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**IN THE MATTER OF AN APPLICATION TO
AN BORD PLEANÁLA
FOR PERMISSION FOR
STRATEGIC INFRASTRUCTURE DEVELOPMENT
(THE CHILDREN'S HOSPITAL OF IRELAND)**

ABP Reg. No. PL29N.PA0024

AND IN THE MATTER OF AN ORAL HEARING

**Submission of Conor Skehan
Environmental Impact Services Limited**

**On the topic of Environmental Impact Statement
Preparation and Landscape and Visual Impact
Assessment**

1. Relevant Qualifications and Expertise

My name is Conor Skehan, in this module I am giving evidence to assist the Oral Hearing on the topic of Landscape and Visual Impact Assessment

I have qualifications in architecture [BSc] and landscape architecture [MLA] and have been chartered by the relevant professional institutes¹. I am qualified to give evidence about Environmental Impact Statement Preparation and Landscape and Visual Impact Assessment on this project because I have extensive experience of preparing and assessing Environmental Impact Assessments – and of Landscape and Visual Impact Assessment in particular². I also have extensive experience of writing and teaching³ and in the provision of training and guidance on these topics which includes the preparation of the EPA's Statutory Guidelines on EIA⁴ as well as Landscape and Visual Impact Assessment⁵.

2. Role in Proposed Development

My role in this project was to advise on Environmental Impact Statement Preparation and Landscape and Visual Impact Assessment which I did since September 2009 and I confirm that I advised the project team of the likely effects of the design and that I recommended mitigations measures that have been incorporated into the design of the project.

The documentation within this application for which I am responsible is the Environmental Impact Statement in general and the sections on Landscape and Visual Impact Assessment, in particular, contained at Chapter 11.

I have also prepared the following responses to observations and objections made in relation to this topic which I have provided to assist this Oral Hearing. Note that this evidence relates solely to the extent, magnitude, appearance and character of the effect. There is also separate relevant evidence, by Mr Arnold, on the significance of this effect on

¹ Royal Institute of the Architects of Ireland, Irish Landscape Institute, Irish Planning Institute, International Association of Impact Assessment, Institute of Environmental Management and Assessment.

² Conor Skehan has been involved in the preparation and assessment of over 300 EISs since 1989.

³ Senior lecturer in DIT's School of Spatial Planning, Head of the Department of Environment and Planning [2004 – 2010].

⁴ Guidelines on the Information to be Contained in EIS, (2002), Environmental Protection Agency
Advice Notes on Current Practice in the Preparation of EIS, (2003), Environmental Protection Agency

⁵ *Guidelines on Landscape and Visual Impact Assessment*, (2002), Landscape Institute and Institute Environmental Management and Assessment, Spon, London,

the architectural heritage of the receiving environment and by the project architects on the relevant mitigation measures that were employed.

3. Key Findings

The assessment of the proposed development was assessed and the likely significant Landscape and Visual Impacts following mitigation are described at sections 11.6 – 11.6 of the EIS. These were summarised in the Non-Technical Summary as follows ;-

This project will be one of the tallest, most distinctive and most conspicuous buildings in Dublin city. It will significantly alter the appearance and character of both the northern skyline of the city as well as the background to many views within the north inner city and its inner suburbs.

These areas contain urban landscapes [sometimes called 'streetscapes'] that are valued as historic and cultural areas and which, in turn, contain significant concentrations of protected structures. Thus the context and background of a number of nationally significant Georgian streetscapes and buildings will be altered by the conspicuous prominence of a modern building with a contrasting form, scale and height.

The skyline of the north inner city will be significantly altered by a visually prominent and distinctive structure that will be conspicuous when viewed from many locations – including O' Connell Street, the Botanic Gardens, and locations as distant as the Promenade in Clontarf and on major approaches into the city including Con Colbert Road and the Swords Road. It will significantly change, and contrast with, the established scale that forms the background of a number of local residential communities.

These changes are the result of a number of intrinsic factors;-

- The Government decision to co-locate with the Mater on an inner city site in an historic medical quarter with a long established institutional character.
- The hospital design factors which require 'vertical adjacency' to optimise care outcomes.

- The specific provision by Dublin City Council for the Children's Hospital in a Local Area Plan that anticipated tall structures and their associated environmental and community effects.

These changes and associated residual effects arise from, and are therefore consistent with, previously determined policies and factors and, as such, are residual effects.

