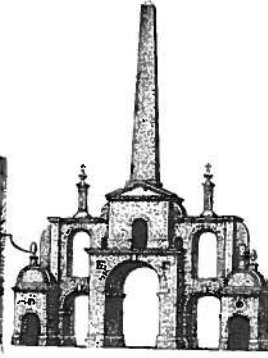


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Irish
Georgian
Society

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

13th September 2011

Re: 29N.PA0024

Proposed Development: Construction of a 392-bed in-patient plus 53 day-care bed National Paediatric Hospital at Eccles St. Dublin 1

The Irish Georgian Society wishes to make the following observations regarding this application. The Society is of the opinion that no justification can be given for a development which would have such a fundamental and negative impact on the character of Dublin's historic centre, its streetscapes and skyline.

Dublin's Historic Character

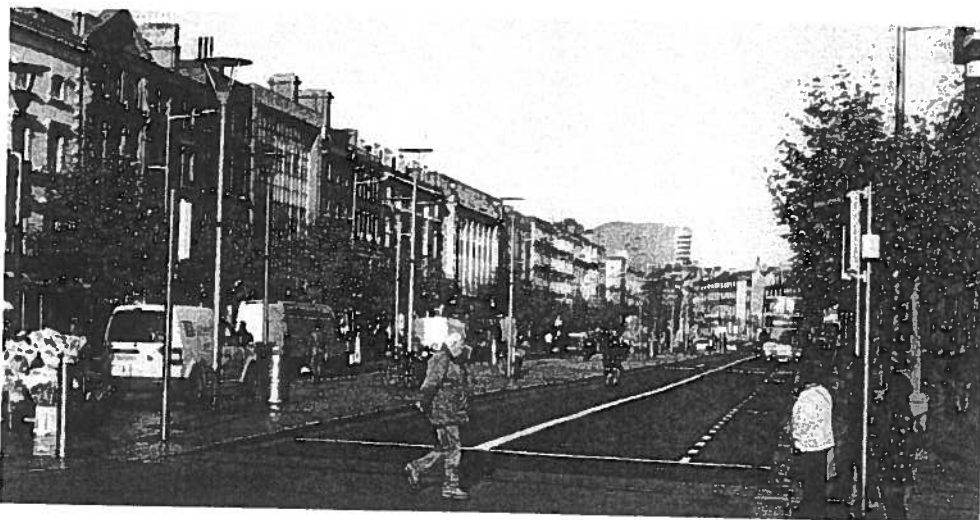
Having been granted UNESCO City of Literature status in 2010, the Historic City of Dublin has also been submitted for inclusion in the tentative list of UNESCO World Heritage Sites. This submission recognised the unique character of the Georgian city, its authenticity and integrity. The proposed development would alter the character of the city irretrievably and undermine the World Heritage Site submission.

Planning Policy

Dublin City Development Plan 2011-2017

Skyline and Streetscapes

The photomontages that accompany this proposal eloquently testify to the radical alteration in the skyline and streetscapes of Dublin that would inevitably accompany the development of the site in its proposed form.



74 MERRION SQUARE DUBLIN 2 IRELAND TEL: + 353 (0)1 676 7053 FAX: + 353 (0)1 662 0290 EMAIL: info@igs.ie www.igs.ie

The Irish Georgian Society is a charitable organization which encourages the appreciation and conservation of Ireland's architecture and decorative arts

Irish Georgian Foundation Committee of Management: Galen Bales (US), Mary Bryan (Chairman), Desmond FitzGerald, Knight of Glin,

Dr. David Fleming, Sebastian Guinness (UK), Jerry Healy SC, John Holohan, William Laffan, Robert O'Byrne, Brian Redmond.

Charity Reference No: CHY 6372 Company Registration No: 32176

Urban Form and Spatial Criteria

The Dublin City Development Plan 2011-2017 states that all proposals for high buildings must have regard for the following criteria:

- *Successfully incorporate the building into the existing urban grain*

The proposed development is utterly and completely out of character with the existing urban grain.

- *Protect important views, landmarks, prospects, roofscapes and vistas*

There will be few points in the city which will not be affected by the insertion of a 16-storey building which will dominate the views from all of Dublin's most important sites including O'Connell Street, North Great George's Street, the Georgian squares on the south side of the city, the Royal Hospital Kilmainham and the Royal and Grand Canals.

- *Consider the impact on the scale and quality of existing streetscapes, spaces and buildings*

The proposed structure is on a scale totally out of keeping with the local residential development which is mainly 1-2 storeys and the Georgian street layout which is largely composed of 3-4 storey commercial buildings.

The Dublin City Development Plan 2011-2017, relating to spatial criteria, requires of the design of tall buildings, that they should:

- *Exhibit exceptional architectural character and quality, creating a building which is of slender proportions, elegant, contemporary, stylish and in terms of form and profile, makes a positive contribution to the city skyline, city structure and topography.*

The proposed designs are the antithesis of slender proportions and would in fact create a mass and bulk that would be visible from even distant parts of the city and would irreversibly alter the skyline of the city and negatively impact on the Georgian core and historic city which the Council is proposing as a World Heritage Site.

