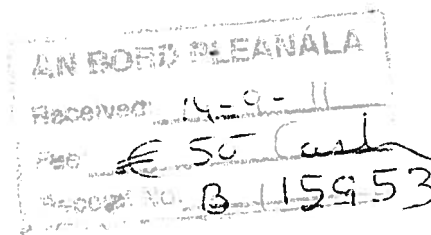


3 Marne Villas
Rathdown Road
Dublin 7

14th September 2011

Re: Ref.PA0024



Strategic Infrastructure Development Application for the Mater Hospital Site under Section 37E of the Planning and Development Acts 2000 to 2010.

Dear Secretary;

I wish to lodge this submission in objection to the proposed development of the National Paediatric Hospital at the Mater Hospital Site on behalf of the Grangegorman Residents Alliance (GRÁ).

We object to the proposed scheme on several grounds which relate mainly to excessive height, over-development of the site, diminution of residential amenities of surrounding areas and the overwhelming impact the proposed scheme would have not only on the immediate area but also on large tracts of the city many of which are of historic significance. We consider that our objections are supported by the standards and provisions identified in the Dublin City Development Plan 2011 – 2017 (DCDP) and the Phibsborough/Mountjoy Local Area Plan (LAP). In any assessment of the proposed scheme the most relevant planning document is the LAP. We note that in referencing the LAP development strategy with regard to key sites such as the Mater Site, page 36 of the LAP states:

“On the key sites, the challenge is to plan for their redevelopment in a manner which integrates new development into the urban context of the area, maximises community gain, promotes sustainable communities, ensures an appropriate intensity of development and delivers the conservation of structures worthy of protection.”

It appears very evident to us that the proposed scheme fails to meet all of the above challenges.

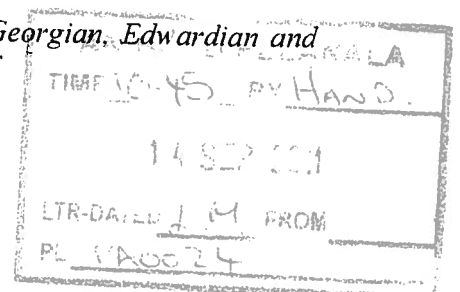
Urban Context

Phibsborough is predominantly a high density Victorian residential area. The urban context of the site is clearly described at page 20 of the LAP which states:

“For the most part the Phibsborough/Mountjoy area consists of two-storey terraced housing built near the end of the 19th century or in the early part of the twentieth century and this defines the low rise character of the area.”

Page 23 of the LAP further describes the context:

“The area is mainly Victorian in character, but it also includes Georgian, Edwardian and modern building stock of architectural, social or technical interest.”



So we are dealing with a low-rise area with considerable architectural merit. It is very evident that the proposed scheme does not integrate into the urban context of the area. This is mainly due to the enormous volume of development proposed for the site. In fact, the proposed scheme would have a dramatic negative impact on the urban context of the area.

The challenge to integrate new development into the urban context of the area clearly would not be met by the proposed scheme.

Impact on Community

The enormity of the proposed scheme both in scale and in intensity of use would have a negative impact on the residential amenities of the area. The degree to which dwellings would be over-shadowed by the huge bulk of the proposed structure is demonstrated in the Shadow Study submitted with the application. The 'Report on the Impacts of Shadows Cast by the Proposed Children's Hospital of Ireland' submitted as part of the EIS, Section 3, Chapter 9 shows the impact of shadows resulting from this proposal on the streets surrounding the Mater site.

In addition to over-shadowing, the impact of over-looking as well as perceived over-looking will further diminish the amenities of residents.

When we also consider the very significant increase in traffic in the area resulting from the size of the proposed Children's Hospital, it is obvious to us that the proposed scheme does not provide any gain whatsoever for the community – in fact a great deal would be lost should this scheme go ahead.

It is our view that the proposed scheme can in no way be considered sustainable. The amenities of the roads in the vicinity of the site will be severely damaged by the towering structure looming overhead. Light to the dwellings will be impacted as will sunlight to the gardens.

Paragraph 17.9 of the DCDP makes the "protection of residential amenities" a "primary concern" of Dublin City Council. Views 21, 21a, 23, 29, 30 and 30a illustrate the visual impact of the proposal on neighbouring streets. It is obvious that there will be a significant loss of residential amenities for many dwellings.

Appropriate Intensity of Development

Anyone examining the file that was submitted to An Bord Pleanála can clearly see that the intensity of development proposed for the site is excessive. This is evident in the height proposed as well as in the volume of development proposed.

In relation to height the LAP states on page 54:

- "The LAP's building height strategy is based on established urban design principles:*
- respect for the identity and character of the receiving context,*
 - achieving sustainable densities in new infill development,*
 - locating taller landmark buildings in appropriate locations within the plan area,*
 - creating attractive and pleasant open spaces*
 - and a quality public realm."*



While the reference to infill development is irrelevant in this instance, the other principles do apply and we are of the view that the proposed scheme fails to comply with them.

The DCDP deals with the appropriate height standards in Sec. 17.6.2 and identifies the Phibsborough area as one suitable for buildings up to 50 metres high, i.e. mid-rise buildings. However on examining the drawings submitted with the application, we note that the height of the proposed scheme rises to c. 74 m. from street level and therefore conforms to the standard indicated for high-rise buildings, but not for mid-rise buildings – this is clearly a breach of the DCDP.

Conservation of Structures Worthy of Protection

One of the worst aspects of the proposed scheme is its impact on the many structures worthy of protection in the area. Section 7.2.5.1 of the DCDP establishes (policy FC26) the commitment to protect and conserve the city's cultural and built heritage. Policy FC28 of the DCDP re-iterates this commitment in accordance with the Department of Environment, Heritage and Local Government document "Architectural Heritage Protection Guidelines for Planning Authorities, 2004".

Despite these policies, however, the photomontages submitted with the application indicate that the proposed scheme would have an overwhelming impact on dozens of protected structures in the area and its visual effect of landmark buildings like the Mater Hospital and St. George's Church (both protected structures) would be extremely damaging.

In fact the scale of the proposed building is so enormous that its negative impact would be felt at great distances from the site. Indeed, it would intrude on many vistas in the Grangegorman area.

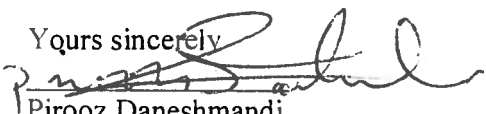
Protection of the skyline of the Inner City has been a policy of DCC for many years and is restated in policy SC18 of the DCDP. However, the proposed scheme totally disregards this policy also - again the photomontages demonstrate the negative visual impact of the scheme on the skyline of the inner city. We see that even the Architectural Conservation Area of O'Connell Street can escape from the negative impact of the proposed scheme.

Conclusion

This proposal is in direct contravention of the DCDP and of the LAP due to over-scaled, over-intense development and the impact that this would have on the historic built environment of large parts of the city. It is also in contravention of the Granada Convention for the Protection of the architectural Heritage of Europe and it makes policy FC57 of the DCDP, to support the designation of Dublin as a "World Heritage Site", preposterous.

We request that An Bord Pleanala refuse permission for the scheme given its failure to comply with even the most basic planning principles.

Yours sincerely


Pirooz Daneshmandi
Chairperson

AN BORD PLEANALA	
TIME _____	BY _____
14 SEP 2011	
LTR-DATED _____	FROM _____
PL _____	

