

AN BORD PLEANÁLA
TIME 3:27 BY Hand
14 SEP 2011
LTR-DATED FROM
PL

19 Leo Street,
N.C.R.,
Dublin 7,
Dublin.

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Date: 14th September 2011

Re: Planning Application Reference Number 09044

Applicant: National Pediatric Development Board

Dear Sir/Madam,

AN BORD PLEANÁLA
Received: 14-9-11
Fee: €50 Cash
Receipt No. B 115963

I am writing as a local resident to object to the above application and I hereby submit my objection to the development of the National Pediatric Hospital at the proposed Mater hospital location.

My objections to the development are based on the fundamentally detrimental impacts of the construction/completion and ongoing operation of the largest building in Ireland on the quality of life of those in the closest residential zone and the contravening of the aspects of the Local Area Plan and the Dublin City Development Plan 2011-2017. As a local resident this is a matter of concern which affects me and other local residents.

- (1) Excessive Height – The overbearing size of the proposed development will contravene the terms of the LAP and Dublin City Dev. Plan 2011 – 2017 which provides for a maximum height of 50m while the proposed building provides for a maximum height of 74m.
The description as 16 storey is also misleading as the equivalent height would represent a approx. 24 storey residential building.

Re: Dublin City Development Plan 2011 – 2017, Pg 235;

17.6.2 Definition of a High Building

The definition of height for various areas in the Dublin context is as follows – unless otherwise approved in a Local Area Plan, Section 25 Planning Scheme or Strategic Development Zone (SDZ), to be agreed by the local area committee.

Category	Area	Storeys Res/Office	Height (m)
Low – rise (relates to the prevailing local height and context)	Inner City Rail Hubs Outer City	Up to 6 res/7 office Up to 6 res/6 office Up to 4 res/4 office	Below 19/28m Below 19/24m Below 13/16m
Mid – rise	Inner City <ul style="list-style-type: none"> • Phibsborough • Grangegorman * • Digital Hub Outer City <ul style="list-style-type: none"> • North Fringe* • Clonshaugh • Industrial Estate * • Ballymun* • Pelletstown* • Park West / Cherry Orchard* • Naas Road* 	Up to 16 res / Up to 12 office	Up to 50m
High – rise	Inner City <ul style="list-style-type: none"> • Docklands Cluster* • Connolly * • Heuston* • George's Quay * 	16 res and above / 12 office and above	50m +

Re: CHOI Strategic Infrastructure Development App, Planning Application Form,
Pg 26

PLANNING APPLICATION FORM SCHEDULE NO.3

Brief description of nature and extent of development (extract from statutory notice):

The construction of a national paediatric hospital, to be known as The Children's Hospital of Ireland at the development site known as the Mater Misericordiae University Hospital campus, Eccles Street, Dublin 7. The site is approximately 7.2 hectares and is bounded to the south by Eccles Street (including footpaths and street surface in the public realm on Eccles Street), to the east by the Mater Private Hospital and by the rear of properties on Leo Street, to the north by the North Circular Road (including footpaths and street surface in the public realm on the North Circular Road) and to the west by Berkeley Road. The site contains proposed structures, namely Nos. 30 to 38 Eccles Street and the original stone Mater Misericordiae Hospital building.

The Children's Hospital of Ireland hospital building will comprise some 88,797 square metres (sq.m.) above ground level (at Eccles Street). The gross floor space of the building will be 108,356 sq.m. with an additional 35,590 sq.m. provided for the underground parking of vehicles. The building height above street level (at Eccles Street) will vary from four storeys in the building block fronting onto Eccles Street to sixteen storeys (fifteen storeys plus a level of plant room), all over five basement levels (at Eccles Street). The building height will be 94.49 metres Ordnance Datum or approximately 73.63 metres at its highest point above the street level at the Entrance Forecourt on Eccles Street (the OD in the centre of Eccles St opposite the entrance is 20.6 metres).



LANDMARKS & TALL BUILDINGS

It is the policy of Dublin City Council to continue to protect the city skyline while having regard to urban design criteria regarding building heights and the value of taller landmark structures in appropriate locations.

Dublin City Council has explicit policies to promote higher densities; to counter urban sprawl; to create a compact city at the heart of an economically and socially vibrant capital; and to perform as a competitive player on the world stage.

The City Council acknowledges that well designed tall buildings in the right locations can create intensity of use, stimulate economic activity, assist in the achievement of national policy objectives, animate the public realm and contribute to the architectural variety of the city.

At the same time, the city is committed to protection of the special character of Dublin's historic core, and it is the City Council's policy that proposals for higher buildings within the city be determined by reference to context, the City Development Plan, and compliance with the relevant framework plan or LAP for the area.

The 2005-2011 Development Plan provides general guidance on building height. The draft policy document 'Maximising the City's Potential' also sets out a building height strategy for the city, including guidance on suitable locations for taller buildings. The Phibsborough/Mounjoy area has not been identified as an appropriate area for higher development in this strategy.

The Building Height section of the LAP sets out the plan's overall strategy including general recommendations designed to contribute constructively to the debate on building height in the city, and offer guidance for new developments in the plan area.

Nevertheless, the LAP recognises the value of tall buildings in making urban design statements and creating landmarks which enhance the skyline and the city's character generally. Higher buildings also have the potential to deliver significant regeneration objectives by attracting investment and employment, and they may contribute to diversity as a landmark or gateway features in otherwise low-rise or medium rise development.

