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AN BORD PLEANÁLA
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12th September 2011
AN BORD PLEANÁLA
Received: 12-9-11
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The Secretary,
Bord Pleanála,
64 Marlborough Street,
Dublin 1

Re : PL29N.PA0024 - Planning Application to An Bord Pleanála for Construction of a 392-bed in-patient plus 53 day care bed National Paediatric Hospital,

Dear Sirs

I wish to make Observations regarding the above application, on my own behalf. These Observations shall be set out under the following headings:-

- Phibsborough/Mountjoy Local Area Plan
- The EIS submitted on behalf of the Applicants.
- The impact of the Proposal on the setting of the North Georgian Core, and Mountjoy Square in particular.

1. Phibsborough/Mountjoy Local Area Plan

In February 2010 The Irish Planning Institute announced that the Overall Planning Achievement Award was to be presented to the City Council for the Phibsborough/Mountjoy Local Area Plan, (LAP), which was prepared jointly by the City Council and consultants Paul Keogh Architects and John Spain Associates. That such a Study receive such an award is indicative of the recognition of the Plan as being a well-researched and presented Study, which draws to-gether a considerable amount of research and which makes extensive and very detailed proposals for the entire Phibsborough/Mountjoy Area, and indeed, for the subject site as well. Such LAPs are intended as guiding documents for Local Authorities, and it is hard to imagine that if the Application for this Proposal had been submitted in the normal way to Dublin City Council for adjudication, that the LAP would not have played a significant role in the determination of the Council's adjudication on the Proposal. For the purposes of this Observation, I propose to limit my referring to this Plan to those elements which refer to the Mater Hospital Site in particular.

Extraordinarily, it is quite apparent when one examines the Proposal that it seems to largely ignore the aspirations of the LAP as a whole, and the subject site in particular. The LAP is divided into a number of sections, which would address this site and this Proposal, and I believe that it is important that the proposal should be measured against the LAP, so that it may be objectively assessed. The reluctance to include the LAP as an informing document or to engage with it is at variance with the Proposal's thoroughness in other respects.

1.01 Urban Design

In this section there are two particularly pertinent paragraphs against which any Proposal for this important site should be judged, as follows :-

- P. 46 LAP "An appreciation of character is at the core of and create a well-defined sense of place"
- P. 46 LAP "The Phibsborough/Mountjoy area requires additional sensitivity on account of the historic importance of the receiving environment and the area's rich.....and historically significant open spaces.

I would submit that this Proposal simply ignores these evaluations.

1.02 Urban Form

Here again, there are some statements, which are relevant to this Proposal.

- P. 52 LAP "Taller buildings and the articulation of architectural features.....should be weighed against the benefits of the landmark value of the proposed design.
- P. 52 LAP "The scale of buildings in new developments should be sympathetic....and protected structures within the Plan area.

No-one can argue that this Proposal is a massive building, and its visual impact will be evident from well beyond its immediate environment. In fact, the 3D photomontages submitted as a part of the Application make it very clear what an impact the Proposal will have throughout the north of the city. Any assessment of the Proposal would agree that the Proposal ignores the LAP requirements with regard to Urban Form.

1.03 Building Height

Building height in Dublin has been a contentious issue for many years, and the debate will not be resolved by this Proposal. However, the LAP does attempt to set a context for the area generally, as follows:-

- P. 54 LAP "The LAP recommends that average heights....should not exceed a benchmark height of 20 metres.
- P. 54 LAP "An increase in building height may be accepted.....a maximum of eight floors for the historic core.
- P. 54 LAP "Context is also a fundamental issue.....to ensure protection of existing residential amenity.
- P. 54 LAP "In summary, the LAP's building height strategy.....respect for the receiving environment.....quality public realm"

It is noted that a special exception is made in the LAP for this site and Phibsborough Shopping Centre for tall buildings, and that will be addressed further in this Observation, however, it should also be noted that neither site is deemed as building suitable for a building taller than twelve stories. This Proposal is for a building of sixteen stories. However, this is an over-simplification, as these floors are hospital floors, and of necessity require such a high level of servicing that the floor-to-floor distance is of the order of 4.7m, (in normal domestic or commercial construction the floor-to-floor distance would be approx. 3.0m). The cumulative impact of this additional 1.7m per floor for 16 floors is that the building is more accurately described as being the same height as a twenty five storey building.

