	t Dublin City Development Plan 2022-2028 rchitectural heritage protection objectives	Anticipated impact in the consideration of Development Plan objectives
		regeneration of the area and create vibrant shared amenities, supporting a diverse range of uses.
SC22	Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.	As cited above, the diverse variety of terraced facades onto O'Connell Street Upper (west) make a significant contribution to the sense of place of the street, setting it apart from the more homogenous treatment of reconstructed facades to the east side of the street.
		The inactivity of street level units towards the north end of the subject terrace and plot vacancy in the same area undermines the wider character, appearance and quality of the local streetscape. The proposal to ensure activity at street level within each (amalgamated and individual) unit will overcome this issue and encourage sustainable occupancy of this part of the city.
		The Dublin Central Conservation Management Plan recognises the multiple layers of historical interest that contribute to the significance of this site. Proposed interventions within Site 2 have been considered in light of this significance. Notwithstanding extensive demolition and excavation required to deliver the proposals, including the MetroLink Enabling Works (MEW), significant historical architectural features have been retained and integrated into the scheme as follows;
		The former reading room at the rear of No.59 O'Connell Street serving as a landmark building of character in a reimagined Moore Lane
		Protection of the legibility of the 1916 evacuation route with access to the monument at Nos.14-17 Moore Street supported as an integral element within the redevelopment area
		The unique character of individual urban areas within the Masterplan Area is intentionally respected in the visual integration of facades of compatible materiality and retention, careful salvage and collective reinstatement of historic street surfaces having acquired patina supplemented by new surfaces where quantities are deficient.
CU09	14-17 Moore Street To support the preservation and restoration of the historic terrace 10-25 Moore Street and adjacent yards and lanes, and the remaining historic built heritage of the street, including numbers 1-8 Moore Street, and the establishment of a commemorative visitor centre, as a fitting tribute to the men and women of Easter 1916 and as an educational and cultural resource	The enclosing section of Moore Lane to the north, south and in part to the east of the National Monument forms part of a proposed public realm design strategy to be considered under the subject development. It is intended, as part of that strategy, to facilitate safe access to sections of public realm to the rear of the National Monument, which in turn will enhance possibilities for its active regeneration.

Relevant Dublin City Development Plan 2022-2028 urban/architectural heritage protection objectives	Anticipated impact in the consideration of Development Plan objectives
centre and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report, OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform.	

Table 15.5.5. Consideration of relevant Dublin City Development Plan architectural heritage protection policies in the design treatments of Site 2

Potential operational stage impacts for the ACA

Please refer to Summary of Impacts for the enclosing environs (including the ACA) as described in Table 12.1 Table of Landscape and Visual Effects of Chapter 12 of the EIAR above for an analysis of wider urban impacts, including those affecting the ACA.

The combined site is located within the boundary of the O'Connell Street ACA. Considerations of general impacts for the character of the ACA and the development's broad adherence with ACA policies and recommendations are examined below. As qualified in italics above, please refer to the table below for an expanded opinion on impacts.

Demonstration of adherence with Part II-Development Control, Section A, New Development, of the O'Connell Street Architectural Conservation Area policy document

Policy

'New developments should respect the established scale of the existing built fabric - including height, massing, proportions and plot width. Proposals for large scale or 'mega-structural' developments will not be favourably considered, and any such proposals should be broken down into smaller, more comprehensible and human scale developments. This can be achieved in part through the provision of multiple uses and access points at ground floor level.'

Adherence

The proposed scheme is intended to recreate a vibrant city quarter of diverse urban character which once thrived in this area but has been eroded over time, promoting high quality architecture and new civic spaces that succeed in harmonious regeneration. It does not however, conform to the scale of all existing buildings on the site. The requirements of contemporary offices and retail spaces are patently different to those of the early 20th century with contrasting typologies a consequence of sustainable redevelopment. However, certain design tools have been used to deflect accompanying morphological changes within this historic urban context, in the interests of successful mergence with the enclosing historic townscape.

Whilst deviating from the existing narrow and long building forms constrained by historic plot widths, the reinterpretation of plot character is reflected in the differing approaches to street level expression of each of the architectural schemes of Site 2AB and Site 2C, in efforts to introduce new identities and reduce the impact of plot amalgamation.

The scale of the proposed development is moderated to defer to the integrity of the terrace as a set piece, with taller building forms set back to give the appearance of 'attic storey' vertical extensions. Whilst taller elements will locally alter the existing roofline, the removal of roof forms, with their rhythmically expressed gables and chimney stacks is referenced in a reimagined modulation of attic stories.

Demonstration of adherence with Part II-Development Control, Section A, New Development, of the O'Connell Street Architectural Conservation Area policy document

Notwithstanding the considerable care in designing proposed building forms, their development will have a transformative impact on the subject site and its receiving environment, experienced mostly to the western edge of the ACA aligned with Moore Lane. From key vantage points within the ACA to the east, the scheme is largely imperceptible with the unity of the streetscape remaining consistent with its original composition. Historic views through and across the site are protected and the impact on adjacent protected structures have been carefully considered.

To the rear of the O'Connell Street plots addressing Moore Lane, changes are most obvious. The architecture of Moore Lane has evolved piecemeal, which creates a specific character and one that is challenging to replicate in a new development, given that all of its 18th and 19th century survivals have been extensively modified and merge with robustly functional but sporadic architecture.

Setting aside the seeming incoherence of the streetscape, the east side of Moore Lane has acquired a certain character. In the interest of protecting this character, the width of the lane will be retained where possible and only increased where necessary for infrastructural reasons.

In respect of the diverse street characters of O'Connell Street to the east and Moore Lane to the west, the materiality of new architectural expression derives from the existing palette of re-used brick (in part), masonry, textured render and metal.

Interactions at street level are improved by the reuse and occupation of presently vacant sites and the rich mixture of retail offerings, with shopfronts and entrances animating presently inanimate façades to dramatically increase footfall and vibrancy within the site and surrounding areas.

Multiple uses such as cafés, restaurant, retail and offices are proposed in Site 2, complimenting the residential, cultural and hotel uses proposed elsewhere in the wider Masterplan Area.

The potential benefit of increased permeability though the ACA and the introduction of an active frontage onto Henry Place is acknowledged as arising from the proposed development.

'All new buildings should be designed to the highest standard in a modern architectural idiom. Pastiche will be discouraged and will only be allowed or required in exceptional circumstances'

Adherence

Proposed replacement buildings are designed to a high quality to attract long term occupants ensuring purposeful long-term occupancy, which will benefit the vibrancy of the ACA.

'Materials used should be of a high quality and be durable to avoid long term maintenance problems. They should include stone, brick, render, steel, glass and timber.'

Adherence

Proposed materials are of a high quality and include stone, brick, render, steel and glass.

'An appropriate and balanced mix of uses will be required in all new developments and large-scale single use developments will not be permitted. Public oriented uses including shops, cafes, restaurants and bars will be required at ground floor level to create more lively, dynamic and successful places.'

Adherence

Demonstration of adherence with Part II-Development Control, Section A, New Development, of the O'Connell Street Architectural Conservation Area policy document

The proposed redevelopment of Site 2 offers a good mix of commercial spaces with restaurant and retail uses at street levels opening onto pedestrian areas to create a vibrant urbanism. Within the wider Masterplan Area, diverse uses including residential, hotel and cultural are proposed, with each element contributing cohesively to the success of the whole.

'The ground floor of all buildings should be clearly articulated to establish a clear identity for each building and use. In general, a higher floor to ceiling dimension should be provided at ground floor level.'

Adherence

All street level spaces have high floor-to-ceiling provisions.

The purpose of this section of the plan is to assist in the implementation of successful and appropriate shopfront and advertisement projects. In a limited number of instances, it will the policy to retain the existing shopfront intact, if the shopfront is deemed to be of special architectural character. However, in general, it will not be the policy to restrict or prevent the remodelling of shopfronts. The general policy will be to encourage new and innovative shopfront design. In all cases of remodelling, new works must be to a high standard and be imaginative and modern. It will be the policy to avoid the use of reproduction style unless dictated by a conservation context. In that instance, traditional design and detailing and a high degree of craftsmanship

will be required'.

Adherence

To ensure a consistent and coherent design approach throughout the Dublin Central Masterplan Area, Acme have prepared a 'Shopfront Design and Signage Strategy (Appendix 4 of the Dublin Central Masterplan Design Statement)' as a central component of the masterplan. The document adheres with broad shopfront design policies described in the ACA, proposing compatible design principles which relate to the individual character areas within the Masterplan Site. The strategy voluntarily adheres with the expanded protection of facades in the Dublin City Development Plan 2022-2028 to include shopfronts; the Retail Design Manual, 2012, *Dublin City Council's Shopfront Design Guide*, 2001 and the *O'Connell Street Area Shopfront Design Guidelines*, 2003.

The majority of extant shopfronts on O'Connell Street within Site 2 have been previously modified, but many retain historical elements which contribute to the character of the streetscape. Where surviving, original elements will be retained and new complimentary backlit signage provided typically consisting of simple, contemporary individually mounted metal lettering, subject to separate statutory approvals.

Shopfronts addressing Moore Lane are designed to appropriately reflect its more intimate scale and character.

'The incorporation of new pedestrian routes and public spaces into new developments will be required where appropriate to enhance and reinforce the existing urban framework. A number of sites have been identified where opportunities for such interventions may be explored including site clusters Nos.4 and 7.'

Adherence

The Masterplan, as a strategy for cohesive urbanism, inherently recognises a requirement to perforate the lengthy western terrace of O'Connell Street Upper and connect it with rear laneways, as a means to revitalise same laneways. Proposed connections with Moore Lane (leading seamlessly to O'Rahilly Parade and Henry Place outside the red line boundary) will enliven hinterland networks, and a future linkage with the proposed public plaza within Sites 4 and 5 of the Dublin Central Masterplan Area will create much needed amenity space certain in turn to regenerate existing building blocks within Moore Street and Henry Street. Whilst the same proposed plaza is outside the boundary of the ACA, it is likely that the ACA will benefit from its presence, with the generous footpath width to the east of the O'Connell Street Upper terrace providing a residually amenable space, complimented by the footfall generated by new pedestrian routes.

Demonstration of adherence with Part II-Development Control, Section A, New Development, of the O'Connell Street Architectural Conservation Area policy document

'It is an objective to develop new pedestrian linkages within the ACA and to adjacent areas, to increase levels of pedestrian movement within the area; to improve linkages between major cultural institutions in the area and to institutions within the south inner city; and to open up the hinterland of the O'Connell Street area and integrate it into the economic mainstream. The development of the following linkages will be a priority.

It is an objective to facilitate the development of a new pedestrian route on a east/west axis, linking O'Connell Street and Moore Street as part of the redevelopment of the Carlton Cinema site, exploiting the presence of the Moore Street Market, opening up the ILAC on its eastern flank, and generating a strong new economic focus in North O'Connell Street.'

Adherence

The proposed development directly meets this ACA objective.

'Access requirements for people with disabilities, the elderly and the very young should be incorporated into the design of shops, public and other buildings.'

Adherence

The design for the public realm has been carefully considered to create an amenable environment for all users, whilst respecting an intention to re-use original setts and granite kerbstones.

'Plant and tank rooms should be provided within the roof space or within the envelope of the building and should not break the plane of the roof.'

Adherence

This objective has been achieved in the careful design of attic story level plant accommodation.

Table 15.5.6. Demonstration of adherence with Part II-Development Control, Section A, New Development, of the O'Connell Street Architectural Conservation Area

Anticipated impacts as envisaged by adherence with recommended policies in the Dublin Central Masterplan Area Conservation Management Plan

Specific statutory policies in respect of the redevelopment of unique characteristics and challenges particular to the large parcel of universally owned land of the Dublin Central Masterplan Area do not exist.

In efforts to provide a more rounded view of impacts arising from the apportioned development of the Masterplan Area, it is proposed not just to gauge impacts generally relative to statutory Development Plan and ACA policies, but also to refer to the scheme's reference to non-statutory architectural heritage protection policies within the site specific Dublin Central Masterplan Area Conservation Management Plan.

Assessment of impacts associated with the site are thus more rigorously and specifically reflected upon in respect of Conservation Management Plan recommended policies as follows:

Demonstration of adherence with Dublin Central Masterplan Area Conservation Management Plan policies as described in the Executive Summary of the Plan

Ref.

