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Planning Appeal Form

Your details

1. Appellant's details (person making the appeal)

Your full details:

(a) Name

Clarion Quay Management Company CLG

(b) Address

The Community Office, 1 Block 3, Clarion Quay
Apartments, IFSC, Dublin 1.

Agent's details

2. Agent's details (if applicable)

If an agent is acting for you, please also provide their details below. If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

David Ward

(b) Agent's address

The Community Office, 1 Block 3, Clarion Quay
Apartments, IFSC, Dublin 1.



Declaration of Interest

1 message

John Bird [REDACTED]
To: secretary@pleanala.ie

10 May 2024 at 12:30

Dear Secretary,

I have been asked by clients to submit an Appeal in relation to Dublin City Council Reg Ref 3274/24 17 storey over 3-storey basement at 1, North Wall Quay for NWQ Devco.

I currently hold a Warrant from An Bord Pleanála as a Fee Per Case Inspector. The Warrant expires on 31/12/2024.

I have no Bord files waiting submission.

Please accept this formal Declaration in relation to the above file.

Yours sincerely,
John Bird,
FPC.

Postal address for letters

3. During the appeal we will post information and items to you or to your agent. For this appeal, who should we write to? (Please tick ✓ one box only.)

You (the appellant) at the
address in Part 1

☐

The agent at the address in
Part 2

☒

Details about the proposed development

4. Please provide details about the planning authority decision you wish to appeal. If you want, you can include a copy of the planning authority's decision as the appeal details.

(a) Planning authority

(for example: Ballytown City Council)

Dublin City Council

(b) Planning authority register reference number

(for example: 18/0123)

DCC 3274/24

(c) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Ballytown)

CitiGroup Building, 1 North Wall Quay, Dublin 1, D01 T8Y1

Appeal details

5. Please describe the grounds of your appeal (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

See Attached Appeal Document

Supporting material

6. If you wish you can include supporting materials with your appeal.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Acknowledgement from planning authority (third party appeals)

7. If you are making a third party appeal, you **must** include the acknowledgment document that the planning authority gave to you to confirm you made a submission to it.

Fee

8. You **must** make sure that the correct fee is included with your appeal. You can find out the correct fee to include in our Fees and Charges Guide on our website.

Oral hearing request

9. If you wish to request the Board to hold an oral hearing on your appeal, please tick the "yes, I wish to request an oral hearing" box below.

Please note you will have to pay an **additional non-refundable fee** of €50. You can find information on how to make this request on our website or by contacting us.

If you do not wish to request an oral hearing, please tick the "No, I do not wish to request an oral hearing" box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☒

NALA has awarded this document its Plain English Mark
Last updated: April 2019.



Third Party Appeal by CQMC in support of Decision to Refuse Reg Ref 3274/24

Dublin City Council Register Reference 3274/24.

Proposed Office Demolition and Office Redevelopment of the CitiGroup Building, 1 North Wall Quay, for NWQ Devco Limited.

Lodged 23rd February 2024.

Date of Planning Authority Decision 16th April 2024.

Last date for Appeal 13th May 2024.

Third party appeal fee € 220

Third Party Appeal on behalf of Clarion Quay Management Company CLG.

To: The Secretary,
An Bord Pleanála,
64, Marlborough Street,
Dublin 1.

Introduction

On the instructions of Clarion Quay Management Company, the undersigned have prepared this Third Party Appeal.

The Clarion Quay Estate (CQE) lies immediately north and east of the proposed development and will be the non-office development most affected by the proposal.

Clarion Quay Management Company CLG (CQMC) fully supports the three Reasons for Refusal given by the Planning Authority in its Decision.

A Brief Summary of Deficiencies in the Application

In the interest of clarity, we wish to highlight deficiencies in the Application, and to reinforce statements made in the Planning Authority Report and in our own previous Submission to the Planning Authority.

We hope to assist the Planning Inspector as they examine the documents and make their Report to the Board. In this regard, we highlight some of our concerns in the bullet points below:

- Lack of response to the serious issues raised in the Pre-Planning Application Consultation with DCC, including an Applicant's Consultant's claim that DCC was not available for consultation.
- Failure to accept the second of two basic criteria for increased height in the C5 City Centre Zoning, which is mixed residential and other uses.
- Failure to recognize that there are working basements in the Clarion Quay Estate and elsewhere on Alderman Way and Clarion Quay roadway.
- Failure to recognize the importance of Alderman Way and Clarion Quay as access for Emergency Services and the vehicular right of way to access CQE.
- Failure to show adequate sections and largescale elevation details and comparisons of existing buildings with those proposed.
- Part of the proposed offices/cultural space is in a basement, which is prohibited in a flood zone.

Third Party Appeal by CQMC in support of Decision to Refuse Reg Ref 3274/24

The application proposes a plot ratio more than twice the maximum permitted under the Z5 City Centre Zoning and ignores important criteria for any increase in height in this zone.

It therefore directly proposes a material contravention of the city's Development Plan and thereby directly conflicts with the policies and objectives of the city Development Plan made by the elected representatives following public consultation.

Although the Application contains a large number of drawings and reports, it is highly deficient in information that would allow its impact to be fairly assessed. This is particularly evident in the case of the primarily residential Clarion Quay Estate.

At the time of our Submission to the Planning Authority, 130 separate drawings and documents were listed on the online system. As per the example in our Submission, it was very difficult to find certain key documents. While we understand that the mislabelling may be a result of lack of capacity in the system, it puts Third Parties under considerable pressure and is not an equitable system. If the Inspector agrees, we ask that they report accordingly to The Board.

Quantum and Height

The Application has been made on the premise that it contributes to the mixed use of the area under its zoning. It does not include any residential units. The proposal is further based on the premise that they are replacing a building not fit for purpose. The proposed office quantum of 69,258 sq. m is approximately 2.5 times greater than the current building quantum of 27,300 sq. m. The reasons given are that they would be providing next generation (A3+, LEED Platinum) office space, which is needed in the Dublin market by 2030, notwithstanding the current surplus, as the existing floorplates and ESG requirements will not suffice. In the Planning Report submitted by John Spain and Partners, they state *'attracting headquarter type uses to the city is a key foreign direct investment strategy. However, there is a limited supply of the large footplate offices outside of Docklands, Heuston and the suburbs. Sites of sufficient size to provide such floorplates are often found in regeneration areas and this represents a strategic advantage for Dublin.'*p46

The Heritage Significance & Adaptive Capacity Assessment includes data from Knight Frank's (Y)OUR SPACE Research regarding real estate provision for global occupiers. It states that 55% of CRE leaders expect that they will require more floor space. p14. No indication of what areas the respondents currently occupy is given. A list of the 10 largest office letting deals in Dublin is given. They range from 78,871 to 430,000 sq. ft. That is 7,327 to 39,948 sq. m respectively. The quantum sought is over 1.7 times the highest existing floorplate (Spencer Place).

The heights of the building range from 32.835 m to 80.150m. This is in contravention of the zoning and while consideration is given to taller buildings in specific locations, the Planning Authority made it clear that the height proposed was not acceptable. The applicants claim that they have modulated the forms to be sympathetic to the receiving environment and to respond to the width of the river Liffey. The river is shown on the contextual elevations, but its full width is not shown on any other drawn submission.

