

Inspector's Report ABP-302881-18

Development Proposed Parnell Square Cultural

Quarter comprising of new Dublin City Library and associated public realm

and site works

Location 23-28 Parnell Square (former Coláiste

Mhuire School) and 20-21 Parnell Square (all Protected Structures), Parnell Square North, Dublin 1

Planning Authority Dublin City Council North

Applicant(s) Dublin City Council & PSQ

Developments Ltd. (joint applicants)

Type of Application Section 175 Planning Application

Observer(s) 1. Fáilte Ireland

2. An Chomhairle Ealaíon

3. National Transport Authority

4. Transport Infrastructure Ireland

Dates of Site Inspections 16th January & 8th March 2019

Inspector Donal Donnelly

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1.0 Introduction

- 1.1. This report relates to an application to the Board seeking approval for the Parnell Square Cultural Quarter including the new Dublin City Library and cultural facilities and associated public realm works at Parnell Square North, Dublin 1. The application is being made by Dublin City Council and PSQ Developments Ltd. (joint applicants) pursuant to Section 175 of the Planning and Development Act, 2000 (as amended); an Environmental Impact Assessment Report (EIAR) has been prepared in respect of the proposed development. The application is also accompanied by the following:
 - Planning application report;
 - 3D and 2D scale models;
 - Architectural, engineering and landscape drawings;
 - Architectural Design Statement;
 - Protected Structure Impact Assessment;
 - Public Realm and Landscape Report;
 - Traffic and Transport Assessment;
 - Other reports relating to drainage, flooding, building sustainability, construction and waste management, traffic and travel;
 - Appropriate Assessment Screening Report;
 - Schedule of prescribed bodies;
 - Letters of support; and
 - http://parnellsquare.ie/
- 1.2. Before making a decision in respect of a proposed development, the Board shall consider the EIAR, any submissions or observations and any other information relating to (i) the likely effects on the environment of the proposed development, and (ii) the likely consequences for proper planning and sustainable development in the area in which it is proposed to situate the proposed development. It should be noted that a total of four submissions on the application were received from Fáilte Ireland,

- An Chomhairle Ealaíon, the National Transport Authority and Transport Infrastructure Ireland.
- 1.3. Under Section 175(9)(a), the Board shall make its decision on the application within a reasonable period of time and may, in respect of such application:
 - (i) approve the proposed development,
 - (ii) make such modifications to the proposed development as it specifies in the approval and approve the proposed development as so modified,
 - (iii) approve, in part only, the proposed development (with or without specified modifications of it of the foregoing kind), or
 - (iv) refuse to approve the proposed development,

and may attach to an approval under subparagraph (i), (ii) or (iii) such conditions as it considers appropriate.

2.0 Site Location and Description

- 2.1. The subject site located on the northern side of Parnell Square in Dublin City Centre comprises an area of approximately 1 hectare. Parnell Square is situated at the northern end of city centre civic spine that extends through O'Connell Street, College Green and onto Christchurch. The square was developed around the Rotunda Hospital and is the oldest of the five Georgian Squares that were constructed in Dublin between 1750 and 1830.
- 2.2. Parnell Square was built in stages around pleasure gardens developed to provide funding for the hospital. Cavendish Row to the east was the first side to be laid out between 1753 and 1785 and Granby Row and Palace Row (Parnell Street North) were constructed by 1766 to complete the Georgian Square. Charlemont House (Hugh Lane Gallery), developed as a mansion on higher ground overlooking the pleasure gardens, forms the centrepiece to Parnell Square North.
- 2.3. The subject site includes all of the surface area of Parnell Square North bounded by the Garden of Remembrance (1966) to the south and including the pedestrian crossings on Parnell Square East and Granby Row to the west. The site also includes no's. 23-28 Parnell Square North (former Coláiste Mhuire School) and lands to the rear thereof, including the hexagonal 1960s theatre (Amharclann) building, a

- section of Frederick Lane North and no's. 20-21 Parnell Square North (former National Ballroom). The 8 no. 4-storey over basement Georgian buildings within the site fronting Parnell Square North are all protected structures and all are currently vacant.
- 2.4. The Hugh Lane Municipal Art Gallery is located between No's. 23 and 21 Parnell Square North. To the east of no. 20 Parnell Square North adjoining the site is the Irish Writers' Centre at No. 19, the Dublin Writers' Museum and Chapter One restaurant at No's. 18/ 19 and Abbey Presbyterian Church (Findlater's Church) at the eastern end. The north-western part of the site is adjoined by Parnell Court and No. 1 Granby Row, both of which are in office/ residential use. Sheridan Place flats are situated to the north of the site.
- 2.5. The existing roadway at Parnell Square North accommodates eastbound one-way traffic. There is angled parking on both sides of the road to the east and south and parallel parking on the north-eastern side. The roadway splits into separate lanes at the eastern end for north, east and south-bound traffic onto Frederick Street North, Gardiner Row and Parnell Square East respectively. The road width is approximately 15m including parking areas. There is a large corner radius at the western end of Parnell Square North which I estimate to be approximately 36m. This facilitates clockwise direction traffic around the square.
- 2.6. A Dublin Bike station is situated at the eastern side of Parnell Square North on the northern side and there is a bus stop outside no's. 20 and 21. A number of bus services operate from or through Parnell Square North, including a number of Dublin Bus services and routes to Donegal and Monaghan. There are two Donegal services operating two to five services daily and one Monaghan services operating one to four services daily. These services pick up from Parnell Square North only.
- 2.7. Parnell Square North also acts as a stop for a number of "hop-on hop-off" bus city tour operators including DoDublin Dublin Bus Tours, City Scape, City Sightseeing Dublin, Ghost Bus Tours, Big Bus and Finn McCool Tours. The Airlink Express stop at this location is no longer in operation effective from 3rd December 2018. Generally, the city bus tours operate every 15 minutes from 9am to 5pm and regional tours pick up in the morning and drop off in the evening.

3.0 **Proposed Development**

- 3.1. Planning permission is sought for the proposed Parnell Square Cultural Quarter comprising of a new Dublin City Library (c. 11,198 sq.m.) and associated public realm and site works. The proposal can be summarised as follows:
 - Change of use and adaptive reuse of no's. 20-21 and no's. 23-28 Parnell
 Square North (all protected structures) to new central library (relocated from
 llac Centre), cultural uses and a restaurant at ground floor level of no. 28.
 - Construction of a new 5-storey over basement extension to the rear of no's.
 23-28 to include demolition of existing Amharclann building, single storey
 atrium and 2-storey rear return. The new extension will include a main
 reading hall comprising a high central volume space surrounded by
 mezzanine levels, together with roof gardens, a terrace and an auditorium
 with seating capacity of 200.
 - The mix of new library spaces will include the main lending and reference library; a children's and young adults' library; a story house (literature centre); conference and exhibition spaces; a learning suite (digital media hub and online learning centre); a music hub; and innovation hub.
 - Amendments and adaptations to existing protected structures to include removal of front steps and enlargement and extension of existing door openings downward to pavement level at No. 21 & 27 to facilitate level entry to houses with graded ramps entering the building; formation of new openings between party walls and on rear façade of buildings to accommodate interconnection with new build; removal of stairs, provision of new stairs and installation of a lift; removal of partitions; removal of floors and replacement of roofs; removal of 1st floor balcony across facades of no's. 20 and 21; localised areas of fabric removal to accommodate services and infrastructure elements; retention, repair and upgrade of any sound joinery of architectural heritage value; and alterations to front basement areas and enclosing railings, plinth walls, removal of modern stairs and insertion of new stairs.
 - Provision of a new public realm area to include widening of footpaths; removal
 of 47 no. car parking spaces; reconfiguration and narrowing of roadway

maintaining 2 no. one-way east-bound carriageways; provision of raised table crossings at eastern and western ends and in the centre of the public realm area; repaving of entrance to Garden of Remembrance; lighting and street furniture including new fountain feature; reconfiguration of existing pedestrian crossing on Parnell Square East and West; and relocation of Dublin Bikes Station and provision of 100 no. cycle parking spaces.

 Provision of rear pedestrian access to library and vehicular access to new service yard from Bethesda Place and Frederick Lane North.

4.0 **Planning History**

An Bord Pleanála Ref: 29N.JS0012

- 4.1. Scoping request for EIS for city library, cultural facilities and works to the public realm at Parnell Square North, Dublin 1. Scoping opinion issued 4th March 2014.
 Dublin City Council Reg. Ref: 1429/02
- 4.2. Permission was granted for demolition of structures to the rear of no's. 20/21 Parnell Square North and Charlemont House and the construction of a new 2/3 storey over basement extension to accommodate additional gallery space, basement cafe, bookshop, resource facilities, disabled lift and children's studio, together with new toilets, circulation and reception for the Hugh Lane Municipal Gallery of Modern Art.
- 4.3. The proposal also included the restoration and conservation of No's. 20 and 21 Parnell Square North for office use and the change of use of the ground and basement floors of No's. 20 and 21 Parnell Square North from dance hall to office use.

Dublin City Council Reg. Ref: WEB1196/12 (PL29N.242067)

- 4.4. Permission refused in November 2013 for a memorial to the victims of abuse in institutions at the Garden of Remembrance comprising a covered walkway, civic area, and gated opening in railing on Parnell Square West.
- 4.5. The reasons for refusal related to the distraction and transformation of the architectural coherence of the space and the adverse impact on the setting, character and function of the Garden of Remembrance.

- Dublin City Council Reg. Ref: 5620/05
- 4.6. Permission under Part 8 for a new pedestrian entrance to the Garden of Remembrance from the north side of Parnell Square opposite the Hugh Lane Gallery.
 - Dublin City Council Reg. Ref: 3603/16
- 4.7. Permission granted for 3 no. apartment units at Parnell Court, 1 Granby Row (Protected Structure), a three storey building previously in office/educational use. The development also involved works to remove a spiral staircase to the rear of the building, a new window to rear at both first and second floor levels and landscaping amenity works to rear courtyard.
 - <u>Dublin City Council Reg. Ref: 2137/17</u>
- 4.8. Permission granted for 1) demolition of the existing rooftop plant-room and its replacement with a new penthouse floor with 16 bedrooms; 2) the addition of a new floor; 3) the change of use of No's 3, 4 & 5 Granby Row from residential use to hotel use; 4) the linking of No's 3, 4 & 5 Granby Row to the existing hotel; and 5) the infilling of the courtyard behind No's 4 & 5 Granby Row as a glass roofed lounge. No's 3, 4 & 5 Granby Row are protected structures.

5.0 **Policy Context**

- 5.1. Dublin City Development Plan, 2016-2022
- 5.1.1. The subject site is zoned "Z8 Georgian Conservation Areas" where the objective is "to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective."
- 5.1.2. The majority of the site is within a designated conservation area, which extends over Parnell Square and O'Connell Street. All 12 buildings along Parnell Square North, including No's. 20 & 21 and 23 28 are protected structures. The site is also within a Zone of Archaeological Interest.
- 5.1.3. Objective CHCO32 seeks "to promote and facilitate the development of a mixed-use cultural facility in Parnell Square anchored by a new City Library, stimulating the regeneration of the north inner city."

- 5.1.4. The civic spine is defined in the Development Plan as "a route through the city centre along which the city's primary civic, cultural and historic attractions are located. The route is from Parnell Square, through O'Connell Street, College Green to Christchurch Place with a southern extension from College Green to Grafton Street and Stephen's Green and an eastern extension from College Green to Merrion Square." It is a policy of the Council (SC2) "to develop the city's character by cherishing and enhancing Dublin's renowned streets, civic spaces and squares; to create further new streets as part of the public realm when the opportunities arise; to protect the grain, scale and vitality of city streets; to revitalise the north and south Georgian squares and their environs, and to upgrade Dame Street/ College Green as part of the Grand Civic Spine."
- 5.1.5. It is recognised in Section 4.5.5 The Public Realm that the proposal to create a new cultural quarter at Parnell Square, to include the relocation of the City Library from the Ilac Centre will significantly expand the public's perception of the city core, and will create a new destination point in the city.

5.2. Transport Strategy for the Greater Dublin Area 2016-2035

5.2.1. It is recognised in Section 3.2.5 of this Strategy that footpaths in the city centre are often substandard. Waiting and crossing times at pedestrian crossings are also factors which render the walking experience sub-optimal. To address the issues faced by pedestrians, a number of aims and measures are included in Section 5.7, such as the widening of footpaths and the removal of uneven surfaces and obstructions; implementation of pedestrianisation schemes; reduction of crossing distances and pedestrian waiting times; and maintenance of permeability and accessibility to public transport stops.

5.3. Architectural Heritage Protection: Guidelines for Planning Authorities, 2011

- 5.3.1. These Guidelines set out advice and recommendations relating to the protection of structures and the preservation of the character of architectural conservation areas. Guidance is also offered on determining planning applications that affect protected structures and the framing of conditions in a planning permission.
- 5.3.2. Extensions, material change of use and demolition are some of the general types of development under which advice is contained. In this regard, it is stated that it may

be appropriate to permit appropriate new extensions to protected structures to keep them in viable economic use. It is also recognised with respect to material change of use that the best way to prolong the life of a protected structure is to keep it in active use. Where partial demolition of a protected structure is proposed, the applicant shall demonstrate that this part of the building does not contribute to the special interest of the whole, or that demolition is essential and will allow for the proper conservation of the whole structure.

5.4. **Design Manual for Urban Roads and Streets, 2013**

5.5. This Manual seeks to provide guidance on how to approach the design of urban streets in a more balanced way. It sets out an integrated approach to promote better street design by slowing traffic speeds and by encouraging careful place making, quality public realm, and walking and cycling. The principles, approaches and standards set out in the Manual apply to the design of all urban roads and streets with a speed limit of 60 km/h or less.

5.6. Dublin City Centre – Public Realm Study and Implementation Plan, 2016

- 5.6.1. The Heart of Dublin: A Masterplan for the City Core (Chapter 4) identifies gaps to be filled in order to deliver a unified pedestrian-friendly core. The Parnell Square Cultural Quarter Project and others will be retained as flagship projects for the city.
- 5.6.2. The Masterplan also sets out a series of recommendations, including the following:
 - Apply principles of Universal Design
 - To improve and expand the existing pedestrian network within the city core.
 - To reallocate space at identified locations to provide adequate provision for pedestrian comfort.
 - To integrate opportunities for lingering in public realm plans for the city core.
 - To develop a transport strategy that facilitates the longer-term ambition to create a pedestrian friendly core by reorganising bus routes to minimise traversing of the city centre.

5.7. Natural Heritage Designations

5.7.1. The subject site is approximately 2.5km west of the South Dublin Bay and River Tolka Estuary SPA and 4km north-west of the South Dublin Bay SAC. The Royal Canal proposed Natural Heritage Area is approximately 850m to the north.

6.0 Consultations

6.1. The following submissions were received by the Board following notification of prescribed bodies of the application, advertisement of the proposal and invitation for observations under Section 175 of the Planning and Development Act, 2000 (as amended):

Fáilte Ireland

- In 2017 investment through a vibrant tourism sector was worth €2.7 billion in revenue as tourist trips to Dublin reached 7.6 million – 65,000 jobs were supported by tourism in 2017.
- In order to reach growth targets and to compete internationally, Dublin must continuously enhance its visitor offer by creating new and exciting experiences for visitors to the city.
- Current projections indicate that overseas visitor numbers in Dublin are set to grow by more than 8% year on year in 2018 and will reach 6.9m by 2022.
- Proposal for the development of the Parnell Square Cultural Quarter will
 assist in attracting more visitors to the north side of the city, to what is one of
 Dublin's most intact and finest Georgian Squares proposal will also
 stimulate further regeneration of the north inner city.
- Proposed new city library and public realm works will significantly expand visitor's perception of the city centre and create a new destination in the city.
- Proposal will reinforce Parnell Square as a cultural and literary hub which is underpinned by attractions such as Dublin Writer's Museum, the Hugh Lane Gallery, the Irish Writer's Centre and the nearby James Joyce Centre.

