



An
Bord
Pleanála

Inspector's Report 305376-19

Development	Two no. external banners & replacement of existing wall mounted brass plaque
Location	G.P.O., Lower O'Connell Street, Dublin 1
Planning Authority	Dublin City Council
Planning Authority Reg. Ref.	3290/19
Applicant(s)	An Post
Type of Application	Permission
Planning Authority Decision	Grant permission subject to conditions
Type of Appeal	Third Party
Appellant(s)	An Taisce
Observer(s)	None.
Date of Site Inspection	18 th November 2019
Inspector	Louise Treacy

1.0 Site Location and Description

- 1.1. The subject site comprises the General Post Office (GPO), Dublin 1, one of the most important architectural landmarks on the western side of O'Connell Street. It occupies the entire city block between Prince's Street North to the south and Henry Street to the north.
- 1.2. This application relates to the primary façade of the building fronting onto Lower O'Connell Street.

2.0 Proposed Development

- 2.1. The proposed development comprises the erection of 2 no. external banners (6.5 m high x 2.5 m wide) at the main entrance portico for a temporary period of 3 years and the replacement of an existing wall mounted brass plaque (675mm x 240mm) with a new plaque of the same dimensions at the north door entrance on the O'Connell Street façade.
- 2.2. The banners and plaque will identify the Witness History Visitor Centre located in the public exhibition area of the building.

3.0 Planning Authority Decision

3.1. Decision

Notification of the Decision to Grant Permission subject to 7 no. conditions issued on 12th August 2019. Condition No. 2 limits the duration of the permission to two years.

3.2. Planning Authority Reports

3.2.1. Planning Reports

3.2.2. Basis of Planning Authority's decision.

3.2.3. The Planning Officer considered that the granting of permission for a period of 3 years was unreasonable. A 2-year permission was considered more appropriate to enable a review of the signage and its impact on visitor numbers.

3.2.4. **Other Technical Reports**

3.2.5. **Conservation Officer:** No objection to the proposed development subject to 5 no. conditions.

3.2.6. Recommendation that the banners be hung for the duration of a season for a maximum period of one year, with the possibility of an extension of this time period, subject to review.

3.3. **Prescribed Bodies**

3.3.1. **Irish Water:** None received.

3.3.2. **NTA:** None received.

3.3.3. **Irish Rail:** None received.

3.3.4. **Fáilte Ireland:** None received.

3.3.5. **An Chomhairle Ealaíon:** None received.

3.3.6. **The Heritage Council:** None received.

3.3.7. **An Taisce:** Recommended that planning permission be refused on the basis of visual impact on the Protected Structure and ACA.

3.3.8. **Minister for Arts, Heritage, Regional, Rural & Gaeltacht Affairs:** None received.

3.3.9. **Transport Infrastructure Ireland:** Notes the site is located within the area of the Luas Cross City S. 49 Supplementary Development Contribution Scheme and makes recommendations regarding works near the Luas line.

3.4. **Third Party Observations**

3.4.1. Two third party observations were made on this application. The issues raised include the impact of the proposed banners on the symmetry of the portico and the architectural and cultural character of the GPO, and the setting of an undesirable precedent for other historic landmarks in the city.

4.0 **Planning History**

4.1. **PA Reg. Ref. 3677/13:** Planning permission granted in March 2014 for development including a new exhibition area which is now in use as the Witness History Visitor Centre.

5.0 Policy and Context

5.1. Development Plan

- 5.1.1. **Zoning:** The site is subject to land use zoning 'Z5' (City Centre), which has the objective "*to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity*". 'Advertisement and advertising structures' are open for consideration on Z5 zoned lands.
- 5.1.2. **Conservation Designations:** The GPO is designated as a Protected Structure (PA RPS Ref. 6010). The site is also located within a Conservation Area and the O'Connell Street Architectural Conservation Area, which is subject to a Scheme of Special Planning Control.
- 5.1.3. **Policy CHC1:** To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.
- 5.1.4. **Policy CH2:** To ensure that the special interest of Protected Structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will:
- (a) protect or, where appropriate, restore form, features and fabric which contribute to the special interest;
 - (b) incorporate high standards of craftsmanship and relate sensitively to the scale, proportions, design, period and architectural detail of the original building, using traditional materials in most circumstances;
 - (c) be highly sensitive to the historic fabric and special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials;
 - (d) not cause harm to the curtilage of the structure; therefore, the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the Protected Structure;
 - (e) protect architectural items of interest from damage or theft while buildings are empty or during course of works;

(f) have regard to ecological considerations, for example, protection of species such as bats.

- 5.1.5. **Policy CH4:** To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.
- 5.1.6. **Policy SC7:** To protect and enhance important views and view corridors into, out of and within the city, and to protect existing landmarks and their prominence.
- 5.1.7. Figure 4 of the development plan identifies indicative key views and prospects within the city. These include a southerly view of O'Connell Street from the junction of Parnell Street/Parnell Street East and northerly views of O'Connell Street from O'Connell Bridge.
- 5.1.8. **Policy CEE12 (i):** To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the provision of necessary significant increase in facilities such as hotels, aparthotels, tourist hostels, cafés, and restaurants, visitor attractions, including those for children.
- 5.1.9. **Policy CEE12 (ii):** To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors.