The Planning Authority have rejected the argument that the proposed development site was suitable for a landmark/tall building. We submit that the DCDP has carefully designated appropriate areas for larger floorplates and that the height and mass of this development are indicative of substantial overdevelopment of the site.

A minimum of 5% arts/community/cultural space must be provided for a development of this size. This equates to 2,361 sq. m calculated on the net office area of 47,225 sq. m. The proposal

includes spaces for the Gaiety School of Acting (partially underground) and the 'Liffey Experience'. These provide a total of 1,815 sq. m (77%). The deficit of 23% is to be provided in the form of a 'community park' which is given as having an area of 556 sq. m. p37 Architectural Design Statement.

This is discussed further below with a more detailed description of the omissions found regarding the information submitted in support of the application and the non-compliance of many aspects of the building with the requisite Statutory and Regulatory Standards.

Lack of Information for Third Parties and Decision Makers.

In order to assess a planning application, sufficient data must be provided to the Planning Authority to do so. It is also a statutory requirement that the public may do so during the 5 week observation period.

Despite the large amount of material submitted by the Applicant, much of that information is incomplete and critical metrics have been omitted. Analyses specifically requested by the Local Authority Planning Department and required by Statutory and Regulatory instruments have not been submitted. We highlight a number of these below for your attention.

Due to this lack of hard information, it is impossible to accurately assess the likely impacts of the proposed development, particularly those on CQE and the mixed-use area to the north of the Mayor Street Luas line. Nonetheless, the reports submitted in support of the application already indicate harmful effects if it were to be constructed as proposed.

Application Drawings Submitted

Planning Authorities require contextual elevations which accurately show the impact of a proposed development on the surrounding environment. True sections and elevations with measurements of height and distance to all adjacent properties are critical to this process.

We note that no distances beyond the site boundaries are given in any instance (plans, sections, or elevations). The Site Location Map and the Site Plans (Existing and Proposed) do not include the southern side of the river Liffey and do not name any of the buildings around the site. None of the key maps given (to indicate the location of the sections, elevations, and contextual elevations) show any buildings or streets beyond the site boundary. There are inconsistencies in the drawing graphics used to indicate the relative locations of other buildings in elevation, spot heights are not consistently shown or labelled, and the dimensions given within the site boundaries on plan do not describe every area particularly to the northern boundaries. No comparative drawings have been submitted showing the changes in building line/floorplate proposed.

The existing building and its proposed replacement are L-shaped with the long axes running north-south along Commons Street and east-west along North Wall Quay. In order to fully describe the proposed scheme, 2 long sections and 2 short sectional elevations should be submitted. These should include detailed drawings of the elevations and gross sections, where possible, of the adjoining buildings. Sectional analysis is critical to assessing the impact of the proposal.

The application only contains two sections, AA and BB. They run through the long axes of the building. There are no short sections which would show the relationship of the proposed development with CQE. It is not identified on either Section. No separation distances are shown.

The elevations submitted are existing and proposed North, South, East, and West. Each drawing has a contextual elevation and an enlarged portion of the same drawing as the elevation. Detailed spot heights are given for the proposed building on both the elevations and the sections. Various spot heights are given to buildings in the vicinity and to buildings which are distant from the site. Some of these are identified but most are not and there is no consistency in indicating depth of field or the elevational treatment of adjacent buildings.

The residential buildings most affected by the proposed development, CQE, are only indicated in outline on the Western and Southern Elevations, where they are not identified. They are indicated by dotted lines on the Northern and Eastern Elevations.

On the North Elevation drawings heights are given for the Trinity Biosciences building (on Pearse Street) and for the Miesian Plaza (on Baggot Street). These buildings are outlined on the drawings with the same weight as the buildings which are adjacent to or close by the proposed development. No distinction is made, and it begs the question of what the context of this proposed development is.

At the scale given it is not possible to make a reasonable assessment of elevational details and finishes. Of particular interest to the residents of CQE, and in particular those whose dwellings front onto Alderman Way, are details of the ground and other floors of the proposed development that would be in their arc of vision. On the east façade drawing there is no clarity, but much distracting detail, at ground floor level. As stated in our Submission to the Planning Authority, we pointed out that the plan drawings show electricity substations, ventilation plant and access to the underground service and parking areas. The plans do not show the two access points to the Clarion Quay basement car parks.

Building Heights and Separation Distances

It is practically impossible to assess the comparative building heights throughout the scheme. The only indication of the gross heights of the CQE blocks are given as spot levels on the Existing and Proposed Sections AA and BB and on the East Elevation. (Spot height of 19.835 with dotted outline described as 'Clarion Quay Apartments in Foreground. However, the CQE blocks have varying heights and which block this is not indicated. As the Elevation appears to cut through the existing CitiGroup carpark ramp, it would be assumed that this is Block 7/8 (the lowest block) with Block 9/10 to the north).

No distances are given between the site, the existing or proposed developments on it, and any buildings adjacent. Only distances within the site boundaries are shown. This means that no separation distances are shown which are critical in the instance of the increase of the building line to the north of the site, specifically in relation to CQE, and with reference to the increase in height from a maximum existing height of 28.6 metres (parapet) to a proposed maximum of 80.15 metres.

Office space occupies the majority of the building from the ground floor up along the northern and eastern facades which face CQE, a residential estate which includes a creche and amenity area directly to the north of the proposed development. There are no dimensions given in the application showing the distances from the building to the existing receiving environment. We have outlined our serious concerns with regard to loss of privacy and overlooking in Appendix A.

Daylighting And Sunlighting – please also refer to Appendix A and Photo-Appendix B

CQE was completed after the CitiGroup building. It was evidently designed with the existing CitiGroup building and the relevant zoning height and density designations in mind. The building

design won multiple awards, the RIAI Silver Medal for Housing 2007, the RIAI Best Housing 2003, the OPUS Housing Award 2003, the RIAI Regional Awards 2003 and the AAI Awards - Special Mention 2002, and is regarded as an exemplar of mixed-use, inner-city living design. It comprises a series of buildings which are arranged about a green amenity space, an internal park strip and, onto Excise Walk. On receipt of the RIAI Silver medal, *'speaking on behalf of the Urban Projects, Derek Tynan explained, "Urban Projects are honoured by the award of the RIAI Silver Medal for Housing for Clarion Quay in recognition of the proposition that we should not only design for people to live in the city but also to live well in the city. The ambition of the project was to form a neighbourhood on the "new city" of the Docklands – a reality which is now emerging"'* <https://www.voltimum.ie/articles/clarion-quay-dublin-docklands-awarded>

The location of each of the 12 blocks which make up the CQE is carefully oriented to maximise access to sunlight and daylight viz. the modulation of the blocks to Excise Walk which are split vertically allow the penetration of sunlight through from the first floor, the distances between the blocks around the garden and the locations of wintergarden accesses and of appropriately designated rooms to prevent overlooking, all allow access to sunlight throughout the day.

The relative heights of the buildings have been carefully designed to maximise access to daylight and sunlight throughout the day for all residents and to the users of the streets around the complex.

The proposed redevelopment of the CitiGroup building would effectively negate all these aspects of this award-winning housing development. The Sunlighting and Daylighting Report submitted in support of the application contains minimal analyses of the effects on the CQE which the Planning Authority clearly stated were deficient. The Dublin city planners had requested at the Pre-planning meeting that a full study was undertaken due to their concerns about the harm that the proposed development would do to the residents and the amenity of CQ Estate due to its height and massing. This constituted overbearing, overshadowing and the loss of light inter alia.