Policy

Policy 1	That redevelopment proposals for the site framed by an overarching masterplan will, on its
	adoption, require reference to the policies of this Conservation Management Plan
	Adherence
	The subject development has been designed cognisant of the Dublin Central Masterplan Area Conservation Management Plan objectives, policies and recommendations.
Policy 2	That the MEW (MetroLink Enabling Works) development is considered in respect of the policies of the Dublin Central Masterplan Area Conservation Management Plan.
	Adherence
	The MEW has been designed to accord with the infrastructural requirements of delivery of the MetroLink project and specifically, its O'Connell Street station, which are deemed to be of national importance for the enhancement of the urban core of a capital city. The consequences of demolition to deliver the combined brief is acknowledged by TII, however, the strategic importance of this site in meeting the MetroLink project objectives outweighs acknowledged significant cultural heritage impacts.
Policy 3	That the unique role of the developer as custodian of the site is recognised in any review of viable redevelopment, whilst respecting the site's architectural and historical significance insofar as possible.
	Adherence
	The subject development has been designed cognisant of the particular urban character of its receiving environment.
Policy 4	That a framework for implementation of the Dublin Central Masterplan Area Conservation Management Plan within the six separate sites of development is established at the discretion of the developer, under the auspices of an independent executive committee, the membership of which should include an experienced conservation professional, a property management professional and a vested third party.
	Adherence
	Conservation strategies for Site 2 are embedded in the preceding sections of the subject AHIA.
Policy 5	That a detailed building inventory is carried out for each building within the development site recognising the integrity of plot formations and associated urban character, as a means to record significance of all structures. The record will identify what buildings are of less significance and therefore could be strategically removed to facilitate development of the site. Further, that a serie of research and recording projects be implemented to consolidate and add to the growing archive of documentation. To this end, it is strongly recommended that a dedicated historian is tasked with continuing the baseline heritage research carried out for this important site, when repositories reopen, post-Covid.
	Adherence
	A detailed building inventory was carried out for each building within the development site appended to this document.

Policy 6	That demonstration of justification for demolition of structures of significance, where occurring i clearly presented, to include examination of alternatives to demolition.				
	Adherence				
	Multiple alternative sites for the MEW were examined by TII prior to their decision to merge with the proposed development of Site 2. In turn, the design of the above-ground scheme is dependant on the delivery of the below ground Station box. Whilst redevelopment of this site might have adopted an alternative design approach retaining a greater extent of existing fabric had the MEV not formed a central brief requirement, the infrastructural justification for the positioning of the MEW on this site has essentially determined the submitted demolition proposal.				
Policy 7	That the urban blocks within the site are given due consideration when assessing the impact of the site's wider proposed redevelopment.				
	Adherence				
	The subject development has been designed to integrate with proposed redevelopment of the remainder of the Masterplan Area, with design workshops occurring at all stages of the design process to ensure the adoption of cohesive practices common to all buildings and open spaces, and to ensure a consistently respectful approach to their wider receiving environments.				
Policy 8	That a programme of fabric repair within the Dublin Central Masterplan Area in the interests of protecting historic fabric in the short-term is implemented.				
	Adherence				
	Ongoing maintenance is occurring to building fabric in Site 2 as considered necessary to protect the integrity of the ACA and its users.				
Policy 9	That a co-ordinated approach to the presentation and development of the public realm in to protection and enhancement of historic routes and street networks, and proposed creation of neurotes is devised as follows:				
	That important historic routes connecting the city's Georgian core along O'Connell Street and from Parnell Street to Moore Lane and Henry Street are taken into consideration in assessing the proposed redevelopment of the area. That the impact of new development in the area should be assessed in relation to views to and from				
	the O'Connell Street and its environs ACA and to and from key landmarks in the vicinity - the GPO Rotunda Hospital. That the prominence and setting of key landmark buildings and their significance within the				
	streetscape is not undermined by the development. That a narrative of the 1916 'evacuation route' from the GPO is specifically expressed within the design of the urban landscape, connecting to a wider statutory-led commemorative trail occurring beyond site boundaries.				
	That the character of the Moore Street Market is respected and protected. That the treatment of the public realm acknowledges historic character, retaining surviving setts and kerbs where possible, and ensures that street furniture, signage and road markings are kept to a minimum, are simply designed and are of quality. That proposed new routes should endeavour not to interrupt the legibility of the historic network.				

Demonstration of adherence with Dublin Central Masterplan Area Conservation Management Plan policies as described in the Executive Summary of the Plan

That a review is taken of buildings/plots that will be lost in the generation of connections and that every effort should be made to acknowledge and, where possible, articulate these historic plot lines within any replacement buildings within the site.

Adherence

Fabric, patterns and legibility of historic streets and laneways will be protected within the redeveloped scheme.

A detailed survey of all historic street surfaces, setts, flagstones, kerbstones, gutters and coalholes has been undertaken. Where fabric is to be lifted to facilitate the construction of the proposed development, it will be subsequently re-laid, with quantum of surviving reusable fabric identified for reinstatement in the most historically significant sections of laneways, as identified in architectural landscaping proposals.

All street surface salvage and reinstatement works will be executed in accordance with methodologies set out by the design team archaeologist, with further input from this office required on recording and assessment of historic substrates to inform an appropriate approach to respectful reinstatement. Where deficiency of salvaged material occurs, supplementation will be provided using authentic material salvaged from elsewhere, where considered appropriate to complete paving compositions.

The remainder of historic street forms will be surfaced with architecturally compatible material.

The surface treatment of newly created public spaces will differ from that of the approach to historic areas, and will be finished with subtly differentiated materials to ensure visual unity between all public areas.

Policy 10

That, as part of the O'Connell Street and its environs ACA, a use impact assessment be carried out for proposed changes of use within the ACA and that grant of permission of the proposed redevelopment be based on the acceptability of any proposed interventions associated with the particular use.

Adherence

The proposed building uses within Site 2 is considered compatible with an objective to support the continued commercial viability of the ACA in attracting long-term occupants that will, over time, lean on services provided elsewhere in the ACA.

Policy 11

That the O'Connell Street and its Environs ACA acknowledge the evolving character of the ACA since its policy was first published in 2001.

Adherence

The proposed development is based on fresh, research-led analysis of the site. The results of this analysis found that the site needs to undergo significant change to reverse a long-standing downward spiral of vacancy and underuse; and that this change needs to be carefully balanced with interventions to retain character, urban grain and sense of place.

Such findings are considered central to the design of Site 2, in their addressing in particular of an under functioning north-western section of O'Connell Street Upper/ Moore Lane.

The potential benefit of increased permeability though the ACA and the introduction of an active frontage onto Henry Place will enhance its urban character.

Policy 12

That public access to the National Monument is facilitated.

Demonstration of adherence with Dublin Central Masterplan Area Conservation Management Plan policies as described in the Executive Summary of the Plan

Adherence

The enclosing section of Moore Lane to the north, south and in part to the east of the National Monument forms part of a proposed public realm design strategy considered under the subject development.

It is intended as part of that strategy to facilitate safe access to sections of public realm adjacent to No.9 Moore Lane to the rear of the National Monument, which in turn will enhance possibilities for its active regeneration.

Policy 13

That development adjacent to the designated protected zone around the National Monument safeguards its importance and legibility into the future, and to ensure that the development contributes meaningfully to the character of the National Monument, enhancing its presentation and interpretation.

Adherence

All development in proximity to the National Monument will be subject to a Ministerial Consent, which will provide an expanded approach to mitigation of impacts where anticipated to occur.

Policy 14

Whilst acknowledging the many shortcomings of this practice, to devise an appropriate strategy for treatment of statutory protected/ retained facades, in locations where all building fabric to the rear will be demolished, as a means to overcome the inherently negative impact of separating a façade from its building, as follows:

The key feature of retained facades is their outward vista onto the street, from their interiors. In the provision of new structures to the rear of retained facades, active continuation of this important relationship must be meaningfully fostered.

In converse, the retained façade must also have integrity when viewed from the street, with interior arrangements composed to reflect placement of fenestration.

Ceilings and lighting, where visible from the street, must be designed sympathetically to ensure visual consistency.

Where additional height is proposed above retained parapets, tensions between new and existing must be resolved by way of setbacks/ overhangs or other appropriate measures.

Technical detailing in terms of temporary and permanent structural restraints/ long term weathering and fenestration must be carefully considered in the interests of protecting heritage fabric.

Adherence

A detailed approach to the retention of facades with collective inputs from relevant members of the design team is contained in 'Dublin Central Masterplan Façade Retention Policy, (Appendix 3 of the Dublin Central Masterplan Design Statement by ACME)'. Whilst the policy reflects a site-wide Dublin Central methodology, it is most relevant as a strategy in demonstrating efforts to ensure that retained facades are protected at every stage of the construction process and can endure to continue to inform their respective streetscapes.

Policy 15

That an architectural strategy for replacement buildings is devised to ensure that the generation of new buildings overcomes the loss of the existing, as follows:

To ensure that new buildings are an exemplar of exceptional architectural design, make a positive contribution to their setting, streetscape and wider urban group, are constructed with high quality materials respectful of their context within the ACA, in reflection of the Categories of Special Interest defined in the 'Architectural Heritage Protection Guidelines for Planning Authorities 2011' and the

Demonstration of adherence with Dublin Central Masterplan Area Conservation Management Plan policies as described in the Executive Summary of the Plan

NIAH Handbook 2017. To ensure that the materiality of new building facades is compatible with the brick, stone, metal and ceramic palettes found in the vicinity.

To establish a long-term conservation-led maintenance strategy for replacement buildings; to ensure that each component and building element is maintainable and ultimately conservable. The conservation strategy must include details on the life span of components, a maintenance plan and risk schedule.

Research and recording: To submit all architectural and technical drawings, together with relevant files to the Irish Architectural Archive as a safeguarding measure to assist in the future conservation of replacement buildings.

Adherence

Whilst this policy largely reflects the conservation of buildings within the Dublin Central Masterplan Area, but outside Site 2, the design of each of the building blocks within the terraced Site 2, in their contrasting architectural approaches by differing architects, has a common theme of excellence in terms of elevational contribution, material durability and performance.

It is hoped that each of the structures will in time merge with their unique environment, and will be considered exemplars of their era of construction.

Policy 16

That a specific conservation strategy for the careful conservation and long-term protection of retained fabric is devised to ensure the continuance and durability of representative buildings of each era of development and their appropriate presentation, as follows:

The different building typologies identified on the site include nineteenth century and early twentieth century warehouse and factory buildings, early-twentieth century (post-1916) terraced retail buildings with purpose-built commercial and office space on the upper floors, and early-twentieth century (post-1916) more modest terraced retail buildings with residential accommodation on the upper floors. The redesign of the site should include for the retention of selected, complete examples of each of these building types so that the character and evolution of the urban blocks can be interpreted within the completed development.

The existing buildings that are identified as being retained under the previously permitted development should be included for retention under any new proposals, unless better examples of equivalent building types can be identified for retention instead

Any new design for the site should include for the conservation, restoration and presentation of No.42 O'Connell Street as an important intact example of an eighteenth-century townhouse on O'Connell Street. A small yard should be formed to immediate rear of No.42 to give the building some space and to facilitate the restoration of the rear window openings at ground floor level. This will require the creation of a new circulation route into O'Connell Hall and its associated top-lit link building, that does not impact on No.42. The introduction of new vertical circulation routes (i.e., lifts and additional escape staircase), if required, should be outside of the eighteenth-century envelope of No.42, with connections into the historic building carefully considered to avoid impacts on its important interior and plan form.

A specific conservation strategy should be devised for No.70 Parnell Street, which will require considerable consolidation and repair .

The surviving eighteenth century buildings within the site (in addition to the National Monument) should be retained and incorporated into the scheme.

The surviving boundary walls and party walls across the site, some of which predate the adjacent existing buildings, are significant survivals. While it is acknowledged that the retention of these walls may not be possible within the constraints of the TII proposals and the originally permitted development, effort should be made to interpret and present the line of these historic plot

Demonstration of adherence with Dublin Central Masterplan Area Conservation Management Plan policies as described in the Executive Summary of the Plan boundaries within the design of these replacement buildings. Where such walls are to be removed, a detailed record should be prepared and lodged with the Irish Architectural Archive. Adherence Specific conservation strategies for retained fabric are proposed for Site 2 which are contained in Section 6.0 of this Assessment and Appendix A2.15. Policy 17 That this Conservation Management Plan can be amended into the future, with the following variations anticipated: Demolition, archaeological investigation and construction phase to catch unknown conditions should they emerge during the course of works and the Plan updated accordingly. The Plan to remain active for 10 years post- construction to ensure implantation and maintenance strategies are observed and put into practice. Adherence The implementation and subsequent management of the proposed development will be carried out in compliance with Conservation Management Plan policies. It is accepted that the demolition and excavation stages of Site 2 will build on the existing store of archaeological and architectural knowledge of the granular and wider evolution of the building fabric and urban blocks within the Dublin Central site, and as a consequence the appendices attached to the Conservation Management Plan will be updated accordingly.

