

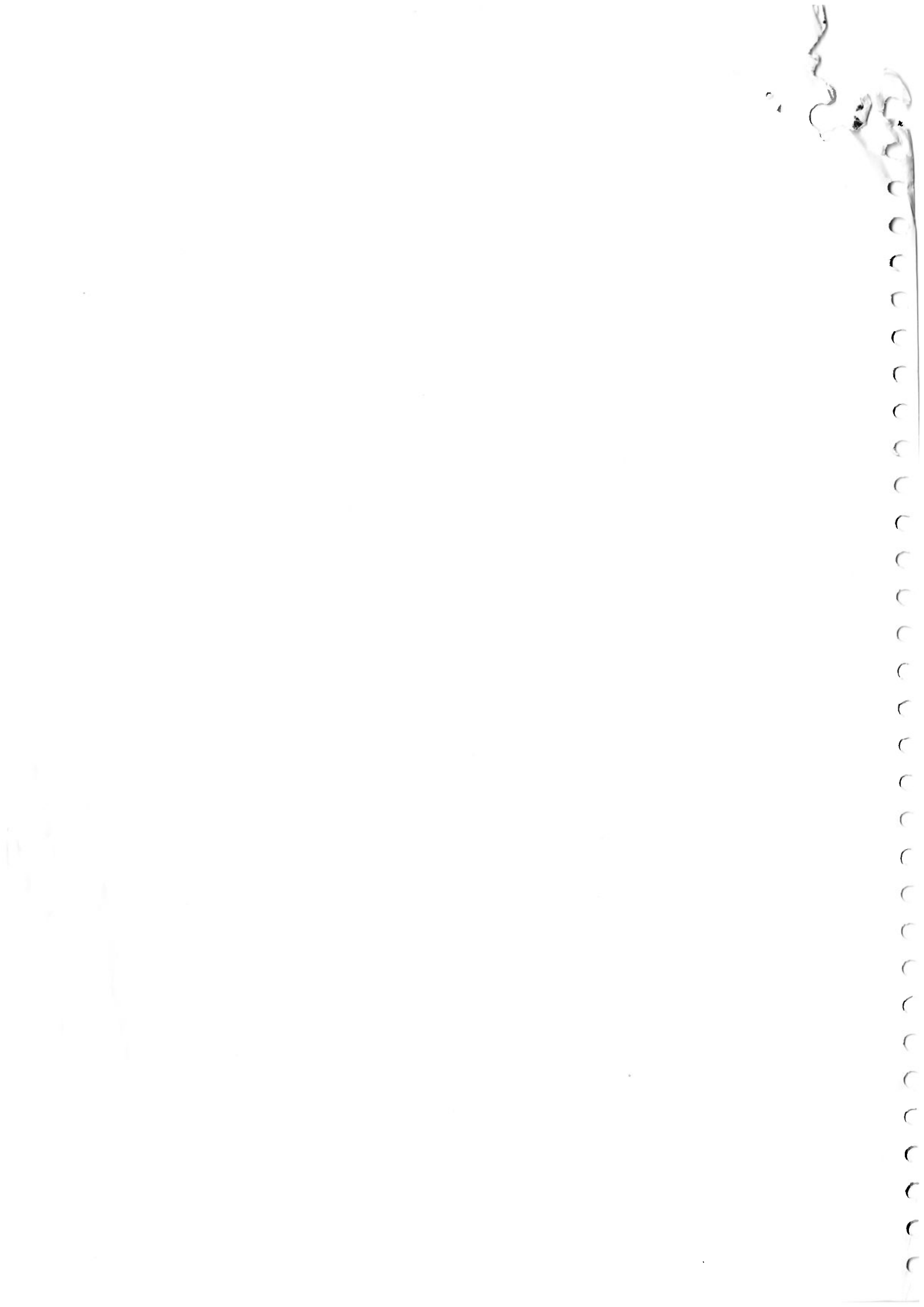
Reg. Ref. 4674/22: Proposed  
Development at 1-4 City Quay,  
5 City Quay and 23-25 Moss  
Street, Dublin

Report on Townscape and Visual  
Impact for 1st Party Appeal

Prepared by Model Works Ltd for  
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November 2022

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# 0 Introduction

This report has been prepared in response to the decision by Dublin City Council (DCC) to refuse planning permission for a proposed development at 1-4 City Quay, 5 City Quay and 23-25 Moss Street, Dublin (Reg. Ref. 4674/22). The report addresses DCC's reasons for refusal relating to potential townscape and visual impacts.

The report has been prepared by Richard Butler MLI MIPI of Model Works Ltd, the author of the Landscape and Visual Impact Assessment (LVIA) chapter contained in the Environmental Impact Assessment Report (EIAR) submitted with the planning application.

That assessment (Chapter 11 of the EIAR) provides (a) a detailed townscape character assessment of the site's receiving environment, (b) analysis of planning policy relevant to the consideration of the proposal's townscape and visual effects, (c) a detailed assessment of the potential effects on 52 no. viewpoints in the receiving environment (informed by verified photomontages), and (d) an assessment of the proposal's overall effects on Dublin's townscape, including its potential cumulative effects with permitted developments in the vicinity. This report should be read in conjunction with Chapter 11 of the EIAR.

The content of this report is as follows:

- Section 1.1: DCC reasons for refusal.
- Section 2: Response is provided to the key points and themes of the Decision and the DCC Planner's Report.
- Section 5: Conclusions.

## 1.1 DCC Reasons for Refusal

1. Having regard to the prominent and sensitive location of the subject site by reason of its important location within the historic City core fronting onto the River Liffey, its proximity to the Custom House and having regard to Policy SC7 & SC17 of the Dublin City Development Plan 2016-2022 which seeks to protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the inner city, the proposed development due to its scale, bulk and height would seriously detract from the setting and character of the Custom House and environs. In addition, the proposal would have a significant and detrimental visual impact on the River Liffey Conservation Area and important views and vistas, including those views from the Custom House environs, Amiens Street, Mountjoy Square, Gardiner Street Lower, Trinity College Campus and views westward from the River Liffey. Moreover, due to the excessive scale of the proposed building and its proposed location, removed from the permitted buildings at Tara Street Station and Apollo House, the proposed building would stand apart as an overly assertive solo building which would not form part of a coherent cluster. The proposal would therefore have a significant and detrimental visual impact on Dublin's historic skyline, by reason of fragmentation and visual intrusion and would thereby seriously injure the urban character of the City Centre skyline, would create a precedent for similar type undesirable development and would be contrary to the proper planning and sustainable development of the area.

2. Taking into account, the scale of the proposed building and the impacts on the surrounding receiving urban environment, it is considered the scheme is likely to have noticeable and detrimental overbearing and overshadowing impacts on neighbouring property. The Overshadowing Study indicates a proposed building of overwhelming scale, mass and height that will undoubtedly cast a significant shadow and have an overbearing impact on the surrounding environment, including the Church and the public space to the front, the nearby school and associated grounds and public space to the front of the adjacent office building. The proposed development would therefore constitute an overdevelopment of the subject site, would seriously



injure the amenities of neighbouring property, would devalue property in the vicinity, create a precedent for similar type undesirable development and would be contrary to the proper planning and sustainable development of the area.

This report focuses on Item 1 of the reasons for refusal, i.e. issues relating to landscape/townscape character and visual impact.

## 2.0 Response to Reasons for Refusal

### 2.1 Prominent and Sensitive Inner City Location

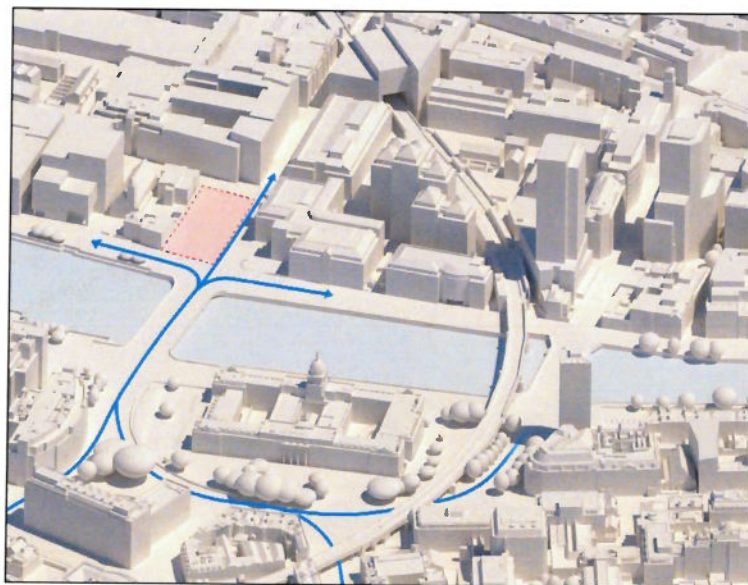
#### DCC Reason 1

*"Having regard to the prominent and sensitive location of the subject site by reason of its important location within the historic City core fronting onto the River Liffey, its proximity to the Custom House..."*

#### 2.1.1 Prominent Location

It is recognised that the site occupies a prominent position in the townscape:

- **As a riverfront site it is highly visible from the Docklands stretch of the Liffey corridor**, where the river is wide and straight and the campshires function as public open space in addition to movement corridors. (It is less exposed to the older city centre stretch of the Liffey to the west of the Loophline Bridge - which acts as a visual barrier - where the river is narrower, sinuous, and more enclosed by built form.) Nonetheless, a tall building on the site would be visible from a distance to the east and west along the Liffey.
- **The site's location diagonally across the river (c.135m) from the Custom House adds to its importance in the townscape and to the requirement for a considered design response.** The neoclassical building is one of the city's most important and valued architectural features. It is both a feature of views (for example from the Liffey quays and Gardiner Street) and – as a cultural heritage attraction – a gathering place at which views, especially of the Liffey corridor, are experienced.
- **The site's position at the landing place of an important river crossing, the Talbot Memorial Bridge, contributes to its prominence.** It occupies a focal-point position for pedestrian and vehicular traffic rounding the Custom House (from Amiens Street, Gardiner Street and the north quays to the west) and crossing the Liffey to arrive in the city centre. This is an important 'place' in the townscape (and 'event' in people's experience of moving through the city) – the crossing of the river and arrival on the south quays, from where traffic disperses west towards the old city centre, east to Docklands, or continues straight past the site towards Trinity.