The report submitted by BPC Engineers refers to the lack of response by the PA during the 'challenge' stage of the application process. They state that the massing of the development was significantly reduced *'to limit the effect of the proposed development on existing neighbourhood amenity areas and properties'* p4. They further state that *'the results show that the proposed development effect has predominantly being (sic) limited to a small number of bedrooms which will have a minor adverse impact with respect to access to skylight and to sunlight.*

The effect of the proposed development has been limited to bedrooms of four apartments within Block 12 and Block 2 which will have a noticeable reduction in daylight.

However, given the current daylight levels in the apartments affected are currently low one could assume artificial lighting would likely be predominantly used which will continue to be the case after the proposed development.' p4

On the basis that their study confirms that 50% of the neighbouring amenity space would receive at least two hours of sunlight on the 21st of March, they conclude that they *'believe that the proposed development performs at an exemplar level for a scheme of this scale and meets many of the recommendations as set out in the BRE Guide.'*p4 Emphasis author's own. We detail our concerns regarding this assessment in the 'Community Park' section below.

In their introduction they state that they have used the BRE Guidelines - Site Layout Planning for daylight and Sunlight: A Guide to Good Practice (2022) and BS EN 17037 as the basis for the assessment and analysis. They note that the location of the site is in the Central Business District where *'it is important on sustainability grounds that buildings extend upwards to gain usable floor*

area'. p5. After this they cite the Housing Quality and Standards objective 11.3(d) *'the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst, minimizing overshadowing and maximizing the useability of outdoor amenity space.'* p5

In their analysis of the loss of daylight to the windows they have identified, they make their case based on the assumption that many of the windows affected most detrimentally already have low levels of light and would use artificial light in any case. This is contrary to the BRE 209 3rd ed. which states that sustainability is a factor that should inform all analysis of Sunlighting and Daylighting. *'Access to skylight and daylight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements.'* P7, Introduction

We refer the Board and Inspector to the model of the proposed building used by BPC in the Part L Compliance Assessment. While this model does not show the surrounding buildings and context, it is considerably more detailed than the block model in the Sunlight and Daylight Analysis and clearly shows the size and massing of the proposed development. There is also a floor by floor plan graphical breakdown of the spatial usage.

In Appendix A we provide further information regarding Daylighting and Sunlighting as well as Solar Dazzle/Glare, Overlooking, Overshadowing, and Overbearing. Appendix B contains Photographs of the Daylight and Sunlight currently enjoyed by CQE.

While we understand that the planning process does not deal with 'rights to light', they do exist in law, and this should be recognised at design stage where there may be a loss to existing properties. Appendix 16, Section 9 of the DCC DP 2022 – 2028 states that *Rights to light is not covered in this guide or under the planning process. The planning authority note that the granting of any planning permission does not override a legal right to light.*

Basements, Potential for Flooding and SuDS

The basements of CQE (2 no.) are not shown on any of the drawings, in the Application Planning Report, SSFRA, Surface Water Management Plan, Engineering Services Report, Demolition Method Statement, or the Basement Impact Plan, nor are they taken into account in the R&E analysis by Hegarty Building Contractors. It is noted that the relevant external departments asked for more information in this regard. The Planner's Report clearly states that the site lies in Floor Zone B and the DCC Strategic Floor Risk Assessment states that underground offices are not permitted in this area. p22.

We are very concerned by the extent of the proposed basement development. The existing Level 00 is given as +3.400 m AOD and building has a single basement with a floor at -0.325 m AOD. The depth of the basement is 3.725 m not including the foundations. The proposed development shows Level 00 at +3.650 m (includes a 500mm freeboard) and the floor of basement level 3 (given as -2) is -9.575 m. Taking into account the difference in Level 00 of 250mm, the three basements proposed have a combined depth of 12.975 m. This does not include the foundation, depths of lift pits nor the proposed geothermal piling.

The R&E assessment by Hegarty Building Contractors describes the difficulties involved in the demolition of the existing basement, concluding that for buildability and safety, it and the ground floor plate should be entirely removed. The documentation submitted in support of the application describes the use of secant piling and anchors to construct the proposed basements to a further depth of -9.250 m excluding any substructures. In view of the omission of the two

Third Party Appeal by CQMC in support of Decision to Refuse Reg Ref 3274/24

existing basement car parks to CQE from the calculations, we submit to the Board that the documentation should not be relied upon, particularly in relation to flood risk, future flooding events, water uplift of structures and potential damage to surrounding structures and property.

New Century House Permission

We note the Conditions (4 & 5) of ABP-308336-20 relating to the height of the refurbishment of New Century House (NCH) which is directly to the north of the subject site and existing CitiGroup building. Condition 4 required there be no plant to the roof of NCH to protect the residential amenities of adjoining residential units.

Condition 5 of NCH Appeal Decision required that all service access be from the South West and not from Alderman Way which serves CQE. A complaint was made to the DCC Enforcement, and a letter of reply issued on the 1st of May (attached). Following inspection, they have referred the matter to the Parking Enforcement Section as the issue has been identified as relating to parking on Alderman Way. This highlights the parking issues raised below but does not address the enforcement of the Condition regarding the location of service access.

Alderman Way and Clarion Quay – Please also refer to Photo-Appendix B

The relevant land registry map shows the first section of the Alderman Way as a right of way. This is marked as far as and including the access to the basement ramp for NCH and includes the pavement to the CQE development side. CQE have a right of way over this road. The rest of Alderman Way and Clarion Quay is shown within the ownership of the Applicant. CQE have rights of access to their basement car parks from Clarion Quay. These are not indicated on the site plans.

This access should be unhindered on a day-to-day basis as well as for waste collection and routine maintenance. CQE will undergo planned works under the Government Apartments Remediation Scheme and access will be required for this programme which will apply to the entire estate.

There is a designated parking and drop-off zone for the exclusive use of the creche in Block 9/10 of CQE for much of the length of Alderman Way on the eastern side. The creche is a required amenity provision in the original CQE development planning approval. We also note that the pedestrian access ramp and steps to CQE where they abut the red site boundary are not clearly shown on the drawings submitted by the applicant.

As noted above, and highlighted in the photographs submitted with this appeal, the current unregulated usage of the streets for servicing and delivery causes ongoing issues for local residents, the creche users and can restrict access for waste collection and potentially emergency services. The safety of users of the road, and particularly the children arriving at and leaving the creche, is a serious concern.