Finally and in addition to these formal and official considerations it is important to bear in mind English Heritage's advice^[1] that *Cities and the skylines evolve*. As Dublin's population exceeds 500,000 the city is undergoing a transition, evolving rapidly from a traditional outward spreading, low-density, low-rise city towards an increasingly planned city that seeks to concentrate uses and densities around a central core serviced by efficient high-density public transportation systems.

These changes and associated residual effects arise from, and are therefore also consistent with, overarching planning policies to foster better urban planning.

^[1] *Tall Buildings and the Historic Environment*, English; Heritage, 2007. See Chapter 15 of EIS Section 15.1 for the full context of the quotation.

4. submissions and Responses

My attention has been drawn to the following observations and objections made that appear to be relevant to my area of expertise and have prepared responses to these that may be of assistance in the determination of this application. These relate, in the first instance to changes in the appearance and character of historic core and city centre [Summarised in Table 1] and in the second to the effects on the appearance and character more local residential amenity [Summarised in table 2]

4.1. Responses regarding Existing Character of the Receiving Environment

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 [Irish Georgian Society]

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.... [Grangegorman Residents Alliance]

There are two components to these observations and objections – typified by the two quotations above from the Georgian Society and the Grangegorman Residents Alliance. The first is a concern that the new building will be visible over large tracts of the city and the second is the reference to the historic centre, its streetscapes and skyline as being affected.

4.1.1. Extent of Visibility

A number of observations and objections [See Table 1] are based upon a concern that the structure will adversely affect the appearance and character of wide area of the city centre – and of the historic core in particular.

While it is true that the upper portions of the project will be potentially visible over a wide area, the reality is that this visibility is limited to views from the uppermost windows and rooftop areas in such areas. It is of critical importance to note that views from the public realm – the streets, squares and parks of the city – occur over a significantly smaller area [as established in the EIS at 11.3.2].

Tall prominent structures can be shown to have limited visibility within densely developed inner city areas. The result is that views of the tall structure tend to be confined to either the most immediate environs or to more distant views across extensive and very open areas – such as large parks and water bodies – that tend to be scarce in city centre areas.

This apparent paradox of the limited visibility of tall structures within inner city areas occurs because of the visual enclosure caused by the buildings on each side of the streets. Typical building height increases closer to city centres - in response to the scarcity and value – which increases this effect of limiting views.

To assist the Bord in this matter – and to confirm this assertion in response to the observations and objections referred to above – a series of analysis sheets have been

prepared [See following] – to illustrate how this confinement of visual effect occurs by reference to the observable effects of an existing tall structure within Dublin's city centre.

These images have been prepared by modelling the topography and buildings of the city centre and then 'projecting' a beam of imaginary light from the uppermost height. Ground level areas 'illuminated' by this process are thus identified as being locations from which there is a potential view of the upper-most portion of the structure from street level.

The analysis is, of necessity, a generalisation that still tends to overstate potential visibility because it takes no account of further localised visual screening that arises - particularly due to trees, vegetation, walls, and other non-structural items such as signs. It is, nonetheless, a useful tool to assess the general extent of the area that is potentially affected and to confirm, for example, that the location of the viewing points employed are indeed representative of the range of 'worst case' views [as stated in the EIS at xx]

Figure 1 illustrates this effect by reference to one of the tallest existing buildings in the city centre – Liberty Hall – showing that despite its height and prominence visibility is principally confined to the areas along the river with very little visibility from the nearby streets of the city centre.

Figure 2 illustrates the zone of potential visibility of the proposed hospital. This confirms the location and limited extent of visibility from within the public realm - as predicted in the EIS. As already mentioned this analysis overstates the impact in open areas with trees – such as the Grangegorman site, the Kings Inns, and the Phoenix Park. It also includes visibility from other undeveloped open areas that are not part of the public realm such as the Broadstone bus depot or the railway yards in the east of the city centre which also overstates the significance of potential visibility.

Figure 2[a] uses the same method to illustrate variations on the extent of the potential visibility of an alternative height of 14 stories. It can be seen that the changes of the extent of areas affected are virtually indistinguishable. This assessment confirms that the proposed design is within the parameters of effect anticipated and provided for by the Dublin City Development Plan.