5.2. **Scheme of Special Planning Control O'Connell Street & Environs 2016**

- 5.2.1. **Key Objective:** The control of advertisement structures and the exhibition of advertisements.
- 5.2.2. **Key Objective:** It is an objective to ensure that all new advertisement structures erected in the area are well designed. Dublin City Council will permit only advertisements which are designed sensitively and which will enhance the appearance and vitality of the area.

5.3. **Natural Heritage Designations**

None.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. 1 no. third party appeal has been lodged by An Taisce, the grounds of which can be summarised as follows:

- The proposed development conflicts with development plan policy concerning protected structures, protection of views, vistas and the integrity of city landmarks and the improvement of the character and visual presentation of O'Connell Street as the city's premier thoroughfare;
- The size and prominence of the banners would have an obtrusive effect on the building and the street and would cause significant harm to the setting and character of the Protected Structure;
- The proposal conflicts with the Outdoor Advertising Strategy of the development plan and Policy SC7 regarding the protection of important views and view corridors into, out of and within the city, and the protection of existing landmarks and their prominence.

6.2. Applicant Response

6.2.1. A response to the grounds of the appeal has been lodged by Doyle Kent Planning Partnership Ltd. on behalf of the applicant, which can be summarised as follows:

- The Witness History exhibition has experienced falling visitor numbers since opening in 2016, with the absence of good signage immediately outside identified as a substantial drawback;
- The fixings which will support the proposed banners have been designed with appropriate cushioning to protect the stonework of the fluted Ionic columns;
- The proposed banners are designed to integrate in form and layout with the scale and geometry of the entrance portico, with their impact on the setting of the GPO being temporary and minor;

- The proposed development will not entail any changes to the existing building fabric and will be entirely reversible, with the lightweight banners being subservient to the solidity and massing of the stonework of the building;
- The proposed banners will place increased emphasis on the special interest of the building, with banners previously being permitted at this location to advertise historic events;
- The proposed banners will not be visible in more distant views along O'Connell Street and as such, will have a limited impact on views and vistas;
- Precedent for such advertising exists elsewhere, including the Bank of Ireland on College Green;
- The Planning Authority's decision to grant permission should be upheld. However, the duration of the permission should not be limited to 2 years. It is submitted that permission should be granted for a 3-year period commencing on the date the banners are erected.

6.3. The appeal response is accompanied by a copy of the planning application conservation report prepared by Lindsay Conservation Architects. This report concludes that the conservation impacts of the proposed development are neutral.

6.4. **Planning Authority Response**

6.4.1. None received.

6.5. **Observations**

6.5.1. None received.

6.6. **Further Responses**

6.6.1. None received.

7.0 **Assessment**

7.1. I am satisfied that the issues raised in the appeal are the main issues for consideration in this case, including:

- Impacts on the Protected Structure
- Compliance with development plan policy
- Duration of planning permission

7.2. Each of these issues is addressed in turn below.

7.3. **Impacts on the Protected Structure**

- 7.3.1. The GPO is a Protected Structure which is located within a Conservation Area and Architectural Conservation Area. The building is also rated as one of national importance in the National Inventory of Architectural Heritage Survey of Dublin City. As such, it is acknowledged that the proposed development must be assessed in the context of these conservation designations and the potential for negative impacts, visual and otherwise, to arise to the Protected Structure and the surrounding streetscapes.
- 7.3.2. The proposed development includes the replacement of an existing brass plaque (240mm long x 675mm wide) which is positioned at the northern building entrance from Lower O'Connell Street. The new plaque will advertise the Witness History Visitor Centre within the GPO. I note that the Planning Authority's Conservation Officer considered the replacement plaque to be acceptable, subject to confirmation of the proposed materials and fixing method. I further note that the applicant has confirmed that the plaque will be brass as per the existing.
- 7.3.3. Given that the proposed development comprises the replacement of the existing plaque on a like-for-like basis, I considered it to be acceptable and further that it would have no impact on the Protected Structure, Conservation Area or Architectural Conservation Area. Details of the proposed fixing method can be confirmed by way of condition.
- 7.3.4. The proposed development also includes 2 no. banner signs (6500 mm long x 2500 mm wide) which will be hung between the columns of the front portico (bays 2 and 4) at 4.75m above ground level. The banners will be a semi-transparent mesh, which will allow wind to pass through and provide views of the building façade to the rear.
- 7.3.5. At either end, the banners will be threaded through stainless-steel tensioners fixed to bespoke stainless-steel rings wrapped around the columns and cushioned with neoprene. No lighting of the banner signs is proposed. A preliminary assessment of

the structural implications of the installation of the banners on the portico has been undertaken by Dermot Nolan & Associates Historic Building Consultants as enclosed with the application. This assessment concludes that, in principle, the details of the proposed fixing arrangements between the banners and the columns are structurally adequate.