 Dublin was designated a UNESCO City of Literature in 2010 and these attractions showcase Dublin's unique literary heritage and are important visitor attractions.

An Chomhairle Ealaíon

- Arts Council is broadly in favour of the proposed development which seeks to combine the past uses and future change of use into a consolidated cultural centre, thereby creating an optimum use of current and historical social and cultural infrastructure.
- Interior of proposed library is of a civic scale; grandeur and excitement that is unprecedented in Dublin.
- Spatially complex interior will be open to all citizens and will directly place architecture of the highest quality in direct contact with the public.
- Arts Council is supportive of developments which serve to contribute to increased cultural activity, footfall and public engagement.
- Proposal will have beneficial impact on organisations in the area supported by The Arts Council including the Irish Writers Centre, The Gate Theatre, Poetry Ireland, Children's Books Ireland and Na Piobaire Uillean.
- Proposed development appears to reclaim the area's historical use by consolidating many existing uses and providing new cultural uses.
- Public realm echoes the traditional form of a public and civic square –
 proposed shared surfaces, deletion of car parking, provision of bicycle spaces
 and public transportation links, provision of informal and formal seating and
 provision of a fountain are all positive developments which accentuate the
 importance of such a cultural use.
- Proposed development, through its interior and external alterations would return an important portion of Parnell Square back to its former significance.
- A well-designed public realm draws people to the location and facilitates its use as a public square.

National Transport Authority

- In relation to the Dublin Area Bus Network Redesign, Parnell Square is likely
 to remain a critical link in the bus network for high frequency through-services
 and some level of terminus services. Most frequent services would be
 focused on east and west side with some less frequent radial services routing
 along Parnell Square North.
- Some high frequency services may need to use Parnell Square North on occasion and as such it is essential that it remain open to public transport traffic.
- It is essential that details of the interface between the Core Bus Corridors
 (east and west side) and the proposed development are agreed between the
 applicant and the NTA prior to commencement of development in the event of
 a grant of permission.
- Proposal to significantly increase the amount of roadspace dedicated to pedestrian movement in a key city centre location is consistent with measures set out in Section 5.7 of the Transport Strategy for the Greater Dublin Area, 2016-2035.
- There is potential to improve the design by reducing the vehicular entry from Parnell Square West from two lanes to one, with the carriageway then widening out to two lanes at an appropriate point to accommodate bus dropoff – this is of particular importance because the proposed pedestrian crossing at this point is uncontrolled.
- NTA recommend the granting of permission subject to conditions that
 maintain the movement of buses on Parnell Square North, revise the design
 to single lane vehicular movement and require NTA to be consulted in
 advance of commencement of works.

Transport Infrastructure Ireland

- No observations on the proposal.
- Consultation should be made with the NTA with regards to Metrolink.

6.1.1. The applicant's agent's response to the above submissions/ observations welcomes the positive sentiments in respect of the proposed development. The applicant also confirms that there is no objection to the NTA's request that it is consulted, and to the possibility of reducing the vehicular entry width from Parnell Square West to Parnell Square North at the uncontrolled pedestrian crossing point.

7.0 Assessment

- 7.1. In my opinion, the main issues to be addressed under this assessment are as follows:
 - Development principle;
 - Built heritage and impact of proposed extension and alterations;
 - Public Realm and Amenity;
 - Transport and Movement;
 - Environmental Impact Assessment;
 - Appropriate Assessment;
 - Conclusion.

7.2. Development Principle

- 7.2.1. The subject site is zoned "Z8 Georgian Conservation Areas" where the objective is "to protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective." It is an aim of this zoning objective to maintain and enhance Georgian Conservation Areas as active residential streets and squares during the day and at night-time. In addition, a range of uses are permitted that will protect the architectural character/ design and overall setting of such areas. Cultural/ recreational buildings/ uses are permissible under this zoning objective and the proposed library use would fall under this category of development.
- 7.2.2. Section 11.2 of the Development Plan notes that the city's cultural wealth is developed through reinforcement of existing cultural quarters, nurturing of new cultural initiatives and enabling of access to cultural development at a local level. It

- is highlighted that the Dublin Writers' Museum, Dublin City Gallery The Hugh Lane, The Irish Writers' Centre and the proposed new City Library project culturally underpin the Parnell Square Cultural Quarter and the rejuvenation of O'Connell Street. The proposed development will be the catalyst for the emergence of this new cultural quarter and this is reflected under Objective CHCO32 which seeks "to promote and facilitate the development of a mixed-use cultural facility in Parnell Square anchored by a new City Library, stimulating the regeneration of the north inner city."
- 7.2.3. The subject site is located at the northern end of the city's grand civic spine along which the city's primary cultural and historic attractions are located from Parnell Square through to Christchurch. The site is also within the north inner city where important linkages will be created with the local community, nearby regeneration projects and the Technological University of Dublin Grangegorman Campus. Fáilte Ireland outlined the benefits of the proposal in attracting more visitors to the north side of the city to what is one of Dublin's most intact and finest Georgian Squares. It is also considered that the proposal will stimulate further regeneration of the north inner city. An Chomhairle Ealaíon notes that the proposal seeks to combine the past uses and future change of use into a consolidated cultural centre, thereby creating an optimum use of current and historical social and cultural infrastructure. No submissions were received by the Board against the proposed development.
- 7.2.4. Having regard to the above, the proposed development is in accordance with aims and objectives of the Dublin City Development Plan, 2016-2022 and is therefore acceptable in principle subject to an assessment of the proposal under other relevant Development Plan criteria and ministerial guidelines. The potential exists for Parnell Square North to develop as a destination where many cultural facilities and activities are co-located to give a special character to the area. Any issues relating to the proposed public realm works, the status of the buildings on site as protected structures and movement patterns in the vicinity of the site are assessed in further detail hereunder.

7.3. Built Heritage and impact of proposed extension and alterations

7.3.1. The site is occupied by No's. 20 & 21 and No's. 23-28 Parnell Square North, all of which are protected structures. The majority of the site is within a designated

- conservation area that extends over Parnell Square. The "Z8 Georgian Conservation Area" zoning applies to the properties on site.
- 7.3.2. The impact of the proposed development on architectural heritage is assessed in detail under the Environmental Impact Assessment below. The visual impact of the proposed extension is also assessed under the Landscape and Visual section of the EIA.
- 7.3.3. In terms of impact on built heritage, it is concluded in the EIA that the proposed development will give rise to positive and negative impacts on the protected structures and the conservation area zoning, and that the negative impacts are necessary to adapt the buildings to a new and sustainable use. The main interventions to the historic fabric of the protected structures will be the construction of the new 5-storey over basement extension to the rear of No's. 23-28 and alterations to existing buildings for universal access. In particular, it is proposed to amend the existing entrance to No. 27 as the main access to the library, which will involve the removal of entrance steps and insertion of a new larger doorway with modern surround. The proposed extension will necessitate the demolition of the original rear return to No. 23 and the alteration of rear elevation windows to provide bridge connections between the old and new structures.
- 7.3.4. It is advised within Architectural Heritage Protection Guidelines that new extensions or material changes of use to protected structures may be appropriate to keep them in viable economic use, thereby prolonging their life. In this case, the currently vacant and unused protected structures will gain a new and sustainable function rather than remaining unused and subject to continuing decay. The proposed restoration, extension and reuse will therefore allow for the proper conservation of the protected structures, thereby positively impacting on the conservation area surroundings and the public realm in this area.
- 7.3.5. With respect to visual impact, it has been demonstrated within planning application drawings, photomontages and the 3D model of the proposed development that the proposed extension will be well concealed to the rear of No. 23-28. The extension will have the effect of filling the visual gap between No. 23 and Charlemont House; however, the corresponding gap to the east of the Charlemont House façade is also filled by the glazed extension to the Hugh Lane Gallery. There may be some minor

- changes to the roofscape of No. 23-28, and part of the side elevation of the new extension may be visible from Granby Row behind protected structures. Overall, however, the extension has been designed to remain subordinate to the protected structures and imperceptible when the main façade is viewed from the front.
- 7.3.6. Internally, the proposed library with 11,198 sq.m. of gross internal floor area is appropriate in terms of scale¹ and effect for its status as the central library of the capital city. As noted in planning application documentation, there is an overall architectural coherence for the new library complex that ensures visual clarity/ distinction between old and new elements. The rear elevation of the protected structures will be visible within the library atrium and various bridges will connect with the extension. This will ensure proper integration, as well as an adequate degree of visual separation.
- 7.3.7. The new build will be contemporary and grand in appearance. A high central volume lit from above will be surrounded by mezzanine levels offering overhead views of the main reading hall. The large scale of the extension will be in contrast to the intimate rooms within the protected structures. This provides opportunities for a good mix of library uses including the main lending and reference area, a children's library at basement level, conference and exhibition space, digital and music hubs, and an auditorium and roof gardens at the top levels.
- 7.3.8. In general, I would be of the opinion that the overall design of the proposed central library is commendable and of the highest standard. The proposed use is appropriate for the protected structures and the special interest, character and setting of the buildings will be protected into the future. Significant alterations necessary to equip the structures for modern use are being carried out to the less intact buildings and the overall restoration works, including repair of roof, brickwork, original windows and joinery will result in significant benefit to the built heritage of the structures themselves and the Georgian core of the city.
- 7.3.9. Policy CHC2 of the Development Plan seeks to ensure that new development shall conserve and enhance protected structures and their curtilage through protection/ restoration of the form, features and fabric that contribute to the special interest; incorporate high standards of craftsmanship; be highly sensitive to the historic fabric

¹ The DLR Lexicon has a floor area of 6.520 sq.m.

- and special interest of the interior; not cause harm to the curtilage of the structure; protect the building during the course of works; and have regard to ecological considerations.
- 7.3.10. I would be satisfied that the proposed development complies with this policy. The proposed works to the protected structures will be carried out in compliance the requirements of the Planning Authority and Conservation Officer. A Protected Structures Impact Assessment accompanies the planning application and this document details the significance of buildings and outlines a schedule of proposed works for all elements of each protected structure. Construction methods will be sensitive to the age and extent of the buildings and works will be carried out in compliance with a construction management plan. Finally, I consider that the design, form, scale, height, proportions, siting and materials of the proposed extension successfully relate to and complement the special character of the protected structures.

7.4. Public Realm and Amenity

- 7.4.1. As part of the Parnell Square Cultural Quarter, it is proposed to carry out public realm works along Parnell Square North to include a reconfigured surface providing a 2-lane vehicular road; widened footpath on the northern side; raised table pedestrian crossings to provide traffic calming and pedestrian priority at both street ends and in the centre; provision of paved surfaces throughout, street furniture and cycle parking; removal of car parking; and relocation of Dublin Bikes facility.
- 7.4.2. It is recognised in the Development Plan that the proposal to create a new cultural quarter at Parnell Square to include the relocation of the City Library from the Ilac Centre will significantly expand the public's perception of the city core and create a new destination point in the city. The proposed public realm works are therefore an essential element of the proposal to create a cultural quarter where the majority of visitors will arrive on foot.
- 7.4.3. At present there are a number of attractions along the northern side of Parnell Square North; however, their combined appeal is insufficient to draw large numbers from the city centre. This may be caused by the internal layout of Parnell Square resulting in a visual barrier, the rise in gradient on Parnell Square East and West and/ or the unduly wide carriageways around the square. Notwithstanding this, there

- is a regular existing daytime presence in the area from people visiting the Garden of Remembrance and the Hugh Lane Gallery, and to a lesser extent, the Irish Writers' Centre, the Dublin Writers' Museum, Chapter One restaurant and Findlater's Church.
- 7.4.4. The proposal will result in a significant change in the character and vibrancy of Parnell Square North. At an estimated 3,000 visitors per day², the new central library will be the largest attractor of people to the area. The Hugh Lane attracted 167,410 visitors in 2017 and it is the goal set out in "Dublin City Gallery, The Hugh Lane Five Year Strategy 2018-2023" to more than double visitor numbers.
- 7.4.5. The proposed public realm works are also likely to attract significant numbers to the area in its own right. The surface area is elevated above lands to the south, thus benefiting from a southern aspect and sheltered surroundings, and there are no overshadowing buildings to the southern side. The street area therefore has the potential to become a pleasant people-friendly open space. The proposed library will be encouraged to "spill out" onto the widened footpath through the provision of the ground floor café/ restaurant and a possible outdoor WiFi zone. Outdoor usage will also be encouraged by the presence of benches, public art, a water fountain, and events such as markets, performances, etc. As noted in Section 11.2.5.5 of the Development Plan (Culture in the Public Domain), "public spaces should be capable of accommodating civic activities such as markets, festivals and events which allow for an animated urban landscape, by day and by night, on a year-round basis. The addition of public art into the urban landscape further enhances its attractiveness and can add greatly to the creative city."
- 7.4.6. The proposed public realm area also has the potential to provide an on-street historic Georgian experience that is largely free from the dominance of traffic. At present, there are few other quiet street locations along the main civic spine in Dublin that benefit from a southerly aspect and can provide a relaxing environment for pedestrians to linger, look around and view the surrounding architectural heritage in comfort. In addition, the opening hours of the new library are expected to be from 9am-9pm Monday to Friday, and 9am to 5pm Saturday and Sunday. The facility will therefore encourage a greater degree of evening and weekend activity in the area.

 $^{^{\}rm 2}$ The DLR Lexicon Library attracted 525,708 visitors in 2017

- A lighting plan is proposed for the public realm that will include the usage of existing heritage lighting fixtures, tree uplighters, linear bench down-lighters and fountain lighting.
- 7.4.7. As well as people using the public spaces and buildings along Parnell Square North, those passing through the new public area will also help to enliven the space. It is therefore essential that pedestrian desire lines are properly accommodated. The most notable new link will be through the library itself, where a connection will be created from Dorset Street to the new public realm area. I would be concerned, however, that the pedestrian crossings that will provide access to Parnell Square North are not properly positioned or of sufficient prominence to encourage direct or casual access to the new space. In particular, the crossing on Granby Row does not follow the pedestrian desire line from the eastern side of Parnell Square East to the new public area.
- 7.4.8. The large kerb radii at both ends of Parnell Square North in effect results in the public space being extended southwards. This will have the positive effect of drawing people from the direction of the city into the new public outdoor area. However, the attraction of this space could have been improved through the usage of raised junction tables and paved surfacing out onto eastern and western sides of Parnell Square.
- 7.4.9. My other main concern regarding the proposed public realm scheme is the continued presence of traffic along the proposed 6m wide carriageway during times when it is most appealing to pedestrians. This is addressed in more detail below under transport and movement. However, in terms of the impact on public realm, I would be of the opinion that this undermines the status of Parnell Square North as a public plaza and retains the adverse impacts associated with vehicular traffic including dominance, noise, fumes, traffic safety and severance. In effect, no restrictions are proposed on buses, coaches, taxis or private vehicles entering the area. Indeed, the additional footfall in the area may make it more appealing to passing taxis plying for hire. Buses passing or halting in a public area also tend to have an oppressive and overbearing impact on pedestrians due to their size and noise. This will create an adverse visual impact and interfere with the experiences of visitors and people relaxing in the area.