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- **A tall building on the site would be visible from within Trinity College**, the other large open space (in addition to the Liffey corridor) in the vicinity of the site. It would be most exposed to view in the wide space of the sports fields in the centre of the campus, but relatively less exposed from the more enclosed (and more sensitive) space of Parliament Square.
- **Additionally, a tall building on the site would be visible from two of Dublin's Georgian streets, one on either side of the Liffey, i.e. Gardiner Street to the north and Kildare Street to the south.** These streets are so aligned that a tall building on the site would occupy a framed, focal point position in the views – albeit distant/well removed from the Georgian streets themselves.

These characteristics of the site all point to its prominence in the townscape. It has a strong spatial and visual relationship with a number of important elements, features, and character areas of the city. **While this demands a considered response in the conceptualisation and design of new development on the site, it equally points to the site's potential – especially considered in light of other policy (e.g. compact growth, increased building height, alignment of land use/density and public transport, promotion of Dublin as a 'global city of scale', etc.).**

The site has considerable potential to contribute to (a) place-making and legibility, (b) regeneration/re-imaging of the George's Quay/City Quay/Moss Street area, which is sub-optimal in character, quality and function, and (c) overcoming the physical and visual barrier between the old city and the Docklands. The proposed development recognises this rare potential and seeks to capitalise on it while also responding meaningfully to the sensitivities that exist in the complex townscape context.

### 2.1.2 Sensitive Location Fronting onto the River Liffey

Dublin developed along the Liffey and the river is one of the main arranging elements of the urban structure, as well as a key movement corridor. The broad blue/green space provides some of the city's most iconic views, including views of the Custom House. The Dublin City Development Plan 2016-2022 (DCDP 2016) designates the entire Liffey corridor a Conservation Area (CA) and identifies the Liffey as being sensitive to tall buildings.

Policy SC17 (in the DCDP 2016<sup>1</sup>) states: *"To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city... In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College... and to established residential areas, open recreation areas and civic spaces of local and citywide importance."*

It is acknowledged that views along the Liffey are highly valued and sensitive to *inappropriate* change. However, it must be recognised that the river is the central spatial/topographical feature of a European capital city. The Liffey passes between a wide variety of character areas along its 5km route through the city

<sup>1</sup> In the Draft DCDP 2022-2028 Policy SC17 states: *"To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:*

- *follow a design led approach;*
- *include a masterplan for any site over 0.5ha;*
- *make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;*
- *deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; and*
- *have regard to the performance based criteria set out in Appendix 3.*

*All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance."*

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Centre (from Heuston to Dublin Port) and along its course people are exposed to innumerable buildings of diverse era, typology, scale and architecture.

The river itself also changes along its length. To the west of the Loopline Bridge its alignment is sinuous, it is relatively narrow (c.50m O'Connell Bridge) and enclosed by mostly older, terraced buildings. To the east of the Loopline it widens and straightens. The buildings here are larger, detached and more diverse, and there is less enclosure. The site falls into this Docklands stretch of the river (see photograph below).



It should also be recognised that, as an open space corridor and thoroughfare for multiple transport modes, the Liffey provides favourable context for taller buildings. This is confirmed by one of the 'development management criteria' included in the Building Height Guidelines to assist in the evaluation of development proposals for taller buildings: *"The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure..."*

The conservation-orientated approach to the Liffey corridor indicated by its CA designation should be balanced with (a) recognition of the diversity of character areas and buildings within view of the river due to it being the central feature and movement corridor through the city, and (b) the validity of the urban design principle of positioning building height along the edge of large open spaces and thoroughfares such as the Liffey corridor.

As to the specific positioning of tall buildings for positive townscape effect (e.g. place-making, legibility), bridges, as nodes along the river corridor, are a suitable location.

### 2.1.3 Sensitive Location in Proximity to the Custom House

The Custom House is one of Dublin's most important architectural heritage features and elements of the townscape and views. It is important to acknowledge, however, that it does not exist in a pristine historic environment. Its immediate context is in fact characterised by an eclectic mix of built form and architecture.

- Directly to the north across **Beresford Place** is a remaining part of a crescent of houses built at the same time as the Custom House. Later developments including the Loopline railway, Busáras, and the Irish Life Centre caused the other parts of the crescent to be removed.

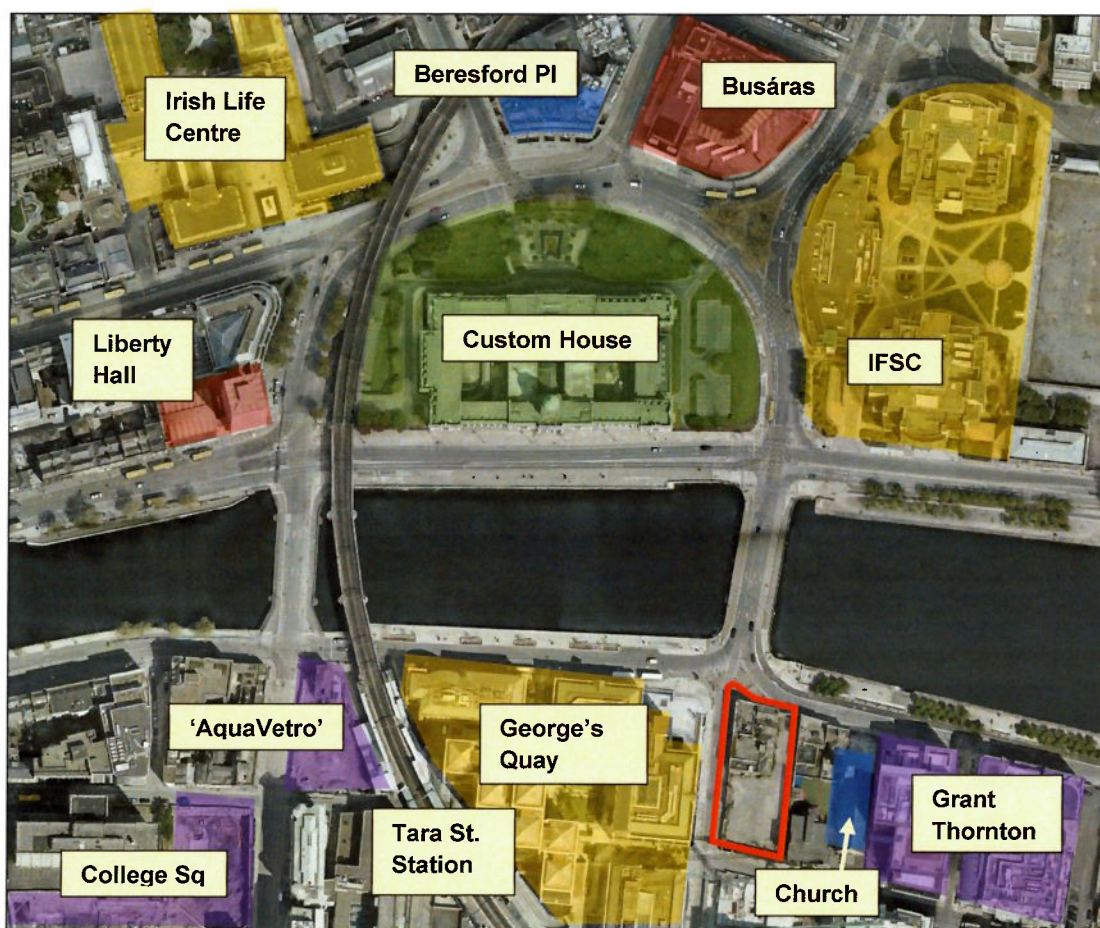


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- The **Loopline Bridge** passes to the west side of the Custom House, 20m from the building at its nearest point. Built in 1891, the long, visually dense metal structure forms a visual and physical barrier in the townscape between the Custom House and the old city centre.
- **Busáras**, Dublin's Central Bus Station, was designed in the 1940s and completed in 1953. In the NIAH it is described as *"the building that announced the arrival of International Modernism in Ireland"*. Like the Loopline Bridge it caused controversy at the time of its construction (for its location, scale and architecture), but it came to be appreciated for its unique design and ornate decoration.
- To the west, also fronting the Liffey, is **Liberty Hall**. Completed in 1965, the 17 storey tower was the first tall building in Dublin. It is described in the NIAH as *"an embodiment of the functional aesthetic of the International Style, with its simple slender form, transparency of structure, and sparse ornament"*. Its lack of decoration is in stark contrast to the style of Busáras, as are its vertical scale and materials palette with respect to the Custom House.
- To the east of Beresford Place/Memorial Road, directly across the Liffey from the site, is the **IFSC**. Developed in the late 20th century, this was one of the early projects in the regeneration of the Docklands. The trio of low, stone and green glass-clad buildings was considered to have set a new standard in office building design at the time.



- Directly across the Liffey from the Custom House is the **George's Quay office campus**, comprised of three low (5-6 storey) buildings forming a skirt around the distinctive George's Quay Plaza. Completed in 2002, this is a complex of seven connected slender towers up to 13 storeys, topped by pyramidal roofs.
- To the west of George's Quay and Tara Street Station is the site of the permitted 23 storey (88m) **'AquaVetro'** building (Tara Street tower). This was a plan-led project, the site having been identified for a tall building in the George's Quay LAP 2012. The site was identified for (a) its potential to serve as a landmark identifying Tara Street Station as a key public transport node, (b) to act as a visual

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counterpoint and to form a gateway in tandem with Liberty Hall “marking the transition between the traditional city core and the docklands”, and (c) to act as a termination of long distance views at a pivotal point in the Liffey River corridor.

- Diagonally across Tara Street from the AquaVetro, is the site of the permitted **College Square** development, which includes a residential tower of 22 storeys (82m). The College Square tower will combine with AquaVetro to form a tight pair of tall buildings in the western part of the George’s Quay area.
- Just to the east of the site (beyond a commercial premises, parochial house and school), is the **Immaculate Heart of Mary Church**, a protected structure. This is a small church built in 1863, which became known for a time as the ‘Dockers’ church’ as it served the seamen and dock workers of City Quay. It is set well back from the quay and features most strongly in views from across the river.
- To the east of the church is the **Grant Thornton** building. This is a recently developed HQ office building with a distinctive, high quality bronze finned and glass façade. Like many of the buildings on the quays in the Docklands it is limited to eight storeys in height and has a flat-topped, boxy form.