Table 15.5.7 Demonstration of adherence with Dublin Central Conservation Management Plan policies as described in the Executive Summary of the Plan

15.5.2.2 Construction Phase

Demolitions

Demolition within an ACA

Section 11.5.2 of the Dublin City Development Plan states; 'There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit. In such exceptional circumstances, a proposal for demolition or substantial demolition will be considered having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011). Where it is proposed to demolish a structure that contributes to the character of an ACA or to demolish behind a retained façade, the onus is on the applicant to make the case for demolition'.

TII's 'O'Connell Street Options Assessment Briefing Note', dated August 2022, outlines an appreciation of the conflicting challenges of protecting architectural townscape character whilst delivering infrastructural projects central to the long term commercial viability of town centres, which in turn economically supports the form of continuous regeneration inherent to the survival of historic city cores. Achieving a cycle of sustainability respectful of architectural heritage is challenging in a layered built environment seamlessly fusing representations of each consecutive era of construction in upstanding built fabric. In respect of Site 2, the TII narrative substantiates its achievement of 'substantial public benefit' in the delivery of the MetroLink project as designed, which, in combination with the Applicant's oversite development, requires extensive demolition within an ACA. In the same document, the significance assigned to each building within Site 2AB and 2C as described in Section 5 above with each structure possessing significance, ranging from high to modest, is understood.

It is pointed out however that the composition of each affected building range within Site 2 has been considered over time under consecutive city development plans and a rigorously assessed suite of planning applications, as reflected in the approval of the previously permitted development on this site, with extensively greater demolition than is what is now proposed.

Notwithstanding the repeated presentation of records verifying significance on the public planning file, of the structures comprising fabric to the rear of protected facades intended to be demolished under the proposed development, none are included in the Record of Protected Structures of either the current or proposed city development plans, with some similarly excluded from the NIAH with descriptions of each protected facade in the RPS limited to protection of 'Upper floor façades'.

Every effort has been made to retain historic fabric beyond that which is protected statutorily, where possible, extending to the retention of shopfronts of merit as part of the proposed development. Given the scale and nature of the proposal however, the extent of demolition proposed elsewhere is considered by the applicant to be necessary by both the Applicant and TII in the delivery of the joint proposals.

The demolition for instance of Nos 59 and 60 O'Connell Street were proposed in earlier iterations of the scheme, which, following close architectural heritage examination and advocation for their retention, were successfully avoided in later design strategies. The consequence of such voluntary 'retention' is the wholescale removal of these structures from the red line boundary.

The loss of buildings of significance dating from a brave period of architectural design in the 20th century progression of an Irish architectural style, fused with remnants of an earlier period of 18th century excellence, is regrettable. Setting aside the statutory protection afforded to individual buildings, their collective influence to the architectural enrichment of the ACA's townscape is acknowledged.

It is accepted that the renewed building forms of the 1920s emerging from a war, superimposed on an earlier townscape resulted in successful integration over time. It is also accepted that the reasoning behind the proposed demolition of building fabric stems from the opportunity for substantive commercial and state investment into a district that has widely lost out to other urban districts in terms of the socioeconomic benefits that such investment has brought.

Challenges in the successful mergence of a scheme overlaid onto a tapestry of retained facades and extant street networks is acknowledged by the design team, with efforts made to collectively bring about a well-researched response ensuring the success of the proposal. Site 2 of the Dublin Central Masterplan Area aspires to deliver substantial public urban gain to an area exacerbated by prolonged vacancy and general decline, as described in detail in a report entitled 'Commercial Rationale for the Proposed Development of Dublin Central' (JLL- September 2022), and submitted with this application. In the context of the entirety of the Dublin Central Masterplan Area, the scheme strives to achieve balance between the retention of historic fabric and the delivery of an ambitious scheme.

Demolition of individual buildings

The site is included within the O'Connell Street and Environs Architectural Conservation Area and as previously stated, a number of its facades are included in the Record of Protected Structures, with some also listed in the NIAH. An appraisal of each building, regardless of its statutory protection was undertaken by this office as part of a wider Conservation Management Plan for the Masterplan Area to determine their significance, the conclusion of which is provided in Section 5, Table 5.1 above.

It is proposed to construct part of the future MetroLink tunnel beneath the subject site and to locate a station box beneath Nos.43- (rear)59 O'Connell Street Upper inclusive. To facilitate the proposed development it is proposed to demolish the following buildings extending to Moore Lane and excavate their plots in their entirety;

- Nos.46-49 O'Connell Street Upper
- Nos.55-56 O'Connell Street Upper

The following structures extending to Moore Lane are intended to be demolished behind their façades, with their plots excavated;

- No.43 O'Connell Street Upper
- No.44 O'Connell Street Upper
- No.45 O'Connell Street Upper
- No.52-54 O'Connell Street Upper (the former Carlton Cinema),
- No.57 O'Connell Street Upper
- No.58 O'Connell Street Upper

A number of outbuildings, annexes and former mews positioned at the rear of Nos.59-60 O'Connell Street are also intended to be removed.

Please refer to demolition drawings submitted with the subject application for detail.

Impacts arising from demolition will generally be considered both in terms of the loss of individual buildings together with wider impacts for the character of site's receiving urban environment.

Impact of the removal of building fabric behind the façade of No.43 O'Connell Street Upper

No.43 O'Connell Street Upper was inspected during the preparation of proposals and was identified in the Dublin Central Masterplan Area Conservation Management Plan as being of architectural significance. It constitutes a good example of an early twentieth commercial building. The façade is identified in the RPS (Ref.No. 6023) and the building is included in the NIAH with a regional rating.

The front façade will be protected and retained within the proposed development with all building fabric behind the façade extending to Moore Lane, demolished.

At basement level, the 18th century lightwells beneath the O'Connell Street footpath survive and will be retained. The original early 20th century mosaic floor at the threshold of the entrance to the upper levels will also be retained and incorporated into the new building. Please refer to Appendix A2.15 for details of proposed works to retained fabric.

The interior at basement and ground floor level is presently in use as a casino. Both basement and ground floor levels have been extensively modified and all interior surfaces are lined with contemporary finishes, with 1920s features either obscured or removed. In contrast, the upper floors of the building are reasonably intact, with stairs, joinery, cornices and chimneypieces original to the construction of the building in 1925 observed throughout.

At the rear of the site, there is a mews, likely constructed in the early 20th century contemporaneous with the reconstruction of the main building.

The removal of the building behind the façade of No.43 is required to give effect to the proposed development.

Whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact on its authenticity and legibility.

Impact of the removal of building fabric behind the façade of No.44 O'Connell Street Upper

No.44 O'Connell Street was inspected during the preparation of proposals and is identified in the Dublin Central Masterplan Area Conservation Management Plan as being of architectural significance. The structure constitutes a good example of an early twentieth century purposefully designed commercial building. The façade is identified in the RPS (Ref.No. 6024) and the building is included in the NIAH with a regional rating.

The O'Connell Street façade will be protected and retained within the proposed development. The

building fabric behind the façade will be removed. At basement level, 18th century lightwells and coal cellars below the pavement survive and will also be retained. Please refer to Appendix A2.15 for details of proposed works to retained fabric.

The building was previously in office use and most recently was used as a Garda Station, which is reflected in the modifications to the ground floor layout. The original 1920's character is apparent in the interior layouts, affixed joinery and plasterwork throughout.

The infill development of the plots at the rear of the main building was well-considered and incorporate a series of staggered lightwells lined with reflective surfaces such as glazed white brick, to direct light into the deep-plan spaces. These courtyards were reflected in the plan of the adjacent plot No.45 to their mutual benefit. The upper floors of the building were subsequently connected internally to No.45 through modest, likely retrospective openings in the shared party wall.

The building is presently unoccupied, and its interiors have suffered from water and vermin ingress.

At the rear of the site, there is an adapted mews, likely constructed contemporaneous with the replacement structure.

The loss of the 1920's building behind the façade is required to facilitate the proposed development.

As above, whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact on its authenticity and legibility.

Impact of the removal of building fabric behind the façade of No.45 O'Connell Street Upper

No.45 O'Connell Street was inspected during the preparation of proposals and is identified in the Dublin Central Masterplan Area Conservation Management Plan as being of architectural significance as an exemplar of an early twentieth commercial building. The building is not a protected structure but is included in the NIAH with a regional rating.

The O'Connell Street façade will be protected and retained within the proposed development with building fabric behind the façade removed. At basement level, the 18th century lightwells beneath the pavement survive and will be retained in the new development. Please refer to Appendix A2.15 for details of proposed works to retained fabric.

The building is presently unoccupied, and its interiors have suffered from extensive leaks and bird damage. The slightly taller building is connected (likely retrospectively) internally to No.44 O'Connell Street Upper via an arrangement of modest upper level openings and steps.

The original 1920's character is apparent in the interior layout, joinery and plasterwork- with all detailing of an exceptional quality. The centrally positioned open well staircase complimented by an opposing lightwell extending to entrance level is a particularly fine feature. It is noted that the topmost floor levels have been extensively damaged by nesting birds.

Lightwells within the building range to the rear extending to Moore Lane intentionally interacts with those of No.44 adjacent, reflecting a highly successful functional interdependence that secures habitability at all levels, including basement.

The loss of the 1920's building behind the façade is required to facilitate the proposed development.

Whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact on its completeness as a building of significance.

Impact of the removal of Nos.46-49 O'Connell Street Upper

Nos.46-49 O'Connell Street was inspected during the preparation of proposals and is identified in the Dublin Central Masterplan Area Conservation Management Plan as being of architectural significance. The building is not a protected structure nor is it included in the NIAH.

The 1970's building is constructed on the amalgamated plots of four earlier buildings. There is an

extensive 18th century brick vaulted basement, not completely surveyed due to lack of safe access, surviving beneath the existing building above which spans the modernist edifice designed in 1973 by Arthur Swift & Partners in a brutalist fashion typical of that era. The scale of the building is respectful of the established parapet heights on O'Connell Street and sits quietly in that context. The façade is clad in repetitive factory produced pre-cast concrete panels with modest relief afforded by the subdivision of the front façade into five equal width bays. The rear of the building, however, is less successful in terms of its relationship with the urban realm. The form and positioning of the T-plan building on the site is in congruence with the historic plot lines. Furthermore, the blank gable poised above a podium of surface car parking does little to engage with Moore Lane or O'Rahilly Parade in the culmination of a vista from Moore Street towards an unsatisfactorily exaggerated alignment respectful of O'Connell Street but ignoring of its presentation due west.

It is acknowledged that late 20th century architecture is commonly under-appreciated in Ireland, with the consequence that these buildings are increasingly becoming a rarity. However the architectural intent and realisation of this structure is not considered to be of sufficient quality in this instance to merit its retention. The Planning and Development Act 2000 requires that a building be of special significance under one or more designated categories; architectural, historical, archaeological, artistic, cultural, scientific, technical or social, in order to merit protection. It is submitted that the building presents a refined frontage onto O'Connell Street and is externally pleasing within its plot, but sits incongruously with its urban context to the west and internally is of poor quality.

The proposed replacement structure delivers a much improved relationship with Moore Lane and the adjacent development sites, together with an enhanced vista from Moore Street due east through O'Rahilly Parade.

The structure will be demolished to facilitate construction of the proposed development. The extant building makes a neutral contribution to O'Connell Street and detracts from the character of Moore Lane. On this basis, it is considered that its proposed replacement with a new buildings that will bring increased activity to the street and positively engages with all street frontage will have an overall positive impact on the ACA.

Impact of the removal of building fabric behind the façade of No.52-54 O'Connell Street Upper (former Carlton Cinema)

No.52-54 O'Connell Street contains extensive portions of original fabric to the front structure, with rear theatres also largely intact, albeit modified. The front bay and façade were identified in the Dublin Central Masterplan Area Conservation Management Plan as being of architectural significance. The upper floor façade is identified in the RPS (Ref.No. 6025) and the building is included in the NIAH with a regional rating.

The present cinema building was designed in the mid 1930's by Robinson & Keefe, on the site of an earlier Carlton cinema at No.55 combined with two adjoining plots. Internally, the cinema was substantially modified in the 1970s, when the main auditorium was subdivided into three smaller cinemas and the restaurant converted to a fourth screen. The significance of the present building is largely limited to the art deco inspired façade and surviving elements of the art deco interior, including an interesting cement lathed ceiling system suspended from the concrete coffered structure, together with early polished steel detailing.