It is Government policy to deliver a world class children's hospital facility on the site of the Mater in order to achieve this, it is likely that it will be necessary to develop taller buildings on this site. The plan also provides opportunities for taller structures

on the Mounjoy Prison and Phibsborough Shopping Centre sites.

However, all proposals for high buildings will be judged in terms of the specific planning gains which they deliver together with their likely contribution to the quality of built form and the urban structure of the area. These issues should be addressed in the master plan, architectural design statement and impact assessment report for the site.

The architectural quality of any building taller than its surrounding context will be a primary consideration and, design, proportion, and materials must be demonstrably of the highest quality.

Tall buildings should be appropriate in terms of proportion, composition and their visual impact; they should be slender and have a minimum height to width ratio (maximum ratio) of 3:1, and generally should not exceed [16 floors] or 50m in height.

Also the site specific masterplan for each key redevelopment site should demonstrate that the height and scale of development proposed will not impact negatively on the amenity and microclimate of open spaces in the area.

An overriding consideration will be whether the height proposed has any negative impact on the established amenity of existing buildings, especially homes and protected structures within the plan area. Privacy, daylighting and shadow analysis will also be required.

In addition, a visual impact assessment will be required to analyse the effect of the proposal on the skyline and important views and vistas, both within the neighbourhood and the overall city skyline. The plan specifically states that approved tall buildings shall not set a precedent and all proposals for one, two, three or four storey structures will be evaluated on the basis of planning gains which will be delivered.

In summary, all tall landmark building proposals will be assessed on a case by case basis in accordance with the Dublin Development Plan, the policies of this LAP and Dublin City Council's draft building height strategy. The approval of the planning authority may be permitted where it can be demonstrated that there is a strong design rationale, and where a specific urban design architectural or planning gains will be delivered by the height proposal.



Key Landmark Objectives [Obj 14]

Tall landmark buildings may be appropriate in the Phibsborough/Mounjoy LAP area subject to the following key objectives:

1. Support the development of singular tall landmark structures of exemplary architectural quality on the Phibsborough Shopping Centre and Mounjoy Prison sites.
2. Support the development of a cluster of taller buildings on the Mater Hospital site to assist the delivery of the National Children's Hospital.
3. Ensure that proposed tall buildings create a visually and architecturally attractive contribution to the skyline, in terms of slenderness ratio (maximum 3:1) and height (maximum 50m).
4. Require proposals for tall buildings to deliver a significant planning gain in terms of the key objectives of this LAP.
5. Ensure that proposals for tall buildings deliver a quantifiable contribution to urban quality, in terms of public realm, built form, architectural treatment and the quality and details of materials proposed.
6. Require an architectural design to be exemplary and reflect the building's function and location; massing and scale should be assessed to avoid monolithic buildings which overpower their surroundings.
7. Ensure proposals are sensitive to local context and protect established residential amenity, historic buildings and open spaces.
8. Protect important views and vistas within the LAP area and ensure proposals for tall buildings will have no negative local or city wide visual impacts; overhanging and over-terminate impacts.
9. Require the preparation of an environmental impact statement as part of all planning applications for tall building proposals.

- (2) Excessive Width – The overbearing size of the proposed development will contravene the terms of the Dublin City Dev Plan 2011 – 2017 which provides for a maximum plot ratio for the given zoned area of 0.5-2.0 while the proposed building provides for a ratio of up to 6 times the site area.
- (3) Overshadowing – The impact of the proposed development will be the fundamental & devastating change in Daylight and increase in overshadowing of properties in the directly affected residential areas e.g. Leo Street, Josephine Avenue, Leo Avenue etc. These are highlighted in the relevant EIS Section 3, Appendix to Chapter 9, 9a Report on the Impacts of the Shadows Cast by the Proposed Children's Hospital. The physical and physiological impact on local residents will be huge and will contribute to a vast reduction in the quality of life for residents throughout the year. In addition this will have a monetary impact on local residents who will require the use of lighting in their homes earlier in the day and more often during the year as well as requiring engaging their internal heating systems earlier in the day and more often during the year. The picture montages provided in the Appendix to Chapter 9 of the planning application are particularly galling.
- (4) Community Consultation Process – The consultation process that local residents actively engaged in was merely an information providing exercise and the concerns of residents were not addressed in any meaningful way. The response to the Community Gain Initiative did not take into account the ideas/suggestions offered up by residents.
- (5) Privacy – The impact of the proposed development will be the elimination of privacy of residents directly affected by the overshadowing of the building onto their properties. This fundamentally contravenes resident's rights.
- (6) Parking/Traffic – The number of parking spaces for local residents is at its limit as things stand. Introducing such a large scaled building in its proposed location would further exacerbate an existing problem for local residents who find it increasingly difficult to find parking spaces outside their properties throughout the week. Disabled/Elderly residents will be most affected by this. The scale of public transport into the area has already been curtailed (see reduction in serviced Dublin Bus routes). The introduction of the proposed building will further clog the inner city streets and cause widespread disruption to transport services.

Given the proposed location, this building would dominate the skyline of inner city Dublin and be seen from many miles away and indeed would represent the highest building re: roof height in the country.

I hope that the matters I have raised will cause you to refuse to grant the application. The residents of inner city Dublin are looking to An Bord Pleanála to provide a leadership in this hugely important issue.

I look forward to having the opportunity to discuss these and further concerns at the oral hearing.

Yours faithfully,

Donnchadh M. O' Riordain

Donnchadh M. O' Riordain

Local Resident