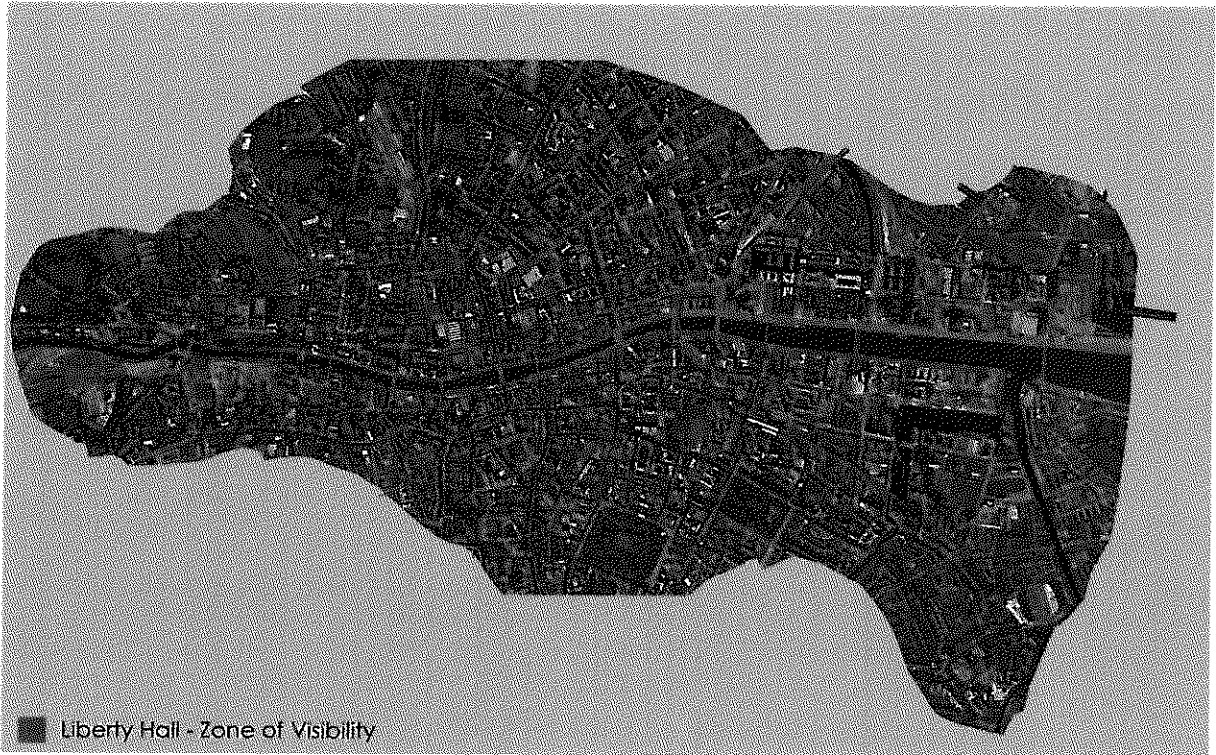


Figure 1 ZVI of Liberty Hall illustrating the confined visibility of tall structures located within dense inner city areas that is caused by the taller buildings that restrict long distance views from city streets except along open vistas afforded by undeveloped areas such as rivers, parks and undeveloped areas