*A view west along City Quay with the Grant Thornton building in the foreground (hiding the neighbouring church), a part of the George’s Quay Plaza complex, and Liberty Hall and the Custom House across the river*







*Photomontage showing the permitted scenario, with the IFSC, Custom House and Liberty Hall on the north side of the Liffey, and a cluster of contemporary buildings of various form, scale and architecture on the south side*

The Custom House is thus at the centre of a particularly diverse character area, in which there is no uniformity in development era, building typology, form, scale or architecture. Many of the developments were forerunners and strong architectural expressions of their type and time - for example the Custom House itself, Busáras, Liberty Hall, IFSC, George's Quay Plaza, AquaVetro and College Square. **The proposed development is a natural progression and could take its place comfortably (albeit prominently) in this character area.**

The diversity and strength of the buildings' character are due to a range of factors including the area's central location, *close to but outside of* the historic city (the medieval and Georgian areas) and at the intersection of all transport networks (sea, waterways, road, rail, light rail). **These factors inspired ambition and innovation in the developments.**

**Another factor is the presence of the Custom House itself. Its very function was to facilitate and generate trade/commerce. It reinforced the area's locational advantages and drove the evolution of the townscape that continues to this day. For the Custom House to be used as a reason to constrain commercial development in its environs is illogical.**

Such change, i.e. a concentration of commerce and related development around a custom house, is natural and not unique to Dublin/Ireland. The following images illustrate similar change in other cities.









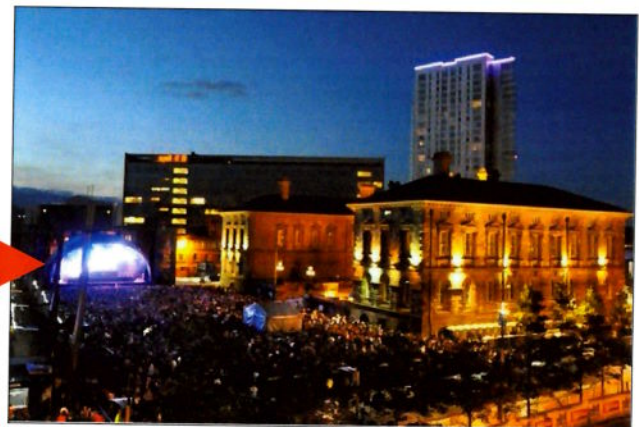
New York



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At the time of its construction the Custom House caused Dublin's commercial core to shift eastwards along the Liffey, away from the old city towards the emerging Docklands. The continuation of this expansion remains the policy of DCC, as expressed by the following statement from the DCDP 2016: *"The strategy of extending the inner city eastwards and westwards, towards the Docklands and Heuston respectively, is now complemented with a strategy for the quality consolidation of the inner city, protecting heritage while promoting diversity"* (DCDP 2016, p.32).

Thus far in the development of Dublin's Docklands area there has been a failure to achieve connection/integration between the old city and the Docklands. This is despite the presence of the Custom House at the interface. This is due to a combination of factors including the barrier effect of the Loopline Bridge, the inconsistent built frontage along the river east of the Loopline (the IFSC in particular), the lack of activity-generating uses and entrances in the buildings fronting the north and south quays (including Custom House Quay), the poor quality of the public realm (along George's Quay and City Quay in particular), and the openness of the river corridor which makes it less definable as a place.

The proposed development could contribute to changing this, by introducing a contemporary building of strong character and the highest quality, which would be visible from west of the Loopline, and - importantly - would introduce a cultural facility (the arts centre), attracting footfall and enlivening the place.

#### 2.1.4 Position 'Within the Historic City Core'

While the site is centrally located, to characterise it as being within Dublin's *historic* city core is not accurate. Most of the lands/plots surrounding the site (apart from the Custom House and the church) were redeveloped in the 20<sup>th</sup> century and/or are being redeveloped. The site lies at the centre of an extensive area of distinctly modern character (the George's Quay area), and this surrounding development forms a buffer between the site and the historic city core. (The two permitted tall buildings, AquaVetro and College Square, are closer to the historic city core than the site is.)



DCC itself recognised the George's Quay area as a definable character area within the wider Docklands when it adopted the George's Quay LAP in 2012. The following excerpt is taken from the LAP Introduction:

*"The George's Quay area of the City, (i) with its role as a location of headquarter and Government departments, (ii) adjoining Trinity College and its associated innovation centres and (iii) located at the bridging point between the City centre and Docklands, means that this area is of significant economic importance to both the City, the Region and the State. The LAP area has capacity to facilitate significant new employment centres as it can provide locations for high quality new office, mixed use and innovation space in the heart of the City centre, attracting new economic activity and headquarter facilities. Its location at one of the most accessible locations in the City, served by a wide range of high quality public transport, and its juxtaposition with residential uses both within the LAP and in adjoining areas in Docklands and also (amongst others) the Georgian city, Ballsbridge and Ringsend areas, makes it a highly sustainable location for economic activity... There are excellent opportunities presented by the current vacant and under-utilised sites within the area for the LAP to create a distinctive economic and residential cluster, within the context of valued historic and riverside settings..."*

DCC thus recognised in 2012 that (a) the George's Quay area had economic potential of national importance; (b) George's Quay lay *between* the historic city centre and the Docklands (straddling the divide and not fully within either); (c) that the area thus had the potential, for numerous reasons including being 'one of the most accessible locations in the city', to develop its own distinct character.

That character would be generated by high quality, new headquarter developments capable of attracting/supporting new economic activity. Importantly, the LAP recognised that this change could happen 'within the context of valued historic and riverside settings'.

## 2.2 Contribution to Urban Character of the Inner City

### DCC Reason 1 continued

*"...and having regard to Policy SC7\* & SC17\*\* of the Dublin City Development Plan 2016-2022 which seeks to protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the inner city..."*

*\* SC7: "To protect and enhance important views and view corridors into, out of and within the city, and to protect existing landmarks and their prominence."*

*\*\* SC17: "To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city... In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance."*

It is important to note that, in both the above policies, 'enhancement' – of views, the skyline, etc. – is promoted alongside 'protection'. These policies should not be interpreted as seeking to prevent change, even in important views and view corridors. This would be unsustainable (and contrary to other DCDP policies and national policy – see below). The above policies allow for the prospect of change and recognise that change can make a positive contribution to urban character ('enhancement').



Policy CEE5 of the DCDP 2016<sup>2</sup> states: “...cities are crucibles of innovation and the city centre Z5 zoned area and inner city area including the Docklands are the crucial metropolitan and national resource for innovation, promoting the proximity and diversity of uses that foster innovation”, and “high-quality and dense development drives productivity and innovation in a city.”

In Section 2.3.2 the DCDP states: “It is a central aim of the core strategy to consolidate and enhance the inner city in order to augment its crucial role at the heart of the capital city and the city region. The inner city of Dublin is the most connected destination in the country and at international level, and supports a dynamic range of economic, educational and cultural clusters...”

The NPF includes the following objective for Dublin: “Supporting the future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.”

National Policy Objective 5 of the NPF states: “Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”

Regarding Economy/Prosperity, the NPF states: “... place-making... is also critical to economic prosperity as globalisation continues to have a concentrating effect... High value added services are attracted primarily to urban areas, and cities are competing with other cities internationally... This means that many sectors, but in particular those related to the information economy and knowledge development, tend to be very place specific... In addition to scale and density, this is dependent on the attractiveness of places to highly skilled potential employees as well as having a steady stream of local talent and innovation associated with third level research institutions. International connectivity is also important, where short travel times to an airport with a good choice of destinations is a critical factor.”

**These policy objectives are important and of relevance to the site:**

- If Dublin is to ‘compete internationally’ as a ‘global city of scale’, then office buildings of scale and distinction must be provided to the market.
- The closer that such a building is to the city centre, to any sectoral agglomerations (e.g. finance, tech/innovation, etc.) or third level institutions (e.g. Trinity) and transport links, the more valuable the development will be – to prospective occupants and to the city and national economy.
- The site, located at the centre of a triangle formed by the city centre, the Docklands and Trinity – minutes’ walk from each of them, and 150m from the Tara Street MetroLink station (providing a rail connection to the airport) - must be considered a land/development asset of national importance.

This understanding of the site’s position/potential in the townscape must be balanced against the conservative interpretation of Policies SC7 and SC17.

Architecture is a means for a city to express innovation, as well as other values/ambitions such as quality, sustainability, etc. The proposed development is a deliberate expression of innovation on a scale intended to be significant at national/international level. Its architecture also displays respect for the historic elements of its context (for example by turning its axis in order to address the Custom House and views from Gardiner Street, setting back the tower to respect the building line of the church, design references to Busáras and Liberty Hall, etc.).

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<sup>2</sup> The Draft DCDP 2022 does not include a policy equivalent to CEE5 of the DCDP 2016. However, we refer An Bord Pleanála to Policies CEE1, CEE2, CEE3, CEE7, CEE8 and CEE9 of the Draft DCDP 2022. All of these are relevant to the subject application. The proposed development would make a significant contribution to their realisation.



