing that these little house were built so close to the centre of a European capital city, while much more urban large scale development was being built further out from the city centre. As is indicated by the published research sources quoted above, these streets of houses are the built expression of the poverty of the City at the time and of the divided administration of the City, where the interests of particular factions took precedent over the good of the City itself.

### Heritage Assessment of the Surrounding Area

The subject site lies within an historic strip of development along the New Street-Clanbrassil Street-Blackpitts corridor, a strip of city built up since mediaeval times. Either side of this corridor there is street after street of little terraced houses. Some of these are designated as Z2 Residential Conservation Areas; some are not. None of the little houses appear to be protected structures.

Some of the little houses, and the streets that they line, are very attractive, some less so. As is suggested by the published research, some of it published by Dublin City Council itself, most of these houses were built to house

the 'Labouring Classes'. Most houses lack much architectural enrichment, but along some streets the houses have such features as: panelled front doors with a bracketed shelves and plain half round fanlights over, decorative brickwork in arches over openings, brick corbels and brackets at eaves, wrought iron railings, tiled thresholds etc., etc. Some streets, like Hammond Street and St John Street have none of these embellishments.

So there is a degree of architectural heritage significance in external expression of some of the little houses and probably in the interiors of these same houses, not others. But what about the contribution of these houses, these streets, to the heritage of the City as a whole?. The character, form and expression of these areas is one that is objectively at a scale appropriate to a small rural village, but not to the centre of a capital city. Dublin is identified internationally by the scale and urban character of its main streets and squares and the Georgian City in particular. These streets of little houses do not compliment that heritage, they contradict it. They may be charming, but their existence undermines the structure of the City and the potential for the consolidation of the City.

The more visually attractive of these areas, those with some architectural embellishments, are given a Z2 Residential Conservation Area zoning. But this is despite obvious shortcomings. Most of the 19th century little houses lack adequate private open space, some have none, and there is no public open space. The Development Plan places an emphasis on open space in Z2 zonings in the first sentence of Section 14.7.2 as follows:

*'Residential conservation areas have extensive groupings of buildings and associated open spaces with an attractive quality of architectural design and scale'*

It would seem that both the application of Z2 zoning to the areas of little houses around the site of the proposed Student Accommodation and the concerns raised by the Planning Authority and the DCC Conservation Division as expressed in the LRD opinion are focussed on immediately local considerations and that the overall heritage of the City and the need to protect that heritage by the consolidation of the City fabric in an area so close to the city centre are not the main focus, which they should be.

None of this is to suggest that the little houses and the streets they line should be damaged or discarded. But the Student Accommodation development does not propose or imply any direct impact on any of the little houses. What the proposed development does propose is consolidation of the City.

### Visibility

The LDR opinion seems to suggest that being able just to see the proposed development from outside one of the little houses is a more important planning consideration than the potential to consolidate the City that the development offers. If that is their opinion, then the Planning Authority must believe that the existence within the City of these late 19th century developments of little houses, and any view from these developments, should sterilise a substantial part of the inner city into the future. And this would appear to be so, even though the proposed development will not be visible at all from the great majority of the surrounding streets or the little houses that line these streets.

The obvious first task of any visual impact assessment is to assess the likely extent and nature of visibility of the proposed development. This includes determining from what locations the proposed development is likely to be visible and from what locations it will not be. It includes determining, where visible, how major or minor an element the proposed development will be in any view. In this assessment the extent and character of visibility is discussed having regard to the following three factors::

- (i) Whether a development will be visible or not;
- (ii) Where visible how much of any view a development will occupy; and
- (iii) Whether or not a proposed development is the focus of a view

Each of these factors affect the visual prominence of a proposed development.