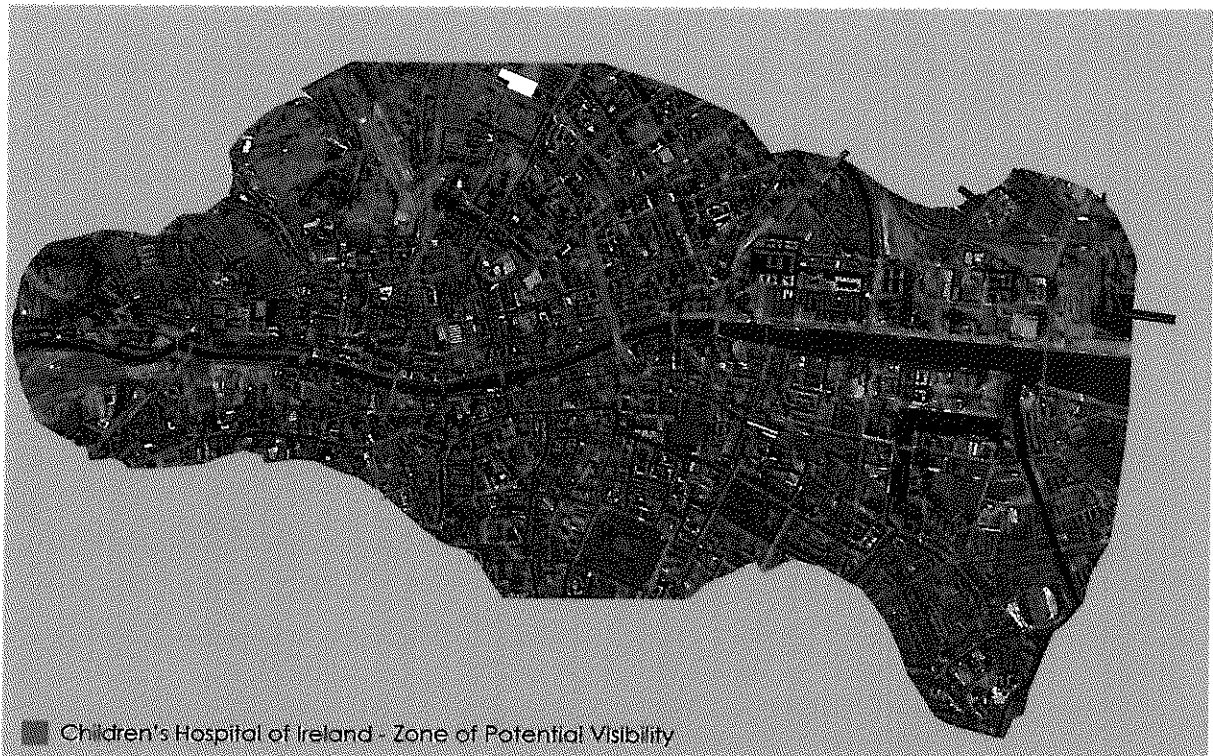


Figure 2 An illustration of the areas from which the upper portions of the proposed development has the potential to be visible from street level. This analysis overstates the impact in open areas – such as the Grangegorman site, the Kings Inns and the Phoenix Park – which are areas from which the building will not be visible because trees will perform the same visual screening function as buildings on city streets.