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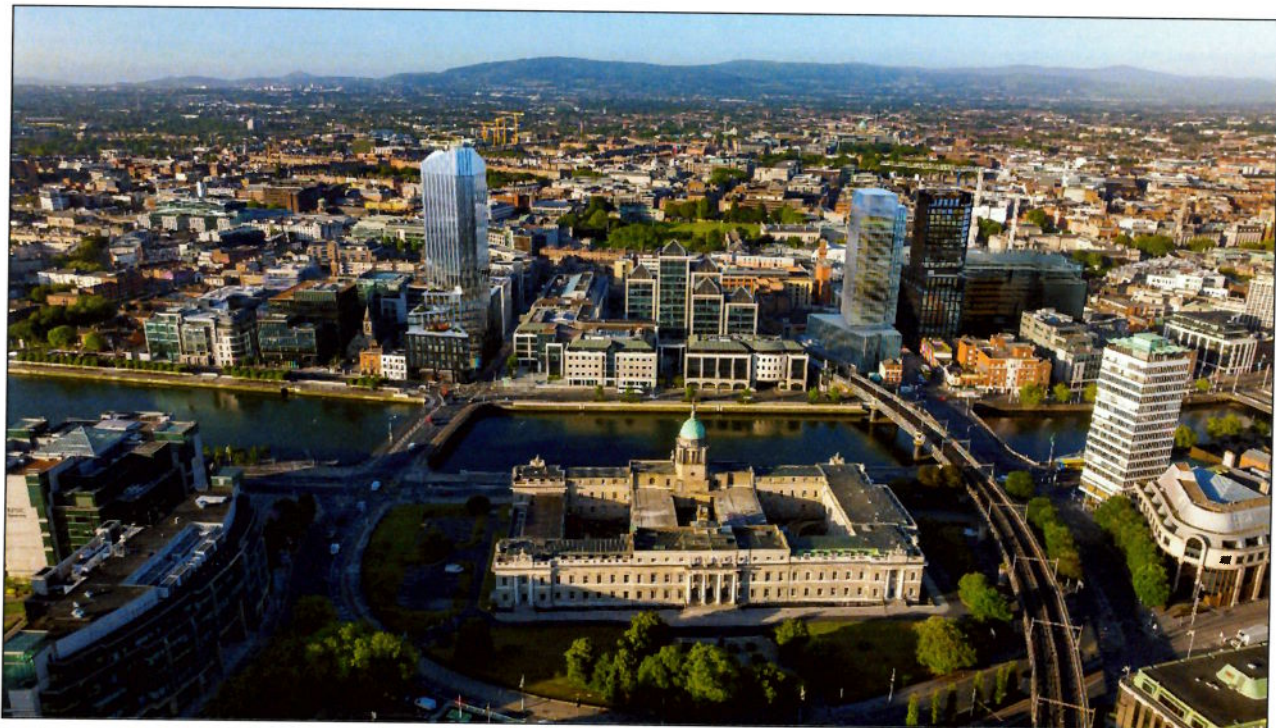
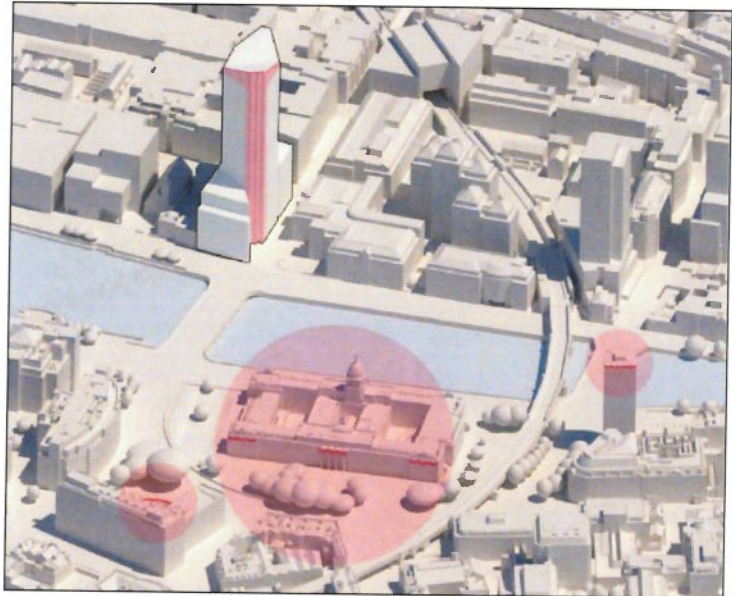
### 2.3 Impact on the Setting and Character of the Custom House and Environs and the Liffey River Conservation Area

#### DCC Reason 1 continued

*"... the proposed development due to its scale, bulk and height would seriously detract from the setting and character of the Custom House and environs. In addition the proposal would have a significant and detrimental visual impact on the River Liffey Conservation Area..."*

The Custom House exists in a townscape which has undergone constant change since it was built, and which is characterised by diversity of built form, scale and architecture (see 2.1.3 above). Its setting has been altered to the point where the building retains its own integrity, but the strongest characteristic of the area is its diversity and juxtapositions.

The form of the proposed building has been designed to visibly respond to the Custom House. The building steps up away from the Liffey and the Custom House, the axis of the tower is turned so that it addresses the historic building, with the tower sculpted to create a slender/elegant form when seen from the Custom House.













In views from east and west along the Liffey, in which the broad flank of the tower is revealed, the separation distance (c.150m) between the tower and the Custom House ensures that any sense of the proposed building crowding the Custom House is avoided. The Liffey corridor functions as a buffer between the contemporary tall building cluster on the south side and the contrasting form of the historic building across the river.







## 2.4 Impact on the River Liffey Conservation Area and Important Views and Vistas

### DCC Reason 1 continued

*“... the proposal would have a significant and detrimental visual impact on... important views and vistas, including those views from the Custom House environs, Amiens Street, Mountjoy Square, Gardiner Street Lower, Trinity College Campus and views westward from the River Liffey...”*

#### 2.4.1 Visual Impact on the Custom House Environs

The following photographs and photomontages show (a) that the existing and permitted buildings in the environs of the Custom House can be seen protruding above its roofline from most directions of view, and (b) that the proposed development would have a similar visual presence.







Depending on the angle and distance of the view, the existing and permitted buildings protrude to various extents above the Custom House roof, and *from particular positions* they may be close to or directly behind the cupola (as illustrated by the photomontage below showing the AquaVetro tower behind the cupola).



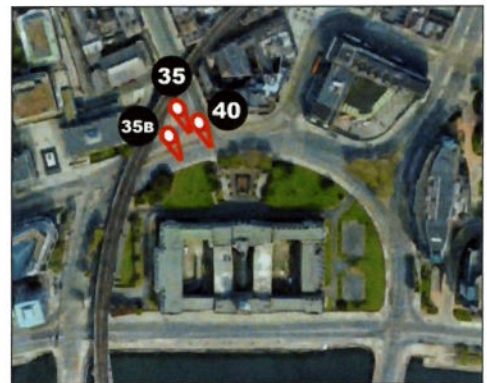






It should be noted that in the case of the proposed development, the particular vantage point at which the tower would rise behind the cupola (Viewpoint 35b – shown above) is not an important viewing position or approach route to the Custom House.

This is a position on Beresford Place, off the axis of Gardiner Street. The view would be only fleetingly experienced while travelling east-west along the street. Given the similar effects of various existing and permitted buildings, the significance of this visual impact is classified 'moderate neutral' in the LVIA.



The protrusion of the taller modern buildings above the Custom House roofline is a function of the historic building's own proportions (large footprint, but low).

Another factor is the extent of open space surrounding the building. It occupies a large plot surrounded by wide streets (Beresford Place and Custom House Quay) and the Liffey. This allows the building to be seen from some distance from most directions and this provides perspective. Buildings of contemporary urban scale in the environs will thus inevitably be seen in the background or alongside the Custom House in views from its surroundings.









The photographs and photomontages above show that the proposed development would cause no greater impact on views than the existing and permitted buildings in the Custom House environs (even those that would not be characterised as 'tall', .e.g. IFSC, Irish Life Centre). In terms of architectural quality, the proposed development compares favourably to the other modern buildings. Therefore, where it does appear in views, its presence would not be negative, and it would elevate the quality of the built environment overall.

The building's height, while significant, achieves a slenderness ratio which contributes to its elegance as a stand alone form. Given the existing character of the area and the similar visual presence of other modern buildings in views of the Custom House, DCC's inclination to substantially reduce the height should be questioned. **This would reduce the quality of the building, and cause the development to have less beneficial effects in terms of compact growth/sustainable land use, place-making, legibility, etc.** The 'improvements' to views of and from the Custom House environs that DCC assumes would result from such a height reduction are questionable, and the optimal use of a site/development opportunity of national importance would be prevented.

#### 2.4.2 Visual Impact on Amiens Street

The DCC Planner's Report states: *"In addition, there appears to be equally dramatic and piercing views from... Amiens St, and the Five Lamps and the proposal appears to be overly assertive in terms of its influence on Dublin's historic skyline"*.

The photomontages for a sequence of views along Amiens Street show that the proposed development's visibility would increase along the approach to the city centre:

- At the Five Lamps it would protrude above the Amiens Street roofline just sufficiently catch the eye, but it would have limited visual presence and would cause no harm to the view. The intrusion would not be 'piercing' or 'dramatic'.







- At the junction of Talbot Street the tower would be more exposed, rising above the complex, bulky form of the IFSC. The building's height and sculpted form would now be evident. Its typology and scale would reinforce the pattern of increasing development intensity along the Amiens Street as it approaches the city centre, representing a further step up beyond the IFSC. It would cause no harm to any valued feature or characteristic of the view, and while 'assertive', its main effect would be to improve legibility (reinforcing the shift in character and identifying its place in the townscape, i.e. the arrival point on the south side of the Liffey).







- As Amiens Street passes between the IFSC and Busáras to merge with Beresford Place approaching Matt Talbot Bridge, the building would be fully exposed, directly across the bridge, presenting its slender elevation to the viewer. Its position, scale and distinctive, attractive design would clearly indicate this as a place of importance in the townscape. Again, it would cause no harm to any valued feature of the view, including the Custom House (screened by the trees to the right).



The sequence of views shows that the visual effect would be 'not significant neutral' at a distance (Five Lamps), increasing to 'moderate positive' towards the end of Amiens Street. It would initially just catch the eye, then gain in prominence as the viewer moves along the street until it is fully revealed just before crossing the Liffey. On a key thoroughfare entering the city centre this changing effect is appropriate and positive overall. DCC's assertion that it would be 'overly assertive in terms of its influence on the historic skyline' is untenable.

#### 2.4.3 Visual Impact on Mountjoy Square and Gardiner Street Lower

The DCC Planner's Report states: "... the scheme would, by reason of visual intrusion, have a significant and detrimental visual impact on a number of important views and vistas in the city, as referenced in the Dublin City Development Plan Key Views & Prospects (Fig.4), including those views from... Mountjoy Square, Gardiner St Lower...

In particular, the views from Gardiner St (View No. 35, 38 & 39) and Mountjoy Square (View 37) illustrate the stark reality a proposed building of such scale and mass will have on the Dublin skyline and the corresponding detrimental visual impacts on the integrity of the historic Custom House building."

- The proposed development would have no visual impact on the open space of Mountjoy Square – as shown by the new photomontage prepared for the appeal, included below. As a typical Georgian Square, the space is enclosed by a belt of perimeter trees and tall, terraced houses, which block views towards the site. Additionally, the topography falls steeply down towards the Liffey, so

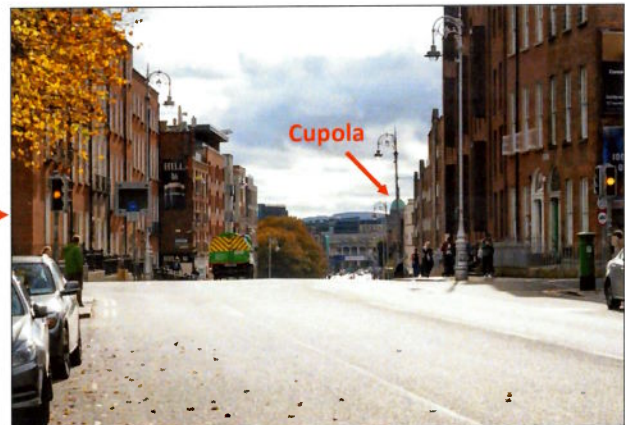




that the site is well below the elevation of the square. (The building is outlined in red in the view below.)