The Applicant has submitted a Traffic and Transport Assessment by CS Consulting Group. While Traffic Survey Data and TRICS Data are included in the report, there is no accurate reporting of the current issues which exist in Alderman Way and Clarion Quay. There is no assessment of congestion or of the short, medium, and long term effects of the increased quantum of vehicles generated by the construction and occupational stages of the development. The proposed traffic light system to manage access to the 2 no. car lifts to access the Basement parking (second level basement) to replace the current ramp access would have a direct effect on Clarion Quay and the access to CQE. As we have noted, the basement access ramps to CQE are not marked on any of the applicant's drawings. These are approximately 12 metres from the proposed access point

to the car lift (no measurements are given so this figure is extrapolated from the proposed Ground Floor Plan). There is a speed calming ramp which extends to half the width of the access doors and the internal 'dwell' space for 1 vehicle (p47 Traffic & Transport Assessment) appears to be directly in front of the proposed 2 no. bicycle lifts potentially obstructing these. As the calculation of peak hour (8-9am) vehicular access to the development is 75 vehicles (64 + 11 service) (Table 12., p35, Ibid.), and there is no parking allowed on Clarion Quay, we submit that there would be considerable congestion and the restriction of access to and from CQE by the residents. The large numbers of trips generated during the construction period (284 per day) which would use a temporary access from Commons Street, will require a comprehensive Traffic Management Plan. Table 13, p36 Ibid. In respect of this we note that Commons Street is the designated area for deliveries and service to New Century House (see above) and is a key access route for the Bus Eireann fleet operating to and from Busaras.

The proposed delivery and service access as well as waste collection for the occupational stage are stated to be from Clarion Quay. The proposed Ground Floor Plan shows 2 no. parking bays on Alderman Way in front of the ESB substation. This is in to the North West side of the building. The waste bin storage areas are on Basement level -1 (the second level of three basements) in the South East corner. A letter from Knight Frank included in the Heritage Significance and Adaptive Capacity Assessment to support the proposal. Amongst the criteria outlined by them which large-scale occupiers (given as 50,000+ sq. ft/4,645+ sq. m), it is stated that they require *'larger areas for drop off/deliveries to accommodate the wider array of uses and future adaptation of their office space.'* P11

As the building will potentially accommodate multiple office users, the Gaiety School of Acting and the visitors to the Liffey Experience, we are concerned that the service and delivery access is not sufficient for the building as proposed and would not withstand future demand as outlined. The ongoing issues with parking and unregulated access to Alderman Way and Clarion Quay indicate failure to do so at the quantum of the current CitiGroup building.

Vehicular access for the users of the building is from Clarion Quay directly beside the north entrance to the 'community park'. This leads to 2 no. vehicle lifts.

'Community Park' – Please also refer to Photo-Appendix B

The proposed Community Park lies to the east of the building and runs north – south. It is described as an amenity for the local residents which would improve connectivity between North Wall Quay and Clarion Quay/Excise Walk. It is a critical contributor to the proposed arts/community/culture quantum required for the development. As described below, a substantial portion of the park is rendered unusable by the location of bicycle stands, a large skylight window with raised planters around it. At the northern end it is directly adjacent to the vehicular access to the proposed scheme.

The only dimensions given for the park are the width which is 12.262 m and the building length which is 51.217 as indicated on the proposed Site Plan. The park is shown on the Proposed Ground Floor Plan and on p13 of the Landscape Design Statement. The entrance to the park from North Wall Quay is narrowed by over 50% due to what appear to be bicycle racks (no label is given) and by the lightwell to an office on the lower ground floor which is protected by raised ornamental planting. This width is further reduced by the proposed outdoor seating for the café/retail unit.

The 'community park' is given as 23% of the culture/community/arts quantum and is stated to be 556 sq. m in area. As the plans do not contain detailed measurements of the skylight, this cannot be confirmed.

The paved area widens just before the ESB substation with social areas and sun loungers indicated on the eastern side and pocket play (chess tables) to the Clarion Quay end on the western side. As the height of the proposed development is 43.635 to the balustrade to the southern end and 38.755 to the same at the northern end, and in the centre, there is a 45.535 m high plant screen, it is clear that the park will be largely in shadow once the sun moves from direct south.

To the east is the CQE Block 1/2/3 which is approx. 3 m from the boundary line. It has a plinth height of 4.8 m (to balustrade) which runs the full length of the park. It has 3 raised blocks of accommodation (28 m at highest point) with gardens in between at plinth level. This will have some effect on the sunlighting levels from the early part of the day until the sun reaches a southerly point.

No sunlight or daylight modelling has been presented regarding the amenity of the park. Based on the orientation of the proposed development, its massing and height as well as the existing buildings, there may be considerable overshadowing of the park throughout the day which would affect its visual attractiveness, any benefits from solar gain and the amenity for users. Due to the current levels of anti-social behaviour in the area, we are seriously concerned that the provision of a narrow, poorly lit corridor may increase this and could not only cause nuisance but also become potentially unsafe. It would remain in the control of the developer and no consideration to the maintenance and surveillance of the same has been submitted. While the southern end would be passively surveilled by the café while open, the central and upper portions have black walls to both sides.

The Pedestrian Wind Comfort Analysis submitted shows the ground level modelling as Business Walking and Strong Grade at the entrance to the park from North Wall Quay where the entrance is narrowed, and a combination of Standing and Sitting Grade for the rest of the park. The Sitting Grade areas run along the western side of the proposed park where the café seating and pocket play areas are proposed. However, the social areas and sun loungers will fall predominantly into the Standing Grade.

The full width of the junction of the proposed park and North Wall Quay is categorised as 'unsafe frail' Lawson wind safety grade.

The DCC Planner's Report & Departmental Reports

While we welcome the decision of the Planning Authority to refuse permission, we are concerned at some aspects of the process. It is not clear from the Planner's Report whether a site inspection was made. It does not appear that the Traffic Engineers visited the site and they and Irish Water do not assess problems that could be caused elsewhere. It is clear, however, that the requests for Further Information indicate the lack of necessary analyses and detail in the application.

The presentation of the Planner's Report posed some difficulty in distinguishing the sections put forward by the Applicant and the Planner's analysis and conclusions.

We are also concerned that the Planner reports that extra height might be permitted but does not emphasise the restrictive conditions in the DCDP.

Possible withdrawal of this protective Appeal.

This Third Party Appeal is to protect the residential amenity of dwellings and maintain and improve safe and uncongested access to other uses of CQE in the event of a First Party Appeal. If by the end of the Appeal period there is no First Party Appeal, the CQMC would consider the

Third Party Appeal by CQMC in support of Decision to Refuse Reg Ref 3274/24

withdrawal of this Appeal so that the Decision of the Planning Authority to Refuse Permission could stand.

A report in the online edition of The Irish Times dated 18th of April 2024 indicates the developer's intention to appeal the Decision of the Planning Authority.

Inspection.

In view of the huge negative impact that the proposal would have on CQE, and especially the residential element, we invite the Inspector to examine the existing CitiGroup building and assess the impact of the proposed development from within and in the vicinity of the Clarion Quay complex.

Ideally, we would respectfully ask the Inspector to visit more than once at different times of day and weather to consider daylight, sunlight, and overshadowing. This would also apply to examining the existing congestion on Alderman Way.

Mr David Ward is the Managing Agent for the Clarion Quay Management Company and can be contacted on [REDACTED] or [REDACTED] to facilitate access.

Declaration of Interest

As Mr John Bird currently holds a Warrant as a "Fee Per Case" Inspector with An Bord Pleanála, a formal Declaration of Interest Letter to the Secretary of An Bord Pleanála is attached, with a copy being sent to the Planning Registry, Dublin City Council. Mr Bird's Warrant expires on 31/12/2024 and at the date of this letter he has no other work in progress with ABP.