1.04 Landmarks and Tall Buildings

This section of the LAP sets out the circumstances under which an exception could be argued for going against the design principals enunciated under 1.03 above.

- P. 55 LAP "However, all proposals for high buildings will be judged.....urban structure of the area.
- P. 55 LAP "An overriding consideration will be.....especially homes and protected structures within the Plan Area"

Here again, I would submit that the Proposal ignores these recommendations.

1.05 The Mater Hospital Site

The LAP attempts to set design guidelines for the site, in terms of accessibility, and permeability from both Eccles Street and the North Circular Road. While acknowledging that this Master Plan is indicative only, it does set out the intentions of the City Council with regard to this site.

P. 75 LAP "Every effort must be made to ensure that increases in height will not have any negative overshadowing effects on adjoining properties or impact negatively on the settings of the protected structures, both on the site and on it's periphery".

The Proposal does not conform to these guidelines. Further, however, on page 77 of the LAP a detailed 15 point design strategy for the site is laid out, and I believe that the Proposal is in direct conflict with these guidelines as to it's meeting them in any respect.

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2. EIS submitted as a part of the Proposal

I wish now to address some of the claims made on behalf of this Proposal as a part of the EIS which was submitted with the Proposal, specifically under "Chapter 14 Architectural Heritage". I do not intend to deal with all parts of the Submission, but will limit this Observation to those parts of the submission which are on the periphery of the site, as the impact of this Proposal is far, far greater than simply on the immediate streetscape of Eccles Street, North Circular Road and the immediate hinterland – this Proposal will be visible from many parts of the city which are either Conservation Areas, Proposed Conservation Areas, or contain many Protected Structures, and therefore will have their setting severely impacted on by this proposal.

This part of the EIS uses an elaborate system of weighted scores to evaluate the visual impact on surrounding areas. I could not find an explanation of how these weighted scores were arrived at and in the absence of an explanation the scores attributed seem arbitrary and open to question.

Ch. 14.5.2.2, P. 51 Potential Impact on St. Georges Church and Hardwicke Place, (View 24)

The written statement here, (particularly under 2.0) provides an interesting assessment of the impact of the Proposal on this setting of this set piece, when describing it as "significant", but in the accompanying columns, while acknowledging that the sensitivity to change of the receiving environment is 4 on a scale of 5 in sensitivity, attests that the impact will be indirect(!) – this assertion is arguable at best and downright disingenuous at worst, and does little to present this EIS as an objective assessment of the Proposal. In fairness, the EIS is probably correct when it asserts that the impact of the Proposal will be even more pronounced at night !

Ch. 14.5.2.3, P. 51 Potential Impact on Nelson St. & St. Josephs Parade, (Views 30, 30a)

I would agree with the claim in the EIS here that these streets would be of medium significance and sensitivity. However, my issue with this part of the Proposal is the description of the impact of the Proposal on the receiving environment as being "indirect" !!! – is this really so ? I remain to be convinced that any detached observer when confronted by Views 30 and 30a would agree with the description offered on behalf of the Applicants. This is a very large building, which will tower over these streets, and to describe it thus is not to do it justice.

Ch. 14.5.2.4, P. 53 Potential Impact on St. Josephs Church, Berkeley Street, (Views 29, 31a)

View 29 shows the impact on the small terraced houses on Geraldine St., and View 31a shows the impact of the proposal on the setting of Blessington St. Reservoir, when looking at St. Josephs' Church. (it is noteworthy that the a view of the Church from the Basin was used as the cover view for the LAP referred to above). In fairness to the applicants they do acknowledge in this case that the impact on the environment will be adverse, but here again the phrase "indirect" is used to describe the impact. I cannot see how the impact of the view form Blessington St. reservoir can be described as anything other than direct.