- A new photomontage has been prepared for Gardiner Street along the west side of Mountjoy Square (it was unclear if DCC was concerned about the view from *within* the square (above) or the street along the side of the square, below). **It should be noted that the Custom House cupola is well off the axis of the street from this angle; it is a peripheral, relatively inconspicuous feature.**



- The proposed building, at the centre of the framed vista, stands to the side of the cupola. While it does transform the distant skyline, it has no real effect on the Custom House, which is not a key element of this view. The attractive Georgian townscape of Mountjoy Square/Gardiner Street is also not negatively impacted by the building, which clearly stands well outside of the foreground character area in another part of the city on the far side of the Liffey (the evolving commercial district of George's Quay). Such juxtapositions are not undesirable in the modern city.







The LVIA assessed the impacts on a sequence of views along Gardiner Street approaching the Custom House. The following aspects of the existing views should be noted:

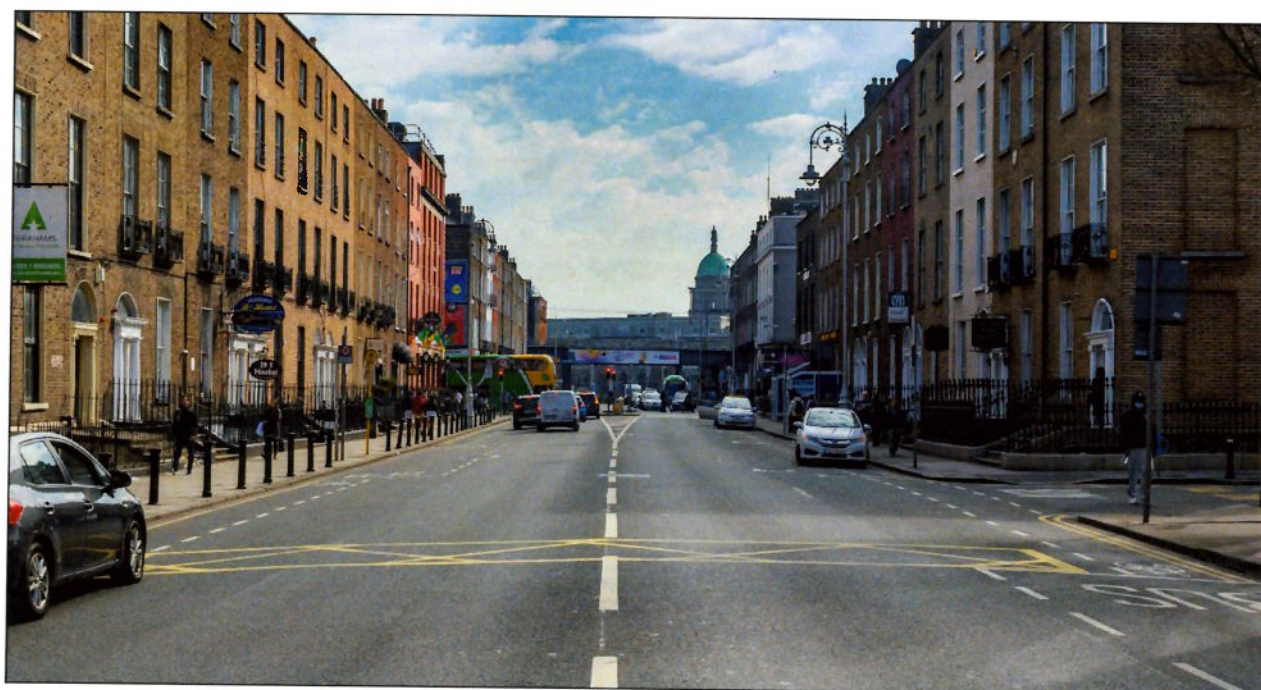
- From the upper stretch of the road near Mountjoy Square, the broad, low body of the Custom House can be discerned at the bottom of the hill. It is partially obscured by the Loopline bridge that crosses the road in front of it, and it is seen against a backdrop of existing development beyond the Liffey in the George's Quay area. These elements (in addition to distance) reduce the legibility of the building, apart from the cupola, which stands clear of the foreground and distant built form, punctuating the skyline. It is important to note its position off centre of the view, i.e. off the axis of Gardiner Street. However, the road aligns exactly with the subject site across the river.







- Further down the hill the Custom House gains in prominence as the distant development across the river falls out of view. Again, the off-centre position of the cupola is notable, as is the Loophole bridge crossing in front of the building.



The proposed building would be a very prominent addition to the views, at the centre of the vista, on the axis of the street, becoming the focal point of the views (see view overleaf). Its degree of contrast with the existing buildings in the view – in typology, scale, architecture and materials – is pronounced.

The proposal has been prepared with cognisance of this visual impact. It was identified early in the design process that any building on the site, even a building limited to 10 storeys (as per the George's Quay LAP) would be visible rising behind the Custom House. Buildings of various height were considered and assessed (refer to the Architectural Design Statement) and ultimately it was determined by the design team, taking account of other factors (principally location and compact growth policy), that a tall building would be





appropriate for the site. Once that approach was decided, a number of key mitigation measures were taken in consideration of the Gardiner Street views. These include:

- The tower was positioned so that it is directly at the centre of the Gardiner Street vista.
- The axis of the tower is turned to align directly with Gardiner Street, so that it presents its narrow façade and visibly addresses the street (despite its separation distance) through its form.
- **The width of the tower was reduced to the maximum extent at which the floorplates remain viable (in terms of plan form, and area), thereby minimising the width of the tower in the Gardiner St. views and maximising its separation from the Custom House cupola.**
- These measures combine to result in a tall, slender building, which is emphasised by the shape of the roof.
- The two steps on the left hand side of the tower's base, have the effect – as intended - of anchoring the tower to the context, by being relatable in scale – both to its neighbouring buildings and to the foreground buildings.

There is no question that the development would have a very significant effect on views from Gardiner Street.



It should be noted that any building of contemporary urban scale – even a building of 10 storeys (as specified in the now expired George's Quay LAP) - would protrude well above the main body of the Custom House, adjacent to the cupola. A taller building allows for a narrower floorplate, which retains some sky space between the new building and the off-centre cupola.

The juxtaposition of the development with the Gardiner Street character and view compositions is both (a) challenging to that character, and (b) of benefit to its continued clear definition. In the photomontages the building clearly stands outside of the historic foreground, in a distant character area across the Liffey, marking a place of significance in the evolving city. The building itself is elegant and even from a distance its refined façade design and materials would be appreciable.





Its position as a backdrop to the wide, low body of the Custom House would reduce the legibility of that element of the historic structure. The relative prominence of the cupola would also be reduced (and it would be replaced as the focal point of the view), but the design measures taken to preserve the visibility and legibility of the cupola are effective.

**It must be recognised that the cupola is not a building or building volume (such as the dome of the Four Courts is); it is a much smaller, decorative feature of a building. In any view/composition the cupola itself will appear small in comparison to an actual building.** While the preservation of its visibility and legibility is a valid objective, its small scale should not determine the scale of new buildings in its environs - particularly not on a site that due to multiple factors is suitable for a building of landmark scale and character.



**Gardiner Street is an important approach route to the city centre, and to a key river crossing. The site's position on the axis of the street is as much a reason – in townscape terms - to place a landmark building on the site as a reason to not do so.** As the city, including the area surrounding the Custom House, evolves under the planning paradigm of compact growth, the curtailing of change to the Gardiner Street views warrants careful consideration. The fact that the development would function as a landmark in views from the north (Gardiner Street), south (Kildare Street) and east and west (along the Liffey) is significant. If locations were being sought to make a meaningful change to the city's legibility, few sites could deliver the same potential.

The net effect on Gardiner Street – as a townscape character area and visual resource - would be to elevate it to a new status and level of visual interest, retaining the historic character of the foreground (due to the building's clear separation from it in space and character) and emphasising that character through juxtaposition. The effect would be very significant but would constitute an enhancement of the townscape character overall.

#### 2.4.4 Visual Impact on Trinity College Campus

The DCC Decision states: "... the proposal would have a significant and detrimental visual impact on ... important views and vistas, including those views from ... Trinity College Campus..."

The DCC Planner's Report states: "... It could be argued that the views from Trinity College will be compromised by the permitted tall buildings at Tara St Station and Apollo House, however views 13, 14, 16, 18, 19 and 20 clearly showcase the isolated nature of the proposal in comparison to the clustered nature of the Tara and Apollo developments... As a result, it is considered that a building of such height, scale and mass at this location would have a detrimental, dramatic and cumulative visual impact on the Dublin skyline." *"Moreover, due to the excessive scale of the proposed building and its proposed location, removed from the permitted buildings at Tara Street Station and Apollo House, the proposed building would stand apart as an overly assertive solo building which would not form part of a coherent cluster..."*

10 no. viewpoints in Trinity College were selected for assessment in the LVIA, addressing all the key spaces and routes of movement in the campus.





The most sensitive parts of Trinity are the historic squares in the western part of the campus, particularly Parliament Square. The cumulative photomontages show that the proposed development, being further from this area than the Tara Street Station and Apollo House sites ('AquaVetro' and 'College Square'), would have less visual presence than either of the permitted buildings.



In the one view (below) in which all three buildings are clearly visible, contrary to DCC's opinion they clearly *do* form a coherent cluster. In the 360 degree field of view available from this location, they occupy a narrow wedge of the view.





Their cumulative effect would be to establish a distinct zone of contemporary high density development in the vicinity, but outside of, the campus. This is neither inappropriate nor undesirable for a university campus located at the heart of a European capital city in the 21<sup>st</sup> century.

DCC's contention that this change – specifically the addition of the 3<sup>rd</sup> building to the cluster – would constitute a dramatic detrimental impact on the Dublin skyline, is untenable.



An important aspect of the proposal is the extent of the building's protrusion above the existing roofline of the foreground campus buildings. This would be sufficient that (a) it would be identifiable as a separate building well removed from Trinity College, (b) it would avoid distorting/reducing the legibility of the Trinity roofline in the foreground, and (c) its design quality would be appreciable. The development would add a building of distinction to the city centre skyline as experienced from Trinity.

There are other views, from the central open space of the campus, in which (a) the building's separation from the more tightly spaced pair of AquaVetro and College Square, and (b) its greater height, would be noticeable (see view overleaf).

Again, it should be recognised that a photograph captures a limited angle of view. Therefore, while in the context of a single frame photograph/photomontage the building may appear 'removed' from the other two tall buildings, when seen in reality (with 360 degrees of view available), the buildings would occupy a particular zone in the townscape surrounding the campus.