Appendices

Appendix A – Sunlighting, Daylighting, Overshadowing, Overbearing and Overlooking

Appendix B – Photographic Survey CQE Amenity Garden, Current Daylighting & Sunlighting to the Estate and Traffic and Parking Issues to Alderman Way and Clarion Quay.

Enclosed

Copy of Receipt of Submission of Observation from DCC

Copy of Letter from DCC Enforcement

Fee - €220

APB Application Form

Copy of Declaration of Interest email – J Bird.

Yours faithfully,

John Bird MIPI

BA(Mod), Master of Civic Design, Dip. Environmental Impact Assessment Management

Katharine Maurer

B(Arch) MA (Visual Culture)

Appendix A: Sunlighting, Daylighting, Overshadowing, Overbearing and Overlooking

The applicants have submitted a Daylight, Sunlight and Overshadowing Assessment of the impact of the proposed development on the receiving environment. This was prepared by BPC Engineers. This document only contains data regarding Daylight to a restricted number of windows in the CQE, Sun on Ground to the amenity garden of CQE, and an Appendix with shadow casting on the solstices and equinoxes (described as purely illustrative). As outlined below, these does not provide the analyses required by the Local Authority. Further to this, there is no comprehensive analysis submitted of the performance of the proposed development nor of the potential Overlooking or Overbearing of the receiving environment.

Section 5 of Appendix 16 of the Dublin City Development Plan 2022 – 2028 clearly states the required analyses to be submitted to the Planning Authority for proposed development.

'5.0 Assessment Methodologies

The following section outlines the expected methodology for daylight and sunlight reports to be submitted with planning applications. Daylight and sunlight assessments will generally consist of two parts, being (a) how the proposed development performs and (b) how the proposed development impacts levels of daylight and sunlight availability in surrounding existing buildings. Until such time when BRE 209 is updated and all relevant and required information is included (i.e. the removal of reference to BS 8206-2 and inclusion of metrics within BS EN 17037), the planning authority will request metrics from both BS 8206-2 and BS EN 17037.

These are outlined below for clarity.

5.1 Performance of the Proposed Development

- *Annual Probable Sunlight Hours on all relevant windows*
- *Winter Sunlight Hours on all relevant windows*
- *Sunlight on Ground in all amenity spaces*
- *Average Daylight Factor in all habitable rooms*
- *No Sky Line in all habitable rooms*
- *Target Illuminance in all habitable rooms*

5.2 Impact on the Surrounding Properties

- *Vertical Sky Component on all relevant surrounding windows*
- *Annual Probable Sunlight Hours on all relevant surrounding windows*
- *Winter Sunlight Hours on all relevant surrounding windows*
- *Sunlight on Ground in all surrounding amenity spaces*

5.3 Other Criteria and Considerations

In addition to the above metrics, the planning authority will require consideration of the points below, save in agreed exceptional circumstances:

- ***When assessing the impact of a proposed development, it is expected that all surrounding properties are assessed. It is not acceptable to assess only the surrounding residential properties. Residential properties should be clearly marked out and results for these presented separately.***
- *When assessing the impact of a proposed development on the existing*

surrounding properties, it is expected that the rule within clause 2.2.4 of BR 209 is applied. This rule outlines that "Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window." Thus, all surrounding buildings that sit within three times the height of the proposed development shall be included within the assessment. The assessment can then use methods typically applied in BR 209 to determine the correct approach to investigating loss of light.

- *When analysing the results found to investigate the impact of a proposed development on the surrounding existing buildings, it is expected that the nomenclature and associated descriptions from within Appendix I of BR 209 are used. The wordings of negligible, minor adverse, moderate adverse and major adverse have defined meanings. These meanings have associated descriptors, and these shall be applied during the analytics section of reports. Appendix I in BR 209 provides these descriptions in full.*
- *The use of average daylight factor in assessing the impact of a new development on surrounding existing developments is not permitted.*
- *Where alternate target values are being set, this shall be completed in line with Appendix F of BR 209.*
- *When analysing the performance of a proposed development, it is expected that all rooms with an expectation for daylight are assessed. Assessing only a sample of rooms is not permitted.*
- *When determining input factors for simulations, applicants shall clearly state their assumptions. 'pp 396 -397 Emphasis author's own.*

The BRE 209 3rd edition was published in 2022. It states that *"the guidance here is intended for use in the United Kingdom and in the Republic of Ireland, though recommendations in the Irish Standard IS EN 17037 may vary from those in BS EN 17037."* P7, BRE 209. As such the use of the BRE 209 3rd edition and BS EN 17037 are applicable to this application.

Throughout the relevant documentation submitted, BCP Engineers make no reference to the Assessment Methodologies from the DCDP. Section 3.5 of the Climate Action Energy Statement submitted refers to BS 8206-2 in relation to internal daylight analysis of the proposed building (this is part of the Scheme Performance Assessment required). However, in the Daylight, Sunlight and Overshadowing Assessment they state that they have used the BRE Guidelines - Site Layout Planning for daylight and Sunlight: A Guide to Good Practice (2022) (BRE 209 3rd ed.) and BS EN 17037 as the basis for the assessment and analysis.

The main changes in the BRE 209 3rd ed. compared to the BRE 209 2nd ed. relate to the assessment of Internal Daylighting in proposed developments. This is no longer measured by Average Daylight Factor. This metric is now based on illuminance lux levels, otherwise known as Spatial Daylight Autonomy (SDA). In addition to this Sunlight Exposure (SE) replaces Annual & Winter Probable Sunlight Hours and Sunlight on Ground studies apply to Scheme Performance which must include evergreen trees if relevant. The No Sky Line study is also applicable where internal layouts are known.

The proposed development must be fully tested in terms of the development itself (Scheme Performance) and its impact on the receiving environment (Impact on Surrounding Properties).

Scheme Performance

As per the DCDP, data must be submitted showing:

- *Annual Probable Sunlight Hours on all relevant windows – Sunlight Exposure*
- *Winter Sunlight Hours on all relevant windows – Sunlight Exposure*
- *Sunlight on Ground in all amenity spaces*
- *Average Daylight Factor in all habitable rooms - Spatial Daylight Autonomy*
- *No Sky Line in all habitable rooms – the internal room layouts are known*
- *Target Illuminance in all habitable rooms – measured in lux*

The application does not provide an assessment of Sunlight Exposure, Sunlight on Ground, No Sky Line or Target Illuminance for the proposed scheme. The Climate Action Energy Statement submitted by BPC Engineers contains a single page referring to the Average Daylight Factor in all habitable rooms. They state that '*Internal daylight analysis is being performed in an effort to maximise daylight in the office spaces*' p12. (Emphasis authors own.) They present one image which is *Figure 8: Example of Daylight Factor Contours for Eighth Floor*. (Emphasis authors own.) No further information is given. In addition to this, their analysis was prepared using BS8206-2 which has been superseded and a methodology which is no longer recommended.

'C2 BS EN 17037 supersedes BS 8206 Part 2 "Code of practice for daylighting", which contained a method of assessment based on Average Daylight Factor, which is now no longer recommended. For daylight provision in buildings, BS EN 17037 provides two methodologies.