- 7.4.10. A number of options were studied as part of the planning application process and these are presented in an Option Assessment Report. These included full pedestrianisation, a public transport only single carriageway, and existing transport modes retained. A number of criteria were applied to the analysis of each of these scenarios. Under design context, matters such as functionality, homogeneity, legibility, forgiveness and self-awareness were assessed. The pedestrianisation and cycle only option performed best in this regard. However, this option scored lowest under the traffic criterion due to proposed restrictions on through traffic on Parnell Square North.
- 7.4.11. I accept that the proposed surface reconfiguration is an improvement over the current situation. Car parking is removed and the large kerb radius at the junction of Parnell Square West & North is reduced and this will have the effect of lowering traffic speeds entering Parnell Square North. The paved road surface and raised crossing tables will introduce a degree of traffic calming, notwithstanding the fact that the proposed carriageway width at 6m is similar to the existing. However, from a public realm viewpoint, the creation of a fully pedestrianised public plaza would give rise to the greatest benefit to users of the new library and cultural quarter. There will be sufficient attractions around the new public space in the form of the library, gallery, museum, restaurants, church and the garden of remembrance, as well as the nearby hospital and new university campus. The architecturally and historically significant setting in a sheltered and sunlit location between the city centre and inner city could all contribute to the emergence of busy, active and successful urban plaza in the absence of traffic. It was also concluded within the Architectural Heritage section of the EIAR document accompanying the planning application that full pedestrianisation is preferred from a conservation perspective. Furthermore, in terms of air quality and human health, landscape and visual impacts, it was determined in the EIA that the removal of vehicular traffic would give rise to positive benefits.
- 7.4.12. Overall, I consider that the proposal before me represents an acceptable contribution towards place-making that will generate a largely positive impact on the amenities of the area. The proposed public realm can create a new destination at a strategically important landmark that forms one end of the city's grand civic spine. Indeed, these works are essential to the success of Parnell Square Cultural Quarter as a people-

friendly sustainable urban destination. The area will see increased vibrancy, footfall and activity; however, the design and layout still allows for conflicting transport movements through Parnell Square North. In this regard, any proposal should be developed in accordance with the advice contained in the Design Manual for Urban Roads and Streets, which places the pedestrian at the top of the movement hierarchy.

7.4.13. Notwithstanding, and having regard to the above, I would be satisfied that the proposed public realm works are consistent with Development Plan Policy SC2, which seeks "to develop the city's character by cherishing and enhancing Dublin's renowned streets, civic spaces and squares; to create further new streets as part of the public realm when the opportunities arise; to protect the grain, scale and vitality of city streets; to revitalize the north and south Georgian squares and their environs, and to upgrade Dame Street/ College Green as part of the Grand Civic Spine."

7.5. Transport and Movement

- 7.5.1. As noted above, the proposed development involves the reordering of Parnell Square North to improve pedestrian conditions and the public realm, mainly by way of widening of footpaths and providing additional pedestrian crossing opportunities. This will largely be achieved through removal of 47 no. on-street car parking spaces and the reduction of kerb radii at both ends of Parnell Square North. The existing unmarked traffic lanes will be replaced with two clearly defined traffic lanes of similar width. The existing bus stop on the northern side will be retained and the disabled parking spaces, an e-parking bay and the Dublin Bike station will be relocated. A total of 100 new bicycle parking spaces are proposed.
- 7.5.2. A transport analysis was carried out of four potential options for Parnell Square North (do-minimum, 2-lanes, 1-lane and closed to all traffic) using the NTA Eastern Regional Model. An average increase of 1.5 minutes is seen for routes travelling via Parnell Square West if Parnell Square North is closed to traffic. The overall difference in journey times between the "do minimum" scenario and the options comprising two lanes and one lane of traffic is marginal.
- 7.5.3. An assessment of local junctions was also carried out using the LinSig model. In all scenarios, including pedestrianisation, the degree of saturation does not exceed 90%. It is noted that larger queues are formed on Frederick Street North if Parnell

- Square North is closed to traffic but the total delay to this arm of the junction is reduced given that it would have a longer green time. The option of two lanes performs better than a single lane in terms of potential queues and delays at the proposed junctions. The 2-lane option was chosen for the proposed development and in traffic terms, existing services, routings and capacities are not greatly altered with this proposal.
- 7.5.4. The Traffic and Transport Assessment (TTA) submitted with the Planning Application considers traffic generation and provides an analysis of the traffic impacts of the proposed development comprising the chosen option. A total of 9 vehicle trips in the AM peak and 16 in the PM peak will be generated. Analysis of local junctions demonstrate that all arms of all junctions will operate efficiently and are not significantly affected by the proposed layout changes and the traffic generated by the proposal. There will be slight delay and queuing during peak traffic hours at the Parnell Square North/ Parnell Square East/ Frederick Street North/ Gardiner Row junction. In terms of parking, on-street spaces are provided elsewhere in the local area and there is multi-storey provision at a number of nearby locations including the Rotunda Hospital, Parnell Centre, Ilac Centre, Moore Lane, the Gresham and at Cathal Brugha Street.
- 7.5.5. With respect to public transport, the TTA estimated as a worst case scenario that a total of 53 bus trips in AM peak and 162 bus trips in PM peak are generated by the proposed development. A total of 11 and 10 AM trips and 30 and 24 PM trips for train/ Dart and Luas respectively are generated. The public transport trips are not predicted to have any impact on the public transport network.
- 7.5.6. The TTA provides an estimation of the future modal split of visitors to the proposed development from survey data collected at the existing central library. A total of 3,070 daily trips to/ from the proposed development will be generated, of which 50% will be carried out on foot. A total of 31% will arrive/ depart by bus, 5% by train, 4% by Luas, 6% by bicycle and 3% by car. These figures demonstrate the importance of the public realm element of the proposed development. One of the main challenges in this case is deciding how street space should be reallocated to best serve all users.

- 7.5.7. The Design Manual for Urban Roads and Streets provides guidance on how to approach the design of urban streets in a more balanced way. It is stated that designers must place pedestrians at the top of the user hierarchy, followed by cyclists, public transport and finally private motor vehicles. Walking is the most sustainable forms of transport and all journeys begin or end on foot. It is a design principle that the quality of the street is measured by the quality of the pedestrian environment.
- 7.5.8. The Design Manual also makes reference to landmarks and civic buildings and spaces, where it is recommended that designers should highlight these focal points by ensuring that pedestrian facilities are adequate to cater for large number of visitors, and that traffic is calmed using surface treatments and other elements that further highlight the importance of the place.
- 7.5.9. As noted, the proposed public realm works will improve pedestrian facilities and calm traffic over and above the current situation. Notwithstanding, I consider that the critical issue is whether or not the proposed works provide for sufficient space and a pleasant experience for pedestrians, whereby traffic is calmed to appropriate levels in the context of the new public realm and all surrounding uses, the location of the site between the city centre and inner city and the architectural and historic significance of the area. I have acknowledged that traffic will be calmed to an extent by the proposed surfacing material, raised informal crossing tables and the reduction in kerb radius at the entry point to Parnell Square North from the west. However, I would still be concerned that a 6m wide one-way 2-lane carriageway will continue along Parnell Square North. There is the issue that the provision of 2 no. one-way lanes will promote faster speeds as drivers do not perceive a risk from on-coming traffic. Furthermore, it is noted in DMURS that designing local streets to cater for buses would require wider streets, which will serve to increase vehicle speeds, thus undermining their place function. The idea that pedestrians would have priority in this area is also jeopardised by 6m wide crossing distance.
- 7.5.10. A submission on the proposed development was received by the Board from the National Transport Authority which refers to the Dublin Area Bus Network Redesign in the context of Parnell Square. In this regard, it is stated that the most frequent services would be focused on the east and west side, with some less frequent radial services routing along Parnell Square North. It is also submitted that some high

- frequency services may need to use Parnell Square North on occasion, and as such, it is essential that it remain open to public transport traffic. The NTA point out that there may nevertheless be the potential to improve the design by reducing the vehicular entry from Parnell Square West from two lanes to one, with the carriageway then widening out to two lanes at an appropriate point to accommodate bus drop-off. This is considered to be of particular importance because the proposed pedestrian crossing points are uncontrolled.
- 7.5.11. In terms of the current and potential usage of Parnell Square North by bus transport, a 12-hour bus traffic count was conducted as part of the TTA. A total of 415 bus movements were recorded eastbound on Parnell Square North, of which 345 turned right onto Parnell Square East. Of the 415 bus movements, 309 were Dublin Bus services. The total number of vehicular movements over this period was 4,560, which included 2,685 car movements and 504 taxis. A total of 95 buses stopped at Parnell Square North during 12 hours from 13 different operators (average 8 per hour). The stop at Parnell Square North is used by a mix of scheduled stage services, tourist sightseeing services, interurban coach services and touring coach services.
- 7.5.12. In my opinion, the impact of traffic removal from Parnell Square North has not been fully established, in particular with respect to the potential re-routing or re-design of bus services. It may be the case that many tourist or coach services using Parnell Square North can be easily re-routed or can continue to/ from an alternative destination/ origin. The NTA consider that it is essential that Parnell Square North should remain available for bus services. However, I note that it is not intended that this part of the square will be used for high frequency services, but rather for lower frequency radial and overspill purposes. The BusConnects Core Bus Corridor emerging preferred route drawings for the Swords to city centre route do not show any proposed works for Parnell Square North.
- 7.5.13. On the one hand, it is unfortunate that the Parnell Square Cultural Quarter project is being decided when there is no certainty with respect to future bus services using Parnell Square North and the surrounding area. At this point, the potential disruption to bus passengers in terms the numbers affected and time delays from bus rerouting in the event of pedestrianisation cannot be accurately determined. However, on the other hand, an opportunity presents itself to design future bus services around what

- should become one of the main destinations along Dublin's grand civic spine.

 Essentially, this would result in the pedestrian being correctly placed ahead of bus transport as per the movement hierarchy set out in DMURS.
- 7.5.14. As noted in the above section relating to the public realm and amenity aspects of the proposed development, I would of the opinion that Parnell Square North provides an ideal opportunity for full pedestrianisation. The proposed 2-lane carriageway does not actually place any restrictions on the quantity of vehicular movements that will travel through Parnell Square North and in my view this will adversely impact on the pedestrian experience. Surveys recorded a total of 4,298 eastbound vehicular movements (excluding cyclists) over a 12-hour period. At an average of approximately six vehicular movements every minute, this is a relatively low volume of traffic. However, it is sufficient to have a significant impact on the character of the public space. There is also the capacity for vehicular growth. The pedestrianisation option would also provide a better opportunity to extend junction tables to the eastern and western sides of Parnell Square, thereby improving pedestrian desire lines and providing a degree of traffic calming on these roads.
- 7.5.15. Notwithstanding, I must assess the scheme before me and having regard to any proposed amendments received within submissions. As a possible compromise solution, the Board may wish to consider the development of Parnell Square North as a shared surface, or alternatively as suggested by the NTA, incorporating a single carriageway only with bus laybys. A reduction in lane width may also provide the opportunity to install a contra-flow cycle lane and would allow for shorter pedestrian crossing distances. Furthermore, the impact of traffic on Parnell Square North could be partly mitigated by restricting the space to public transport use only. One of the benefits of retaining traffic movement through the area would be the continuation of "eyes on the street" outside of library opening hours. Thus, a similar arrangement to the temporary public transport corridor currently operating at College Green may be acceptable, whereby buses, taxis and cyclists only could be permitted to use Parnell Square North during certain hours.
- 7.5.16. In conclusion, my concern is that the retention of traffic and the insistence that Parnell Square North remains available for bus access is being imposed at the location as the dominant theme at the expense of pedestrians and the creation of a people friendly cultural quarter and a desirable and enticing urban space. I accept

that bus transport is particularly critical in a largely suburban style city such as Dublin; however, projects such as Parnell Square Cultural Quarter are essential to the city centre being a destination in the first place. I am not fully satisfied that the impact of this proposal has been fully assessed. The library will attract one million visitors a year but it is unclear as to what extent bus passengers could be affected by the pedestrianisation of Parnell Square North.

7.5.17. Notwithstanding this, and when the transport layout of the proposal is assessed in comparison to the current situation on the ground, and having regard to the potential usage of public realm along Parnell Square North, I consider that the proposed street layout is acceptable subject to amendment as recommended by the NTA that only single lane vehicular movement should be permitted, and this should be dedicated to public transport use only during library opening hours. The widened public space would also reduce the potential for conflicts between pedestrians and cyclists.

8.0 Environmental Impact Assessment

8.1. Introduction

- 8.1.1. Dublin City Council issued an Environmental Impact Statement (EIS) scoping request to the Board on 14th November 2013. The Council noted in the request that the proposal for the city library, cultural facilities and works to the public realm at Parnell Square North comprising an area of c. 1.2 hectare would be sub-threshold for the purposes of Part 10 of the Planning and Development Regulations. However, having regard to the character of the proposed development in an area of significant architectural heritage, an EIS was considered by Dublin City Council at that time to be justified and beneficial to guide the project.
- 8.1.2. A EIS scoping opinion was issued by the Board before the 16th May 2017 when the provisions of Directive 2011/92/EU would have applied. However, the applicant confirms that the broad description of the proposed development has not changed and thus the likely significant impacts and information to be contained in an EIAR should remain consistent for the topics already considered by the Board. It is also noted that scoping for EIAR is not mandatory.

- 8.1.3. Pursuant to Section 175 of the Planning and Development Act, 2000 (as amended), an Environmental Impact Assessment Report (EIAR) has been prepared on behalf of Dublin City Council and PSQ Developments (joint applicants) for the proposed Parnell Square Cultural Quarter. Directive 2014/52/EU amending the 2011 EIA Directive was transposed into Irish legislation on 1st September 2018 under the European Union (Planning and Development) (Environmental Impact Assessment) Regulations, 2018. This application for approval was received by the Board on 26th October 2018 and is assessed under the provisions of the new Directive.
- 8.1.4. An examination has been carried out of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application for approval. A summary of the results of the submissions by prescribed bodies and other observers and the response on behalf of the Planning Authority has been set out at Section 6 of this report. The main issues raised specific to EIA can be summarised as follows:
 - Impacts both positive and negative on architectural heritage;
 - Positive impacts on human health from proposed public realm works;
 - Positive visual impacts from restoration of protected structures and creation of a more visually pleasing streetscape.
 - Adverse archaeological impacts from site excavations;
 - Adverse impacts on population and human health during the construction phase from noise, vibration, dust, traffic and visual impact.
 - Adverse impacts in terms of overshadowing, in particular on adjoining properties to the north.
- 8.1.5. These issues are addressed below under the relevant headings, and as appropriate in the reasoned conclusion and recommendation including conditions.
- 8.1.6. I am satisfied that the EIAR has been prepared by competent experts to ensure its completeness and quality, and that the information contained in the EIAR and supplementary information provided by the applicant, adequately identifies and describes the direct and indirect effects of the proposed development on the environment, and complies with article 94 of the Planning and Development Regulations 2000, as amended.