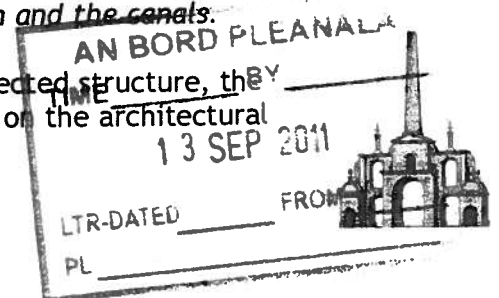
Height

Dublin City Council acknowledges the intrinsic quality of Dublin as a low-rise city and it is policy that it should predominantly remain so. It is the policy of Dublin City Council to protect and enhance the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city, and create opportunities for place-making identity in the outer city.

In Section 17.6.3, Assessment for Tall Buildings, the Dublin Development Plan requires that proposed developments:

- *Consider the impact on protected structures, conservation areas, and the architectural character and setting of existing buildings, streets, and spaces of artistic, civic and historic importance, in particular, the building's relationship with the historic city centre, the river Liffey and quays, Trinity College, Dublin Castle, the historic squares and precincts, the Phoenix Park, the Royal Hospital Kilmainham and the canals.*

Located in close proximity to the Mater Hospital, a protected structure, the proposed development would have a detrimental effect on the architectural



character of the surrounding streets. Dublin City Council's Local Area Plan for the Phibsborough Mountjoy Area notes that:

Residential development predominates in the LAP area. The bulk is represented by the one and two storey red brick Victorian terraces built towards the end of the nineteenth century or beginning of the 20th. A considerable quantity of these dwellings are zoned Z2 - 'To protect and /or improve the amenities of residential conservation areas'.

The Society believes that it is contrary to the stated policy of protecting and improving the amenities of the local residents if this proposed development is granted permission. A 16-storey structure with a length of 156 metres will dwarf the neighbouring structures and greatly diminish their residential amenities.

It is noted that the proposed development does not comply with several standards set out in Chapter 7 of the Dublin City Development Plan 2011-2017. Specifically it exceeds the maximum figures permitted for both plot ratio and site coverage for Zoning Z15.

Site Coverage

The extent of the proposed site coverage is greatly in excess of what is deemed to be permissible in a 'Z15' zone. It constitutes further evidence that the proposed development constitutes over-development of the site and justifies a refusal of permission on that ground.

Plot Ratio

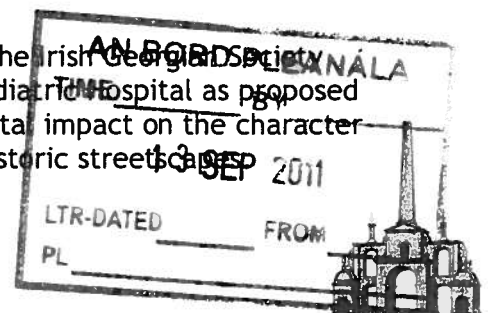
While Z15 zoning indicates a plot ratio of 0.5-2.0, the proposed ratio is greatly in excess of the maximum figure when the actual size of the site rather than the Mater complex as a whole is taken into account. On these grounds alone the proposed development must be considered as unsuitable over-development.

Transportation

The applicants agent's submit that the proposed plot ratio is justified, having regard to a number of factors including the proximity of the development site to public transport services and the site's city centre location. The advantage of the city centre location will be severely reduced if the proposed Metro North is postponed or cancelled. At the time of this submission of this observation, an alternative DART line to serve the airport is being proposed which throws into question the feasibility of the Metro North project. In addition, the crowded nature of the surrounding streets, impacted especially by large-scale events held at Croke Park and the O2 Venue, frequently result in traffic gridlock with potential implications for ambulance access to the proposed children's' hospital.

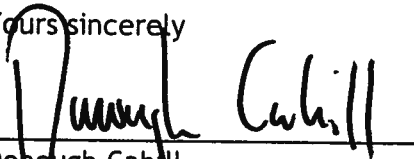
Taking into consideration all the above circumstances, the Irish Georgian Society would submit that the current design does not provide the optimum benefit to either the children who will be using the facility, their parents and staff members, nor does it contribute the desirable goal of enhancing the city of which it will form such a vital element.

Taking into consideration all the above circumstances, the Irish Georgian Society would submit that the development of the National Paediatric Hospital as proposed with its 16 storey tower would have a severely detrimental impact on the character and scale of Dublin city and the special interest of its historic streetscape.



Furthermore we believe that the provision of the Dublin City Development Plan set out in this submission clearly establish that this development would be contrary to the proper planning and development of the city.

Yours sincerely


Dohough Cahill
IGS Executive Director

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