An Taisce – The National Trust for Ireland

Planning Decisions
Planning Dept.
Dublin City Council
Civic Offices
Wood Quay
Dublin 8

18 August 2014



Re: Proposed redevelopment of ESB office, Lower Fitzwilliam Street, Upper Mount Street, James's Street East and Lower Baggot Street, Dublin 2 (site includes Protected Structures)

Planning Ref. 3052/14

Dear Sir or Madam,

Thank you for referral of the above inviting comment.

APPLICATION SITE PROVISION
The application site has the Z8 conservation-oriented zoning which is to *"protect the existing architectural and civic design character, to allow only for limited expansion consistent with the conservation objective"*, is a designated Conservation Area where Development Plan Policy FC41 is *"To protect and conserve the special interest and character of ... Conservation Areas in the development management process"*, includes and adjoins many Protected Structures where Policy FC30 will protect these structures and their setting from *"any works that would cause loss or damage to their special character"*, and is the subject of a Development Plan Variation (No 16) – see below.

NON-COMPLIANCE WITH DEVELOPMENT PLAN VARIATION NO 16
The proposed development is seriously at variance with this clause and other relevant provision of the Dublin City Development Plan 2011-17. Variation No 16 provides:

> *"To promote an exceptional urban design and architectural response in relation to any proposed redevelopment of the ESB Headquarters site on Fitzwilliam Street Lower, which respects and enhances the character and composition of the Georgian streetscape in terms of the solid to void ratio, the rhythm of windows and doors, the proportion and scale of the ground floor storey to the upper storeys, parapet height, the quality and craft of material and finishes*

(including brickwork), the relationship with the public realm, (including the degree of public access) the way by which the building holds the Georgian Street line, together with the long term durability and environmental sustainability of the building, all in accordance with the Urban design principles set out in Chapter 16.1."

The proposed façade to Fitzwilliam Street, in particular the mid and southern sections with their extensive use of full-height window opes, does not constitute an exceptional urban design and architectural response and does not maintain the character and composition of the Georgian streetscape and its solid-to-void ratio, having regard to the consistent, classical design of the area and is further at odds with Policy SC30 of the Development Plan which is *"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"*.

The proposal to 'reinterpret' the Georgian architecture of Fitzwilliam Street is unsatisfactory having regard to Variation No 16, to the various conservation provision relating to the site, to its key location within the sequence of streets and spaces regarded as the high point of urban planning in Ireland and along the "Georgian Mile", one of the longest terraces of its kind in the world.

Scale and bulk: The proposal steps up excessively to the rear, overdeveloping the highly sensitive Z5 Georgian site and overwhelming the setting of surrounding four-storey Protected Structures which dictate the scale and design of the area. The proposal would unbalance the very specific scale of Georgian Dublin, appearing to 'pile up' in the south-eastern corner of Merrion Square, and as such would be inconsistent with the international conservation charters whose aims are to retain, recover and reveal the significance of heritage.

The proposal in this regard would further be contrary to the "limited expansion" allowed for under the Z5 conservation zoning of the site and to the protection afforded to the setting of Protected Structures under Policy FC30. The applicant's approach of stepping up the development towards the adjacent eight-storey block of the former Bank of Ireland building across James's Street East would erode the one-off, landmark function of this building, which is a Protected Structure, and would detract from its setting.

Antennae structure to roof: The current building has a large telecommunications antennae structure on the roof which represents a highly visually injurious element in a street and district of great historic and architectural sensitivity, being particularly visually intrusive when viewed from Merrion Square. The object, in any redevelopment at the site, should clearly be for removal or concealing of any similar such structure that might be needed. Incredibly though, the applicant proposes a similar antennae, highly visible in a different location on the roof (though this antennae structure has been faintly and unrealistically represented in the applicant's 'Visual Assessment' photomontage submission so that its impact is not properly conveyed). Suffice to say, a structure of this type would not be appropriate in the Z5 Georgian area.

Photomontage views: The applicant's 'Visual Assessment' photomontage submission illustrates many of the problems associated with these type of studies:

- faint depiction of proposed development in relation to surrounding townscape
- assembly of large number of views so that key impacts are lost among many unnecessary views
- use of large wide angle lenses so that perspective falls away quickly and prominence is given to extensive unnecessary immediate foreground areas

The object in development photomontages is not to make the most flattering, viewer-friendly image of the proposed development. It is simply to show what it will realistically look like in its setting and where it can be seen from.

CONTRARY TO 'THE FUTURE OF THE SOUTH GEORGIAN CORE' DOCUMENT
The current proposal for a large office development at Fitzwilliam Street (with a small portion of residential use to Upper Mount Street) is contrary to the Dublin City Council document 'The Future of the South Georgian Core' (2012) which outlines a vision for a return of the south Georgian area to a residential district.

Following introduction of a levy exemption for residential conversion of Protected Structures, as recommended in the document, a significant uptake was seen in 2013 for change-of-use applications from office to residential in the south Georgian core of the city.

In this context increased residential provision at the application site - in particular fronting Fitzwilliam Street (comparable to Edinburgh where apartments in premium Georgian streets are highly sought after), with appropriate separation from commercial elements - would be in line with the current stated vision for the area.

It is noted in the document that residential regeneration of Georgian Dublin has major benefits for local businesses and investment in the wider historic fabric of the area. There is thus a clear impetus for residential use along Fitzwilliam Street, which would also maintain individual front-door use (we note also in this regard that, due to the large size of the site, the context for universal access is not the same as it would be for individual terrace Georgian properties).

The whole thrust 'The Future of the South Georgian Core' document is the fostering of a situation where families and young people would be encouraged to move back to Georgian Dublin, and this is complemented by Development Plan Policy FC51 which is *"To identify and implement positive measures for the enhancement and regeneration of the historic city, improve its physical condition and presentation, sustain its character and authenticity."*

However, even before publication of the 'Future of the South Georgian Core' document, it was clear from reading the additional notes on the Z8 zoning objective contained in the Development Plan written statement that office was not the favoured use in the Z8-zoned Georgian cores of Dublin:

> *"The Lands zoned objective Z8 incorporate the main conservation areas in the city, primarily the Georgian squares and streets. The aim is to protect the architectural character/ design and overall setting of such areas. A range of uses is permitted in such zones, mainly residential, as the aim is to maintain and enhance these areas, as active residential streets and squares during the day and at night time. Office may be permitted where they do not impact negatively on the architectural character and setting of the area."*

Also required is that that *"a minimum of 60% of the floorspace on each site [in the area] shall be residential."* It is further noted that *"In the case of new build or redevelopment of buildings which are not Georgian"*, which is applicable to the application site, *"the 40% limit on the proportion of office use may be relaxed if the development contributes to enhancing the existing architectural and civic design character."* Since the new-build involved in the proposed development (representing the majority of the proposal) contains no residential use at all and due to its inappropriate scale and design does not, it is submitted, enhance the existing architectural or civic design character it is seriously at variance with the Development Plan zoning objective for the site.

CONCLUSION

The proposed development is fundamentally flawed, seeking a large-scale commercial floorspace scheme at a time when a residential vision has been outlined for the subject area, and at a scale and density that does not preserve the character and setting of the of the internationally significant Georgian area of Dublin in which it is sited ('Historic City of Dublin' is now on the World Heritage Tentative List) and that of the individual Protected Structures in the vicinity. As such it is considered that the proposal as a whole would be contrary to a range of provision of the Dublin City Development Plan 2011-17 as outlined in this submission and should be refused permission.

Yours sincerely,

Kevin Duff
Dublin City Association