It is intended to demolish the structure behind the façade to facilitate construction of the proposed development.

Whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact.

Impact of the removal of No.55-56 O'Connell Street Upper

No.55-56 O'Connell Street was identified in the Dublin Central Masterplan Area Conservation Management Plan as being of limited significance, given the apparent survival only of a rear staircase and early lift core. The building is not a protected structure but is included in the NIAH with a regional

rating.

The present building which spans two earlier 18th century building plots was constructed between 1926-1931. The ground floor shopfront was originally framed with masonry elements including a deep fascia board which has since been either replaced or is concealed with modern fabric. The upper floors of the façade are clad in brick, divided by three recessed bays with steel windows having decorative swag embellishments on their panels. The building is presently in use as a casino and although it has been substantially modified internally, some elements of the original interior survive.

As stated above, a rating of 'Regional Importance' has been assigned to this building in the NIAH. However over the course of successive Development Plans, the building has not been added to the Record of Protected Structures. The Planning and Development Act 2000 requires that a building be of special significance under one or more designated categories; architectural, historical, archaeological, artistic, cultural, scientific, technical or social, in order to merit protection.

The structure is of some interest on account of its comprising part of the approved early 20th century architectural scheme for the reconstruction of O'Connell Street post the Civil War in 1922. However, not all of the individual buildings are of equal standing in terms of architectural quality. The composition of the façade of No.55-56 is arguably less successful than its counterparts; in that the combination of both traditional and modern design less successfully executed as demonstrated in the pastiche application of decorative mouldings to the window aprons. It is considered that Nos. 55-56 is not of comparable quality to the adjoining structures and that it fails to meet the standard of architectural interest to warrant long term protection.

The removal of the building is required to facilitate the proposed development. The proposed replacement building will adhere to the existing parapet heights to sit unobtrusively within the streetscape. The varied uses proposed, including cafés and retail at ground level coupled with multiple entrances will bring increased vibrancy to both O'Connell Street and Moore Lane to the rear.

The proposed development demands an ambitious planning scheme to regenerate the long-underutilised area, and given the limited interest attributed to this particular structure, there is an opportunity to construct a high-quality contemporary architectural scheme on this site. The broader beneficial impacts of the regeneration proposals on O'Connell Street and the wider ACA must be considered in assessing this proposal.

Impact of the removal of building fabric behind the façade of No.57 O'Connell Street Upper

No.57 O'Connell Street was inspected during the preparation and identified in the Dublin Central Masterplan Conservation Management Plan as being of architectural significance. The façade is identified in the RPS (Ref.No. 6026) and the building is included in the NIAH with a regional rating.

The front façade will be protected and retained within the proposed development and the building fabric behind the façade will be demolished.

At basement level, the 18th century brick vaults beneath the pavement survive and will be retained. Please refer to Appendix A2.15 for details of proposed works to retained fabric.

The ground floor level is presently in retail use, with storage at basement level. The retail space has been lined with contemporary finishes and a series of contemporary extensions have been constructed at the rear of the main building. The upper floors of the building, have recently been occupied after long term vacancy. Features original to the construction of the building in 1926 including a top-lit open-well staircase, joinery items, cornices and chimneypieces, all recorded throughout.

The removal of the building behind the façade of No.57 is required to give effect to the proposed development. The replacement building will form part of the multi-use development and support the delivery of more vibrant streetscapes.

At the rear of the plot, onto Moore Lane, an original frontage was modified to create two wide vehicular openings with the earlier fabric fragmented and limited to framing piers, in itself comprising façade constructed in multiple phases, one section allegedly bearing a mark of a bullet hole from the

1916 Rising. Despite this theory remaining unproven, and notwithstanding an infrastructural requirement to remove the building, it has garnered some rapport in public consciousness and might, in the interest of respecting potential evidence of the conflict, be possible to salvage the pier and display it elsewhere on the site, potentially as part of the proposed museum at 14-17 Moore Street. The location on site could be identified using dedicated signage demarking a historic trail, forming part of a subsequent application to be made by a third party.

Whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact.

Impact of the removal of building fabric behind the façade of No.58 O'Connell Street Upper

No.58 O'Connell Street was inspected during the preparation and identified in the Dublin Central Masterplan Conservation Management Plan as being of architectural significance. The façade is identified in the RPS (Ref.No. 6027) and the building is included in the NIAH with a regional rating.

An extensive brick arched basement constructed in 1873 extends beneath the length of the entire plot. The area beneath the pavement on O'Connell Street has been modified and pavement lights supported on steel I-beans have been installed in place of the original brick vaults.

The ground floor level is presently in retail use, all other floors, including the basement were most recently in use as a gym, but are now vacant. The retail space has been lined with contemporary finishes. With the exception of the modified ground floor, the layouts original to the construction of the building in 1926 are legible and feature joinery items, cornices and chimneypieces throughout.

In conservation terms, this part of the proposal involves the loss of a well-crafted, intact building that is assessed as being of significance. Similar to arguments for demolition of other buildings to rear of facades in this terrace, the removal of the building behind the façade is balanced by the socio-economic benefits that increased permeability integral to the success of the wider Dublin Central development and also its benefit of acting as catalyst for the urban regeneration of the north inner city as a whole.

At the rear of the site, the remnants of the 19th century shopfront complete with brick piers, projecting cornice, and bearing the inscription, "J& G. CAMPB—" formed in stucco survives. This signage band is not possible to remove as a cracked stuccoed element and therefore requires demolition as part of the demolition of structures onto Moore Lane. Whilst its intact removal for reinstatement would be desired, the team are realistic that the pre-existing friability of the stucco precludes suggesting an unviable intention. The design team would like to obtain moulds for the sign, and might re-use whatever sections fall away whole coupled with re-mixing of crushed aggregate to remould remainder, mitigating wholescale demolition.

Whilst the conservation of the O'Connell Street façade is positive, the removal of the remainder of the building will have permanent negative impact on the building's appreciation as a complete entity.

Impact of the removal of an annex and outbuildings at the rear of No.59 O'Connell Street Upper

It is noted that the main building, No.59 O'Connell Street Upper including the rear return falls outside the application boundary. No.59 was scheduled to be demolished in its entirety as part of the originally permitted development, but on account of its significance as discovered during investigations, the MEW has been redesigned to avoid it.

To facilitate the proposed development, including that of an escape stair from the Station box, it is however necessary to remove certain structures to the rear of No.59, as identified in Plate 7.1 above and described as an early 20th century carport and a 19th century annex.



Plate 15.5.1 Identification of structures proposed for removal at the rear of No.59 O'Connell Street Upper; the 20th century carport to the west and the 19th century annex to the east.



Plate 15.5.2 Aerial photograph depicting the roof form of rear buildings, with Carlton Cinema demarked for orientation purposes, 1933; (Historic Environment Scotland)

The 19th century, two-storey, hipped roof annex is perpendicularly attached to the extended rear return of No.59. The structure has been previously altered both externally and internally. Historic photos confirm that there was previously a lantern-roofed building attached to the west facing façade of this structure, which was subsequently removed. A chimneystack centrally positioned on this west

elevation, is truncated to eaves level. The east façade, facing the main building, has two windows, with plaster hooded moulding over. The interior retains little of interest as most of the original fixtures and fittings have been stripped out, with the consequential loss of original character. It is submitted that this structure is not of significant architectural interest and that its proposed removal will not diminish the character of the main house at No.59 O'Connell Street Upper.

At the rear of the site, there is a is carport enclosure which spans between the rear boundary wall on Moore Lane and the west elevation of the former reading room. The roof extends above the lightwell pertaining to the former reading room to create a double-height space. The building is utilitarian in nature, clad with corrugated metal sheeting on cast iron trusses and functions as a carport and rear entrance to the plot. The removal of this later structure, which is considered of moderate architectural value, is required to facilitate the proposed development.

Impact of the removal of No.60A O'Connell Street Upper

This modest and much-modified 18th century structure most-likely served as one of three stables or coach-houses pertaining to main houses on O'Connell Street Upper. Original masonry and a door frame was found to an internal entrance level spine wall, with early external walls of the rectangular plan building comprised of calp limestone, surviving.

The removal of this structure is required to facilitate access for maintenance and fire emergency vehicles around the narrow junction at Henry Place and Moore Lane, which is presently restricted, as described in reports by Waterman Moylan Consulting Engineers Limited.

The structure is of 18th century origin and attests to the original relationship between the main houses on O'Connell Street and the structures that address Moore Lane. This corner-sited building effectively upholds the alignment of the historic street corner and is significant with respect to the 1916 battlefield. Its removal will diminish the legibility of the historic building line and alter the character of what is presently a relatively enclosed space, with the impact mitigated to an extent by proposed landscaping measures adopted by Gross Max.

Impact of the proposed works and removal of part of entrance level of No. 61 O'Connell Street Upper

Singular impacts associated with each intervention attached to the proposed redevelopment of this historic townhouse is outlined in the planning application Architectural Heritage Impact Assessment and its appendices.

The proposed works seek to retain and purposefully re-use an 18th century townhouse which was intended to be demolished as part of an earlier planning permission.

The proposed development is therefore viewed as being wholly positive, and will involve the refurbishment of a building which has been previously modified on all levels. There is limited historic fabric remaining internally, so care has been taken to integrate the surviving fabric into the proposed scheme where possible. The exterior of the building, including the protected façade, will be refurbished, and conserved in accordance with best conservation practice upholding the visual integrity of the ACA. The proposed rear extension is modest and an improvement on the existing arrangement which obscures the rear elevation of the 18th century structure. The most significant alteration proposed involving the replacement of the ground floor structure which is a direct consequence of the inclusion of a pedestrian link through the building. While any loss of historic fabric is regrettable, the potential benefit of increased permeability though the ACA and the introduction of an active frontage onto Henry Place is acknowledged.

Site Excavations

The proposed site excavations required to give effect to the proposed development necessitate the removal of the O'Connell Street buildings behind their façades. The loss of early 20th century buildings is regrettable on account of the commercial importance of O'Connell Street and elevated status of its occupants.

However, the replacement of the terrace with an ambitious scheme led by highly skilled Irish and international design studios, will support the regeneration of the wider Dublin Central Masterplan Area and the conservation of historically significant buildings within the masterplan boundary.

Retaining walls will be constructed around the perimeter of the new MEW basement to avoid surcharging existing basements on plots adjacent. Appropriate vibration limits, specific to the structural characteristics of upstanding retained buildings within the site and buildings immediately neighbouring and in proximity to the site, will be established, to mitigate risk of disturbance during the construction process. Please refer to the Outline Construction & Demolition Management Plan – Site 2, DC-WAT-2X-XX-RP-C-001011 (Waterman Moylan Consulting Engineers Limited) for further details on the overall strategy.

Given that the development is within the ZAP for Dublin (DU018-020), an archaeological assessment and test excavation, together with the preparation of an impact assessment of any proposed development on the subject site will be provided by Courtney Deery, archaeological consultants.

Façade Retention

Please read in conjunction with engineering and architectural strategies for retained facades, Dublin Central Masterplan Façade Retention Policy, Appendix 3 of the Dublin Central Masterplan Design Statement by ACME and also Appendix 15.15: Works to retained fabric.

All façades included on the current Record of Protected Structures will be retained in the proposed development. The removal of the non-protected fabric behind the façade is required to realise this ambitious development, but retention of the most characterful façades does at least offer safeguarding of the character of the civic streetscape.

Post appraisal of No.45 O'Connell Street Upper, it was considered that the front elevation of this building was also worthy of retention. It is a finely crafted façade, using high quality material and forms part of the early 20th century streetscape.

Although façade retention is not a preferred strategy in conservation terms, the demolition of building fabric behind retained façades is required to deliver the proposed development, whose importance, coupled with the proposals for the oversite development by the Applicant, are deemed by statutory stakeholders (TII) and the Applicant to exceed the heritage protection guidance in this instance.

The façade retention strategy proposed for the Site 2 development was rationalised in accordance with a statement in Section 11.1.5.8 of a previous 2016-2022 Dublin City Development Plan; 'in certain circumstances, where it has been agreed that substantial demolition of a non-protected structure is acceptable, the retention of the façade may be important, where this makes a positive contribution to the special character of the area. In these circumstances the retention of the building façade may offer a compromise allowing protection of façades of townscape merit while allowing new accommodation to be developed behind.'

Whilst reference to façade retention is not contained in the current development plan, Section 11.5.1 of the Plan states; 'It is accepted that in some circumstances, the loss of a protected structure may be the only option and this may be permitted where it will secure substantial public benefit or where there is no other viable option. Any proposal regarding the demolition of a protected structure will require the strongest justification provided by a qualified professional with expertise in architectural conservation. The applicant will be required to provide preservation by written and visual record of the structure or any element of the structure that contributes to its special interest, or the architectural salvaging or reinstatement of any such element, before the authorised development takes place'.