8.2. Reasonable Alternatives

- 8.2.1. The EIAR must include a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, as well as an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment.
- 8.2.2. An overview of the alternative sites, designs and processes for the project are provided in Chapter 4 of the EIAR. Consideration of six alternative locations for the new central library are set out, along with the progression of three alternative library design and layout options, and five alternative landscape design and layout enhancements for the public realm along Parnell Square North.
- 8.2.3. In considering the alternative locations for the proposed central library, the selection of the project site has had regard to the "Dublin City Library Project Interim Report on Site Selection, Feb. 2011"; "Parnell Square Cultural Quarter: A Catalyst for Renewal and Growth along the Civic Spine, Vision Document, April 2013" and "Dublin City Council Parnell Square Cultural Quarter: Public Consultation Green Hat Report, 2013". Five other locations were considered at Henry Street, Wolfe Tone Street, Dominick Street, Abbey Street and St. Michan's Street. Parnell Square North was chosen for its ability to deliver on the following essential criteria:
 - Public thoroughfare, visibility and accessibility;
 - Ground floor location or multi-level building:
 - Independence of access;
 - Potential for expansion on the site or into adjoining buildings;
 - Access for disabled parking and deliveries;
 - Proximity to other cultural and educational services.
- 8.2.4. Consideration was also given to the objectives of the Dublin City Development Plan, 2016-2022 and to the fact that the chosen site would lead to the restoration and adaptive use of currently vacant historic buildings.
- 8.2.5. An iterative process was carried out for the new build design approach for the library extension to the rear of no's. 23-28. Consideration of the advantages and disadvantages of an initial option informed the development of subsequent options

- and finally the chosen option, which amalgamated the advantages of the different study outcomes.
- 8.2.6. Public realm works alternative considerations were guided by an Options Assessment Report which considered a (1) 'do minimum' option; (2) 2 no. 3m wide traffic lanes (all traffic); (2A) option 2 with all traffic lane and public transport lane; (3) 1 no. 3m-wide traffic lane (all traffic); (3A) Option 3 for buses, coaches, taxis and cyclists; (4) pedestrianisation. Option 2A was chosen on the bases of the criteria included in the Options Assessment Report.
- 8.2.7. In general, all reasonable alternatives that are relevant to the project and its specific characteristics are clearly presented in the EIAR. The main reasons for the chosen site and the development of the design process are set out, together with the background for the chosen public realm layout and design. Section 7 above provides further detail on this aspect of the proposal. I would be satisfied, however, that this section of the EIAR is sufficient to comply with the provisions of Paragraph 1(d) of Schedule 6 of the Planning and Development Regulations, 2001 (as amended).

8.3. Land Take

8.3.1. The proposed development will occupy an area of approximately 1 hectare. The site comprises public carriageway and footpaths, building footprints and private ancillary space. There is no land take in the sense that the proposed development sees the adaptive reuse of existing properties and public space. There is no displacement of existing uses elsewhere and the proposal will free up space where the existing library is situated.

8.4. Likely Significant Effects on the Environment

8.4.1. This section of the EIA identifies, describes and assesses the potential direct and indirect effects of the project under each of the individual factors of the environment (population and human health; biodiversity; land, soil, water, air and climate; material assets, cultural heritage and the landscape; and the interactions between these factors). In addition to these individual factors, the interrelationship between the factors are identified, described and assessed to reach a stated conclusion in respect of the significant effects.

Population and Human Health

- 8.4.2. Chapter 5.1 of the EIAR describes the general characteristics of human activity in the study area, the likely significant effects of the project on population and appropriate mitigation measures and residual impacts. Chapter 5.2 reviews the existing health status of the areas close to the proposed development, as well as the wider area. Assessment of the impacts of the project on human health should also focus on the human health issues in the context of other environmental factors and the interaction between these factors.
- 8.4.3. The EIAR sets out the demographic characteristics of the study area and identifies the resident population, working population and visiting population as the broad communities likely to be affected within the study area. The population of the identified local area comprising five electoral divisions was 21,662 in 2016, an increase of 9.4% from 2011. The closest residential properties to the project site are at Granby Row (3 no. residential units), Parnell Square West and Sheridan Place and Court.
- 8.4.4. In terms of the working population, 9.92% of the local area were unemployment in 2016 compared to 7.08% at Dublin City level and 6.24% for the State. The existing Central Library in the Ilac Centre employs 40 full time staff and has approximately 1,000 visitors per day. The opening hours are from 10am 8pm Monday to Thursday, and 10am 5pm Friday and Saturday.
- 8.4.5. The most notable visitor attractions within the local area are the Garden of Remembrance, Dublin City Gallery Hugh Lane, Dublin Writers' Museum, Gate Theatre, Ambassador Theatre, the Spire and the GPO. A total of 167,410 visitors were attracted to the Hugh Lane Gallery in 2017.

Characteristics of the Proposed Development

8.4.6. The demolition and construction of the proposed development is expected to take 2-3 years and approximately 100 construction workers will be engaged on site. The proposed library will employ c. 70 no. persons on a full time basis and approximately 3,000 daily visitors will be attracted to the facility. Opening hours are expected to be from 9am-9pm Monday to Friday, and 9am to 5pm Saturday and Sunday.

Potential Impacts of the Proposed Development

- 8.4.7. There is potential for adverse impacts on the residential population during the construction phase from noise, vibration, dust, traffic and visual impacts and these factors are addressed in further detail below.
- 8.4.8. The local working population may be adversely impacted in terms of access and construction nuisance. However, positive impacts may arise from increased local employment and use of local businesses by construction workers. The visitor population may also be affected by construction nuisance and impeded access to local visitor attractions.
- 8.4.9. During the operational phase, the proposal will have a positive impact for the city by providing a new central library and public realm improvement works. This will be more acutely felt at local level. There will also be positive employment impacts at a local level directly from the new library, with indirect positive impacts for local businesses and the freeing up of floorspace within the llac Centre. The visiting population will benefit from a new significant visitor attraction and an increased number of visitors are likely to improve the perception of the area.
- 8.4.10. The assessment of impacts on human health makes reference to those environmental factors under which human health effects might occur, i.e. air, noise, traffic, etc. and these are addressed further below.
- 8.4.11. Impacts on air quality during the demolition and construction phase are likely to be short-term and imperceptible with respect to human health. Asbestos containing materials will be removed as part of the construction/ demolition phases by a suitably qualified contractor. There is potential for operational phase impacts on human health from vehicle related emissions and other traffic associated impacts. It is envisaged that there will be increases of up to 60 annual average daily traffic movements (AADT) on Parnell Square as a result of the proposed development. However, this is significantly below the AADT of 1,000 which is deemed to cause impact on human health.
- 8.4.12. In terms of noise and vibration during the demolition and construction phase, the more likely source of nuisance will be from piling and ground/ rock breaking and from general construction works. Impacts will be short term, negative and significant on sensitive receivers. There is also potential for health and safety impacts on the local and working populations.

Mitigation Measures

- 8.4.13. Mitigation measures for the construction phase are identified in other sections hereunder. An Outline Construction Management & Waste Management Plan and a Construction Traffic Management Plan are appended to the EIAR. A dedicated local liaison officer will inform local residents of construction works.
- 8.4.14. No specific mitigation measures are proposed for the operational phase of the proposal for population and human health.

Residual Impacts

8.4.15. It is not predicted that there will be any significant adverse direct or indirect impacts on the resident, working and visitor populations during the construction or operational phases of the proposed development.

Conclusions on Population and Human Health

- 8.4.16. Having regard to the above, I am satisfied that the impacts identified would be avoided, managed or mitigated by measures forming part of the proposed development, proposed mitigation measures and measures within suitable conditions.
- 8.4.17. Positive long term impacts are likely to accrue on the immediate area through health and social benefits. The creation of an aesthetically pleasing indoor and outdoor public area will improve the townscape and visual setting. Increased physical activity for pedestrians and cyclists is also likely to have a positive impact on the health and well-being of local residents, workers and visitors. I am therefore satisfied that the proposed development would not have any unacceptable significant direct, indirect or cumulative impacts on population and human health.
- 8.4.18. No specific monitoring for population and human health is required during the construction and operational phases of the proposed development.

Cultural Heritage – Architectural Heritage

8.4.19. Chapter 5.3 of the EIAR identifies the architectural heritage aspects of the proposed development, assesses their potential significance and sensitivity and evaluates the likely significant impacts. Mitigation measures are proposed to protect and safeguard built heritage features. The receiving environment is considered in the

- EIAR in terms of its historic context, conservations areas, protected structures, adjacent buildings and the immediate environs.
- 8.4.20. The northern side of Parnell Square North is zoned Z8 Georgian Conservation Areas. There are 8 no. protected structures on site (no's. 20 and 21 and no's. 23-28 Parnell Square North). The Architectural Heritage Protection Guidelines advise on the protection of protected structures, whilst allowing for changes and alterations that will not undermine historic character, and will permit buildings to have a sympathetic and sustainable future function. Two factors to be considered in this regard are the loss of the identifiable plots and the relationship of the house, rear return, garden and mews, and the interconnections between buildings that have existed for approximately 100 years and reflect the historic associations of the buildings.

<u>Characteristics of the Proposed Development</u>

8.4.21. The proposed library involves the conservation, alteration and repair of 8 no. Georgian houses (protected structures), and the construction and interconnection of a rear extension. All pre-existing returns, garden walls and mews dwellings to the rear of all houses (apart from no. 23) have been removed or replaced in the past. The buildings that remain are currently vacant and were last in use as a school (no's. 23-28) and ballroom (no's. 20 & 21). Specialist skills will be required during the demolition and construction phase to design, monitor and implement the conservation, repair and modification of the 8 no. Georgian houses.

Potential Impacts of the Proposed Development

- 8.4.22. There is greater potential for impacts on protected structures during the demolition and construction phase from works to conserve, repair and adapt the buildings. In particular, structural repairs, services installation and excavations give rise to concern if carried out inappropriately. Fire upgrading, universal access, environmental upgrades, noise abatement and Building Regulations compliance will also give rise to potential impacts.
- 8.4.23. The new extension to the rear of the protected structures and the interconnection of new build with the existing will have potential impacts, as well as any works that may alter the bearing capacity of ground under or in the vicinity of foundations.
- 8.4.24. During the operational phase, potential impacts may occur from damage to historic fabric from people using the buildings and from general wear and tear. There may

also be impacts if room functions and uses are later altered. It should be noted, however, that the buildings are currently vacant and a 'do nothing' scenario would result in the continued decay of the buildings and their historic features and finishes.

Mitigation Measures

- 8.4.25. It is noted in the EIAR that information on the extant fabric of the protected structures and its condition can only be obtained when full opening up is possible during the construction phase. Therefore, a process of monitoring the opening up of fabric and modifying details and methodologies as work progresses is required to achieve the best conservation, repair and adaptation. Skilled conservators will require sufficient time to undertake conservation, repair and adaptation works and a system of rolling compliance to the Planning Department and Conservation officer should be in place.
- 8.4.26. Profound negative impacts on historic fabric may be necessary to meet regulatory requirements. This includes the access ramp and staircase installation for no. 27. Mitigation for all individual works should be subject to a review process to reduce impacts to the historic fabric.
- 8.4.27. Alteration of ground conditions arising from the construction of the new building and the connection between the new and existing buildings have been considered and appropriate measures have been taken to minimise impact at planning design stage; however, works will be constantly monitored and adjusted as they proceed.
- 8.4.28. All eight protected structures have been subject to water ingress and have been vacant and unheated. The period for introduction of heat and/ or air conditioning must extend to at least nine months to avoid a sudden and sustained increase in temperature and reduction in humidity.
- 8.4.29. Monitoring will be required during the operational phase to control how the building is used and to assess vulnerable and improper usage.
- 8.4.30. The hearth of no. 28 has collapsed and there is severe decay to the staircase in No.23. Floor joist and timber window heads are decayed and the process of decay will continue and accelerate in a 'do nothing' scenario.

Predicted Impacts

8.4.31. Conservation architects have prepared an "Architectural and Urban Heritage Impact Report" which assesses the impact of the proposed development on historic fabric.

- This includes a schedule outline scope of works for existing buildings. If original fabric can be repaired rather than replaced, this would be considered a positive rather than a negative impact, e.g. replacement of roof structure of No's. 20, 21 and 28 is a worst case scenario.
- 8.4.32. The setting of the protected structures will see a reordering of Parnell Square North that will include the retention of historic paving, coal hole covers, and basement area walls, railings and steps. From a conservation viewpoint, Option A (full pedestrianisation) is preferred and would attract a very significant positive impact. A number of issues are highlighted from the photomontages appended to the EIAR. These include the removal of the balcony from No. 20 & 21 revealing windows and parapet at different levels and the pairing conflict of No. 19 and 20, as well as the modern doorway proposed to No. 27, which will have the appearance of a carriageway arch. However, the overall impacts are likely to be positive, significant and permanent, with some negative impacts, including the installation of the ramped access to No. 21 and new basement escape stairs to No. 27.
- 8.4.33. Within the rear of the protected structures, it is proposed to remove the Amharclann building and the return to No. 23. The proposed extension will protect existing adjoining buildings with step-backs and the full extent of the rear elevation of No. 23-28 will be visible from the proposed atrium space or externally (No. 28). Removal of rear windows to accommodate bridge connections with have a moderate negative impact.
- 8.4.34. Table 5.3.4 sets out a full description of external and internal works and an assessment of their impact ranging from the profound to the imperceptible effects. The most profound and significant impacts from external works are summarised as follows:
 - Adjustment to existing entrance and ground levels, including removal of stone steps and door to accommodate new ramp, enlargement of ope and modern decorative surround to doorway to No. 27.
 - Removal and making good of return to No. 23 (previously altered);
 - Adjustment of rear window opening to 23, 24, 25, 26 & 27 to form bridge access:

- New sash windows to No's. 20 & 21;
- New metal/ timber fire screens to stair windows;
- Provision of new stairs and lift at No. 28;
- Ground level adjustment and provision of new ramped enlarged entry door to No. 21.
- Removal of balconies from 2nd floor.
- 8.4.35. The proposal will also give rise to significant positive impacts such as repair of roof, brickwork, stairs, removal of cementitious render to gables of No's. 21 & 23, retention and repair of original windows, new steps and front door to no. 23 to historic pattern, and repair and re-fixing of balconies. Overall, the impacts on external fabric will be mostly positive and negative impacts may require adjustments during the course of works.
- 8.4.36. The most profound and significant negative impacts from internal works are summarised as follows:
 - Structural strengthening of floors;
 - Relocation of dumb-waiter at No. 28 to opposite side of the room;
 - Ground floor hall and former stairwell at No's. 21 & 27 removal and formation of ramp (as above);
 - Floor levels of No's. 20, 25 & 26 raised to facilitate Universal Access;
 - Removal of original partitions;
 - Installation of new partitions;
 - Removal of original party wall and installation of lift and large duct at No. 26;
 - Installation of new sub-division in rear first floor room of No. 21;
 - Removal of staircase at No. 24 (significantly decayed);
 - New joinery throughout impact mitigated if historic joinery can be retained and repaired;
 - Formation of new openings in front rooms at 1st floor level to connect No's. 23, 24 and 25:

- Acoustic wall to double doors in front room of No. 27 (mitigated if sympathetically detailed).
- New feature staircase at No. 27 (requires loss of original plasterwork, cornices and floor structure).
- Partition to form entrance hall at No. 23
- Formation of new opening in ground floor front room to connect No's. 24 & 25.
- Loss of barrel vault in No. 27;
- Removal of original walls to No's. 24, 25, 26 & 27.
- Sub-division of front room at basement level in No. 28;
- Installation of new basement staircase to No. 27.
- 8.4.37. The main positive impacts on the internal fabric of the protected structures include repair of Portland stone floor in hall and new lath and plaster ceiling at No. 28; removal of modern partitions; reinstatement of missing or irreparable joinery; repair of main staircase to No. 28; reinstatement of original room arrangements; and reinstatement of vault under pavement at No. 21. The general impact on the internal features of the protected structures will be positive with a number of major negative impacts that are necessary for the new function of the buildings.