One is based on target illuminances from daylight to be achieved over specified fractions of the reference plane (a plane at tabletop height covering the room) for at least half of the daylight hours in a typical year. The other, alternative, method is based on calculating the daylight factors achieved over specified fractions of the reference plane.' BRE 209 Appendix C, p72

Impact on Surrounding Properties

The DCDP clearly states that the assessment of the impact of a proposed development must be carried out on all surrounding buildings including non-residential buildings. These assessments are based on the BRE 209 3rd ed. and BS EN 17037 / IS EN 17037. BRE 209 3rd ed. guidelines are intended '*for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed. The guidelines may also be applied to any existing non- domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices.*' Section 2.2.2 p14

The required analyses are

- *Vertical Sky Component on all relevant surrounding windows*
- *Annual Probable Sunlight Hours on all relevant surrounding windows*
- *Winter Sunlight Hours on all relevant surrounding windows*
- *Sunlight on Ground in all surrounding amenity spaces*

The buildings, which must be included in the analyses listed above, are identified using the

height:distance ratio and 25 degree rule. If the lowest window of an existing building (taken to be 1.5m above ground) is within 3 x height of the proposed development, it must be analysed using the 25 degree rule. If the angle described (see below) is greater than 25 degrees, further analysis using Vertical Sky Component must be undertaken.

'2.2.5 If the proposed development is taller or closer than this, a modified form of the procedure adopted for new buildings can be used to find out whether an existing building still receives enough skylight. First, draw a section in a plane perpendicular to each main window wall of the existing building (Figure 14). Measure the angle to the horizontal subtended by the new development at the level of the centre of the lowest window. [...] If, for any part of the new development, this angle is more than 25 degrees, a more detailed check is needed to find the loss of skylight to the existing building. Both the total amount of skylight and its distribution within the building are important.' Ibid.

The highest point of the proposed building is 80.150 m. The calculation of the distance within which all buildings must be assessed, is $3 \times (80.150 - 1.5) = 235.95$ m. The red circle on Figure 1 overleaf shows the full extent encompassed - it extends pasts Stacks A and C (protected structures) to the west, to the playing fields and amenity gardens of at Mariners Port including Mayor Square and the Former Excise Building (Protected Structure) to the north, and the National College of Ireland and 25 North wall Quay to the east.

All of the lowest windows to all buildings within 235.95 m of the proposed development should then be assessed by applying the 25 degree test to ascertain whether there is a loss of skylight to the existing building.

The Daylight, Sunlight & Overshadowing Assessment does not refer to any of the above methodology. On page 9 of the Assessment, BPC identify the sections of existing neighbouring dwellings which they include in their analysis without any justification for these results. It is unknown whether they carried out the required analyses to reach this conclusion. These are designated 'potentially sensitive receptors'. They then use the Vertical Sky Component (VSC) method to assess the potential reduction of skylight to the windows of these buildings only.

Considering the extensive range of windows/buildings which should be initially assessed, it is possible that there are other windows which would need to be analysed using the VSC method. With specific reference to CQE, there are numerous windows and wintergardens which may be affected considering their aspect and the fact that the proposed building lies to the south of the existing dwellings.

Sunlight

Access to sunlight is key to amenity and health. This is true of both domestic and non-domestic buildings where there is a particular requirement for sunlight. The BRE 209 3rd ed., section 3.2.13 outlines when testing for potential obstruction to sunlight is warranted: *'If a living room of an existing dwelling has a main window facing within 90° of due south, and any part of a new development subtends an angle of more than 25° to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:*

- *receives less than 25% of annual probable sunlight hours and less than 0.80 times its former annual value; or less than 5% of annual probable sunlight hours between*

21 September and 21 March and less than 0.80 times its former value during that period;

- **and also has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.' p26**

Sunlight is measured in Annual & Winter Probable Daylight Hours which is a metric required by the Local Authority. No data relating to this has been submitted by the Applicants.



Figure 1 – GeoHive map showing 235.95 m red circle for Daylight assessment.

Sunlight on Ground

The applicants have submitted a Sunlight on Ground study of the main Garden to CQE which shows that it achieves exactly the minimum required performance of at least half the space (50%) receiving two hours of sunlight on the 21st of March. The area defined as the 'neighbouring Residential Amenity', identified on page 34 of the Assessment, and shown in the diagrams on p35, appears to be substantially truncated to the south compared to the original plans for CQE and the amenity garden. Also note the difference in shape and enclosed area. (Figs. 2 & 3)

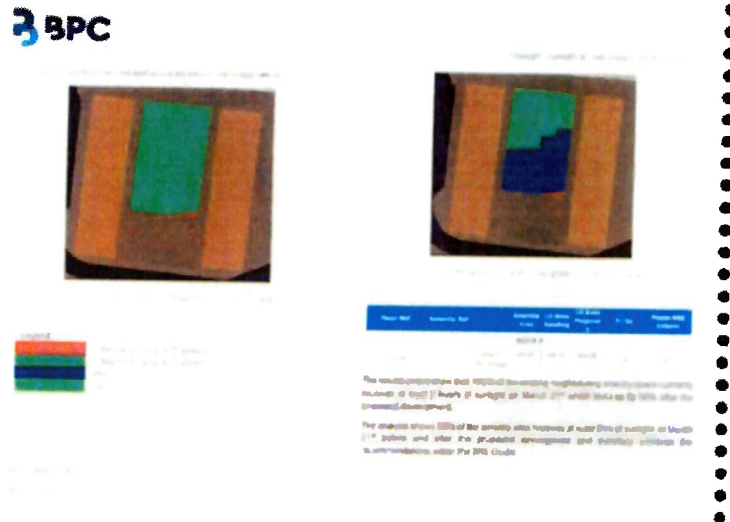


Figure 2 – p35 of the Applicant Daylight, Sunlight & Overshadowing Assessment identifying the area of the amenity garden in CQE

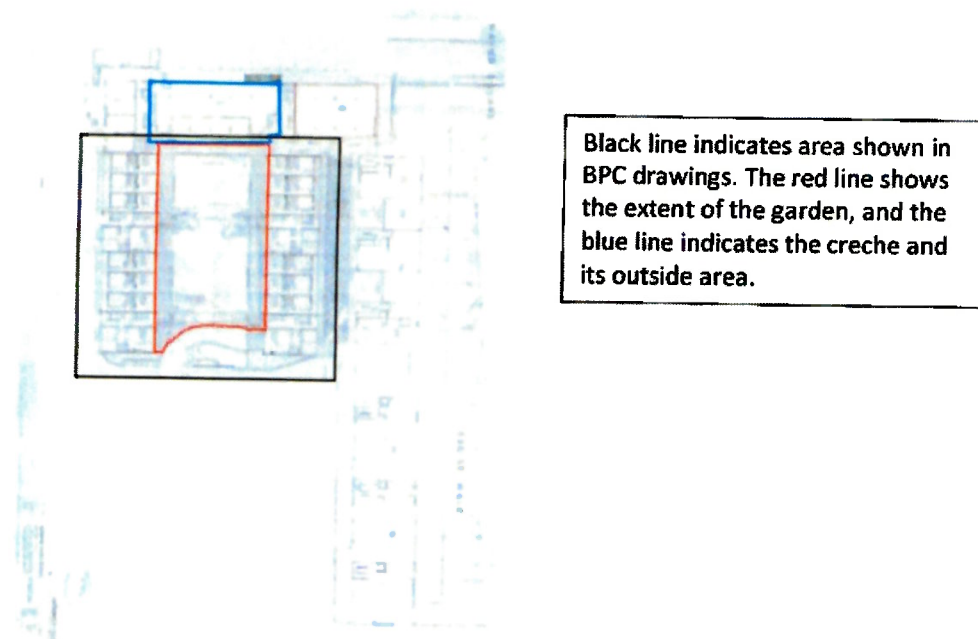


Figure 3 – Urban Projects Clarion Quay Estate Layout Plan

The photograph below clearly shows the reality of the extent of the garden to the southern boundary and its relationship to the parking ramp and the southern end of Block 8. (Fig. 4)



Figure 4. View of garden looking East.