Design parameters governing the reconstruction of the façades in the early 20th century were prescribed by Dublin Corporation, with emphasis placed on preserving the classical scale and Georgian proportions of the earlier street as part of an externally unified design approach. Internally, each building strove to achieve brave new layouts reflective of a changed economic society, realising in blocks of height punctured with tall often shared lightwells serving all levels, what could be ambitiously embraced as commercial purpose built buildings constrained within an 18th century

residential plot form. An intention to reinstate a restaurant unit at Level 1 to the rear of the retained Carlton façade represents one such gesture.

Collectively insofar as these buildings now contribute to the ACA and in particular the character of O'Connell Street, it could be held that their reimaging as now proposed, represents the latest in a series of radical morphological changes to the terrace, which will also, in time, acquire status and merge with that same character.

The challenges of constructing a new building behind a retained façade are recognised and the design team have taken care to ensure that the interaction between new and retained fabric is satisfactorily resolved. It is not possible to reinstate floorplates in their original locations on account of variances in levels across adjoining plots, which are to be amalgamated in the proposed development. The new floors have, however, been strategically positioned to avoid clashing with existing windows, in order to retain the visual integrity of spaces behind façades as viewed from within the public realm of the ACA at night.

The technical aspects of the façade retention policy are described in the Dublin Central Masterplan Façade Retention Policy Document DC-ACM-ZZ-XX-RP_A_10_0725. The various stages of removals, site protections and reconstruction are described in this report. The general principles of applying breathable linings to the solid walls will be observed throughout. Original façade masonry, signage and fenestration will be retained and inappropriate additions and later features removed and replaced as described in Appendix 15.15.

The entrance level shopfronts are not included in the description of the buildings in the current RPS, however their contribution to the ACA is acknowledged and they will therefore be retained and restored inherent to façade retention works.

15.5.3 Do-Nothing Impact

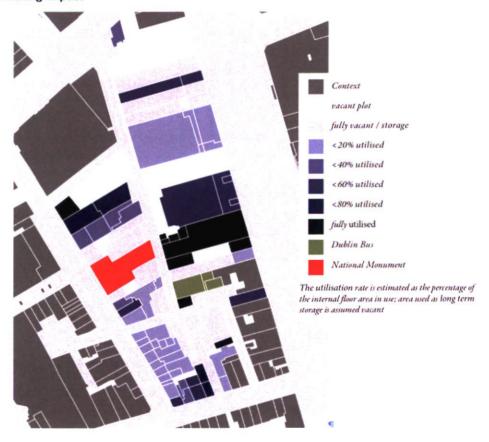


Figure 15.5.3: Indicative land use/vacancy/under-use within the masterplan site

For the purpose of this assessment, it is assumed that the existing permitted development is not carried out and the combined sites' character remains unchanged.

Should no development proceed within the Dublin Central Masterplan area, this extensive city centre site would remain as it currently exists. Whilst no impact would arise from an absence of development, the converse scenario of continued decline would present a more tangible long term impact in the incremental decline of protected fabric, and now-known fabric of architectural significance.

Part 4 of the Dublin Central Masterplan Area Conservation Management Plan cites a range of risks and vulnerabilities that are found to actively undermine both building fabric of significance within the masterplan site and the public realm enclosing same fabric of significance, the consequences of which extend beyond the boundaries of the site and contribute to urban decay in the wider vicinity.

It notes that the level of vacancy, estimated as being in the region of 60% (refer to fig.15.5.3. above) of the floor space of existing buildings across the Dublin Central Masterplan Area, together with economic decline on this strategically important site has created a justifiable sense that a single major intervention is the only way to reverse its fortunes. The amalgamation of ownership, as existing, creates an opportunity for a paradigm shift for this underperforming part of the city (that many regard as the only way forward) but carries the risk that a single overarching design approach may fail to respond to the granular character of the site- a risk that has been partially offset by the Applicant employing numerous architects to bring as much variety as possible. The analysis concludes that there is a need to strike a balance between appropriate level of demolition necessary to provide a real catalyst with the retention of the most significant buildings and representative examples of key building types.

A 'do nothing' scenario should not therefore continue to be tolerated within the masterplan site.

15.5.4 Extent of Potential Architectural Heritage Impact Attached to the Proposed Development

The extent of effects/ impacts attached to the proposed development is pinioned in accord with EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR), May 2022, Table 3.3; Description of Effects, Section 3: page 50

	Quality of Effect	Significance of Effects	Magnitude of Effects	Probability of Effects	Duration of Effects
Dublin Central	Masterplan				
Operational Phase	Positive	Significant	Extensive; permanent	Likely	Permanent
Construction Phase	Negative/ adverse	Moderate	Extensive; ranging from 7-15 years depending on the phase.	Likely	Medium- term
Proposed Deve	elopment – Site 2 &	No. 61 O'Connell Stree	t Upper		
Operational Phase	Positive	Very Significant	Extensive, permanent	Likely	Permanent
Construction Phase	Negative/ adverse	Significant	Extensive; 11 years	Likely	Medium- term

Do-N Impa	Nothing Negative/ act adverse	Profound	Extensive; permanent	Likely	Long-term	
--------------	----------------------------------	----------	-------------------------	--------	-----------	--

Table 15.5.9: Extent of effects

15.6 MITIGATION MEASURES (AMELIORATIVE, REMEDIAL OR REDUCTIVE MEASURES)

15.6.1 Dublin Central Masterplan

15.6.1.1 Operational Phase

Construction stage impacts are envisaged as being short term, and whilst disruptive, will, on completion provide an enhanced urban environment in which all structures and spaces of architectural and cultural heritage interest can collectively thrive.

15.6.1.2 Construction Phase

Potential impacts are envisaged as arising at demolition, excavation and construction stages where the development sequence for multiple masterplan plan sites occur in tandem. It is envisaged over a prolonged period, that construction will be active to one or more development sites, with common road networks and site compound areas outside designated 'Sites' in correspondingly active use. As all works occur within or in the vicinity of the ACA and neighbouring protected and historic fabric, the impact of the proposed development is likely to be experienced by this built architectural heritage.

15.6.2 Proposed Development - Site 2 & No. 61 O'Connell Street Upper

15.6.2.1 Operational Phase

Anticipated impacts for the urban character of O'Connell Street and the enclosing ACA streetscape

Please read in conjunction with Table 15.7.1 Summary of impacts for the enclosing environs (including the ACA) as described in Landscape and Visual Effects of Chapter 12 of the EIAR.

The streetscapes which enclose Site 2 have distinctive characters, dictating a specific response to each varying condition in an appropriately sensitive manner. Impacts of the proposed development on the setting of the ACA are described on a street-by-street basis as follows;

Summary character appraisal

The present O'Connell Street is an amalgamation of multiple eras, architectural styles and typologies.

The construction of the Carlisle Bridge and the widening of Drogheda Street by the Wide Street Commissioners in the eighteenth century established Sackville Street, now O'Connell Street, as one of the primary thoroughfares in the city. Over the course of the 19th century, many buildings were amalgamated, refashioned and adapted to reflect the increased commerciality of the street as it continued to prosper.

Historic events that led to the formation of the state, namely the Easter Rising in 1916 and the Civil War in 1922 had a lasting impact on the character of the street. The latter in particular, directly resulted in the loss of multiple 18th century structures. The reconstruction in the early 20th century, which was carefully controlled by state authorities, is an insight into urban design concerns of the day. The focus was on the retention of 18th century urban character to a greater extent than retaining actual 18th century fabric, by reconstructing buildings which conformed to the heights and massing the earlier buildings. Materiality was also dictated by earlier Georgian ideals, with granite shopfronts and upper floors of brick or ashlar a prerequisite for approval. The adoption of Neo-Georgian architecture in the late 19th and early 20th century for public buildings was commonplace internationally, and it is not surprising that this was the preferred style for what was then, and is now, the primary civic street in the capital.

The late 20th century frontages at Nos.46-49 and No.59 upheld the 18th century scale of the street, although the materiality of glass and concrete does somewhat interrupt the solidity of what is primarily a masonry terrace. in embracing irregularity, it is this assortment of eras and styles, whilst contrary to the rigorous uniformity of the original Mall design, in its reimagined early 20th century form collectively establishes the present architectural character of O'Connell Street.

Addressing ACA vulnerability

Despite recent investment in the upgrading of street surfaces, post the introduction of the LUAS line, the building fabric and streetscape have continued to decline. Underutilised sites and vacant plots from unrealised developments are not only visually disfiguring but have wider social and economic impacts which negatively afflict the wider area.

The proposed development which encompasses the majority of the west side of Upper O'Connell Street will have a transformative impact on the character of the street. There is an opportunity to reestablish O'Connell Street as a place of central civic importance, whist retaining its historic architectural street character. The terrace of protected façades, which have been subject to continual evolution, will be purposefully integrated into the proposed development.

Adherence with ACA policies

As illustrated in the accompanying Shopfront Design and Signage Strategy, (Appendix 4 of the Dublin Central Masterplan Design Statement), the policies of the ACA will be adhered to in the protection of historic shopfronts on O'Connell Street Upper. Existing masonry fascia panels and pilasters framing the shopfronts will be retained and restored. Good contemporary shopfronts using durable, high-quality materials with simple lettering will be introduced on new buildings or to replace later inappropriate interventions.

The introduction of a balanced range of uses will have a beneficial impact on the immediate streetscape but also on the wider ACA environs. Few of the present uses on the street actively contribute to the streetscape. The casinos, which are the predominant use are, by their nature, introverted spaces and do not engage with the public realm. The high levels of long-term vacancy are apparent in the blank shopfronts present a poor visual backdrop to what was once a fine civic space. The reoccupation of these plots, which have remained dormant or inactive for too long, will have a positive impact on the ACA.

Principles of lateral urban connectivity established in the previous planning consent have been reciprocated and improved upon in the subject application. The proposed introduction of a new pedestrian street in a sensitive architectural setting is acknowledged. It is contended that the scale of O'Connell Street as a whole is sufficiently large to endure and that the sense of containment established by the enclosing structures is not undermined by the introduction of a new street.

Design precedents as a measure of impacts

Simulations of anticipated pedestrian movement patterns were used to establish the optimum width for comfortable pedestrian movement and to facilitate outdoor dining to animate the street. The scale of the street is intentionally subordinate to O'Connell Street, in conformity with an established hierarchical street system. The new street meets O'Connell Street at a slight angle and this deviation from the typical Georgian grid pattern serves to distinguish it from the grid patterns of Henry Street and North Earl Street thus retaining the prominence of historic town planning.

The architectural treatment of the new buildings has made efforts to respect the existing historic context. The scheme has benefited from the engagement of multiple architectural teams to collectively create a high-quality and contemporary architectural scheme, in which the quality of both the individual buildings and the collective result on the urban realm could be rigorously examined.

Presently these buildings, by virtue of their function and the nature of the long linear plots, disconnect the inner network of streets from the wider urban surrounding and isolate them from more vibrant surroundings. The lack of positive activity within the central areas of the block has contributed to pervasive anti-social behaviour which further compounds a sense of dereliction. The perceived lack of security discourages casual pedestrian movement through the site and further marginalises the positive use of inner streets, with consequential negative impact on the built environment. The cycle of decline will continue without intervention. Improved permeability and increased footfall will facilitate the successful occupation of Moore Lane and support a well-designed network of quality urban spaces within the Masterplan Site, as advocated in a report entitled, 'Urban Baseline Study-Pedestrian impact assessment- Pedestrian movement forecast', Dublin Central by Space Syntax and attached with this application.

The redevelopment will also benefit surrounding urban areas. There is a potential to link adjacent areas of heritage interest, such as the new cultural quarter at Parnell Square to the north and St. Mary's Victorian fruit markets to the west.

The proposal is intended to protect and enhance O'Connell Street's distinctive identity by retaining historic street frontages interwoven with high-quality contemporary architecture to re-establish it as a fitting focal point for national gatherings and celebrations of civic importance.

Anticipated impact for the urban character of Moore Lane

The character of Moore Lane has continuously evolved in correlation with its changing building uses. Rocque's Map of 1756 (Fig 4.3) identifies 'Old Brick field Lane,' as it was then known, as a narrow straight lane running in a north-south direction. This earlier name is a reference to the Old Brick fields, depicted on the map as an undeveloped plot to the west of the lane. It was the site of brick manufacturing, likely supplying material for the construction of the earlier developments in the area. A neat terrace of regular buildings are shown along the eastern side of the lane, a typical stable lane of its era of origin, likely consisting of carriage houses and servants quarters pertaining to the residences on what was then Sackville Street, later O'Connell Street.