<u>Conclusions on Cultural Heritage – Architectural Heritage</u>

- 8.4.38. The proposed development will give rise to positive and negative impacts on the protected structures and the conservation area zoning. Negative impacts are necessary to adapt the buildings to a new and sustainable use. In particular, significant and profound proposals are necessary to facilitate Universal Access via altered accesses to No's. 21 & 27. The new extension will also require alterations to the rear of the protected structures to connect the new build with existing. It should be noted, however, that all historic returns (apart from No. 23), mews/ coach houses, plot divisions to the rear of No's. 23 28 are no longer in place and the extension will largely occupy a former school yard.
- 8.4.39. Of the 8 no. protected structures on site, No's. 20 & 21 have survived reasonably intact with some losses during the 20th century. No's. 23 to 27 have experienced a significant amount of alteration from when the building was in educational use.

Further alterations to the less intact No's. 25, 26 and 27 rather than a more intact houses is an important mitigation. It is proposed to remove the 1960's Amharclann building and its connection corridor from No. 27. A new staircase will be inserted in the re-opened original stair hall; this will have both positive impacts and negative impacts through removal of a full barrel vault and historic fabric. The new doorway to No. 27 replacing the former school doorway and the works to remove the access to the Amharclann building are examples of carrying out significant alterations to the less intact buildings. No. 28 has experienced very little alterations over time and it is proposed to retain and repair original fabric in this building both internally and externally. Other significant positive impacts are the reinstatement of the doorway to No. 23 and the conservation and repair of original fabric.

- 8.4.40. Overall, the major positive impact is that the currently vacant and unused protected structures will gain a new and sustainable function. A 'do nothing' scenario is that the protected structure will remain unused and subject to continuing decay. The Architectural Heritage Protection Guidelines advise that it may be appropriate to permit appropriate new extensions or material change of use to protected structures to keep them in viable economic use, thereby prolonging their life. I would be satisfied that the proposed development will see the sensitive restoration and reuse of these protected structures for publicly accessible use. It has been adequately demonstrated that any demolition or alteration works are essential and will allow for the proper conservation of the 8 no. protected structures. The restoration, extension and reuse of the protected structures will also have an overall positive impact on the conservation area surroundings and the public realm in this area.
- 8.4.41. As outlined in the EIAR, it will be necessary to put in place a monitoring system to ensure that deviations from the procedures, methodologies and materials are appropriate.

Material Assets - Archaeology

8.4.42. Section 5.4 of the EIAR details the archaeological assessment carried out at No's. 20 & 21 and 23-28 and the rear thereof. The purpose of this assessment is to determine the presence of known archaeological heritage sites that may be affected by the proposed development; assess the likelihood of finding previously unrecorded archaeological remains; and suggest mitigation measures. This involves a desk

- study of relevant historical sources and a field inspection that included excavation of test trenches.
- 8.4.43. An assessment of the receiving environment places the subject site in the context of the prehistoric period (7000 BC-400 AD), early medieval period (AD400-1100), medieval period (1100-1600), post-medieval period and post 1900. It should be noted that redeposited human bone was discovered during test trenching at the site that has been dated to the early medieval period (692-961 AD). A total of six test trenches and seven pits were excavated on site. These are illustrated within Figure 5.4.7 of the EIAR.
- 8.4.44. The site is located within the zone of archaeological potential for Dublin City (National Monument DU020-018).

<u>Characteristics of the Proposed Development</u>

8.4.45. Figure 5.4.8 illustrates the ground reductions that will be required as part of the proposed development. The attenuation tank to the rear of the site will require a depth of 6.5m to be excavated and 4.8m will be excavated to facilitate the new basement to the rear of the Georgian buildings. The main yard area will be excavated to a depth of 0.8m, with areas to east side down to depths of between 1.9m and 2.5m. An estimated 9000 m³ of material will be taken from the site. All foundations will be piled prior to commencement of bulk excavation, with the Georgian buildings being underpinned.

Potential Impacts of the Proposed Development

- 8.4.46. Test trenches have revealed archaeological deposits including post medieval basements, a redeposit of early medieval human remains and a possible pit.
- 8.4.47. The excavation of material for the new basement will have a negative and very significant impact on the deposit of human remains. The remains identified outside the basement excavation area will also be impacted upon by ground disturbances.
- 8.4.48. There will be negative and moderate impacts on the potential remains of a post medieval midden or cess deposit identified within the centre of the site, as well as backfilled remains of mews structures to the northern part of the site.
- 8.4.49. Ground disturbances outside the test trenches in the area of the Amharclann or within the area of the public realm works may have a direct impact on previously

unrecorded archaeological deposits. Potential impacts may range from moderate to profound significance.

Mitigation Measures

- 8.4.50. Preservation by record of all archaeological remains will be carried out during construction of the new basement and associated ground works. A programme of additional archaeological testing will be carried out following demolition of the Amharclann building. A minimum of four additional test trenches will be excavated within the site.
- 8.4.51. Figure 5.4.10 of the EIAR illustrates the proposed archaeological advanced works locations. Post medieval basements and the cesspit, and the redeposits of human remains will be excavated (preserved by record) within open areas and analysed post excavation.
- 8.4.52. A section to the rear of the site will be opened and graded down to assess the nature and extent of the potential backfilled mews structures.
- 8.4.53. Mechanical excavation shall cease upon identification of archaeological levels and recording of the features will be carried out.
- 8.4.54. All archaeological testing will be carried out in consultation with the National Monuments Service and the Dublin City Archaeologist. Further archaeological mitigation may be required depending on the results of the testing exercise.

Predicted Impacts

8.4.55. All archaeological remains on site will be preserved by record following completion of mitigation measures.

Conclusions on Archaeology

8.4.56. Whilst preservation in-situ is of archaeological remains is preferred wherever possible, the proposed development will necessitate the excavation and construction of a new basement. The preservation of archaeological remains by record is only possible in this case. Adequate mitigation and monitoring procedures are proposed and consultation with the necessary bodies will take place during construction works.

Material Assets – Transportation

- 8.4.57. Section 5.5 of the EIAR presents a traffic and transportation assessment for the demolition, construction and operational phases of the proposed development. The methodology includes traffic surveys and reviews of public transport routes and services, proposed transportation improvements, future trips to and from the proposed development, transport capacity and an assessment of the transportation impacts.
- 8.4.58. Parnell Street North forms part of the Inner Orbital Route, with traffic moving one-way in an eastern direction. The speed limit is 30 km/h and there are 47 no. on street car parking spaces. A large kerb radius at the southern side of the junction of Parnell Square West and North facilitates higher traffic speeds at this location.
- 8.4.59. A bus stop is situated outside the Hugh Lane Gallery and a Dublin Bikes station is located at the north-western end of Parnell Square North. There are six bus operators utilising Parnell Square North providing a total of 13 no. services at a frequency of approximately 32 buses per hour. These are a mix of scheduled stage services, tourist sightseeing services, interurban coach services and touring coach services. According to the summary of hourly off-peak traffic movements, buses provide 10.7% of traffic on Parnell Square North.
- 8.4.60. Footpaths along Parnell Square North are generally narrow and there is an absence of pedestrian crossing facilities at the Garden of Remembrance. Kerbside parking also limits forward visibility.
- 8.4.61. Future transport proposals affecting Parnell Square as outlined in the EIAR include upgraded pedestrian and cycle routes; Metro Link with underground stop on O'Connell Street North; and the Bus Connects project, which proposes super frequent spine services and secondary radials passing through Parnell Square. Parnell Square North is also shown as a terminus for two routes.

<u>Characteristics of the Proposed Development</u>

8.4.62. The public realm proposals along Parnell Square North include the reordering of the road carriageway to 2 no. 3m wide lanes, reconfiguration of the junctions with Parnell Square West and East and the creation of a public realm area and enhanced pedestrian facilities, including widened footpaths and new/ improved pedestrian crossings. The proposal will also see the removal of all on-street parking, relocation of the Dublin Bikes station, provision of 100 no. bicycle parking spaces and the

- provision of a combined bus stop, set down and loading bay. Delivery and waste collection facilities will also be provided at the rear of the site accessed from Dorset Street.
- 8.4.63. The Construction Traffic Management Plan outlines two routes for accessing the site at the front on Parnell Square North and to the rear along Frederick Lane. Construction traffic will peak at the start of the construction phase when approximately 40 inbound and 40 outbound trips per day are expected during excavation. The peak generation of construction operatives is unlikely to coincide with the background peak conditions.
- 8.4.64. During the operational phase, it is anticipated that the proposed development will attract 3,000 visitors per day. A total of 70 staff are expected to be employed at the facility. The EIAR presents the daily trips (arrivals and departures) generated by the proposed development as follows:

Mode of	de of Staff			Visitors		
Travel	(Persons)			(Person per day)		
	Modal	Arrive	Depart	Modal	Arrive	Depart
	Split (%)			Split (%)		
On foot	22	15	15	51	1,530	1,530
Bus	34	24	24	31	930	930
Bicycle	12	8	8	6	180	180
Train	10	7	7	5	150	150
Luas	7	5	5	4	120	120
Car	15	11	11	3	90	90
Total	100	70	70	100	3,000	3,000

Potential Impacts of the Proposed Development

- 8.4.65. The potential impact of the proposed development during the demolition and construction phase as outlined in the EIAR are summarised as follows:
 - Non-compliance with Construction Traffic Management Plan and/ or Construction Management & Waste Management Plan leading to nonadherence to vehicle access routes and traffic congestions and road safety issues.
 - Reduction of road carriageway width on Parnell Square North leading to congestion, particularly at bus stops.
 - HGVs waiting on public roads outside the site leading to delays and congestion.
 - Non check of vehicles leaving the site and deposition of material onto public roads.
 - Non-compliance with Dublin City Council regulations for HGVs.
 - Mismanagement of public realm works leading to traffic delays and congestion.
 - Installation of underground services or over-ground drainage leading to delays, congestion or diversion.
- 8.4.66. Potential impacts that may arise on traffic and transportation during the operational phase of the proposed development, as outlined in the EIAR, include the following:
 - Removal of existing car parking creating increased demand elsewhere.
 - Impact on the future combined provision of Bus Connects, Swiftway BRT,
 Strategic Green Route, GDA Cycle Network, Strategic Pedestrian Routes, etc.
 on Parnell Square East.

Mitigation Measures

- 8.4.67. The primary mitigation measures on traffic and transportation during the demolition and construction phase will be implemented through the Construction and Traffic Management Plan and the Construction Management & Waste Management Plan. This will include the following:
 - Use of designated HGV and construction routes.

- Provision of site compound with offices, materials storage area and drive through route in front of No's. 23-28 Parnell Square North.
- Ramp works to connect Frederick Lane to Bethseda Place to facilitate construction related activities to rear.
- Carrying out of works in a number of stages to manage traffic movements on Parnell Square North.
- Provision of new disabled car parking spaces on Granby Row and Frederick
 Street North in place of those occupied by site compound.
- 8.4.68. Operational phase mitigation measures include implementation of a Travel Plan to manage travel demand. Consideration will also be given to the provision of further disabled spaces on Parnell Square North and additional secure cycle parking for staff.

Predicted Impacts

- 8.4.69. The overall predicted impact of the proposed development during the demolition and construction phase is likely to be slight negative and short term. The predicted impact of the proposed development during this phase on traffic and transportation are summarised as follows:
 - Temporary diversion of bus routes during public realm works.
 - Some delays may occur to Luas services and general traffic on Parnell Street due to construction traffic.
 - Provision of temporary pedestrian facilities during construction.
- 8.4.70. During the operational phase, the proposed development is likely to have an overall positive long term significant impact on the transportation environment. The predicted impact of the proposed development during this phase on traffic and transportation are summarised as follows:
 - Shortage of car parking ameliorated by high provision of public transport in the surrounding area.
 - Traffic calming at the junction of Parnell Square West and North.
 - No bus route diversion.

- Capacity of Dublin Bus and Luas services will greatly exceed the predicted demand arising from the proposed development.
- No provision for westbound contra-flow cyclists space will be shared with pedestrians and could lead to conflicts.

Conclusions on Traffic and Transportation

- 8.4.71. In general, the proposed development is likely to give rise to positive impacts on movement and transportation in the vicinity of the site, both directly and indirectly when considered with other factors such and human health, air quality, climate and climate change. The widening of footpaths, improved pedestrian crossing facilities and more clearly defined traffic lanes will slow traffic and provide a safer environment for pedestrians, notwithstanding the potential conflicts with cyclists.
- 8.4.72. A number of future transportation improvements will indirectly and directly affect Parnell Square North, in particular the Bus Connects project. It is proposed to retain 2-way vehicular access through Parnell Square North and therefore existing and future public transport proposals will be largely unaffected by the proposed development.
- 8.4.73. It is stated in the EIAR that the operation of Parnell Square North should be monitored with particular attention paid to contra-flow cycling arrangements. Monitoring of the impact of all modes of vehicular traffic on the usability of the pedestrian space will also be required.
- 8.4.74. A 'do nothing' scenario would see the continuation of the large inner kerb radius at the junction of Parnell Square West and North and associated excessive traffic speeds. The overall 'do nothing' scenario would retain the existing poor environment for pedestrians and cyclists.

Landscape & Visual Impact

8.4.75. Photomontages were prepared for 18 no. view locations at various distances from the site. In views were the proposed development is not visible, the location of the building envelope is indicated with a red line. Photographs in the direction of the proposed development were taken in April before trees were in leaf and again afterwards when in leaf.

<u>Characteristics of the Proposed Development</u>

8.4.76. From a visual and landscape perspective, the proposed development involves the demolition of existing modern structures and the construction of a new extension to the rear of No's. 23-28 Parnell Square North (protected structures), as well as repair and reinstatement works, local alterations to public realm and works to the protected structures. The new public realm comprising hard landscaping works are proposed along the surface area of Parnell Square North.

Potential Impacts of the Proposed Development

- 8.4.77. The demolition and construction works associated with the proposed development will give rise to the usual visual impacts expected from a large construction project, including tower cranes and construction traffic. Temporary construction compounds will be erected on Parnell Square North and the building will be temporarily concealed behind scaffolding and netting. It is considered that the visual impact during the construction phase will be moderate, negative and short term in extent.
- 8.4.78. During the operational phase, it has been found that the visual impact of the new structure is very limited. Of the 18 views assessed, the extent of visual impact is moderate within seven of these views. The proposed new doorway is the only obvious indication along the northern side of Parnell Square and the extension to the rear will be most apparent from Granby Row to the east.

Mitigation Measures

8.4.79. There are no mitigation measures in the context of the landscape and visual impact assessment.

Predicted Impacts

- 8.4.80. During the operational phase of the development, the predicted impacts on each of the 18 recorded views are summarised as follows:
 - View 1 Uppermost elements of new structure likely to be just visible through gaps in trees at Garden of Remembrance. Likely moderate improvements arising from public realm works and repair and reinstatement façade works.
 - View 2 Glimpse views of new structure predicted to be visible in gaps between Charlemont House and No. 23, and above roof. Slight to moderate positive changes in the visual character of existing buildings.

- Views 3-5 New structure glimpsed above roofs of existing buildings. Overall
 positive impacts on visual character of existing buildings and public realm.
- View 6 Moderate change on views from parts of the south end of Granby Row from new structure.
- Views 7-16 No impact on views from these locations
- View 17 Moderate view of the proposed new structure from Upper Dorset Street into Bethesda Place.
- View 18 No impact on view from this location.