Ch. 14.5.3.1 P. 63 O Connell Street, (Views 09, 10, 11,11a, 11b 12)

In Views 9 and 11 the impact of the proposal on this ACA is evident, (Frankly, view 10 should not have been included in my opinion, as the presence of a bus in the foreground masks the bulk of the proposal). I would submit that even though this proposal is more than one kilometer from O Connell Street, the fact that it is so high, so bulky and on such an elevated site will mean that it will have a greater impact on O Connell Street than the recent Shopping Mall Proposal for O Connell Street itself . That such a building, so remote from this ACA can have such an impact on this ACA must be a cause for concern.

3. The impact on the North Georgian Core, and Mountjoy Square in particular.

As someone who works and lives on Mountjoy Square, I must express deep anxiety at the impact of the Proposal as shown in View 33. Mountjoy Square, as the last Georgian Square constructed in the city, is seen as the most refined, in terms of urban design. Firstly, it is a perfect square, a fact which distinguishes it from all other "squares". Secondly, the roads on the east-west axis entering and exiting the Square are off-set to the width of two houses, which was a design device in the sense of

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enclosure of the square and it's environment¹. That sense of enclosure is still evident to-day, now that the four sides of the square have been re-instated to various degrees in the Georgian idiom. The Square is a proposed ACA, with a significant number of Protected Structures and the views from the Square are mostly of the square, and the only interruption to the skyline other than chimneys and roofs is the occasional church spire. The form, materials and scale of the Proposal, when seen from this architectural set-piece are totally alien to the environment, and make no attempt whatever, at this distance to respect the vistas. It is also noteworthy that the views are taken at ground level, but the impact of the proposal is bound to increase as one ascends to higher levels in any building in the vicinity of the Proposal.

When one examines the Views from Mountjoy Street, (View 32), the impression is of nothing less than an ocean-liner or cruise ship atop a tall building. North Great Georges Street, an exercise in classical planning with Belvedere House as a vista-closer at the end of a rising street, is now to have two hundred years of civic planning undone by the impact of this Proposal lurking to one side, behind and above Belvedere House.

4. Conclusion

This is a truly colossal building, and the final selected building form cannot be fairly said to make any architectural concessions to it's surrounding environment. However, I believe that the impact on the surrounding environment is significantly greater than normal, simply because of the bulk of the proposal, and the elevated site upon which it is proposed to be sited. The comprehensive application prepared by the applicants, which can permit the assessment of such a huge building on the city, from so many viewpoints is commendable insofar as it demonstrates the potential negative impact on a significant proportion of the north city.

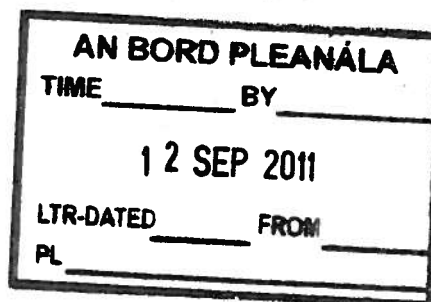
My concern is that this element of Architectural heritage the north Georgian core, having survived for two hundred years largely in an externally unaltered form, will now be severely compromised by this proposal, which will alter these settings forever.

There is no doubt that such a facility is necessary for the country. That it is to be located in the city is also to be welcomed. Such a dense, intense development is not appropriate for such a confined site. Whether the site will offer sufficient opportunity for later expansion/diversification as medical requirements change is not for me to say. However, I believe that An Bord must consider this Application very carefully, in terms of the impact it will have on the city, which is seeking to have itself recognized as a World Heritage Site, on the basis of it's Georgian Architectural Inventory.

I thank the Bord for the opportunity to make these Observations, and enclose the appropriate Fee for the consideration of this submission.

Yours Sincerely


Nuada Mac Eoin



¹ See Christine Casey "Dublin", (pages 200-201) Yale University Press, and John Heagney "The Georgian Squares of Dublin", (page 35), Dublin City Council.