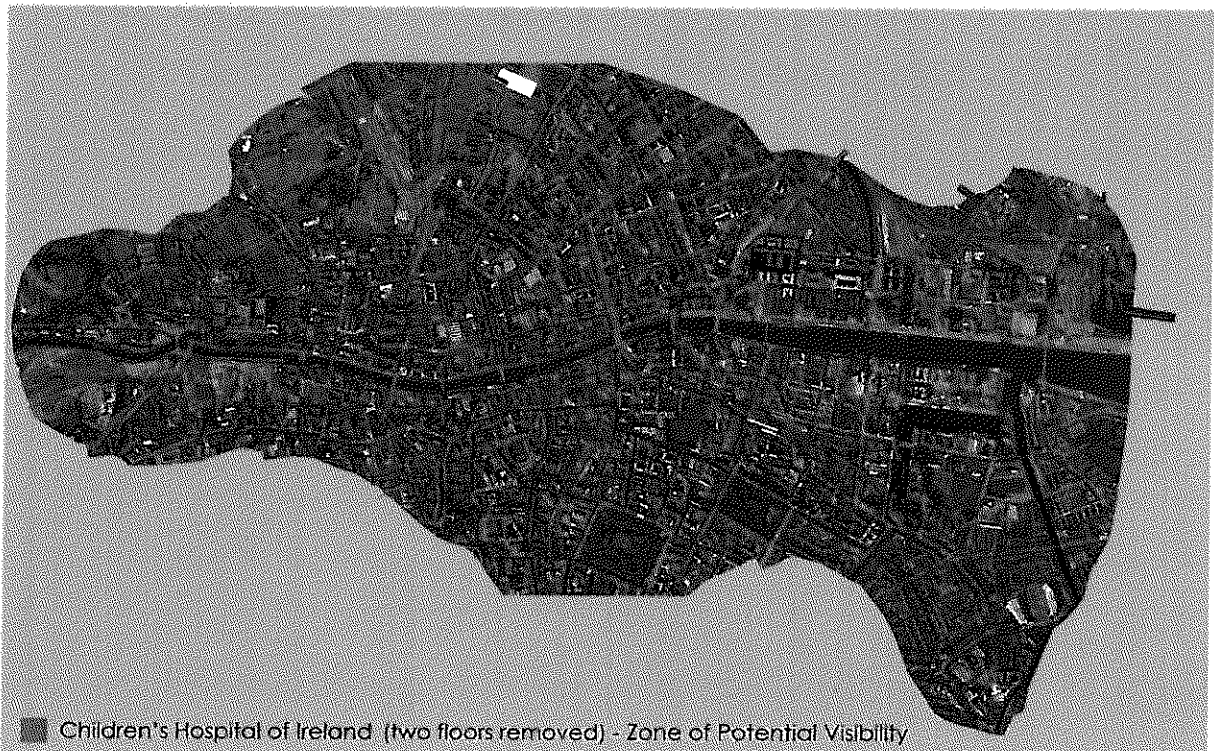


Figure 2 (a) An illustration of the extent of the potential visibility of an alternative height of 14 stories for the proposed development. Note that the extent of the zone of potential is virtually indistinguishable from that of the taller structure assessed above.

4.1.2. *The Character of Dublin's historic centre*

A number of observations and objections have referred explicitly and implicitly to the effect of the proposed development on the appearance and character of the existing receiving environment which is the context of this development. [See table 1]. In so doing the terms 'city centre' and 'historic' are continually conflated.

Guidelines on EIA note the need to describe not only the character of the existing environment – but also the dynamics and trends that are evident within the receiving environment – to provide a basis for determining whether the resultant changes are anomalous or part of an established or emerging pattern.

In this regard it is important to note when considering the effect on the existing urban environment that it is not static or unchanging. Dublin city centre is a highly dynamic environment that has consistently experienced significant change of fabric and appearance over an extended period of time.

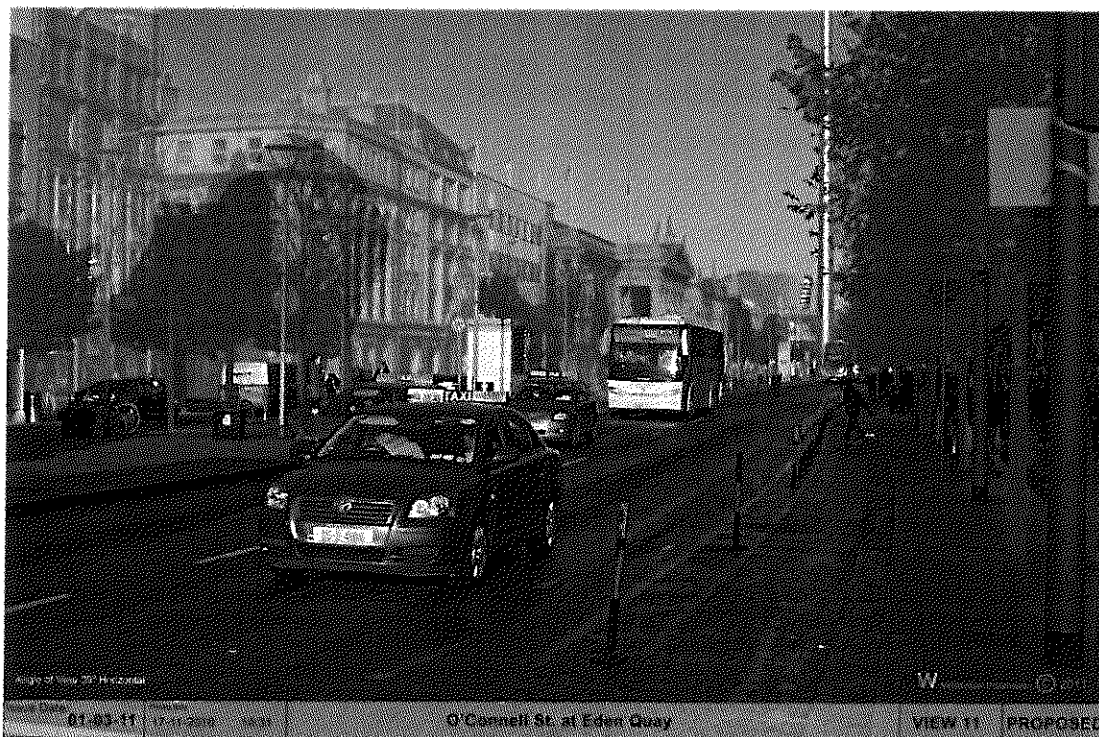
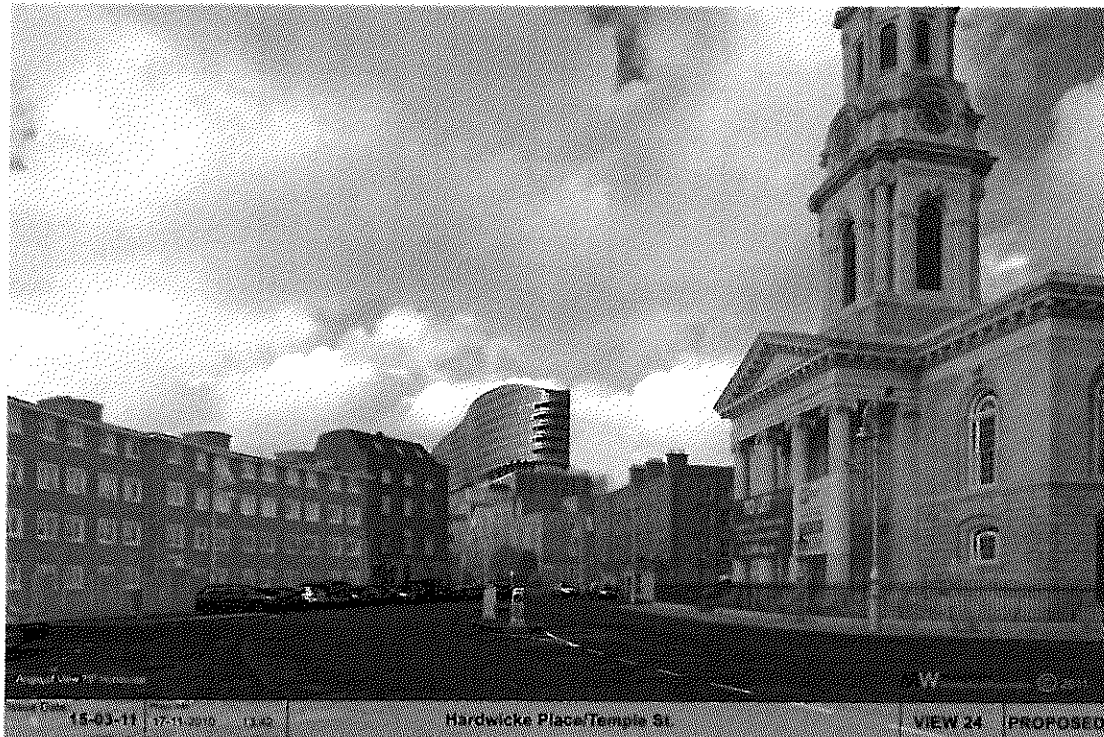
Consider the two views that were of most concern to the architects throughout the design process – the views from O'Connell Street and the view from Hardwick Place. Figures 5 and 6 below illustrate the extent and approximate age of each of the components of the principle parts of each view indicating their extensive and constantly changing nature which challenges the received wisdom of the integrity or age of the city centre.