Conclusions on Landscape and Visual Impact

- 8.4.81. The overall landscape and visual impact of the proposed development is generally of a positive nature. The proposed public realm works will result in a more visually pleasing streetscape and improved opportunities to view the surroundings. These works will also improve the setting of the protected structures, principally through a reduction in parked traffic. The appearance of the structures themselves will be improved through repair and restoration works.
- 8.4.82. The proposed large scale extension to the rear of the protected structures has the greatest potential for visual impacts. However, this structure is designed to be unobtrusive and is well concealed behind the main protected structures from all principal views. Views of the new structure from Dorset Street and Granby Row are seen as a background feature only.
- 8.4.83. Views of the proposed development from the Garden of Remembrance are largely restricted due to its sunken level and intervening vegetation. Changes in the visual environment of the area will also result in positive interactions with other factors, such as population and human health and material assets.

Biodiversity

8.4.84. The potential zone of influence of the proposed development is considered to be less than 1km from the site perimeter having regard to the key ecological receptors in this case. A desk study was carried out of information relating to the local ecological environment and habitat and flora surveys were conducted in August 2015 and May

- 2018. This included dusk and dawn bat activity surveys and daytime breeding bird activity surveys.
- 8.4.85. The subject site is not located within any designated site; however, potential pathways of connectivity have been identified via surface water networks to Dublin Bay European Sites and pNHAs. The majority of the site consists of buildings and artificial surfaces, with some recolonising of bare ground. No bats were recorded entering/ exiting any buildings but these structures may be suitable as bat roosts. Herring gulls and feral pigeons were observed nesting on rooftops.

Characteristics of the Proposed Development

- 8.4.86. Surface water run-off from the existing structures will drain to the proposed new drainage system and attenuation tank prior to discharge to the existing sewerage systems on Bethesda Place or Parnell Square. Public realm run-off will discharge through new drainage channels and gully outlets to a new surface water sewer that will discharge to the existing combined sewer on Parnell Square North. SUDS feature will also be incorporated into the proposed development.
- 8.4.87. The proposed development will have a population equivalent of 3,070 and wastewater will discharge to the existing sewerage system and onto Ringsend wastewater treatment plant.

Potential Impacts of the Proposed Development

- 8.4.88. Assessments are carried out in the EIAR of the effects on designated sites, bats, birds and cumulative effects. Potential impacts can be summarised as follows:
 - No possibility of significant effects on European Sites low likelihood of accidental pollution event during construction, significant distance between source and receptor and no possibility of significant effects from additional loading to Ringsend WWTP.
 - No evidence of bats recorded within any building; however, some suitable features for bats to roost were identified and in the absence of mitigation, there could be a potential loss of bat roost.
 - If refurbishment works are carried out in the bird breeding season, there is potential for significant negative impacts to local breeding bird populations.

- Loss or disturbance of potential nesting habitat during the construction stage will result in significant negative impact.
- Birds likely to be habituated to human and vehicle related disturbance and would not be impacted in a significant way by construction works.
- No potential impact on bats or local breeding bird populations during the operational phase.
- No significant cumulative impacts likely.

Mitigation Measures

- 8.4.89. If bats are encountered during construction works, the relevant activity will be suspended until the advice of a bat ecologist is sought and a derogation licence may be required from the NPWS. Buildings to be demolished are not considered suitable for roosting bats.
- 8.4.90. Refurbishment and associated works to attic spaces and rooftops will take place in the non-breeding season to limit the potential impact of construction on breeding birds. A licence will be required from the NPWS to permit the destruction of nest sites and disturbance to birds during the breeding season.

Predicted Impacts

- 8.4.91. No significant residual impacts are anticipated during operational and construction phases following implementation of mitigation measures.
- 8.4.92. There are potential interactions between hydrology, noise and vibration and biodiversity; however, no significant impacts arise.

Conclusions on Biodiversity

- 8.4.93. The planning application is accompanied by a screening report for Appropriate

 Assessment which rules out likely significant effects on European Sites arising from the proposed development.
- 8.4.94. It can also be concluded, based on the findings of the EIAR, that no significant impact on biodiversity will occur from the proposed development, both in construction and operational phases.

Soils & Geology (including land)

8.4.95. The proposed development includes extensive grounds works within and to the rear of the protected structures. Section 5.8 of the EIAR identifies and assesses the impact of the proposal on the existing soil and geology environment. Geotechnical investigations established that the underlying strata consisted of made ground, brown boulder clay, black boulder clay and sand and gravels. Groundwater was encountered at 12.7-13m below ground level. Bedrock under the site is expected to be predominately Carboniferous Limestone and groundwater vulnerability of the aquifer is low.

<u>Characteristics of the Proposed Development</u>

- 8.4.96. The proposed development will include a new basement area and an attenuation tank. The existing ground levels vary between 13.5m OD and 15.5m OD and the floor of the existing basement is 10.5m OD. The proposed excavation for the new basement will be 9.5m OD.
- 8.4.97. Proposed groundworks will include underpinning of existing walls, excavation, installation of piles, storage of excavated material and local pumping if groundwater is encountered. Prior to removal off site, excavated material will be tested to determine the most appropriate means of disposal.

Potential Impacts of the Proposed Development

- 8.4.98. Potential impacts that could arise from the demolition and construction phase of the proposed development are summarised as follows:
 - Increase in standing water in excavated basement area during adverse weather conditions.
 - Risk of construction traffic damaging roads and increased mud and dirt.
 - Risk to workers due to presence of contaminated ground.
 - Instability due to excavations.
 - Risk of damage or disruption to existing services.
 - Risk of contamination from spillage during refuelling or storage or fuel.
 - Risk of pollution by dust during dry weather.

 Installation of piles could transfer contaminated subsoil from the upper layers into the groundwater layer.

Mitigation Measures

- 8.4.99. The following mitigation measures will be implemented under the Construction Management & Waste Management Plan:
 - Removal of contaminated subsoil prior commencement of piling.
 - Casting of piles over the upper 4-5m to isolate contaminated ground from the piling operation.
 - Piling operation could be replaced by raft solution.
 - Provision of wheel-wash facilities.
 - Suitable bunded areas for oil and petrol storage tanks and designated fuelling point to be put in place.
 - Temporary sumps to collect any surface water run-off to avoid standing water in basement and other excavations.
 - Surface water run-off and water pumped from excavation works to be discharged via a silt trap/ settlement pond.
 - Dampening down measures during periods of dry weather.
 - Contaminated soils to be disposed of in accordance with the relevant regulations and guidance.

Predicted Impacts

- 8.4.100. It is predicted that the proposed development will generate a surplus of excavated material that will contain contaminants. This material will be removed to a licensed facility prior to piling to avoid contamination of groundwater. This will have a slight, negative and short term impact during the construction phase.
- 8.4.101. Interactions are outlined between soils and geology and with population and human health, biodiversity, water and air. Impacts are not likely to be significant.

Conclusions on Soils and Geology

8.4.102. The proposed development will require significant ground works and excavation of material that maybe contaminated. No likely significant impacts are envisaged with

proper adherence to mitigation measures and compliance with the Construction Management & Waste Management Plan and measures outlined with the waste management section of the EIAR.

Water (Drainage, Supply, Flood Risk and Groundwater)

8.4.103. Section 5.9 of the EIAR includes a review and assessment of the existing and proposed water environment in the vicinity of the site. Irish Water operate and maintain a system of underground water supply and drainage pipes. There are three external public sewers at Parnell Square North, Bethesda Place and Frederick Lane North. Drainage from the public realm discharges to the sewer on Parnell Square North. Water supply to existing properties is from mains along Parnell Square North and Frederick Lane North. There are also four fire hydrants on Parnell Square North and one on Frederick Lane North. No flooding of the surrounding area has been recorded.

<u>Characteristics of the Proposed Development</u>

- 8.4.104. It is proposed to abandon the existing largely combined foul drainage system within the site. A new and separate internal collection system is to be provided for foul only that will discharge via a grease separator to the existing 300mm combined sewer on Bethseda Place. No alterations are proposed to the foul system serving No's. 20-21.
- 8.4.105. Proposed SUDs measures will include green roofs, rainwater butts, permeable paving and bio-retention tree pits. An underground attenuation tank is also proposed.
- 8.4.106. It is proposed to remove the existing water distribution system and to install a new supply, storage and distribution system off the 250mm main on Parnell Square North. No change is proposed to the existing water supply system to No's. 20-21. Irish Water has advised that the additional demand from the proposed development can be accommodated. Water storage will be provided within an underground tank to meet Fire Authority requirements.
- 8.4.107. The site is within an area classified as Flood Zone A where the probability of flooding is low. The proposal is also classified as a "less vulnerable development".

Potential Impacts of the Proposed Development

- 8.4.108. Potential impacts that may arise during the construction and operational phases of the proposed development are summarised as follows:
 - Local flooding from burst watermain or blockage/ damage to sewer;
 - Overground discharge of wastewater due to blockage or damage to sewer;
 - Accidental discharge of excavated material to drains;
 - Inadequate capacity within existing watermains and sewers to serve the proposed development;
 - Inadequate storage for fire flow needs;
 - Capacity of proposed stormwater attenuation tank may be inadequate or surface water measures may cease working;
 - Capacity of proposed foul water pumping system may be inadequate or may cease working.

Mitigation Measures

- 8.4.109. Mitigation measures for water during the demolition and construction phase will be implemented through the implementation of the Construction Management and Waste Management Plan.
- 8.4.110. Mitigation measures during the operation phase include the use fittings to reduce water demand; the operation of SuDS measures; the ongoing attenuation of surface water; and the ongoing maintenance of water supply and drainage systems.

Predicted Impacts

- 8.4.111. Impacts on water during the demolition and construction phase are predicted to be short term, slight and within the capacity of existing public networks.
- 8.4.112. There will be an increase in demand for water supply and foul discharge, and a decrease in the rate of surface water discharge during the operational phase of the proposed development. These impacts will not be significant. There will be no adverse interactions between water and biodiversity and soils and geology.

Conclusions on Water

8.4.113. The proposed development will not give rise to any significant impact in terms of water supply and drainage. There will be an increase in demand for water services that can be readily accommodated. The introduction of SuDS measures may bring about a positive impact on surface water drainage systems.

Air – Noise and Vibration

- 8.4.114. A noise survey was conducted at three locations surrounding the site to quantify the existing noise environment at daytime and night-time. The measured noise levels reflect a typical city centre environment, with constant traffic contributing to measured levels.
- 8.4.115. Appropriate criteria for permissible construction noise levels for sensitive receivers, including residences and the Rotunda Hospital, are set out in the EIAR. Guidance is also set out for acceptable vibration in order to avoid damage to buildings.
- 8.4.116. During the operational phase, noise can be emitted from mechanical plant and from additional traffic accessing and site.

Characteristics of the Proposed Development

- 8.4.117. Construction noise and vibration will arise from the demolition of existing buildings, excavation works, the formation of new basements and construction of new buildings.
- 8.4.118. The primary source of operational noise is deemed to be mechanical plant serving the proposed development. Visitors and staff will also generate noise by making trips to and from the site.

Potential Impacts of the Proposed Development

- 8.4.119. The nearest noise sensitive locations are considered to be the hotels rooms to the north-west, apartments on Bethesda Place, the adjoining art gallery, the dwelling on Granby Row and the IVF clinic at the Rotunda Hospital. The potential noise and vibration impacts of the proposed development during the demolition and construction phase are summarised as follows:
 - Noise from plant such as breakers, excavators, lifting equipment, dumper trucks, compressors and generators.

- Flow of vehicular traffic to the construction site.
- Vibration from excavation and piling and from lorry movements.
- Nearest noise sensitive location is approximately 10m from the site boundary and predicted construction noise levels are above 70 dB(A) – there will be negative, significant and short-term impacts at these receivers.
- Predicted noise levels are within relevant criteria at closest non-residential receiver and the clinical buildings at the Rotunda.
- Calculated noise levels from trucks at various phases range between 51 and
 61 dB L_{Aeq, 1hr.} which is below the construction noise criterion of 70 dB.
- Vibration levels at adjoining buildings are not expected to pose any significance in terms of cosmetic or structural damage to the protected structures. Range is also below levels which would cause any disturbance to occupants of adjacent buildings.
- Construction activities will be expected to operate below recommended vibration criteria.
- 8.4.120. During the operational phase of the proposed development, mechanical and electric plant noise will be reduced to a minimum during night time. Plant that is required to operate on a 24-hour basis will be located and attenuated as necessary.
- 8.4.121. The change in noise levels from additional vehicles travelling to the development will be neutral, imperceptible and long-term.

Mitigation Measures

- 8.4.122. The following mitigation measures are proposed for the demolition and construction phase of the proposed development:
 - Contractor should compile a Noise and Vibration Management Plan to deal with management processes and strategic mitigation measures to remove or reduce significant noise and vibration impacts.
 - Plan also to define noise and vibration monitoring and reporting and include method statements for each phase of works, associated mitigation measures and detailed appraisal.

- Contractor to provide proactive community relations.
- Standard planning condition should be attached relating to mitigation measures during construction.
- Consideration of noise control measures such as quiet plant, enclosures and screens around noise sources and limiting hours of work.
- 8.4.123. During the operational phase, noise emitting plant will be concealed from the direct line of sight of nearby noise sensitive receivers. Acoustic attenuation will also be provided and external noise emitting plant will be screened off by vertical elements. Noise limits as set out in the EIAR will be adhered to.

<u>Predicted Impacts of the Proposed Development</u>

- 8.4.124. Construction noise will be minimised through implementation of the above mitigation measures. However, construction noise levels will be above the relevant criteria while works are within 10m of noise sensitive receivers. More moderate impacts will be experienced within 20-80m.
- 8.4.125. External plant will give rise to neutral, long-term and imperceptible impacts.
- 8.4.126. During the construction phase, noise monitoring terminals and vibration monitoring stations will be installed. Spot checks will also be carried out on a monthly basis.
- 8.4.127. Significant noise impacts from the proposed development will be on a short term basis during the demolition and construction phase. These impacts can be mitigated through implementation of the measures specified above, and in particular through proper communication with those who will be most affected by construction work. A Noise and Vibration Management Plan will also help to remove or reduce significant noise and vibration impacts. Extra care will be required to address the impact of works on the protected structures.

Climate & Climate Change – Air Quality

Conclusions on Noise and Vibration

8.4.128. Section 5.11 of the EIAR assesses the likely impacts associated with air quality and climate during the demolition, construction and operational phases of the proposed development. Limit values in ambient air for a range of pollutants are set out, along

with a local and regional air quality assessments. Meteorological data, trends in air quality and EPA monitoring data are also factored in.

<u>Characteristics of the Proposed Development</u>

8.4.129. The potential air quality and climate impacts of the proposed development are considered during its demolition and construction phase and operational phase.
Dust and traffic emissions are the most likely sources of impact.

Potential Impacts of the Proposed Development

- 8.4.130. The potential impacts of the demolition and construction and operational phases of the proposed development are summarised as follows:
 - Construction dust emissions and the potential for dust nuisance;
 - Potential for asbestos impacts;
 - Greenhouse gas emissions from construction vehicles, generators, etc.;
 - Increases in AADT of up to 60 vehicles during the operational phase;
 - No road links can be classified as 'affected' by the proposed development –
 no requirement for local air quality, emissions of CO₂ or climate assessments
 as impact will be neutral and long term.

Mitigation Measures

8.4.131. A dust minimisation plan will be provided for the demolition and construction phase of the proposed development. This will include measures such as the sweeping of hard surface roads to remove mud and aggregate materials; watering of roads during dry/ windy conditions; speed restrictions; and the covering of delivery materials with tarpaulin. There are no mitigation measures for air quality or climate during the operational phase.