There is no reason that a cluster of two closely spaced buildings is necessarily better than a wider cluster of three (this subject is also addressed in the appeal report by Urban Strategies). It can be argued that the third building has the effect of (a) strengthening the cluster so as to form a character area or quarter, (b) creating a better balanced composition of form/massing in the cluster (as illustrated by the view from Parliament Square above), and (c) reducing the relative prominence of the other two buildings (a more diverse cluster has greater 'tolerance' for peoples' varying aesthetic/ architectural preferences than a smaller cluster). All three of these factors apply in the case of the proposed development.







Overall, the proposed development would have similar visual impact to the two permitted buildings. If only one building, either AquaVetro or College Square, were currently permitted, that building could be considered a 'landmark' tall building, and the introduction of the proposed development may be considered to undermine that building's landmark status. This is not the case however. A cluster is now established by the two permissions, and the development would have the effect of reinforcing this cluster and adding to the visual interest of the evolving city centre skyline surrounding Trinity. The character of the campus is strong. It can withstand such change in its environs without losing its own integrity and charm.





'It is worth questioning whether the currently permitted scenario - the two buildings on Tara Street, with the tallest of these on a small, constrained site - represents the height of Dublin's ambition for the delivery of density/height in the city centre. Could one or more similar buildings not be accommodated to realise the potential of this cluster, which is particularly well served by public transport.)

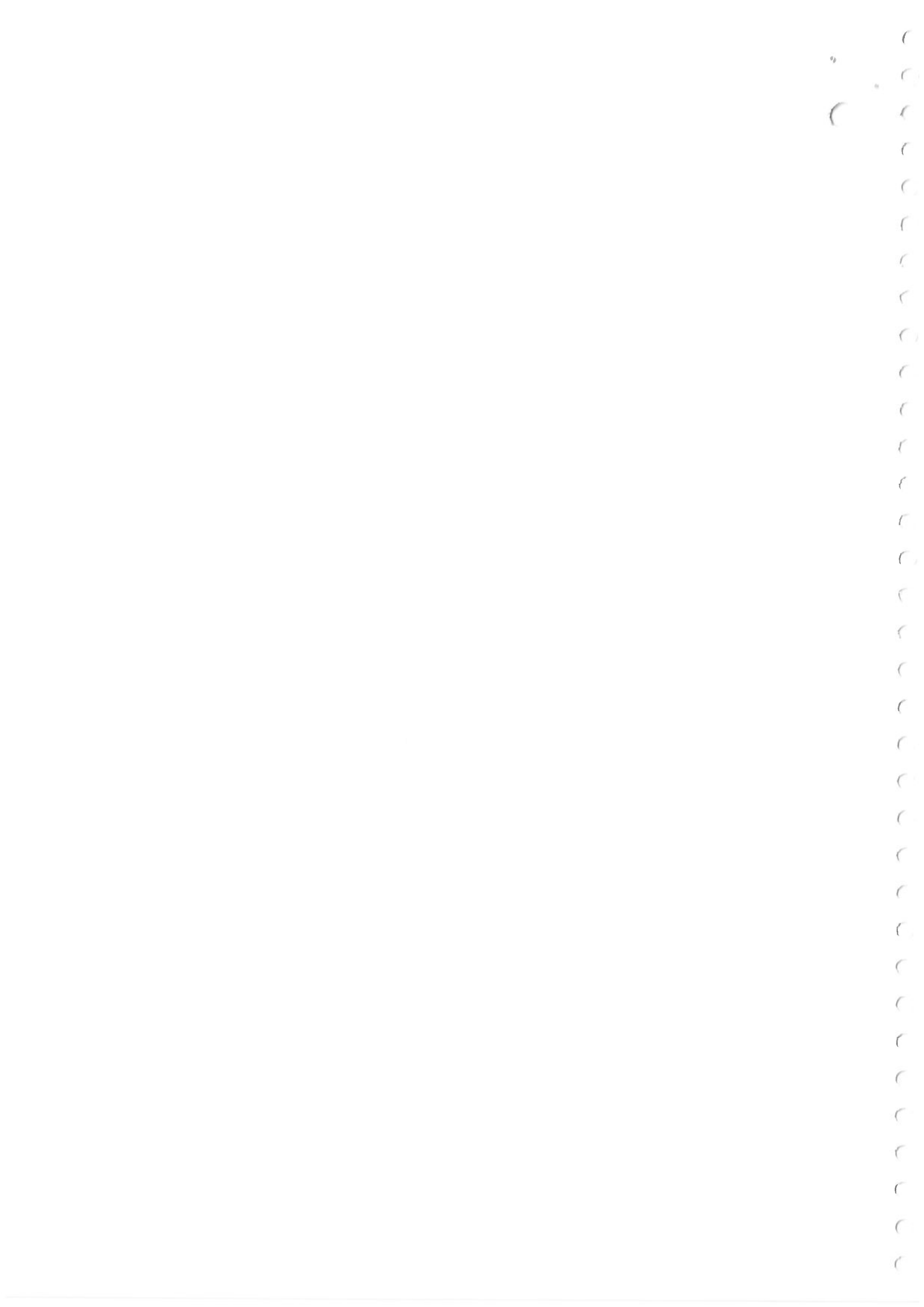
#### 2.4.5 Visual Impact on Views Westward from the River Liffey

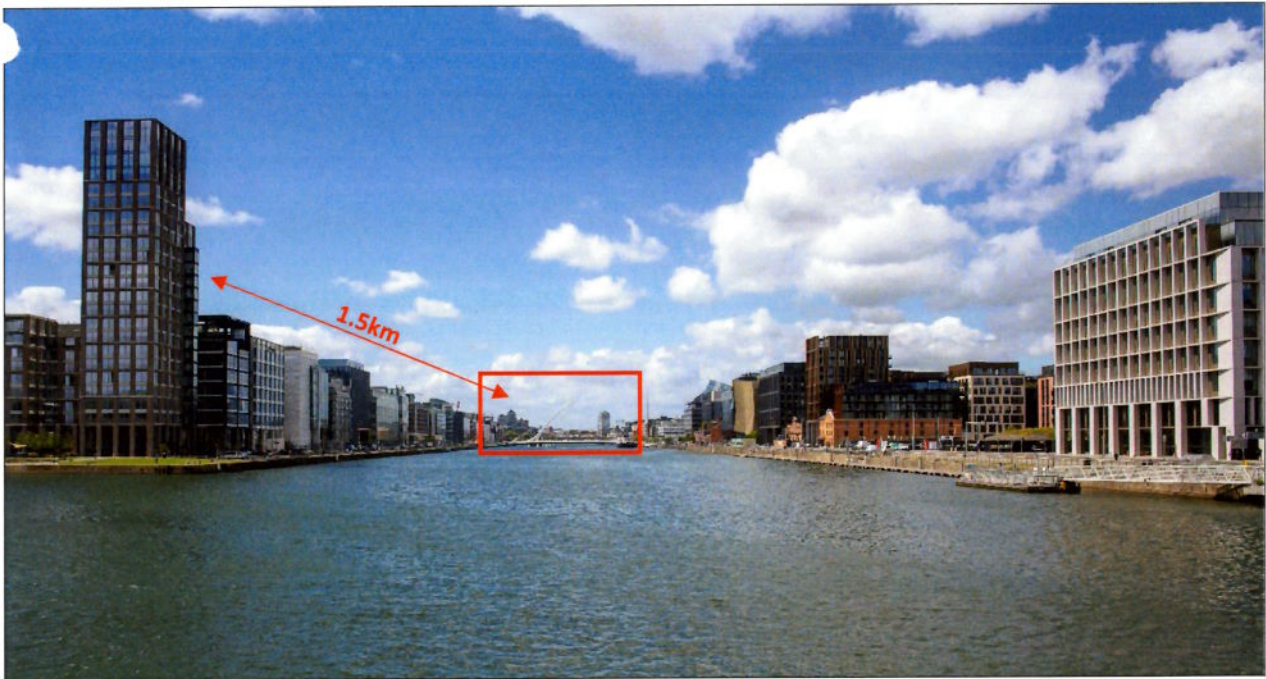
The DCC Decision states: "... It is further considered that the scheme would, by reason of visual intrusion, have a significant and detrimental visual impact on a number of important views and vistas in the city, as referenced in the Dublin City Development Plan Key Views & Prospects (Fig.4), including ... views westward from the River Liffey."

It can be argued that the Liffey River east of the Loopline Bridge could have accommodated taller buildings than were built in the regeneration of the Docklands. The river is wide in this area, the plots are large and orthogonal, there were few sensitive residential receptors and the cultural/architectural heritage was mostly industrial (Docklands-related). There was thus capacity to accommodate taller development, and conditions (e.g. plot size) to facilitate it.

Many of the buildings on the river have facades of the highest design and material quality. They are beautiful to look at from close up, but it is worth questioning why their height was limited, resulting in the area's repetitive, boxy shapes and a very horizontal townscape. There are few 'events' in the built form along the long, wide stretch of the Liffey through the Docklands.