Dublin's population has more than doubled since the foundation of the state, while it's role in the late 20th century has changed from serving a contiguous city to a dispersed urban region that contains over 1.8 million people. Accommodating the needs of this rapidly growing population creates challenges of further change while offering opportunities to realise long-held planning objectives of revitalising Dublin's city centre – and the north inner city, in particular.

Meeting this challenge and realising these opportunities will involve continuing changes to the appearance of the city – as has already occurred with the city's successful accommodation of other large modern public structures in central areas - such as the Aviva and Croke Park stadia as well as the new Court Services building.

Dublin's role as both the national capital and as Ireland's principal demographic and economic centre means that this process is unlikely to lessen or cease. This means that extensive and constant change, which challenges the received wisdom of the integrity or age of the historic city centre will continue in the future – as it has done throughout history.

Thus this and future generations will continue the process of developing and renewing the centre of the city to accommodate the present and the future. The resultant changes will, inevitably, continue to challenge sensibilities as each generation struggle to come to terms with the new and unfamiliar architecture of the next generation and as older designs give way to newer ones.



Figures 5 and 6 showing the extent and approximate age of each of the components of the principle parts of each view indicating their extensive and constantly changing nature. The colours approximate to the period of construction, as follows:-

- pre - 1800s (red - early Georgian buildings)
- 1800s - 1880s (orange - includes GPO)
- 1880s - 1916 (yellow - from 1880s up to the destruction of the 1916 rising)
- 1917 - 1960s (light yellow - post rising reconstruction up to the 1960s)
- 1960s to present (very light yellow - modern structures including the Spire)
- All trees (green) are recent

4.1.3. Residential Amenity

The Observations and Objections that relate directly to the effect of the project on the appearance and character of the area are collectively examined under the headings of residential amenity and the associated veracity of the photomontages used to carry out the assessment.