Predicted Impact of the Proposed Development

- 8.4.132. There are medium sensitivity receptors within the area of the site and construction dust may be generated during excavation, earth moving, back filling, etc. Receptors within 20m of the site will have a high sensitivity to dust soiling effects.
- 8.4.133. The dust magnitude for the proposed demolition works is classified as small, with an overall medium risk of temporary dust soiling impacts and an overall negligible risk of

- temporary human health impacts. Mitigation measures will ensure that fugitive emissions of dust will be insignificant.
- 8.4.134. Earthworks will also have a medium magnitude, a medium risk of temporary dust soiling impacts and an overall low risk of temporary human health impacts. Mitigation measures will also ensure that fugitive dust from the site will be insignificant. Construction works and trackout will give rise to a similar magnitude and duration of impacts.
- 8.4.135. An asbestos report found significant amounts of asbestos containing materials in areas to be demolished. All asbestos containing materials will be removed by a suitably trained person prior to commencement of demolition works.
- 8.4.136. In terms of predicted air quality and climatic impacts, demolition and construction CO₂ and NO₂ emissions and operational traffic emissions will have a negligible impact.
- 8.4.137. With respect to dust deposition monitoring, sampling is proposed to be carried out using a number of Bergerhoff Gauges.

Conclusions on Air Quality

- 8.4.138. Impacts on air quality from the proposed development are most likely to occur during the demolition and construction phase of the proposed development through dust deposition. The nearest receptors will be affected without implementation of adequate mitigation measures.
- 8.4.139. During the operational phase, additional pedestrian numbers attracted to the new public realm may be affected by diesel fumes from the significant number of buses that will pass through the area. However, this likely to be negligible in terms of impact on human health.

Climate – Sunlight and Daylight Analysis

8.4.140. Sections 5.12 gives an indication of sunlight access before and after the proposed development using a digital model to cast shadows at different times of the year. The site is also assessed in terms of Average Daylight Factor where in general if daylight access is reduced by one fifth, it is likely to be noticed.

8.4.141. The site is bounded by the 3-storey Charlemont House, which has been extended significantly to the rear. There is a terrace of buildings to the south-west ranging in height from one to six storeys and to the north-west is a 3-storey residential development on Bethesda Place.

Characteristics of the Proposed Development

- 8.4.142. The demolition and construction phase of the proposed development will comprise of enabling works (hoardings, compounds and cranes and demolitions); substructure works; superstructure and conservation works; and public realm works.
- 8.4.143. The proposal will involve the construction of a new 5-storey over basement extension with roof gardens and the demolition of the existing 3-storey Amharclann building.

Potential Impacts of the Proposed Development

- 8.4.144. The potential impacts of the demolition and construction and operational phases of the proposed development on sunlight access are summarised as follows:
 - As proposed development nears completion, impacts of emerging structure on sunlight access and daylight is likely to be similar to completed structure.
 - Shadows will be cast by temporary structures during the demolition and construction phase.
 - Potential for overshadowing by completed development is largely limited to neighbouring lands on Parnell Square, Granby Row (Parnell Court), Bethesda Place, Sheridan Place and Frederick Lane North.
 - Potential of proposed development to result in change in shadow environment is limited.
 - Shadows cast by development have potential to reduce sunlight access to the rear façade of Sheridan Place to a significant extent; however, impact may be considered to be consistent with emerging trends for development in the area.
 - Potential for imperceptible to moderate additional overshadowing of Charlemont House, as extended; however, rear facing windows in gallery do not have reasonable expectation of sunlight.

- Potential for minor impacts at certain times of the year on Granby Row,
 Dorset Street Upper, Parnell Square North and Frederick Lane North.
- Detailed quantitative analysis carried out on sample surrounding windows
 facing within 90 degrees due south shadows cast have the potential to
 reduce sunlight access to windows at rear of Sheridan Court; however, these
 are secondary windows and the scale of the proposed development is similar
 to existing or permitted developments in the area.
- Moderate impact on rooflight to rear of gallery; however, shadow environment
 in historic core of the city is typically dense and a second opaque window with
 coloured glass intervenes between the rooflight and affected room.
- Daylight levels are predicted to decrease to between 0.8 times and 0.94 times their former value within Sheridan Place, Parnell Court and Charlemont House.
- Impact of the proposed development on rooms within Parnell Court and
 Charlemont House is likely to range from "imperceptible" to "moderate", while
 the sample studied southeast-facing rooms opposing the new block at close
 proximity has the potential to experience a "moderate" to "significant"
 reduction in daylight access.
- Developments comprising the densification of backland or infill sites in the core of Dublin City often result in impacts of a similar extent to the above – proposal might properly be considered to be consistent with emerging trends.

Mitigation Measures

8.4.145. The scope for mitigation measures to improve access to sunlight and daylight during construction and operational phases is limited.

Predicted Impact of the Proposed Development

- 8.4.146. As no mitigation measures are proposed, the predicted impact will be as described above.
- 8.4.147. Impact of the proposed development on sunlight will result in interactions with climate, population and human health, material assets and landscape.

Conclusions on Sunlight and Daylight

8.4.148. The most significant overshadowing impacts from the proposed development will be to the rear façade of the 3-storey properties on Sheridan Place to the north. However, it would appear that the windows most affected do not serve principal habitable rooms. Furthermore, the proposed development is stepped back to a degree from surrounding properties and would not be considered overbearing or overscaled for this location.

Material Assets – Waste Management

- 8.4.149. A Construction & Demolition Waste Management Plan and an Operational Waste Management Plan have been prepared to deal with waste generation during the demolition/ construction and operational phases of the proposed development.
- 8.4.150. A description and estimates of waste generation during all phases has been calculated and mitigation measures are identified to prevent waste and promote management of waste in accordance with the waste hierarchy. Efficient waste segregation and the reduction of the quantity of waste requiring disposal is promoted.

Characteristics of the Proposed Development

- 8.4.151. A total of 4,153 tonnes of demolition waste is estimated to be present on site, of which 794 tonnes can be reused, 2,203 tonnes recycled/ recovered and 1,155 tonnes disposed of. The types of waste include glass, concrete/ bricks/ tiles/ ceramics, plasterboard, asphalts, metal and timber.
- 8.4.152. It is estimated that a total of 9,000 m³ of material will be excavated with little or no opportunities for reuse on site. Site investigations have shown that asbestos is present below ground level. Asbestos containing materials are also present in existing buildings, as well as lead paint. Contaminated material will be removed off site for treatment or disposal as appropriate.
- 8.4.153. During the construction phase, it is estimated that a total of 332 tonnes of waste material will be generated, comprising of 75 tonnes to be reused, 225 tonnes recycled/ recovered and 31 tonnes disposed.
- 8.4.154. During the operational phase, all wastes will be segregated into appropriate categories and stored in suitable receptacles in accordance with Objective SIO16 of

the Development Plan. Methods of treatment will include composting, recycling, recovery, return to supplier and disposal.

Potential Impact of the Proposed Development

- 8.4.155. The potential waste impact of the proposed development during the demolition and construction phase of the proposed development can be summarised as follows:
 - Construction waste from oversupply of materials, incorrect materials or cutting to size of materials.
 - Generation of municipal wastes by construction employees.
 - Dedication of areas on site for temporary storage of waste materials.
 - Presence of vermin from poor waste management or storage.
 - Use of non-permitted or unauthorised waste collectors or facilities resulting in negative environmental impacts or pollution.
 - Insufficient capacity for acceptance of C&D waste in the region majority of demolition and construction materials are either recyclable or recoverable.
 - Use of recyclable materials reduces the consumption of natural resources.
 - Correct classification and segregation of excavated material required to ensure that potentially contaminated materials are properly identified and handled.
 - Potential effect of construction waste generated from the proposed development is considered to be likely short-term negative but one that is not significant.
 - During operational phase, improper waste management would result in a diversion from the priorities of waste hierarchy and leading to small volumes being unnecessarily sent to landfill.
 - Network of waste collection, treatment, recovery and disposal infrastructure in place to manage waste efficiently.
 - Potential impact of operational waste generation from the development is considered to be long-term, negative and insignificant.

Mitigation Measures

- 8.4.156. During the demolition and construction phase, effective waste management and minimisation, reuse, recycling, recovery and disposal will be ensured through adherence to a project specific Construction & Development Waste Management Plan. This document will be refined/updated prior to commencement of works.
- 8.4.157. The contractor will endeavour to ensure that excavated material to be taken off site will be reused or recovered insofar as is reasonably practicable. Other mitigation measures will include the designing out of waste; on-site segregation and storage in designated areas in appropriate receptacles; reuse where possible; training of construction staff; and proper procedures for waste leaving the site.
- 8.4.158. During the operational phase all wastes will be segregated into appropriate categories and reused, recycled or recovered where possible.

Predicted Impact of the Proposed Development

- 8.4.159. With proper adherence to the C&D WMP, the predicted impact in terms of waste management during the demolition and construction phase is predicted to be likely, short-term, neutral and imperceptible.
- 8.4.160. A structured approach to waste management during the operational phase will give rise to a predicted likely, long-term, neutral and imperceptible impact.
- 8.4.161. A waste manager will be appointed to monitor actual waste volumes during the demolition and construction phase. Reasons will be identified if waste targets are not being met and the waste manager will work to resolve any issues. Waste generation volumes will also be monitored during the operational phase.

Conclusions on Waste Management

- 8.4.162. Waste generated by the proposed development during demolition/ construction and operational phases can be minimised through adherence to the Construction & Demolition Waste Management Plan and the Operational Waste Management Plan. Procedures will be put in place to reduce, reuse, recycle and recover waste and where this is not possible, waste will be disposed of in a safe manner.
 - 8.5. Vulnerability of the Project to Major Accidents and/ or Natural Disasters
 - 8.5.1. It is stated in the EIAR that the proposed project does not pose a major hazardous accident risk. The nearest SEVESO facility is located approximately 3.2km to the

- east of the site at Tolka Quay Road. This is outside the SEVESO site consultation zone.
- 8.5.2. The EIAR indirectly assesses the vulnerability of the project to potential natural disasters/ disasters/ accidents, such as flooding and climatic factors. No significant issues are likely in this regard.
- 8.5.3. In my opinion, the proposed project would be most vulnerable to accident/ disaster from redevelopment works taking place in close proximity to potentially delicate protected structures that are approximately 250 years old. The demolition and construction phase of the project will require careful monitoring of the condition of these historic buildings. An Outline Construction Management Plan will be updated and supplemented prior to commencement of works and a Noise and Vibration Management Plan will also be prepared for the project. Adherence to these plans together with ongoing monitoring should avert any potential impacts on the structural condition of the buildings. It should be noted that the risk of building collapse becomes more likely in a 'do nothing' scenario. Vacant buildings also attract vandalism and an increased potential for damage or loss by fire.
- 8.5.4. I am satisfied that given the nature of the proposed development, and the mitigation measures proposed, together with the low probability of a major accident/ natural disaster, it is not likely that significant effects on the environment would arise in this regard.

8.6. Environmental Interactions & Cumulative Impacts

- 8.6.1. Section 8 of the EIAR addresses the likely significant interactions between environmental factors and the cumulative effects that may arise from these interactions and from other approved projects in the area.
- 8.6.2. In terms of cumulative impacts, there are a number of transportation plans that, together with the proposed public realm works, may have cumulative impacts on the operation of public transport in the area. These projects, however, are not yet advanced to a level to determine their effect.
- 8.6.3. Table 8.1 of the EIAR provides a matrix of interactions between environmental factors during the demolition/ construction and operational phases of the proposed development. The EIAR lists interactions between population and human health and

most other environmental factors. The assessment of impacts on population and human health should refer to the assessments of those factors under which human health effects, both positive and negative, might occur. This may include the opening up of the buildings and the enjoyment of the new facility by people. The proposal will also provide an improved townscape and visual setting and a more comfortable environment for pedestrians. Other more adverse impacts on human health may occur from dust and noise nuisance, vehicle emissions and reduction in daylight/ sunlight access.

8.6.4. The EIAR also lists the potential interactions with other factors including architectural heritage, archaeology, transportation, landscape and visual impact, biodiversity, soils and geology and air quality. Overall, I consider that the EIAR document has satisfactorily addressed interactions. I am also satisfied that the proposed development is not likely to result in significant adverse impacts in terms of the interaction of individual environmental factors.

8.7. Reasoned Conclusion

- 8.7.1. Having regard to the examination of environmental information contained above, and in particular to the EIAR and supplementary information provided by the developer, and the submissions from prescribed bodies in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:
 - Positive long term impacts on population and human health through the creation of aesthetically pleasing indoor and outdoor public areas that will improve the townscape and visual setting and encouraged increased physical activity.
 - Positive impacts on movement and transportation in the vicinity of the site through widening of footpaths, provision of improved pedestrian crossings and traffic calming.
 - Major positive impact is the provision of a new and sustainable function for currently vacant and unused protected structures - restoration, extension and reuse of the protected structures will also have an overall positive impact on the conservation area surroundings and the public realm in this area. A "do

- nothing" scenario in this case, whereby the current state of the site environment continues to evolve without the proposed project, would result in seriously adverse impacts for the condition of the protected structures.
- Adverse interventions to protected structures to include provision of Universal Access; removal of return to No. 23; and adjustment of rear window openings to form bridge access to new extension – mitigated by the fact that alterations are being carried out to the less intact No's. 25, 26 and 27 rather than a more intact houses.
- Adverse impacts on population and human health in terms of adjoining residential amenity during the construction phase from noise, vibration, dust, contaminated material, traffic and visual impact – mitigated through compliance with the Construction Management & Waste Management Plan and measures outlined with the waste management section of the EIAR.
- 8.7.2. There are currently no approved plans or projects in the vicinity of the proposed development that will give rise to significant cumulative effects. Furthermore, significant cumulative effects will not occur from the interaction between the environmental factors.
- 8.7.3. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment.