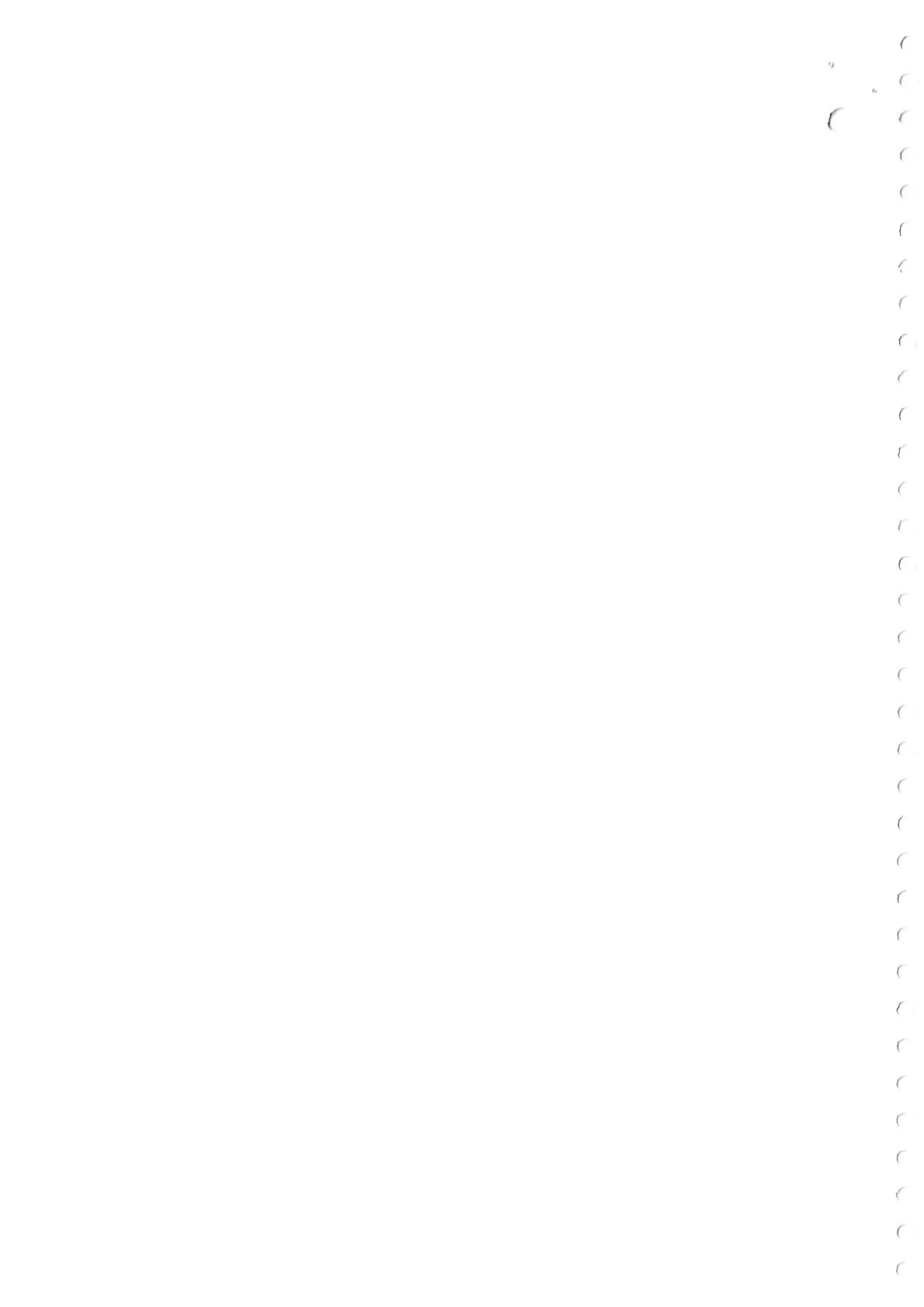




Towards the western end of the Docklands stretch (1.5km from Capital Dock), the George's Quay Plaza complex, Liberty Hall and the cupola of the Custom House bring some verticality/punctuation to the riverside built form, causing a welcome shift in character (see below).







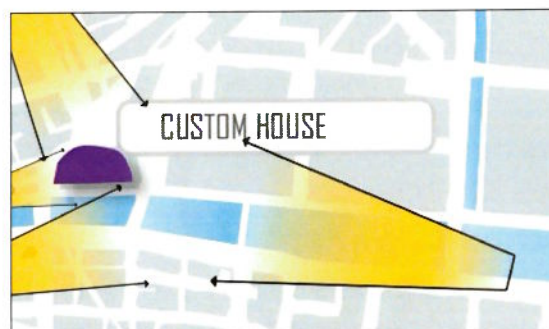


Seen from the Sean O'Casey Bridge (Viewpoint 45, above) the building would be a prominent addition to the view:

- The low podium block, clad in dark grey brick framing a vertical grid of river-facing windows, reads clearly and fits comfortably into the river-front composition of buildings.
- The two steps from the podium to the set-back tower are effective in transitioning to the vertical form. The tower itself presents its broad but sculpted elevation to the viewer, and the angled roofline adds to the interest and elegance of the form. The refinement of the tower façade is appreciable from this distance.
- It should be noted that the lower the building, the broader it would be when seen from east and west along the Liffey (due to the site's rectangular shape, with the long axis perpendicular to the river). Height in this case adds to the elegance of the built form.
- Overall, the building – for its type and considering the site proportions – is a bold but responsive and attractive architectural composition. The development does no harm to any valued element or characteristic of the view – including the Liffey and the Custom House. In combination with the AquaVetro and College Square buildings it forms a distinct new character area in the townscape on the south side of the Liffey. This is a welcome change to the otherwise very uniform Docklands river corridor.

In response to an observation by the OPW, a new photomontage has been prepared to assess the effect on a protected view identified in the DCDP 2016 (and Draft DCDP 2022).

This is the view from the south quays in the vicinity of the Samuel Beckett Bridge, with the Custom House the focus of the view. The photomontage is provided below.



Similar to View 45 (see preceding page), this view shows (a) the considerable separation distance between the proposed tower and the Custom House across the river, which negates any sense of crowding/

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overbearance despite the difference in scale between the two elements, and (b) the additional capacity for change resulting from the predominance of modern development. If there is a district in the city that can accommodate contemporary tall buildings – as compact growth policy demands – it is this area.



### 3.0 Conclusions

**If a study were undertaken to find a suitable site for a tall development in Dublin, it is likely that the subject site would be a leading candidate. This is due to:**

- Its position in the city centre, but outside of the historic core (the medieval and Georgian areas);
- Its position across the Liffey from the Custom House, the historic centre of trade/commerce, which initiated the 'modern' expansion of the city eastwards into the Docklands;
- Its Liffey riverside location, at the landing of Talbot Memorial Bridge, which is a key river crossing and the arrival/distribution point for a large proportion of traffic arriving in the city centre from north of the river;
- Its location in a recognised 'transitional area' between the historic city and the Docklands;
- The particular diversity of development in its immediate area, the Custom House environs, in which a wide range of development eras, building typologies, scale and architecture is represented;
- The status of the area as the crucible for building height in Dublin (evidenced by Liberty Hall, George's Quay Plaza, AquaVetro, College Square; even Busáras in its day);
- Its focal-point position in views from two key north-south aligned Georgian streets, one north of the river (Gardiner St) and one south of the river (Kildare St), complementing its prominence in the east-west corridor of the Liffey.

**These townscape factors all point to the site being suitable for a landmark tall development.**





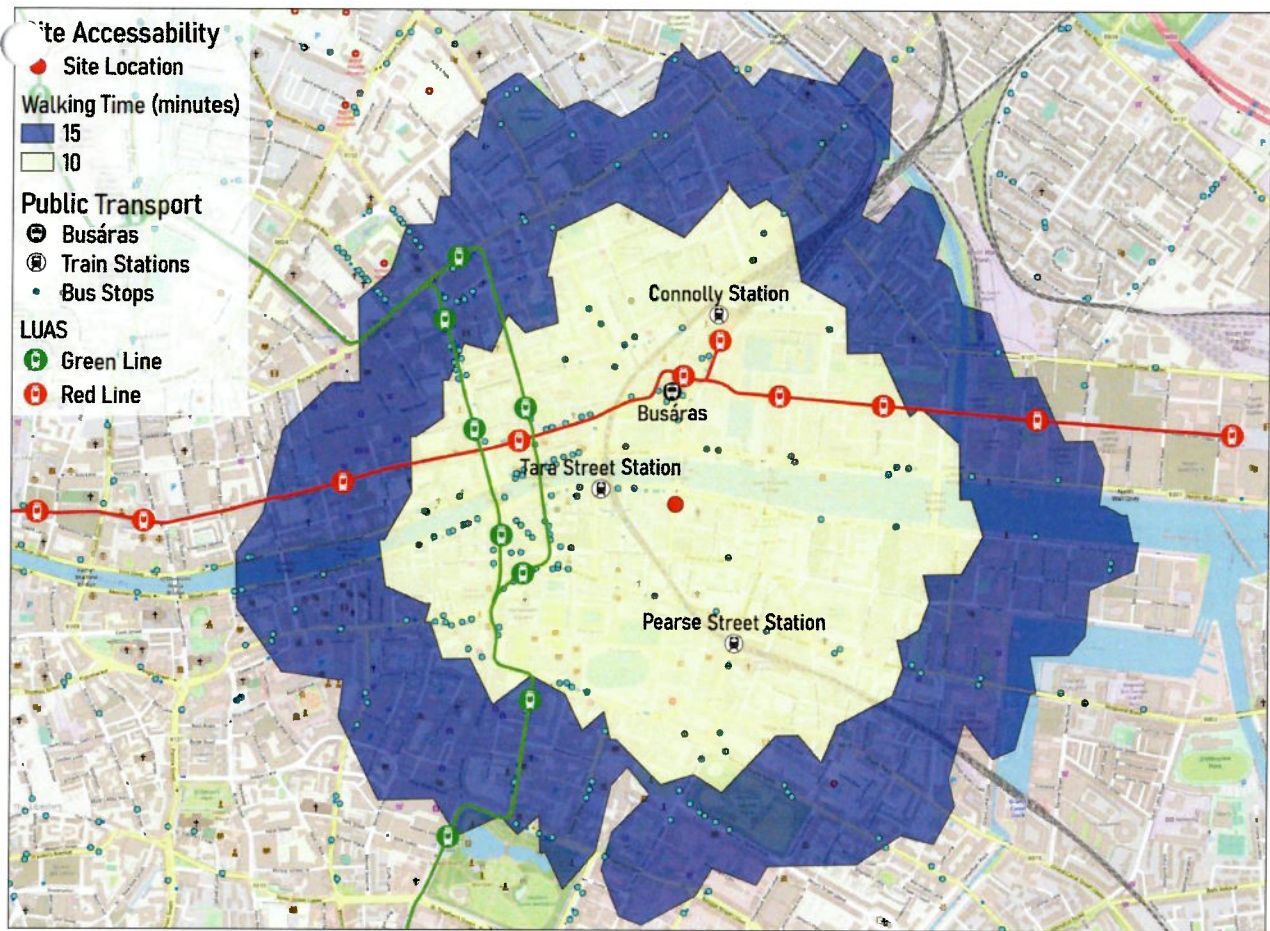
The site's position in the Custom House environs is also a reason for an ambitious, innovative, high quality commercial development. It is the norm for a city's custom house to spark the growth of a commercial district, and for that district to modernise over time. There are historic custom houses throughout the world that now exist in vibrant, contemporary high density townscapes – with the juxtaposition lending to the particular character of these places. It does not appear to be recognised in DCC's assessment, but this is already the case with Dublin's Custom House, which is surrounded by developments that were all major steps forward in the architecture of the city in their time (Busáras, Liberty Hall, IFSC, George's Quay Plaza, AquaVetro and College Square). The proposed development represents a continuation of this evolution, and to use the presence of a custom house as a reason to quell a city's commercial growth is counterproductive.