The southern end of the garden is the area most affected by the potential loss of sunlight and possible overshadowing, so it is critical that accurate measurements of the amenity be used. It may be that the minimum standard of 50% would not be met if the full extent of the garden were used for the measurement. This amenity is used by the residents of CQE and provides substantial visual amenity. The creche on the ground and first floor of CQE Block 9/10 (facing south) has a substantially glazed wall looking on to it and its external space opens onto it.

Shadow Diagrams

The shadow diagrams which are included in the Appendix to the Daylight, Sunlight and Overshadowing Assessment provide data for the 21st of March, June, September, and December. The results given are for increments of every 2 hours per day. An hourly breakdown would be more informative. The computational models of the existing building, the proposed development and the surroundings used are lacking in detail and appear to be missing some plant and screening elements which are critical to the assessment of potential obstruction. The model of the building generated for the solar gains study is considerably more detailed.

Solar Gain, Solar Glare and Solar Convergence

In Appendix A of the Part L Compliance Assessment submitted by BPC Engineers there is a detailed analysis of Solar Gain. The building is glazed for most of its elevations which exposes it to considerable solar gain. From the ground to 11th floor the peripheral spaces are mostly generic offices. From the 12th to 16th floors the offices face south with circulation spaces to the north. In every instance on the southern facade, blinds are required as the solar gain limits of the design were exceeded.

Due to the almost exclusive use of glazing, in addition to the requirements of the Local Authority which have not been provided, no account has been taken of the potential of the development to cause Solar Dazzle or Glare. This is identified in the BRE 209 3rd ed. as a possible '*long-term problem for some heavily glazed (or mirror clad) buildings.*' P41. This has the potential to cause 'disability glare' which '*can affect motorists and train drivers' ability to drive safely.*' Ibid

A further potential issue is that the concave layout of the south facing façade of the proposed development has the potential to cause Solar Convergence. This '*creates a relatively small area of concentrated solar radiation. Within this area, various adverse effects could occur:*

- *damage to people's eyes from looking at the reflected sun*
- *burns to people's skin, either directly from the radiation or from touching hot objects like metal railings or door handles*
- *local overheating, for example if someone is in a parked car*
- *damage to materials*
- *in extreme circumstances, materials could smoulder or catch fire.*' P42 BRE 209 3rd ed.

Overlooking and Overbearance

The proposed development is primarily glazed throughout with large areas of office space to the periphery on all sides. The distance of the building from the CQE cannot be ascertained as the applicant has lodged no details or measurements in this regard. There is no indication of separation distances and whether there would be a loss of privacy to the residents of the dwellings in CHQ and when using their amenity spaces.

The potential for significant, substantial overbearance due to the impact of the proposed development on the residences and amenity space of CQE must be considered. The overdevelopment of the site, indicated by the plot ratio and building heights, leads to massing and scale which would overwhelm the existing CQE development and deprive the residents of their existing amenity.

Appendix B: Photographic Survey

1. CQE Amenity Garden & Creche
2. Examples of CQE Wintergardens and current access to light
3. Traffic Issues on Alderman Way and Clarion Quay

1. CQE Amenity Garden & Creche

1.1 View to North East including ground floor 2-storey Creche on southern elevation of Block 9/10 (2 floors) - evening



1.2 View to East: western elevation of Block 7/8 showing southern extent of garden and landscaped area over car park access ramps - afternoon



1.3 View to South showing extent of amenity area and landscaping over car park ramps. – afternoon.



1.4 View to South West showing Block 11/12 - afternoon



2. Examples of CQE Wintergardens and current access to light

2.1 West facing Wintergarden Amenity Block 11/12



2.2 Sky Quadrant to South West over Existing Citigroup Building – morning sun



2.3 Sky Quadrant to South West over Existing Citigroup Building – afternoon sun



2.4 Current access to Daylight / Sunlight – midday/afternoon.



2.5 Current condition – midday/afternoon – Blocks 4/5/6 due to modulation



3. Traffic Issues

3.1 Car Parked Behind Bollards in CitiGroup Service Area



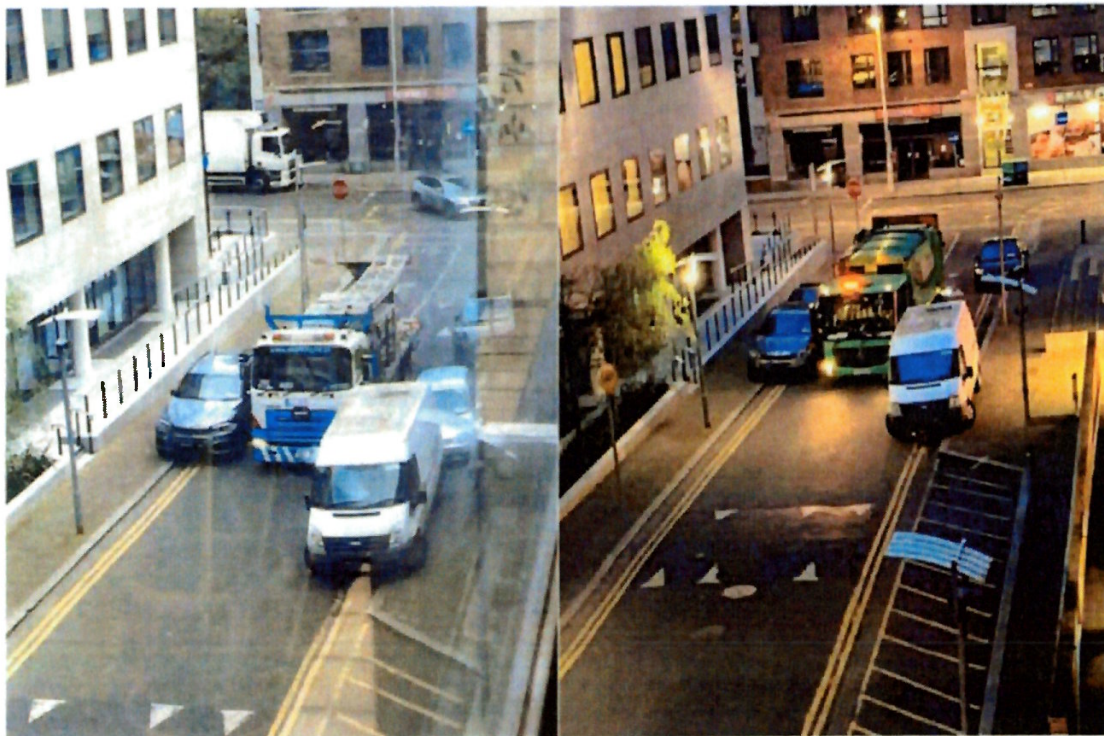
3.2 Delivery Vehicle in Creche Designated Bay



3.3 Vehicles in Creche Designated Bay – long-term usage not drop off only



3.4. Extended Illegal Parking and obstruction of vehicles along Alderman Way



3.5 Illegal Parking on Clarion Quay affecting Access to CQE 2nd Basement Carpark



3.6 Unregulated Service Delivery on Clarion Quay



3.7 Illegal Service Delivery directly opposite access ramps to CQE Main Basement Carpark



3.8 Existing Landscaping in Proposed Service Area



3.9 Existing Ramp Designated 'Community Park'



3.10 Junction of Existing Ramp and Clarion Quay. Note location of ramp to 2nd CQE Basement Carpark behind wall with Citi carpark sign in both photographs.