The commercialisation of O'Connell Street in the 19th century simultaneously altered the character of Moore Lane. Goad's 1893 map illustrates the diverse range of enterprises that were operating on the street at the turn of the 20th century. Moore Lane would have been heavily trafficked with regular deliveries to each premises, some occupying differing uses serving substantial enterprises with public frontages facing onto O'Connell Street.

Active street fronts on Moore Lane have lessened over time. The former Carlton Cinema, on account of the specific building typology, presents a blank gable onto Moore Lane. Similarly, the 1970's office building at Nos.46-49 O'Connell Street Upper focused exclusively on the public interface with O'Connell Street to the detriment of Moore Lane. Unlike their earlier counterparts, these buildings do not directly engage with the street, with its character informed instead by defensive blank walls. The prolific detachment of active buildings from their urban context has had a lasting negative impact on the quality of the Moore Lane streetscape.

This condition, coupled with the long-term vacancy has created an often hostile environment, frequently the site of anti-social activity and intentionally bypassed by pedestrians. The few remaining plots that do have façades addressing the laneway are either unoccupied or concealed behind security shutters with interactions to the street limited to occasional car access.

Notwithstanding, the ad-hoc nature of the present streetscape, there is a certain charm to the present materiality of the extant outbuilding and boundary walls. It has a raw, industrial character which has evolved incrementally and inadvertently. The fragmented remnants of brick piers and calp limestone are a testament to the former uses and activity along the street.

It is necessary to demolish all structures in Site 2 facing onto Moore Lane, with the exception of the former reading room at the rear of No.59, to facilitate the proposed development. A core brief requirement was the retention of its distinctive character in that manufactured architectural context.

To recreate this particular character, the new proposal will use similar materials, albeit in a contemporary manner. The multi-layered tapestry that has evolved over time will be reflected in the proposed cladding of the new buildings.

The lane will retain the existing hierarchical relationship between interconnecting streets. Its width will be kept as close to the original as possible and marginally increased where necessary to facilitate anticipated increase in pedestrian flow, to accommodate accessible entrances to cafés and restaurants and to facilitate vehicular access and maintenance vehicles.

The buildings to the west site of the street, which fall within Site 4 of the Dublin Central Masterplan Area, are comparatively of greater architectural and historic significance and will be more comprehensively retained and adapted for reuse in the proposed scheme. The introduction of new uses and active street fronts will support these adapted buildings that share the lane and other retained buildings within the wider Dublin Central Masterplan Area.

Historic setts are exposed on the surface where later concrete and black-top linings have failed. A ground penetration radar survey (Fig.7.1 above) confirms the extent of the original setts and granite kerbstones surviving beneath the later blacktop surface, but condition has yet to be confirmed when applied surfaces are removed. Historic street surfaces and alignment of pavements, will be carefully re-laid to preserve the legibility of the original street pattern.

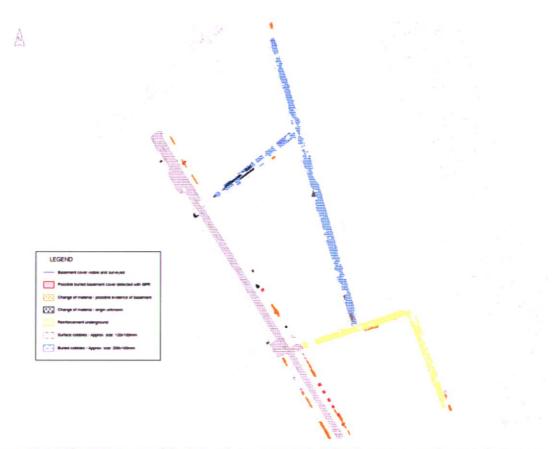


Figure 15.6.1. The GPR survey of the internal street network, indicating existance of setts below tarmac surfaces. Please Note, due to their concealed presence, it is not possible to confirm the extent of disturbance to accommodate extensive ground works in the past. Source: Murphy Geospatial

The events of 1916 give additional historic and social significance to the historic fabric. The reoccupation of Moore Lane as intended will support the National Monument in it's potential future role as a commemorative centre, under the ownership of the Dept of Housing, Local Government & Heritage and stewardship of the Office of Public Works.

The character of Moore Lane will be greatly altered by the proposed development, but it is considered that intervention is required if the Dublin Central Masterplan is to succeed as a new vibrant quarter. The reintroduction of an active street front is essential to this objective, with the existing character of the street reflected in the proposed materiality and scale.

Anticipated impact for the urban character of Henry Place

Henry Place has a similar character to Moore Lane. It has a similar scale and materiality and shares a common history.

As previously stated, No.60A, the corner-sited building at the rear of No.60 O'Connell Street Upper will be demolished to facilitate access for maintenance and emergency vehicles. Presently larger vehicles are forced to mount the kerb to negotiate turning the corners in this area and for practical and safety reasons that it is proposed to remove this structure and create a pocket square at this location.

As a consequence of these interventions, the sense of enclosure and the context of the battlefield site will be altered. It is proposed to mitigate against this loss by reinforcing the legibility of the historic street surfaces, as described in Dublin Central Site 2 Landscape Planning Report (Gross Max Landscape Architects)-Document Number: DC-GM-2X-XX-RP-L-10-0001.

The introduction of a pocket square will benefit the refurbished reading room by supporting it in its adapted role as a café / restaurant. As a presently wholly concealed building, the proposed square will give it a generated setting in its renewed capacity as a detached structure.

As with proposed definition of historic setts and kerbs described above for Moore Lane, the proposed reinstatement and supplementation of historic surfaces will is anticipated as enhancing the architectural character of Henry Place.

Anticipated impact of new pedestrian links

Section 1, 13.12 SDRA 10 – North East Inner City of the Dublin City Development Plan 2022-2028, citing Guiding Principles for Key Opportunity Sites O'Connell Street/Moore Street Civic/Cultural Hub and pertaining to O'Connell Street to Moore Lane incorporating Carlton Site, recommends that: 'Scheme design should be based on a comprehensive masterplan that incorporates a convenient access route to the planned MetroLink stop, quality connections across the site, and a cultural interpretative element. Any final proposal must incorporate at least one new east-west pedestrian route interlinking to at least two new civic spaces within the block, utilising the existing lane structure for cross connections'.

It continues to state that 'Masterplan proposals should hence incorporate....new pedestrian connections linking both O'Connell St. to Moore St. via a new public square, and also Henry Street to Henry Place/Moore Lane.' Connection through the vacant plot of No.47 O'Connell Street to link with Moore Street, via a proposed civic square is a major element of the architectural and urban design proposal. A similar benefit is introduced in the arched entrance under No.61 O'Connell Street, connecting with a presently unwelcoming knuckle at the bend of Henry Place. Increased permeability through the site addressing the unbroken length of the O'Connell Street terrace which on account of its impermeability compounds the street's present inanimate character, will generate greater connections across the ACA from street networks to the west of O'Connell Street, correlating, and essentially emulating a Talbot/ Henry Street precedent.

ACA policy, dating from 2001, in anticipation of the same objective also states that, 'It is an objective to facilitate the development of a new pedestrian route on an east/west axis, linking O'Connell Street and Moore Street as part of the redevelopment of the Carlton Cinema site, exploiting the presence of

the Moore Street Market, opening up the ILAC on its eastern flank, and generating a strong new economic focus in North O'Connell Street'.

In review of statutory policies directing the provision of pedestrian linkages within the development site, the proposal wholly fulfils this important requirement in addition to purposefully redeveloping a presently vacant plot which succeeds in its existing capacity only at eroding urban unity.

Anticipated impacts for the urban character of the wider townscape

Anticipated impact for the urban character of Henry Street

The development of Site 2 does not directly impact Henry Street, however, the taller buildings will be visible above its terrace, due north and from its junction with Henry Place.

A proposed development at Site 3, whilst subject to an ongoing An Bord Pleanála review, will alter the character of the same aspect due north, from Henry Street. In the event that Site 3 is delivered, its mergence with Site 2 will reduce adverse impacts associated with the morphological change of the latter. Whilst on its own merits the scheme deviates in density from the existing given template, in fusing with larger building typologies on Henry Street (GPO, Arnott's, ILAC Centre etc), a new interactive category is generated.

As previously stated, the scale and orientation of the new pedestrian street has been designed to avoid displacing the prominence of Henry Street as the most significant secondary street interconnecting with O'Connell Street. Henry Street is the primary shopping street on the north side of the city and the proposal seeks to support the street in this central role. The new access route proposed as part of the Site 2 development will create a 'loop' likely enhancing the commercial success of the ACA and Henry Street.

Anticipated impact for the urban character of Moore Street and its historic market

As cited in Section 13.12 SDRA 10 – North East Inner City, Table 7.1 above, the proposed development provides a new pedestrian street linking O'Connell Street to a proposed new civic space within Site 4 of the Masterplan scheme. Proposed east-west connections with Moore Lane from O'Connell Street Upper, together with the introduction of the MetroLink Station are intended to increase access to and in turn the prominence of the Moore Street Market, creating new possibilities for the restoration of the market as a thriving cultural and commercial destination.

Anticipated impact for the urban character of Cavendish Row

Site 2 will be visible from Cavendish Row, with the gable of Site 2C culminating the existing No.43 O'Connell Street acquiring particular prominence from this position.

Its prominence is exaggerated, albeit not eliminated, on account of the presently injurious fracture in the once homogenous terrace, caused by the absence of terraced buildings at Nos.40 and 41 O'Connell Street. The consequentially incongruous gable condition of No.42, divorced from its original mid-terraced form, draws attention from the classically composed corner of the AIB Bank at Nos 37-38 O'Connell Street and highlights an urgent requirement to restore the terrace and compositional integrity of this important junction, a central objective of Site 1 of the Dublin Central Masterplan. The temporary condition of undeveloped vacant plots at Nos 40 and 41 inevitably does little to shield Site 2. It is likely that a development at Site 1 at operational stage will screen Site 2C to an extent where it becomes imperceptible within the roofscape provided by the remainder of Site 2 to the south.

In mitigation, in offering to address uppermost, visible levels of Site 2C as a mid-terraced building temporarily viewed 'in the round' from this viewpoint due south, Grafton Architects have skilfully integrated a colonnaded belvedere within the northern gable. A concept borrowed from attic storey belvederes found in prominent 18th century city-center buildings such as the Four Courts, is successfully adapted in the subject development not just to mitigate the impact of visual change, but to provide an exceptional amenity within the proposed building. The treatment of this northern

elevation is thus tempered in its further adoption to the rhythm of the smooth limestone pilastered shopfront of Nos 37-38 O'Connell Street, visually connecting both with the consequence of an urban cohesion overcoming a potentially excessive impact otherwise.

A further element visible from Cavendish Row will comprise the proposed walkway and chamfered corner of Site 2B, which will likely encourage greater animation of this street and its extant amenities.

Anticipated impact for the urban character of Parnell Street

As evidenced from assessment of View 1 of the LVIA (Parnell Square- North West), the proposed scheme is most visible due south from the junction of Parnell Street West with Moore Lane, and as described in Section 7.8.3.3. above, with Parnell Street East/ Cavendish Row/ O'Connell Street Upper, with the gable of Building 2C having greatest prominence.

Setting aside visual change inevitably following the taller development of Site 2 as proposed than what exists presently, the proposal will support the success of the Parnell Square Cultural Quarter's integration with the ACA in improving pedestrian connections unifying the northern portion of the ACA with the retail core of Henry Street in a manner not existing at present.

Anticipated impact for the urban character of Cathal Brugha Street

It is anticipated that the introduction of a new pedestrian route through Site 2 obliquely opposing the junction of Cathal Brugha Street with O'Connell Street Upper, will encourage lateral movement of pedestrians with adjoining streets. Increased footfall towards the north end of O'Connell Street Upper from within Site 2 is likely to enhance the relative prosperity of Cathal Brugha Street and Parnell Street East as cited in Section 7.8.2.4 above.

Anticipated impact for the urban character of Cathedral Street

Cathedral Street is positioned to the east of the subject site. West facing vistas from this street terminate in the protected terrace of Nos.59-68 O'Connell Street, defined as much by its variances as its cohesive assemblage.

The proposed raising of building mass set back behind the extant terraced screen reconciles the potential dichotomy between the terrace as the dominant plinth to a lesser attic storey above. However this architectural approach, consistently applied across the entire eastern length of Site 2 is received, it is preferable to the originally permitted approach (Planning Reference Number 247/08/ABP Ref. PL29N.232347) which successfully argued for the removal of No. 59 O'Connell Street, which would have arisen in a more dramatic break of the homogeneity of the terrace as viewed from Cathedral Street than what is now proposed.