Effects of Height, Dominance and Appearance on Residential Amenity

Parties object that the proposed development will affect the visual amenity of adjoining residential areas. In relation to the narrower issue of visual amenity of adjoining residential areas the EIS at Section 11.3.2 states that *'The proposed development will be visible from many parts of the neighbouring residential areas, firstly because the lower buildings, combined with wider roads will afford less visual enclosure and expose more views. In the second instance the proximity of many of these residences to the new development will mean that the building will be prominently and occasionally dominantly visible from these houses and their environs. This visibility combined with the significant contrasts of scale, form and materials will significantly alter the perceived character of the area.'*

However in considering the wider issue of the significance and extent these residual effects it is important to note the following.

- Effects on the residential amenity generally decrease with distance from the hospital. The most significant effects are highly localised and are thus confined to a very limited number of dwellings – which the developer and this EIS identify and acknowledge.
- In recognition of effects – anticipated due to likely developments within the general Mater complex - the residents of these most affected dwellings are being compensated by the provision of additional garden space.
- Many of the residential amenities affected arise from the temporary absence of buildings on the development site – as such these amenities are anomalous and not typical of those occurring within denser city locations.
- As noted above, these effects are consistent with the specific provision by Dublin City Council for the Children's Hospital in a Local Area Plan that anticipated tall structures and their associated environmental and community effects.

Thus the residual impacts arising to residential amenity are limited in number and extent and in proportion to the overall benefits conferred on the regional and national population. Furthermore these effects on amenity are acknowledged and compensation is provided and finally these residual effects have been acknowledged and taken into account by the Development Plan preparation and adoption process.

4.1.4. *Unrepresentative Photomontages*

The views selected are objected to as being neither representative nor comprehensive to ensure that the proposed development is presented from the most favourable viewing positions.

These assertions are incorrect. As the EIS explains at section 11.3.1 'The analysis of residual effects concentrates on views that illustrate the range of 'worst case' visual impacts due to the project..... These views do not purport to comprehensively illustrate all visual effects of the proposed development. Indeed as 'worst case views' some are not representative of the overall visual effects because some are only visible from extremely localised viewing points, but they are provided to offer an indication of the likely maximum residual effect. There will generally be less visual effect when seen from the majority of other areas because enclosures by buildings mean that urban views tend to be confined to the immediate street.' Figure 2 (above) provides confirmation that the selected views represent views from the areas most affected.

5. Conclusion

The potential for effects on the appearance and character of the area have been thoroughly and objectively assessed as having specific but localised and acknowledged effects on nearby residential amenities and on the wider inner city.

The applicant has demonstrated that the residual impacts arising to residential amenity are limited in number and extent and in proportion to the overall benefits conferred on the regional and national population. These residual effects have been acknowledged and taken into account by the Development Plan. It has been demonstrated that these effects on amenity are acknowledged and that appropriate compensation is provided to those who are most significantly affected.

The applicant has demonstrated that the extent of practical visibility is primarily limited to views within a confined and readily identifiable part of the north inner city and its inner suburbs. Both the mapping and the photomontages clearly demonstrated that the new building will be partially and intermittently visible , but will not 'dominate the north-side Georgian city', as feared by many.

The dynamics and trends that are clearly evident within the receiving environment have been also described. This challenges the received wisdom of the integrity or age of the historic city centre, offering instead a view of the reality of a long-established pattern of extensive and constant change in Dublin's city centre. Accommodating the development necessary to realise the long-held ambition to revitalise Dublin's inner city will involve a continuation this pattern of change to serve the needs of a rapidly emerging urban region that contains over 1.8 million people.