9.0 **Appropriate Assessment**

- 9.1. The EU Habitats Directive (92/43/EEC) requires competent authorities to review planning applications and consents that have the potential to impact on European designated sites, i.e. Special Protection Areas (SPA's) and Special Areas of Conservation (SAC's). To assist this process, the applicant has provided Screening Report for Appropriate Assessment.
 - Stage 1: Screening
- 9.2. The first stage of the Appropriate Assessment process is the screening exercise where it should be decided if the effects of a development on a European site are likely and whether or not the effects are significant in light of the Conservation Objectives for the site. It should also be determined if there are in-combination

- effects with other projects. The precautionary principle should apply if there are significant effects that cannot be excluded, or where the likelihood is uncertain.
- 9.3. The first step of this stage is to identify all European sites which could potentially be affected using the Source-Pathway-Receptor model. According to the Screening Report submitted with the planning application, there are 18 European Sites within 15km of the appeal site. Of these, South Dublin Bay SAC (0210) and the South Dublin Bay and River Tolka Estuary SPA (004024) are within 5km.
- 9.4. Having regard to the nature and scale of the proposed development, impact pathways would be restricted to hydrological pathways. Using the source-pathway-receptor risk assessment principle, the European sites that could potentially be affected by the proposed development are those listed above in close proximity to the site. The distance to all other European Sites is in excess of 5km. It can be reasonably concluded that the proposed development would not have a significant effect individually or in combination with other plans or projects on European sites in excess of 5km from the site having regard to the conservation objectives for these European Sites, the nature of discharge from the development site, and the source-pathway-receptor risk assessment principle.
- 9.5. The nearest European Sites to the appeal site are the South Dublin Bay SAC located c. 3.9km south-east of the proposed development site, and the South Dublin Bay and River Tolka Estuary SPA, located c. 2.3km to the east. A description and the conservation objectives of these European Sites are set out in the Screening Report. The assessment of the potential for significant effects on each European site taking account of the south-pathway-receptor principle is also set out.
- 9.6. It is concluded that no European sites are deemed to be at risk of likely significant effects from the construction or operation of the proposed development. The local surface water drainage network drains to Dublin Bay; however, no likely significant effects are predicted due to the temporary nature and small scale of any construction related discharges; the significant distance between the outfall of surface water runoff and the nearest European Site; and the fact that enriched water entering Dublin Bay has been shown to rapidly mix and become diluted.
- 9.7. Foul water generated on site will be treated at Ringsend wastewater treatment plant, which is operating at or above capacity. However, no significant effects are

- predicted due to the mixing and dilution of enriched water entering Dublin Bay; no proven link between WWTP discharges and nutrient enrichment of sediments in Dublin Bay; the confinement of nutrients from the WWTP to an area between South Wall and the Tolka Estuary; and the fact that there is no data to suggest that water quality in this area is adversely affecting the conservation interests of European Sites.
- 9.8. The Screening Report includes an assessment of the potential for in-combination effects of other existing or proposed plans or projects nearby, which may lead to incombination effects on European Sites. I would be satisfied that there will be no likelihood for significant effects on any European sites, and no adverse impacts to European site integrity arising from surface and foul water discharges during the construction and/or operation of the proposed development in combination with other plans or projects. The site is sufficiently distant from the nearest European Site and the nature of the discharge from the site is such that no significant effects are likely.
- 9.9. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Sites No's: 0210 and 004024 or any other European site, in view of the site's Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

10.0 Conclusion

10.1. The proposed Parnell Square Cultural Quarter anchored by the relocated Dublin City Central Library and comprising public realm works along Parnell Square North will bring about substantial improvements to the architectural heritage at a significant site within the Georgian core of the city and at one end of the city centre grand civic spine. Protected structures that are currently vacant and in poor state of repair will be carefully restored and brought back into long term sustainable use. The proposed library design is exemplary and befitting of its status as the main library serving the city. This is a flagship project for Dublin that will emerge as an important

- destination and one which will generate activity for the area by way of increased pedestrian footfall attracted to the library itself and the new outdoor space.
- 10.2. It is therefore important that a proper balance is struck between the different modes of transport utilising Parnell Square North. The proposed development retains the existing capacity for transport, albeit in a more traffic calmed environment. This gives rise to a potential for transport conflicts and an undermining of the use of Parnell Square North as a pleasant and safe public plaza.
- 10.3. Under Section 175(9)(a) of the Planning and Development Act, 2000 (as amended) the Board may approve the proposed development; modify the proposed development; approve, in part only, the proposed development; or refuse to approve the proposed development. It is also open to the Board under Section 175(5) to require the applicant to submit further information in relation to the effects on the environment of the proposed development or the consequences for the proper planning and sustainable development of the area.
- 10.4. Having regard to the above, the Board may wish to consider approving the proposed library element of the scheme only, or to seek further information that requires a revised layout and design for the public plaza to incorporate shared surfacing or full pedestrianisation. However, I consider the National Transport Authority's recommendation of a single carriageway solution with bus layby to be acceptable. I consider that the lane should be available for public transport use only during the opening hours of the library. This would reduce traffic volumes and speeds passing through Parnell Square North and allow for a narrower crossing distance than the 6m wide double lane proposal. The widened public space would also reduce the potential for conflicts between pedestrians and cyclists. I therefore recommend that the proposed development is approved subject to modification reflecting same.

11.0 Recommendation

11.1. On the basis of the above assessment, I recommend that the Board APPROVE the proposed development with modifications for the reasons and considerations and subject to the conditions set out below.

12.0 Reasons and Considerations

- 12.1. In coming to its decision, the Board had regard to the following:
 - a) EU legislation including in particular:
 - The relevant provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU (EIA Directive) on the assessment of the effects of certain public and private projects on the environment,
 - Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC
 as amended by 2009/147/EC (Birds Directives) which set the
 requirements for Conservation of Natural Habitats and of Wild Fauna
 and Flora throughout the European Union.
 - b) National Legislation including in particular:
 - Section 175 of the Planning and Development Act 2000 (as amended) which sets out the provisions in relation to local authority projects which are subject to Environmental Impact Assessment (EIA).
 - c) National Policy and Guidance including in particular:
 - Architectural Heritage Protection: Guidelines for Planning Authorities, 2011, which sets out advice and recommendations relating to the protection of structures and the preservation of the character of conservation areas.
 - The Design Manual for Urban Roads and Streets, 2013, which
 provides guidance on how to approach the design of urban streets in a
 more balanced way.
 - d) Regional Policy including in particular:
 - The Transport Strategy for the Greater Dublin Area 2016-2035, which includes aims and measures for improving conditions for pedestrians in Dublin City.
 - e) Local Planning Policy including in particular:
 - The provisions of Dublin City Development Plan 2016-2022, including Objective CHCO32 which seeks "to promote and facilitate the development of a mixed-use cultural facility in Parnell Square

- anchored by a new City Library, stimulating the regeneration of the north inner city."
- Dublin City Centre Public Realm Study and Implementation
 Plan, 2016, which identifies The Parnell Square Cultural Quarter
 Project as a flagship project for the city.

f) The following matters:

- the nature, scale and design of the proposed works as set out in the application for approval and the pattern of development in the vicinity,
- the documentation and submissions of the Local Authority, including the environmental impact assessment report and associated documentation submitted with the application, and the range of mitigation and monitoring measures proposed,
- other relevant guidance documents,
- the submissions and observations made to An Bord Pleanála in connection with the application,
- the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European sites and
- the report and recommendation of the inspector including the examination, analysis and evaluation undertaken in relation to appropriate assessment screening and environmental impact assessment.

12.2. Proper Planning and Sustainable Development

12.2.1. The proposed development is in accordance with aims and objectives of the Dublin City Development Plan, 2016-2022 and is therefore acceptable in principle. Parnell Square North will develop as a destination where many cultural facilities and activities are co-located to give a special character to the area. The proposed use is appropriate for the protected structures and the special interest, character and setting of the buildings will be protected into the future. The proposed works to the

public realm represent an acceptable contribution towards place-making that will generate a largely positive impact on the amenities of the area. Subject to amendment, the proposed street layout is acceptable in comparison to the current situation on the ground, and having regard to the potential usage of public realm along Parnell Square North. The Board concluded that the proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

12.3. Environment Impact Assessment

- 12.3.1. The Board completed in compliance with s.172 of the Planning and Development Act 2000 an environmental impact assessment of the proposed development, taking into account:
 - the nature, scale, location, and extent of the proposed development;
 - the Environmental Impact Assessment Report and associated documentation submitted with the application;
 - the submissions from the applicant and the prescribed bodies;
 - the Planning Inspector's report;
- 12.3.2. The Board considered that the Environmental Impact Assessment Report, supported by the information submitted by the applicant identifies and describes adequately the direct, indirect and cumulative effects of the proposed development on the environment. The Board is satisfied that the information contained in the EIAR complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU.
- 12.3.3. The Board agreed with the summary and examination, set out in the Inspector's report, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made in the course of the application. The Board is satisfied that the Inspector's report sets out how these were addressed in the assessment and recommendation including environmental conditions and are incorporated into the Board's decision.
- 12.3.4. The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the

mitigation measures proposed, as set out in Section 6 of Volume 1 of the EIAR 'Summary of Mitigation Measures', and, subject to compliance with the conditions set out herein, the effects on the environment of the proposed development by itself and cumulatively with other development in the vicinity would be acceptable. In doing so, the Board adopted the report and conclusions of the reporting inspector.

- 12.3.5. The Board considered that the main significant direct and indirect effects of the proposed development on the environment are, and will be mitigated as follows:
 - Positive long term impacts on population and human health through the creation of aesthetically pleasing indoor and outdoor public areas that will improve the townscape and visual setting and encouraged increased physical activity.
 - Positive impacts on movement and transportation in the vicinity of the site through widening of footpaths, provision of improved pedestrian crossings and traffic calming.
 - Major positive impact is the provision of a new and sustainable function for currently vacant and unused protected structures - restoration, extension and reuse of the protected structures will also have an overall positive impact on the conservation area surroundings and the public realm in this area. A "do nothing" scenario in this case, whereby the current state of the site environment continues to evolve without the proposed project, would result in seriously adverse impacts for the condition of the protected structures.
 - Adverse interventions to protected structures to include provision of Universal Access; removal of return to No. 23; and adjustment of rear window openings to form bridge access to new extension – mitigated by the fact that alterations are being carried out to the less intact No's. 25, 26 and 27 rather than a more intact houses.
 - Adverse impacts on population and human health in terms of adjoining residential amenity during the construction phase from noise, vibration, dust, contaminated material, traffic and visual impact – mitigated through compliance with the Construction Management & Waste Management Plan and measures outlined with the waste management section of the EIAR.

12.3.6. The Board is satisfied that this reasoned conclusion is up to date at the time of taking this decision.

12.4. Appropriate Assessment

12.4.1. The Board completed an Appropriate Assessment Screening exercise in relation to the potential effects of the proposed development on designated European sites. The Board noted that the proposed development is not directly connected with or necessary to the management of a European Site. The Board considered the nature, scale and location of the proposed development, the appropriate assessment screening report submitted with the application, the submissions on file and the report of the Inspector. In completing the screening exercise, the Board adopted the report of the Inspector and concluded that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European sites, in view of the sites' conservation objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

13.0 Conditions

1. The proposed development shall be carried out and completed in accordance with the plans and particulars, including the environmental impact assessment report (EIAR), and other associated documentation, lodged with An Bord Pleanála on the 26th day of October 2018, except as may otherwise be required in order to comply with the conditions set out below. Where any mitigation measures set out in the Environmental Impact Assessment Report or any conditions of this Approval require further details to be prepared by or on behalf of the Local Authority, these details shall be placed on the file and retained as part of the public record.

Reason: In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.

- 2. The proposed development shall be amended as follows:
 - (a) Vehicular entry to Parnell Square North from Parnell Square West shall

be reduced from two lanes to one lane.

- (b) The carriageway through Parnell Square North shall widen out to two lanes at an appropriate point to accommodate bus drop off/ pick up.
- (c) The carriageway through Parnell Square North shall be reserved for public transport use only during the opening hours of the new central library.

Revised drawings showing compliance with these requirements shall be placed on the file and retained as part of the public record.

Reason: In the interests of pedestrian and traffic safety.

3. The mitigation measures and associated monitoring outlined in the plans and particulars relating to the development, including the environmental impact assessment report submitted with this application as set out in Section 6 of Volume 1 of the EIAR 'Summary of Mitigation Measures', shall be carried out in full except as may otherwise be required in order to comply with other conditions.

Prior to commencement of the development, details of a time schedule for implementation of the mitigation measures and associated monitoring shall be prepared by or on behalf of the Local Authority, these details shall be placed on the file and retained as part of the public record.

Reason: In the interest of clarity and protection of the environment and in the interest of public health.

4. Prior to the commencement of development, developer or any agent acting on its behalf shall prepare a Construction and Environmental Management Plan (CEMP) including demonstration of proposals to adhere to best practice and protocols. The CEMP shall include specific proposals as to how the CEMP will be measured and monitored for effectiveness.

Reason: In the interest of protecting the environment and public health.

5. Prior to commencement of development, the developer shall consult with

the National Transport Authority with regard to proposals for the interface between Parnell Square North and the Core Bus Corridors (east and west side).

Reason: To protect the bus network.

- 6. The following conservation requirements shall be complied with:
 - (a) A conservation expert shall be employed to manage, monitor and implement the works on the site and to ensure adequate protection of the retained and historic fabric during the works. In this regard, all permitted works shall be designed to cause minimum interference to the retained building and facades structure and/or fabric.
 - (b) All works to the protected structures shall be carried out in accordance with best conservation practice as detailed in the application and the "Architectural Heritage Protection Guidelines for Planning Authorities" issued by the Department of the Environment, Heritage and Local Government in 2004 (as amended in 2011). Any repair works shall retain the maximum amount of surviving historic fabric in situ, including structural elements, plasterwork (plain and decorative) and joinery and shall be designed to cause minimum interference to the building structure and/or fabric. Items that have to be removed for repair shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
 - (c) All existing original features, including interior and exterior fittings/features, joinery, plasterwork, features (including cornices and ceiling mouldings), staircases including balusters, handrail and skirting boards, shall be protected during the course of refurbishment.
 - (d) All repair of original fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric, in particular to the external stone/ brick work and replacement windows. Full repair and reinstatement schedules (condition surveys, specifications and methodologies) to avoid loss or damage to original fabric and ensure

- that the character of this protected structure is not altered shall be placed on the file and retained as part of the public record.
- (e) A schedule of condition and associated repairs of the historic plasterwork (plain and decorative to be retained) and clarification of all restoration works, thermal and damp upgrading works (to avoid adverse impact on breathability and historic character) to be confirmed with conservation staff.
- (f) Upgrading measures triggered by Building Regulations to have regard to the architectural significance of the protected structure/complex and to be based on a managed solution retaining original fabric and character.
- (g) Samples of materials and site exemplars of site workmanship with respect to external repairs and restoration shall be placed on the file and retained as part of the public record.

Reason: To ensure that the integrity of the retained structures is maintained and that the structures are protected from unnecessary damage or loss of fabric.

7. The developer shall facilitate the preservation, recording and protection of archaeological materials or features which exist within the site and these details shall be placed on the file and retained as part of the public record.

The developer shall also comply with the following requirements:-

- (a) satisfactory arrangements shall be put in place for the execution (or supervision) by a suitably qualified archaeologist of all archaeological excavations, investigations and site development works.
- (b) This archaeologist shall advise on such measures as may be necessary to ensure that any damage to the remaining archaeological material is avoided or minimised. In this regard, the proposed locations of piled foundations, etc. shall be the subject of continuing review and full details of any revisions to the proposed location or levels of pipe caps, ground beams, service trenches or other subsurface works shall be

- placed on the file and retained as part of the public record.
- (c) satisfactory arrangements for post-excavation research and the recording, removal and storage, of any archaeological remains which may be considered appropriate to remove, shall be placed on the file and retained as part of the public record. In this regard, a comprehensive report on the completed archaeological excavation shall be prepared within a period of six months or within such extended period as may be agreed with the planning authority.

This report shall, in particular, include reference to the following matters:-

- (i) The evidence (if any) of later medieval occupation or activity on the site.
- (ii) The physical topography and natural environment of the site, prior to mediaeval occupation.

Reason: In order to conserve the archaeological heritage of the site, it is considered reasonable that the developer should facilitate the preservation by record of any archaeological features or materials which may exist within it. In this regard, it is considered reasonable that the developer should be responsible for carrying out properly supervised archaeological excavations in circumstances where the permitted development works would be likely to result in the unavoidable disturbance or destruction of such features or materials.

8. A suitably qualified ecologist shall be retained by the applicant to oversee the construction of the proposed project and implementation of mitigation measures relating to ecology as set out in the EIAR. Upon completion of works, an ecological report of the site works shall be prepared by the appointed ecologist and submitted to the Local Authority to be kept on file as part of the record.

Reason: In the interest of nature conservation and protection of terrestrial and aquatic biodiversity.

Donal Donnelly
Planning Inspector
3rd April 2019