This conservation-oriented approach is all the more questionable considering the site's unparalleled access to public transport facilities. There can be few brownfield urban development sites in Ireland so well served by public transport. It is:

- 200m from Tara Street station, giving access to the DART and future Metro Link;
- Less than 500m from both Connolly Station and Pearse Station, giving further access to DART and Intercity Rail services;
- Less than 1km from Docklands Station, giving access to additional Intercity Rail routes;
- Less than 500m from both the red and green Luas lines;
- 250m from Busáras and close to numerous bus stops for Dublin Bus, Bus Eireann and various private services.

The 'Walktime' map for the site (below) shows Tara St., Connolly and Pearse St. Stations, the LUAS Red and Green lines, Busáras and the city's largest concentration of on-street bus stops all well within 10 minutes walk of the site. Also within the 10 minute walk zone are O'Connell Street, Henry Street, Grafton Street, Trinity College, the IFSC, Merrion Square and a large part of the Docklands north and south of the Liffey.





This demands that the site be used to its full potential. The inclination to restrict must be overcome. That was the purpose of the Government's Building Height Guidelines – to encourage developers and the planning authorities to recognise and react to the climate change and biodiversity crises by maximising the use of urban land through increased building height.

The Tara Street site was identified for a tall building in the George's Quay LAP in 2012. There has been a paradigm shift in planning policy since that time, as the depth of the climate change crisis becomes ever clearer. **Would an LAP prepared in 2022, informed by the NPF's compact growth policy and the Building Height Guidelines, have settled for one landmark tall building in the area, on a small, constrained site?** It is highly unlikely. DCC is now seeking to use the 2012 LAP to restrict the use of the subject site, by insisting that the building should be subservient to the Tara Street tower. This is not sustainable. The site is equally worthy and able to function as a landmark, and is equally well served by public transport, but is less constrained in terms of its size.

The impending delivery of the MetroLink warrants consideration. **Such transport infrastructure projects change cities.** That is their intent. This, like the policy of compact growth, has implications for the townscape and the composition of views in the city. **Higher density and taller buildings must follow the transport infrastructure for it to realise its potential value. There is no more suitable station than Tara Street on the entire MetroLink route for a high density cluster to be developed.**

Tall buildings should not only be seen as 'markers' for train stations. Their more important function is to provide concentrated floorspace around the stations. For this reason, the concept of preserving the Tara Street tower (AquaVetro) as the 'landmark' building marking Tara Street Station, is unsustainable. As it is, that 'solo landmark' concept has already been diluted by the permission for the College Square tower across the road.





These factors – the policy, the future transport infrastructure – have implications for townscape, and for how we consider the potential impact of development on the townscape and views. It is no longer sustainable to consider the simple presence of a tall building in a view, where previously there was no tall building, as a bad thing. A prominently located tall building, if well designed, can have neutral or positive effects. In time, people will become accustomed to correctly placed tall buildings in the same way that they have become accustomed to seeing wind farms in windy upland areas. They are necessary and they belong, and while causing sometimes stark change, they represent progress and sustainability. Such values affect how people evaluate 'impact'.

A case in point is the impact of the proposed development on Viewpoints 31 (Eden Quay beside Rosie Hackett Bridge) and 24 (Kildare Street as St Stephen's Green).







DCC evaluates the effects of the development on both these views (among others) as dramatically **negative**. While the effects may be dramatic, if different values are applied the effects can be considered **positive**. This applies to the proposed development due to its very high design quality and the consideration given to the sensitivities in the context, which reflects in the design. It is not only a beautiful building, but also appreciably responsive to the river, the Custom House (and Gardiner Street views) and the church.

The discussion in this report, responding to DCC's refusal, has focussed on the visual impact of the building as seen from distance across the townscape. The potential impacts on the immediate environs of the site are also important to note. Currently, the area at the junction of George's Quay, City Quay, Moss Street and Matt Talbot Bridge 'does not work'. For the location, the area lacks (a) life/activity (owing to the land use mix) and (b) buildings of distinction. This 'dead area' in the townscape contributes to the persistent disconnection the old city and the Docklands. This should be the gateway but east-west movement along the quays is minimal.

**The proposal's inclusion of a large arts centre in a building of landmark quality fronting City Quay and Matt Talbot Bridge, would transform this area.**

The arts centre as proposed is a generous proposition. While internal to the building, it would nonetheless affect the surrounding townscape, adding colour and people to the streets and quays, and re-establishing the cultural identity of the place (which has faded since the previous arts centre's closure).







**APPENDIX 5: URBAN STRATEGIES INC. APPEAL RESPONSE**



**APPENDIX 6: COVER LETTER AND ENCLOSURES PREPARED BY BYRNE LOOBY**





Mr. Blaine Cregan  
John Spain Associates  
39 Fitzwilliam Place  
Dublin 2  
D02 ND61

Friday 4 November 2022

Ref: B1876/LT/001/00

**Re: City Quay Planning Application (Ref. 4674/22)  
Engineering Inputs**

Dear Blaine,

ByrneLooby have been requested to review the commentary provided by the DCC Roads, Streets and Traffic Department - Road Planning Division, in relation to the recent refusal of the proposed planning application (Ref 4674/22) at City Quay. In the report provided by the Road Planning Division, the following elements were outlined as being required, should Further Information be requested. This letter sets out the proposed responses and additional information relating to these elements.

**Recommendations**

It is recommended that Further Information be requested from the applicant with regard to the following:

- 1) The applicant is requested to submit revised basement layout detailing piling proposals to clearly demonstrate that the proposed development would not impact on the public footpath.
- 2) The applicant is requested to submit proposed site layout plan incorporating topographical survey information to clearly demonstrate that the development would not encroach up on or overhang the public footpath.
- 3) The application is requested to provide information clearly demonstrating that the proposed car lift and service area would not result in localised queuing on Gloucester Street.
- 4) There are no details provided on number, type and frequency of vehicles that will be required to serve the development from the proposed access on Gloucester Street South. Having regard to the scale of the proposed development and location adjoining a school and creche, the applicant is requested to prepare and submit a detailed Servicing Management Plan which sets out the number, type and frequency of vehicles that will be required to serve the development. This plan should also inform the requested RSA Stage 1 and the operational trip generations.

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- 5) The applicant is requested to submit information on the following matters relating to Gloucester Street South:
- a) Having regard to the adjoining school whose pedestrian access is in close proximity to the proposed access, the applicant is requested to prepare and submit a Road Safety Audit Stage 1 and incorporate any recommendations into to a revised design. The RSA Stage 1 should be informed by the number of vehicles identified within the requested Servicing Management Plan.
  - b) Having regard to the extensive vehicular access across the public footpath and increased vehicular activity along Gloucester Street, the applicant is requested to investigate to opportunity to provide and signalised pedestrian crossing on Gloucester Street South for the benefit of pedestrians.

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**Item No. 1** - Appendix A includes a basement layout plan developed by the structural engineer for the scheme, detailing the proposed extents of the basement piling to facilitate the development. This entails a perimeter secant pile wall surrounding the proposed basement. The extents of the secant piling are entirely within the site boundary and do not encroach upon the public space or footpath.

**Item No. 2** – Appendix A also includes a basement layout plan and secant pile wall layout plan, along with the topographical survey information, illustrating that the proposed development does not encroach upon or overhang the public space or footpath.

**Item No. 3** – Appendix B includes a detailed Delivery and Servicing Management Plan for the proposed operation and functioning of the development once in use. A dedicated Facilities Management Team shall be responsible for the implementation and coordination of the plan during the operational phase. In relation to the use of the car lift, this serves a relatively small number (11) of parking spaces in the context of the overall development. Access to these spaces shall be limited and controlled by the Facilities Management Team such that daily use and hence access shall be staggered to ensure queuing is avoided. Furthermore, and as outlined in the Road Safety Audit, the current on-street parking bays along Gloucester Street shall be removed, which will facilitate two-way traffic on Gloucester Street, which shall allow suitable manoeuvring of vehicles in the public space.

**Item No. 4** – As outlined above, a detailed Delivery and Servicing Management Plan for the operational phase of the development has been included in Appendix B. This sets out the proposed approach to management of the building and servicing and deliveries which would be expected. A dedicated Facilities Management Team shall be responsible for the implementation and coordination of the plan during the operational phase. This plan will ensure that all servicing and deliveries to the operational building shall be planned outside of peak hours and





the drop off and collection times of the school and creche. All activities for the ongoing servicing and maintenance shall be planned such that queueing will be prevented on Gloucester Street.

**Item No. 5a** – Appendix C includes the Stage 1 Road Safety Audit for the proposed development. The Road Safety Audit has been developed based on the expected trips and vehicle movements as determined within the Transport and Traffic Chapter of the EIAR submitted with the application, which account for the servicing and management of the operation of the building once occupied. As outlined within the findings of the audit, the following shall be implemented to improve the safety of the scheme:

- All footpaths surrounding the development shall be formed such that pedestrians have priority, especially with respect to vehicular access from Gloucester Street South whereby a continuous footpath shall be provided with a bevelled kerb detail at the vehicle entrance.
- Visibility of pedestrians shall be managed via suitable controls on the pull out location of vehicles, which shall ensure suitable visibility. This shall be detailed and agreed with the DCC Roads, Streets and Traffic Department prior to implementation.
- The existing uncontrolled crossing on Gloucester Street South, at the junction with Moss Street shall be retained. Further discussions with DCC Roads Department shall be arranged to examine options for suitable signal controlled pedestrian crossing locations.

**Item No. 5b** – as outlined above, suitable locations for a signalised pedestrian crossing shall be discussed and agreed with the DCC Roads, Streets and Traffic Department, and incorporated into the proposed development.

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In addition to the commentary provided above, a Public Transport Capacity Assessment has also been completed to further strengthen the justification of the proposal. This assessment is included in Appendix D and validates the assessment at planning stage that there is ample capacity in the public transport network to accommodate the proposed development. The abundance of different public transport options will ensure that any increased usage of the modes of public transport will not negatively impact the capacity, and the increase in usage due to the development will not be perceived by the casual observer or operators of these services. The network of public transport will be readily capable of accommodating the expected usage from the development given the location within the central business district of the city.



Finally, in relation to a number of observations by neighbouring properties in relation to dust, noise, vibration and general nuisance caused by the expected construction activities, an updated Outline Construction Management Plan is included in Appendix E, which includes the undertaking that early engagement with neighbouring property owners will be undertaken to limit the impact of the proposed works on the nearby sensitive receptors.

Yours sincerely  
For ByrneLooby,



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Maurice Ryan BE(Hons). MSc. CEng. MIEI.  
Technical Director





## **Appendix A – Drawings**



## **Appendix B – Delivery and Servicing Management Plan**