An Roinn Pleanála & Forbairt Maoin, Bloc 4, Uirlár 3,
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8

Planning & Property Development Department, Dublin City Council,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8

T: (01) 222 2288
E. planningsubmissions@dublincity.ie

David Ward/John Bird o.b.o. Clarion
Quay Management Company
The Community Office
1, Block 3 Clarion Quay Apartments
IFSC
Dublin 1

IMPORTANT: Please retain this letter. You will be required to produce it should you wish to appeal the decision issued by the Planning Authority to An Bord Pleanála in relation to this development

PLAN NO.
DATE RECEIVED:
LOCATION :
PROPOSAL :

3274/24

23-Feb-2024

CitiGroup Building, 1 North Wall Quay, Dublin 1, D01T8Y1
We, NWQ Devco Limited, intend to apply for a 10-year planning permission for development at a site consisting of the CitiGroup Building, 1 North Wall Quay, Dublin 1, D01 T8Y1. The site is bound by North Wall Quay to the south, Commons Street to the west, Clarion Quay/Alderman Way to the north and an access ramp to the existing basement to the east. The site area is c. 0.88 ha.

The proposed development comprises:

- Demolition of existing 6 no. storey office building and single-level basement;
- Construction of a mixed-use development ranging in height from 9 no. to 17 no. storeys in height (73.4m) over lower ground floor and double basement comprising office accommodation, arts/community/cultural spaces and retail/café/restaurant uses;
- The development is divided into 4 no. buildings ranging in heights of 12 no. storeys (Block A), 17 no. storeys (Block B), 10 no. storeys (Block C) and 9 no. storeys (Block D);
- The overall gross floor area of the development comprises 87, 209 sq.m. (excluding double basement of 14, 420 sq.m.) including 69, 258 sq.m. of office space, 2, 371 sq.m. arts/community/cultural uses and 196 sq.m. of retail/café/restaurant space;
- Office accommodation is proposed at lower-ground floor to 15th floor with 4 no. double-height office entrance/receptions areas provided at GF level;
- 3 no. internal arts/community/cultural spaces are provided in total. 1 no. arts/community/cultural space is provided over lower ground and ground floor level in Block A, 1 no. at 1st floor level with a GF entrance space in Block B and an arts/community/cultural use with viewing deck is provided at 16th floor level in Block B;
- External arts/community/cultural space will be provided on the new landscaped park located to the east of the site;
- 1 no. retail/café/restaurant unit is provided at GF level in Block D;

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- Outdoor landscaped terraces are provided at 8th, 9th, 10th, 11th, 15th and 16th floor level;
 - Provision of winter terraces at 4th, 6th and 9th floor level;
 - Provision of a shared atrium between Block B and Block C;
 - Green roofs and blue roofs are provided across the scheme;
 - Provision of a double basement comprising 30 no. car parking spaces, 923 no. bicycle parking spaces, 6 no. motorbike parking spaces and male & female shower and changing facilities at B1 level and plant across B1 & B2 levels;
 - 2 no. car parking spaces located at street level (32 no. total);
 - Provision of 2 no. vehicle lifts and 2 no. bike lifts to the basement accessed from Clarion Quay;
 - The development includes the fill and cover of existing access ramp to existing basement to provide a landscaped park (including external arts/community/cultural space) to the east of the building connecting North Wall Quay with Clarion Quay. The park will include a pedestrian link from North Wall Quay to Clarion Quay
 - Provision of upgrades to existing public realm within application site including public footpaths along North Wall Quay, Commons Street and Clarion Quay;
 - All ancillary and associated works to facilitate the development including plant, switch rooms, generators, water tanks, sprinkler plant, ESB substations, landscaping, telecommunications infrastructure, utilities connections and infrastructure.
- An Environmental Impact Assessment Report and Natura Impact Statement have been prepared in respect of the proposed development and have been submitted with the planning application.

Note: Submissions/Observations may be made on line at:

<https://www.dublincity.ie/residential/planning/planning-applications/object-or-support-planning-application>

To Whom It May Concern,

The Planning Authority wishes to acknowledge receipt of your **submission/observation** in connection with the above planning application. It should be noted that the Dublin City Council as the Planning Authority will consider this application strictly in accordance with the provisions of the Dublin City Development Plan. The contents of your submission/observation will be considered by the **Case Officer** during the assessment of the above application, and you will be notified of the decision in due course.

- All queries should be submitted to the e mail address shown above.
- Please note that a request for Further Information or Clarification of Further information is not a decision.

**An Roinn Pleanála & Forbairt Maoin, Bloc 4, Uirlár 3,
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8**

**Planning & Property Development Department, Dublin City Council,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8**

**T: (01) 222 2288
E. planningsubmissions@dublincity.ie**

- **You will not be notified, if Further Information or Clarification of Further information is requested by the Planning Authority.**

Please also note that a weekly list of current planning applications and decisions is available for inspection at the planning public counter.

Opening Hours 9 a.m. - 4.30 p.m. Monday to Friday (inclusive of lunchtime)

A weekly list of planning applications and decisions is available for inspection at all Dublin City Council Libraries & on Dublin City Council's website. www.dublincity.ie.

Yours faithfully,

For ADMINISTRATIVE OFFICER



Dublin City Council
Baile Átha Cliath

Ferdiana Fieanala
An Roinn Pleanála & Forbairt Maoiní
Bloc 4 Uirlar 2 Oifig na Cathrach An Ché Adhmaid Baile Átha Cliath 8

Planning Enforcement
Planning & Property Development Department
Block 4 Floor 2 Civic Offices
Wood Quay Dublin 8

T: 01 222 2147 E: planningenforcement@dublincity.ie

Apartment [REDACTED]
Clarion Quay
IFSC Dublin 1

1st May 2024

Re: New Century House Mayor Street Lower IFSC Dublin 1 D01 K8N7

Dear Sir,

I refer to our enforcement file regarding the above address

A recent inspection carried out by the Planning Enforcement Officer for the area has revealed that this is an issue relating to parking on Alderman Way and therefore this complaint has been referred to Parking Enforcement Section for further review.

On this basis the file has now been closed.

Should you require any further information please do not hesitate to contact planning enforcement inspector [REDACTED]

I trust that this information is of assistance to you.

Yours faithfully,

for Acting Planning Enforcement Manager

Ref: Paul Mc Kenna

Te [REDACTED]

Please quote File Ref: E0263/24

Leabharlán na hÉireann / Leabharlán na hÉireann
Block 4 Floor 2 Civic Offices Wood Quay Dublin 8 Ireland