From ARC Consultants' long experience in carrying out assessments of visibility the following factors determining visibility have been noted. The extent of visibility of a proposed development in any view tends to be directly related to the distance of the viewpoint from the development. However, intervening obstacles such as buildings or structures, trees and planting, and topography, can modify the extent of visibility of the proposed development. Where streets or urban spaces are aligned towards the site of a proposed development, and where the buildings or trees at the end of these alignments are relatively modest in height, there is a potential for taller developments to be visible above any lower intervening buildings or other obstacles. This potential increases with the length of the open foreground, but reduces when the viewpoint is closer to any intervening obstacles. It follows, that for taller structures (e.g. taller than the prevailing height of the surrounding built environment or landscape elements) to be openly visible, they must be seen across an open foreground or at the end of a long vista or alignment. From viewpoints within dense urban, or even suburban, environments, very modest buildings in the foreground can conceal even very large or tall structures from view.

In the case of the proposed Student Accommodation at Blackpitts, the alignment of surrounding streets is a critical element in determining likely visibility. A glance at a map of the area will confirm that almost none of the streets in the surrounding area align towards the site of the proposed development. This fact alone will prevent the proposed development being visible from the most of the surrounding area and will confine visibility to places that are both close to the subject site and align towards the subject site.

The potential visibility of the proposed development from the surrounding area is very limited. In the whole of the surrounding Z2 Residential Conservation Areas only one street, St Kevin's Parade, is oriented towards the subject site. A continuous four storey plus pitched roof apartment development on Clanbrassil Street, sited on ground some 2 metres higher than that of the subject site, intervenes in any view from St Kevin's Parade towards the proposed development, reducing the visibility to almost nil. The proposed development is likely to be visible from parts of a late 19th century development of very small scale terrace houses at Hammond Street, St. John Street and St. Michaels Terrace. From these locations, which are very close to the subject site, the proposed development will be seen in the context of existing buildings of a similar height. Apart from these locations, the potential for visual impacts to arise from the surrounding general area is very low. At locations in the wider area from which the proposed development may be visible, the existence of the development is likely to result in only modest changes to the character of most views.

The photomontages prepared by the architects and the Townscape and Visual Impact assessment prepared by Model Works both confirm that the visibility of the proposed development will be confined to locations very close to the subject site.

Of the 17 photomontages prepared by the architects 10 are very close to the subject site, 4 from the east show the development concealed by intervening buildings on Clanbrassil Street, and just 3 views show the development as it is likely to be seen by observers in the general area. In these three views the development is a minor element in the view and its visual impact would be considered 'slight' in extent.

The set of 17 photomontages would be considered by ARC Consultants to be over-represented by close-up views of the site. It is understood that some of the close views were requested by the Planning Authority. Preparing most of the views from very close to the proposed development only serves to demonstrate that when you are right beside the proposed development you will see it. Some of the 10 close views are too close to properly describe the surrounding context and so completely exaggerate the potential visual impact of the proposed development. Seen from very close to the development site the proposed development will of course be a major change. But moving further back the extent of visual change will reduce. This is demonstrated by photomontage views 10 and 11, both views looking south along Blackpitts towards the proposed development. View 10 is taken from only some 25 metres from the subject site and the proposed development is very large in the view. On the other hand, view

11 is taken some 160 metres north of the site and the proposed development is only a minor element in that view..

It is, of course, also the case that the proposed development is intended to result in visual change. That is a given with any new development. And the proposed development is not unique. There are already other developments in the area of a similar scale, mass and height.

## Conclusion

There is no potential for the proposed development to have any direct physical impact on any structure of architectural heritage significance. Having walked the streets and roads in the area, it is my assessment, as a conservation architect, that there is very little potential for visibility of the proposed development from within any Z2 Residential Conservation Areas and that there is little or no potential for impacts on the architectural heritage of these areas. There is potential of impacts on the setting of buildings on Hammond Street, St. John Street and St. Michaels Terrace, but less than is suggested by the photomontage views from these streets. The buildings on these streets are small and their architectural treatment and detail is very plain. They have very little architectural heritage significance.

## Legal Notice

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