In the respectful retention of protected facades within Site 2, visual change will be limited to the new buildings that appear above and behind the parapet line, with the only new form comprising a replacement structure at Nos.55-56 O'Connell Street to the north west of this vantage point.

Anticipated impact for the urban character of O'Rahilly Parade

The original character of O'Rahilly Parade has evolved somewhat negatively from vibrant laneway fusing light industrial and tenement functions. The lane was culminated by the tall façade of a brick and calp warehouse building, befitting the forms flanking the north and southern faces of the street. Present-day O'Rahilly Parade dues east from Moore Street is defined by impermeable hotel facades of its northern edge and a vacant plot at its southern edge, with the bleakness compounded by its culmination of the car park building at Nos.46-49 O'Connell Street. The replacement of this building with a carefully crafted contribution made by Site 2C will immeasurably enhance the visual amenity of O'Rahilly Parade and offer an unparalleled opportunity to engage with the ACA of O'Connell Street from its continuance through the proposed new street.

The laneway bears little resemblance to its historic character and will greatly benefit from the instatement of sympathetic historic surfaces which will also assist in its redefinition.

Anticipated impact of the detachment, conservation and adaptation of the Reading Room at No.59 O'Connell Street Upper

Please read in conjunction with Appendix 15.15

Proposed detachment of an introverted, inherently 'attached' structure

Goad's map depicts the fully developed site at No.59, where the exterior form of the former reading room was not the primary consideration in its design, given its sandwiching between flanking garden walls shared with Nos.58 and 60 respectively.

Its origins were likely as a coach house coupled with staff kitchens, which evolved to include a myriad of increasingly grander functions over the course of the varied occupancy of No.59, as reflected in its possibly 19th century multi-pitched roof form surmounting a top lit reception space. Enclosed to the east by another top lit building, and to the west by a car port onto Moore Lane, viable daylight from its roofs was a central function of the otherwise elevationally constrained building.

The extent of its obscure composition has influenced even its external recording for the purposes of this study.

The reimagining of its introverted character as a detached structure revealed within a newly created landscaped urban setting of a proposed pocket square dramatically transports this modestly scaled building into an entirely different architectural genre, which could be viewed by sceptics as somewhat unsettling. The challenge of appropriately presenting a building never intended to be viewed 'in the round' in its new context is considered to be satisfactorily resolved by the development, with design tweaks likely to continue into the development stage as more of the building's fabric is exposed.

Proposed adaptation

The radical transformation of its exterior wholly contrasts with the relative consistency of its internal character, which does not depart significantly from its origins, albeit with windows inserted into niches to improve visual permeability.

The internal spatial quality of the elevated upper ground level reading room, is compromised by the insertion of mid-20th century partitioning of cellular stores, whose removal is proposed as part of the subject development. Reinstatement of the original spatial configuration of the room will positively enhance its legibility and also introduce a unique recreational form in this part of the city.

The function of its former kitchen at lower ground level will be reinstated, alongside the provision of appropriate guest facilities and additional café spaces.

Proposed conservation

The proposed conservation of the building's fabric will reinstate its physical integrity and render the exercise of its change of use wholly positive.

Anticipated impact of the change of use and conservation of No.61 O'Connell Street Upper

The development of this historic townhouse as proposed will enliven a presently undiscovered historic building within the streetscape. The introduction of residential uses at upper floors will prove immeasurably beneficial for the enclosing ACA. Please read in conjunction with Appendix 15.15

15.6.2.2 Construction Phase

The process of demolition and subsequent construction of the proposed development has the potential to disturb adjacent retained buildings and historic fabric, however, every effort at

anticipating worst case scenario impacts at construction stage and mitigating against same is acknowledged with acceptable levels of vibration determined on a case by case basis, depending on the materiality of what is being removed, as described in Table 5 of the Outline Construction & Demolition Management Plan –Site 2; DC-WAT-2X-XX-RP-C-001011 (Waterman Moylan Consulting Engineers Limited). In accordance with recommendations, the structures will be monitored for movement during the course of the demolition and reconstruction works.

Prior to the demolition phase an external survey control system is to be established. This will be carried out using traditional closed traverse surveying techniques and will involve the setting up of sufficient external control stations to allow monitoring of the neighbouring structures during and after demolition. The control stations are to have co-ordinates which are directly correlated to the building grids and datum levels related to those shown on the Land Survey drawings, issued by the Architect. The initial control survey is to be carried out by the Contractor and may be independently checked and verified by the appointed survey contractor.

The appointed Grade 1 Conservation Architect will be required to attend site at regular intervals to visually observe that all protection measures are succeeding to safeguard retained fabric as designed, and will swiftly react if any instance of potential damage arises.

Singular mitigation strategies will be adopted to reduce impacts in respect of each building. in the instance of retained facades, each building was physically investigated at all levels and comprehensively recorded in advance of preparation of this report. It is recommended that a copy of measured surveys and records be submitted to the Irish Architectural Archive in mitigation of removals.

Mitigation measures adopted for the removal of selected building fabric at No.59 O'Connell Street Upper will require care where abutting retained return building fabric to rear of the main building range, and fabric abutting the east and west gables of the reading room. All such fabric will be dismantled carefully and recorded as the works progress.

The public realm strategy is committed to preserving the legibility of the historic streetscape. This will be achieved by reinstating the historic street surfaces in the original location. New street and open public spaces will be finished in complementary, but clearly distinguishable materials.

Mitigation measures adopted for the physical removal of No.60A will be generated to ensure that a full recording takes place during demolition and that no damage occurs where abutting the retained Reading Room.

15.7 RESIDUAL IMPACT OF THE PROPOSED DEVELOPMENT

15.7.1 **Dublin Central Masterplan**

15.7.1.1 Operational Phase

The viability of the masterplan development at operational stage is dependant on the prosperity of the community for which it is intended to be delivered. In the event of a recession, and piecemeal occupancy – the vitality of the scheme and long term securing of its architectural heritage would be impacted. A positive residual impact, even in the event of a future recession, would be the securing of that same architectural heritage at construction stage, overcoming the current status of incremental decline.

15.7.1.2 Construction Phase

A key residual impact is the possibility of accidental/ unforeseen permanent loss during the construction stage, of architectural heritage cited as having significance and intended to be retained as part of the proposed development.

A less tangible residual impact following the commencement of the development of the masterplan is economic uncertainty or a continuing post-Covid pandemic-scenario or continuing conflict to the east of Europe arising in the temporary or prolonged cessation of works, leaving historic fabric more vulnerable than it is currently.

The proposed development has been designed so that on commencement of the masterplan development, both risks are mitigated against in the certainty of funding and in the natural elimination of the pandemic.

15.7.2 Proposed Development – Site 2 & No. 61 O'Connell Street Upper

15.7.2.1 Operational Phase

The massing, scale and height of the scheme as a single development exceeds the existing, largely consistently formed volumes. However, considerable incremental intensification of plots on this western side of O'Connell Street has occurred over the course of the 20th century, commencing with the full infilling of certain plot footprints in the 19th century and gradual infilling of others in the 1920s and 1930s.

The proposed increased massing and plot amalgamation inevitably accompanies a commercially viable city centre development designed to maximise occupancy and ensure functional occupancy where every urban convenience of transport and use mix is offered.

The consequences of the scheme's massing, scale and height are more perceptible from the north, due south, along Cavendish Row and due west from Cathal Brugha Street, than corresponding views due north up O'Connell Street.

In terms of materiality, each proposed scheme seeks to reflect to palette of pre-existing materials within the ACA, of brick, Portland stone and granite. All are used in contemporary methods, to good effect, with the consequence of a materially compatible scheme.

In respect of use, the proposed development within Site 2 comprises a mixture of offices, with restaurant and retail uses at ground level opening onto pedestrian street and new civic squares to create vibrant urban spaces. No.61 O'Connell Street in turn offers a mix of residential and retail, and also accommodates a critically important pedestrian link connecting O'Connell Street with laneway networks to the rear. Within the wider Masterplan, diverse range of uses including residential, hotel and cultural are proposed, with each element contributing cohesively to the success of the whole.

Multiple uses proposed complimenting the residential, cultural and hotel uses proposed elsewhere in the wider Masterplan are designed to a high quality to attract long term occupants ensuring purposeful long-term occupancy, which will benefit the vibrancy of the ACA.

Summary of anticipated residual architectural heritage impacts for the enclosing environs

referencing Section 12.5.2.6 of EIAR Chapter 12, Landscape and Visual Impact Assessment are tabled below. The assessment reflects on findings of the LVIA, but reviews same views from the perspective of architectural heritage impacts, differing in some instances from the opinion contained therein.

Viewpoint	Distance	Extent of Effects	Anticipated Architectural Heritage Impact
1. Parnell	270m	Moderate	Moderate
Square North West			It is accepted that the height of the proposed development is visible above existing buildings on the south side of Parnell Street from this

Viewpoint	Distance	Extent of Effects	Anticipated Architectural Heritage Impact
			vantage point. However, it is found that the character of the western 18 th century terrace is sensitively reflected in the rhythmic modulation of the development with the result that its impact is reduced.
2. Parnell Square North	280m	Impercepti ble to Slight	Slight The proposed development is taller than the existing townscape but is largely screened from this vantage point by existing buildings, merging with the existing terraced roofscapes provided by buildings on Parnell Street.
3. O'Connell Street at the Parnell Monument	100m	Moderate to Significant	Significant As described in 7.8.3.3. above, the permanent effect of the proposed development following development of Site 1 (i.e. infilling of the vacant former terraced plots at Nos 40 and 42 O'Connell Street) is not examined in this application.
			The <i>temporary</i> condition of a gable at No.43 rising above the roof of No.42 introduces a significant visual change from within the ACA due south down O'Connell Street.
			The removal of chimneys repeating the rhythm established by the corner structure at No.39 is also notable, but one which will inevitably be obscured in the future development of Site 1.
4. O'Connell Street at Cathal Brugha Street	40m	Moderate to Significant	Significant The proposed development changes the character of the terrace to the west of the ACA. Its new infill frontages replacing selected buildings introduces a divergence stylistically from the existing settled street and roofscape, however, an excitement is also generated in the quality of the architectural provision, fusing with early 20 th century retained facades.
4a. O'Connell Street at the Carlton	40m	Moderate to Significant	Significant The façade of the Carlton is largely obscured by trees in this view, reflecting the reality of this verified view. However, in examination of proposed contiguous elevations, the proposal is found to successfully respect the proportions and materiality of the Carlton as the dominant protected façade, in its referencing of a rhythm established by this nationally important early modernist building. Notwithstanding the careful synchrony introduced in the crafting of a denser, taller enclosing development, the change brought about by the scheme is significant, but found to be tempered.
5. Cathal Brugha Street near O'Connell Street	60m	Moderate to Significant	Moderate Site 2C is less dramatic from this vantage point when compared with View 3 above, with the architectural intention behind the gesture of the belvedere is most evident. The subtle consistency in approach to the colonnaded façade at Nos 46-49 and the belvedere successfully terminates the gable and is found to be respectful of the lower roof form of No.42.
5a. Cathal Brugha Street	150m	Moderate to Significant	Moderate The development is found to merge with the character of the southern terrace of Cathal Brugha Street whilst retaining the legibility of parapets of the opposing O'Connell Street terrace, including that of No.42. The recessed attic stories of the taller structures are rendered distinct from their terraced plinths, relating as much to a

Viewpoint	Distance	Extent of Effects	Anticipated Architectural Heritage Impact
			rear development on Moore Lane as to a hinterland development visible above the streetscape of O'Connell Street.
6. O'Connell Street at the GPO	120m	Moderate	Slight The proposal is barely discernible above an established streetscape offering differing attic storey treatments, from this vantage point within the ACA. The GPO retains its prominence as a focal landmark structure and is not found to be compromised by the scale of the development. It is noted that an assessment of the cumulative impact of Site 3 with Site 2 is absent from this submission, however on its own merits, Site 2 is considered to provide a benign change within the streetscape.
7. O'Connell Street at Abbey Street	200m	Slight to Moderate	Slight As above, the proposed development merges with the given roofscape of the western side of O'Connell Street and is not found to present a significant change within the ACA.
8. O'Connell Bridge	360m	Moderate	Slight As with View 7 above, the proposed development merges with the given roofscape of the western side of O'Connell Street and is not found to present a significant change within the ACA.
9. Cavendish Row	120m	Moderate	Moderate The set-back of upper levels of Site 2C is visible above the parapet line of No.39 O'Connell Street and the Rotunda but recedes behind the established streetscape with the result of a reduced relationship with O'Connell Street and greater association with Moore Lane. The change is moderate and generally found to be acceptable.
10. Parnell Square West	95m	Moderate	Moderate The full depth of the plot at No.43 is visible from this vantage point, however the taller building, perhaps owing to its orientation aligns itself with the character of the hotel development at the western junction of Parnell Street with Moore Lane. As a consequence, morphological impacts are reduced.
11. Moore Street looking into O'Rahilly Parade	80m	Moderate	Significant Whilst outside the ACA, this view due east towards the ACA is already dominated by the unfortunately angled, anonymous rear structure at Nos 46-49 O'Connell Street. Setting aside the visual change, the proposed development being perforated and incorporating the MetroLink entrance, successfully animates this junction and enhances its purposeful connection with the ACA.
12. Moore St looking towards the National Monument	65m	None	None No change to the compositional integrity of the National Monument or its setting arises from the proposal, from this pivotal viewpoint.
12a. Moore St looking into Henry Place	65m	Slight	None Please note that an assessment of the proposed redevelopment of No.61 O'Connell Street falls outside the scope of this study. No change to the compositional integrity of Moore Street arises from the proposal, from this pivotal viewpoint.