- 7.3.6. I note the Planning Authority's Conservation Officer considered that the erection of the banners for a temporary period of 1 year was acceptable subject to conditions. The duration of the permission is discussed further in Section 7.5 of this report below. Having reviewed the planning application documentation and drawings, and the Conservation Officer's assessment, I am satisfied that the proposed banners would have no significant impact on the Protected Structure. A design methodology has been devised to protect the stonework of the building and I note that the proposed banners are temporary and reversible. As such, I consider that the banners are acceptable in this instance. The reaching of agreement regarding the fixing method for the banners can be dealt with by way of condition.

7.4. Compliance with development plan policy

- 7.4.1. The appellant submits that the proposed banners would be visually obtrusive and harm the setting and character of the Protected Structure. The appellant further submits that the banners would conflict with development plan policy regarding the protection of important views/view corridors and the prominence of existing landmarks.
- 7.4.2. In my opinion, the proposed banners would not harm the setting or character of the Protected Structure and would not conflict with development plan policy as identified in Section 5.0 of this report.
- 7.4.3. A visual impact assessment accompanies the application as prepared by James Horan Architectural Illustration. This includes 3 no. verified photomontage views which illustrate the banners in the context of the surrounding streetscapes. While I note that no written assessment of the visual impact has been provided, in my opinion, the photomontages demonstrate that the proposed banners can be absorbed into the streetscape with no undue visual impacts arising. I also note that the banners will not be visible in more distant views of the GPO from Upper

O'Connell Street to the north and Lower O'Connell Street to the south, given their central position between the portico columns.

- 7.4.4. Development plan policy generally seeks to control inappropriate advertising and to permit only that which is sensitively designed and enhances the area. In my opinion, the proposed banners have been sympathetically and sensitively designed in a manner which will not detract from the setting of the GPO or surrounding conservation area. I also note that their lightweight material will continue to facilitate views of the primary building façade to the rear. Furthermore, the Planning Authority's Conservation Officer had no objection to the proposed development subject to conditions. The applicant's conservation assessment also concluded that the conservation impacts of the proposed development are neutral.
- 7.4.5. The development plan also includes policies which seek to promote and facilitate tourism as a key pillar of the city economy. The proposed banners are intended to advertise the Witness History Visitor Centre which commemorates the 1916 Easter Rising, the War of Independence, the Civil War and the Northern Ireland peace process. Having regard to the foregoing, it is considered that the proposed banners would be in accordance with the Planning Authority's tourism policies of enhancing Dublin as a world class cultural destination.
- 7.4.6. In conclusion, I consider that the proposed development would comply with development plan policy and as such, would be in accordance with the proper planning and sustainable development of the area.

7.5. Planning Permission Duration

- 7.5.1. The Planning Authority's Conservation Officer recommended that the proposed banners be hung for the duration of a season for a maximum period of one year. The Planning Authority's Planning Officer considered a 2-year period would be more reasonable to allow a review of the proposed signage and its impact on visitor numbers. The applicant's agent submits that planning permission should be granted for a 3-year period commencing on the date the banners are erected. This argument is based on the time required for preparatory arrangements, including the making of compliance agreements with the Planning Authority.
- 7.5.2. Having regard to the foregoing, I consider that the granting of permission for a period of 1 to 2 years would provide insufficient time to assess the impact of the proposed

banners on tourist numbers to the visitor centre. Given the temporary nature of the proposed development, I consider that the granting of permission for a 3-year period would be acceptable in this instance and would provide a reasonable timeframe in which to establish any new trend in visitor numbers.

- 7.5.3. The preparatory arrangements for the erection of the banners, including the making of any compliance agreements with the Planning Authority, are not relevant to the Board's assessment of this case. As such, in the event planning permission is granted in this instance, the duration of the permission should commence on the date of the Board's Order.

8.0 Recommendation

- 8.1. I recommend that planning permission be granted subject to conditions.

9.0 Reasons and Considerations

- 9.1. Having regard to the nature and scale of the development, the temporary nature of the proposed banners and the policies of the Dublin City Development Plan 2016-2022 to promote tourism within the city, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the visual amenities of the area or of property in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to the commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.
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	Reason: In the interest of clarity.
2.	<p>The permission for the banner signs shall be for a period of 3 years from the date of this Order. The banners shall then be removed unless, prior to the end of the period, permission for their retention has been obtained.</p> <p>Reason: To allow for a review of the development having regard to the circumstances then pertaining and in the interest of visual amenity.</p>
3.	<p>(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 façade structure and fabric.</p> <p>(b) All works to the protected structure will 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 Arts, Heritage and the Gaeltacht in 2011.</p> <p>Reason: To ensure that the integrity of the Protected Structure is maintained and protected from unnecessary damage or loss of fabric.</p>
4.	<p>Details concerning the installation, fixing method and fixing materials of the proposed banners and plaque sign shall be submitted to, and agreed in writing with, the Planning Authority prior to the commencement of development.</p> <p>Reason: To ensure an appropriate standard of conservation.</p>

Louise Treacy
Planning Inspector

26th November 2019