Appendices- tables of relevant Observations and Objections

Table 1 Observations and Objections relating to historic core and city centre	
Party	Issues raised
Irish Georgian Society	...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.
Grangegorman Residents Alliance	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....
An Taisce	Impact on townscape and 'Brusselisation'...
Dublin City Council	However, it is the opinion of the Authority that the potential impact of the overall development proposal in the context of Dublin's historic core and in particular the north Georgian core is not adequately demonstrated, specifically in terms of how the proposed new hospital will change the architectural significance of the wider context, its historical architectural character and scale, set - pieces and its important landmarks of the cityscape.
Nuala Morris and Others	In every way, it looks to be completely out of sympathy with all the surrounding Georgian and Victorian buildings...
Mac Eoin Architects	My concern is that this element of Architectural heritage the north Georgian core, having survived for two hundred years largely in an externally unaltered form, will now be severely compromised by this proposal, which will alter these settings forever...
Rita White (Leo Ave)	We would like to retain the architectural state of the area and the construction of this building will downgrade this.
BLEND Residents Association	Impact of Excessive Height on Historic City. The concentration of height on the site has very significant implications for large areas of the city...
	The Dublin City Plan has many policies relating to the protection of our built heritage but in the case of O'Connell Street, the importance of its built heritage is such that the area was singled out for special protection in the form of the designation of an ACA
Irish Georgian Society	Dublin's Historic Character The proposed development would alter the character of the city irretrievably and undermine the World Heritage Site submission...
	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 streets.
Heritage Council	For a full assessment of the impact of the development on ACAs, the EIS should have also provided an analytical description of the components of the receiving historic environment that give the area its character...
Mountjoy Square Society	We consider the development, in particular the height and massing of the ward block, to be very out of scale with its surroundings in this sensitive part of the Georgian city, and to impact negatively on the whole of the North Georgian Core.
	The application itself highlights the very serious impact the building will have upon many properties, streets and vistas in the North Inner city and Georgian Core...
An Taisce	The scale, bulk and height of the proposed development, which would dominate the north-side Georgian city, materially contravenes the Development Plan and it should be rejected out of hand.
	The proposed building would constitute a monstrous intrusion on the historic inner-city skyline and on account of its long sprawling form and its height would not make a positive contribution to the urban character of the city or be sensitive to the historic city centre.
Berkeley Environment Awareness Group (Irene Bent and Others)	The height and scale of the proposed Building of sixteen storey + roof + metal dome will destroy the historical Architectural character of the area and impact significantly on the Victorian and Georgian dwellings (some protected structures) which surrounds the Proposed development....

Table 2 Direct Observations and Objections in relation to Landscape & Visual Impact						
Party	Issues Raised	Height	Dominance	Appearance	Residential Amenity	Photomontages
LOCAL RESIDENTIAL						
Nuala Morris and Others	We, as residents of Leo Street, deem this site behind our row of two-storey Victorian houses , to be totally and utterly unsuitable for such an enormous building...					
	Visually it will be horrendous...					
Anne Coll (Josephine Ave)	Viewing the new development of the A & E Department as one approaches from St. Joseph's St / Synnott Place or indeed each time I step outside my front door (as the end house on the left of the Josephine Avenue cul-de-sac), I am reminded of the ugliness of the structure rising up to the rear of the quaint uniformed houses of Leo Street...					
Mary Gallagher (Josephine Ave)	My concerns are mainly about the proposed height of the new national children's hospital and its impact on local residences .					
BLEND Residents Association	the topography of the site which would result in the development as envisaged having a significant impact even on areas of the city which are at a very considerable distance from the site,					
	the residential context of the predominantly 1, 2 & 3 storey dwellings in the immediate vicinity					
	The excessive scale, bulk and mass of the proposed development will have a very dramatic impact on the built environment of the area ...					
	Intrusion on this scale is not supposed to happen in residential areas where the objective is to protect, provide and improve the amenities of the residents ...					
	The Landscape and Visual Impact Assessment at Section 2 of the EIS provides some images of the visual impact of the proposed development on areas outside of the site . Many of these are shocking...					
	...the extent of the negative impact of the proposed development in the sense that very often views are presented from the most advantageous angle i.e. from the perspective that would appear to present the least damaging aspect of the vista...					
	Additionally we submit that the visual impact study is inadequate in its coverage of key city sites . We believe that the scale of the proposed building is such that it will impact on the vista from some of the most important historic buildings...					
WIDER ENVIRONS/CITY						
Irish Georgian Society	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.					
Heritage Council	It is noteworthy that Chapter 11 of the EIS 'Landscape' (or 'Landscape and Visual Impact 'Assessment'), does not make reference to the extensive literature on the impact of development on the setting of Heritage Assets "...					
Robert Foley Architects	...The proposed development will have a negative affect on both the amenities and architectural quality and setting of the area , and is contrary to proper planning and sustainable development of the area.					