Viewpoint	Distance	Extent of Effects	Anticipated Architectural Heritage Impact		
13. Henry Street at Liffey Street	245m	None	None No architectural heritage impacts arise from the development of Site 2, which is not visible from this viewpoint.		
14. Parnell Street at Dominick Street	195m	None	None As above		
15. Sean McDermott Street at Gardiner Street	400m	Slight to Moderate	None As above		
16. Marlborough Street at North Earl Street	240m	None	None As above		

Table 15.7.1: Summary of impacts for the enclosing environs as described in Section 12.5.3.2. of EIAR Chapter 12, Landscape and Visual Impact Assessment

Anticipated impacts for protected structures and adjoining historic buildings adjoining the site are tabled below:

Address	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National)	Anticipated Architectural Heritage Impact
10 Moore Street, Dublin 1	8908	-	The proposed development is positioned at a distance from this recently designated protected structure and is not considered to alter its setting significantly.
			The proposed enhancement of the public realm and rear of No.61 will arise in a positive impact for the quality of Henry Place, and the gable of this protected structure.
			Due to construction traffic management mitigations, construction stage impacts are not envisaged.
12- 13 Moore Street, Dublin 1	8909 8910	-	This structure, being embedded within existing building fabric, is not at risk from damage from the proposed development of Site 2.
14 Moore Street, Dublin 1	5282	50010489 (R)	As cited above, physical impacts arising from the proposed development have been mitigated in favour of conserving the special status of the national monument at Nos.14-17 Moore Street.

Address	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National)	Anticipated Architectural Heritage Impact
15 Moore Street, Dublin 1	5283	50010490 (R)	The western edge of Site 2 will alter the outward visual setting of the monument, as it opposes its Moore Lane elevation, with visual impacts anticipated as including absent connection with the rear of the O'Connell Street terrace, as viewed from upper rear rooms of the monument.
16 Moore Street, Dublin 1	5284	50010491 (N)	Visual impacts from Moore Lane are not considered especially adverse, as it is intended to develop the presently ruined façade of No.9 Moore Lane (to the west of the Moore Street terrace), which will unify with
17 Moore Street, Dublin 1	5285	50010492 (R)	similarly scaled buildings opposing.
20-21 Moore Street, Dublin 1	8911	-	The proposed structure, if no development occurs to the rear as proposed for the development of Site 4, will be shielded physically and visually from Site 2 due to the scale of buildings immediately to its rear and as a consequence will not experience any effect. Its setting onto Moore Street will remain intact, as the proposed
			development will not visible from within the public realm of Moore Street.
Rotunda Hospital: Parnell Square West, Dublin 1	6419	50010619- 50010622 (N)	Site 2C is most visible from the section of Cavendish Row aligned with the Rotunda. It is likely to be visible from upper rooms due south across the city roofscape, a factor not considered central to the continuance of character of a city centre protected structure.
			As assessed in Section 7.10 above, the proposed intensification of the site is not found to present an injurious impact for the outward visual integrity of this compositionally intact $18^{\rm th}$ century building group.
70 Parnell Street, Dublin 1	6423	50010561 (R)	Due to the once terraced composition of No.70 Parnell Street to the south aligned with Moore Lane, a historic visual connection between Site 2 and its accommodation was not originally enjoyed. Owing to the bulk of O'Connell Hall at No.42 O'Connell Street, the present-day visibility of Site 2C in particular, being in closest proximity, is largely imperceptible, with little impact arising as a consequence.
71 Parnell Street, Dublin 1	-	50010562 (R)	The rear of this 19 th century structure previously opposed the hotel, now demolished, at Nos.40-41 O'Connell Street. as a consequence, no visual connection with Site 2 existed. A present day connection is possible but limited from mostly blocked up upper level rear windows. Visual impacts are therefore reduced.
72-74 Parnell Street, Dublin 1	6424	50010559 (R)	The rear of this public house due south towards Site 2 presents an impervious boundary with no openings, precluding a direct visual connection between the two sites. Site 2 will not be visible from the streetscaped setting of this protected structure, precluding any visual impact.

37-38 O'Connell Street Upper, Dublin 1	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National) 50010558 (R)	A similar rear boundary condition to that at Nos.72-74 Parnell Street exists at this protected Bank building forming a chamfered junction between O'Connell Street Upper and Parnell Street. whilst no direct visual connection exists between the two sites, the gable of 2C will be visible from the junction of Cavendish Row/ O'Connell Street Upper and Parnell
			Street, altering the roofscape profile of this protected structure when viewed due south within the ACA.
42 O'Connell Street Upper, Dublin 1	6022	50010554/ 50010560 (N/R)	The proposed intensified development of a plot adjoining the southern boundary of this protected structure is bound to introduce a change to its amenity. The form of the building occupies the full of the plot length, with a gap created at the boundary offering respite from the scale of the new building. the set back succeeds in separating the proposal from the rear rooms of the protected structure, and in particular its stair hall which is of exceptional importance.
			A Sunlight, Shadow and Daylight Analysis – Site 2 (BDP), has been generated examining existing daylight levels and comparing the differences between the proposed development and the previously permitted, taller development which also encroaches the rear of No.42. It is not surprising that the proposed scheme presents significantly lesser impacts, not just in terms of loss of daylight, but also loss of separation and legibility of form.
			The subject development will however, reduce daylight levels to rear rooms and from rooflights within No.42. As examined in the daylight assessment, the loss is attached to any vertical extension of the plot above an additional floor level. It is inevitable therefore that daylight quality will be reduced within No.42 in any form of taller development at No.43.
			The proposal, as cited above, presents a marked improvement on the originally permitted scheme in reducing its encroachment enclosing the rear of No.42.
			The proposal also presents a reduced impact in terms of construction, in the provision of a more generous set back for excavations to what was previously permitted.
			On the whole, whilst the scheme may be perceived as introducing radical and unacceptable change, the inevitable development of this site encapsulated by the proposal is a significant improvement on the originally permitted development.
			Changes in the condition of Moore Lane to the south of the subject site will not adversely impact O'Connell Hall.

Address	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National)	Anticipated Architectural Heritage Impact
59 O'Connell Street Upper, Dublin 1	-	50060601 (R)	The rear, western building range to No.59 is included in the boundary of Site 2, with positive impacts associated with the redevelopment as proposed to retain and purposefully re-use the former Reading Room as a cafe. The proposed taller development of Site 2, within the plot of No. 58 to the north of this retained structure will have little impact on its integrity. The principal building range to the east is outside the subject site. Its integrity is largely respected physically and visually by the proposal.
60 O'Connell Street Upper, Dublin 1	6028	50010535 (R)	Notwithstanding the proximity of No.60 to the taller development of Site 2 above the plot of No.58 O'Connell Street, the integrity of this building remains largely unaffected by the development. Outward vistas from upper rear rooms when viewed obliquely due north will be altered in the infilling of a presently modestly scaled footprint commencing at No.58. No similar visual connection will arise from outward vistas to front rooms. The vertical extension above the retained façade of Nos.43-58 O'Connell Street will alter the urban composition of No.60 insofar as it will become more legibly intact as retaining its original building form within the terrace. On the whole, the scheme will have little adverse impact on the quality of this protected structure.
61 O'Connell Street Upper, Dublin 1	6029	50010534 (R)	Similar to an assessment of No.60 adjacent, the architectural amenity of spaces within No.61 will remain largely unaffected by the proposed development of Site 2. Further, its external composition will remain independent of the scheme and will still be legible.
62 O'Connell Street Upper, Dublin 1	6030	50010533 (R)	No.62 O'Connell Street is considered at a sufficient distance from Site 2 to preclude significant impacts.
63-64 O'Connell Street Upper, Dublin 1	6031	50010532 (R)	Nos.63-64 O'Connell Street are considered at a sufficient distance from Site 2 to preclude significant impacts.
65-66 O'Connell Street Upper, Dublin 1	6032	50010531 (R)	Nos.65-66 O'Connell Street are considered at a sufficient distance from Site 2 to preclude significant impacts.

Address	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National)	Anticipated Architectural Heritage Impact
67 O'Connell Street Upper, Dublin 1	6033	50010530 (R)	No.67 O'Connell Street is considered at a sufficient distance from Site 2 to preclude significant impacts.
68 O'Connell Street Upper, Dublin 1	6034	50010529 (R)	No.68 O'Connell Street is considered at a sufficient distance from Site 2 to preclude significant impacts.
69 O'Connell Street Upper, Dublin 1		50010493 (R)	No.69 O'Connell Street is considered at a sufficient distance from Site 2 to preclude significant impacts.
O'Connell Street Lower, Dublin 1, The GPO	6010	50010528 (N) 50010500 (R)	The GPO remains the most significant landmark building in the vicinity of the development site, and is considered at a sufficient distance to preclude significant impacts.
7-15 (inc.) Arnott's., Henry Street, Dublin 1	3666	50010470 (N)	Owing to their distance from Site 2, these buildings will remain visually and physically unaffected by the proposed development.
16 Henry Street, Dublin 1	3667	50010471 (R)	
17 Henry Street, Dublin 1	3669	50010472 (R)	
18 Henry Street, Dublin 1	3670	50010473 (R)	
19 Henry Street, Dublin 1	3671	-	
20 Henry Street, Dublin 1	3672	50010474 (R)	
21 Henry Street, Dublin 1	3673	50010475 (R)	These structures are considered at a sufficient distance from Site 2 to preclude significant impacts.

Address	RPS Ref.	NIAH Rating (L= Local) (R=Regional) (N= National)	Anticipated Architectural Heritage Impact
22-23 Henry Street, Dublin 1	3674	50010476 (R)	
24 Henry Street, Dublin 1	3675	-	
25 Henry Street, Dublin 1	3676	-	
33 Henry Street, Dublin 1	-	50010494 (R)	These structures are considered at a sufficient distance from Site 2 to preclude significant visual impacts. However, a physical impact might arise at construction stage, due to the intensification of Henry Place.
4-8 Henry Place, Dublin 1	8906	-	This protected façade opposes the west side of the proposed development, at the 'knuckle' in Henry Place. Whilst a short term impact will arise at development stage, the improved public realm attached to the development will enhance the meaning of the retained historic structure.
17-18 Henry Place, Dublin 1	8907	-	As above, the protected façade opposes the west of the development site, but will improve in the positioning of the public pocket square adjacent to the Reading Room.

Table 15.7.2: Anticipated impact for protected structures and adjoining historic buildings

Anticipated residual impact for the legibility of the 1916 Battlefield

Please read in conjunction with Appendix 15.15 and Figures Fig 15.3.12, 15.3.13. and 15.3.14. above, where pre-1916 fabric of Moore Lane Fabric is graphically represented in sketch form.

The proposed development will arise in the loss of surviving pre-1916 fragments embedded within post-1916 structures linings the eastern side of Moore Lane. The quantum of fabric surviving from the 1916 era is minimal, as gauged from a sketch shown in Figures 5.2 and 5.3a/5.3b above.

The question as to possible evidence of a bullet hole in a surviving fragment of a brick pier at the rear of No.57 O'Connell Street Upper onto Moore Lane will remain unanswered, as it is held that such detail cannot be proven in the passage of time since occurrence.

Mindful of the physical absence of battle scars in the laneway otherwise, the removal of building fabric having emotive collective association with the framing of the battlefield will likely arise in controversy. The proposed placement of buildings representative of the lane's past industrial