



THORNTON O'CONNOR
TOWN PLANNING

Response to Dublin City Council's LRD Opinion

**In Respect of a Planning Application for
a Large-Scale Residential Development
Primarily Comprising Student
Accommodation at Nos. 87-93 Middle
Abbey Street, Dublin 1, D01 NH70
(known collectively as 'Independent
House')**

On Behalf of Summix IHD Developments Limited

April 2025

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1.0 INTRODUCTION

On 18th November 2024, Thornton O'Connor Town Planning on behalf of Summix IHD Development Limited submitted a pre-application LRD consultation request to Dublin City Council. The purpose of this document is to provide a summary response to the specific information requested by Dublin City Council in their Notice of LRD Opinion (Ref. LRD6075/24-S2) dated 4th January 2025, further to a meeting held on 9th December 2024 with Dublin City Council and the Applicant/Design Team.

This Notice states that it is the Planning Authority's determination that the documents submitted with the request to enter into consultations constitutes a reasonable basis for an application for Large-Scale Residential Development subject to certain issues/areas to be addressed by the Applicant and Design Team. The key issues /areas that must be addressed in any future application are provided below.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the Applicant and the wider Design Team. Therefore, this report **must** be read in tandem with these materials.

1.1 SUMMARY OF DEVELOPMENT

The full description of the proposed development, as described in the Statutory Notices, is as follows:

"Summix IHD Developments Limited intend to apply to Dublin City Council for a permission for a Large-Scale Residential Development principally comprising Student Accommodation at this c. 0.3 Ha site at Nos. 87-93 Middle Abbey Street, Dublin 1, Do1 NH70 (known collectively as 'Independent House'). The site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. The site comprises 6 No. interconnecting, long-standing vacant structures as follows: (a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as Independent House, with a single storey workshop building to the rear; (b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as Emerald Chambers; (c) a triple height (at basement level) structure towards the centre of the site, known as the 'Printing Hall'; (d) a 2 No. storey (above basement level) warehouse and office fronting William's Lane; (e) a part 3 No. to part 4 No. storey (above basement level) loading bay and office fronting Prince's Street North; and (f) a 3 No. storey (above basement level) office in the eastern portion of the site, bounded by Penneys. The site includes 2 No. Protected Structures (RPS Ref. Nos. 18 & 8797).

The development's surface water and foul water drainage network shall discharge from the site into the existing combined sewer located along Prince's Street North to the north-west of the site. A new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North are proposed. Public realm improvements are also proposed to William's Lane. The development site area, drainage works, road works and public realm improvements will provide a total application site area of c. 0.33 Ha.

The development will principally consist of: the retention and refurbishment of part of the building façade along Prince's Street North; the demolition of the 3 No. former warehouses and offices (c. 5,270 sq m) and the lowering of part of the basement level thereat; the demolition of part of the adjoining wall to the north-east of the site, bounding the Penneys loading bay; the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m); the removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor-to-ceiling height at fourth floor level; the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access; refurbishment works to the Protected Structures including general internal and external works for conservation repairs, maintenance, change of use and upgrading of the buildings; and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures and principally comprising 316 No. Student Accommodation bedspaces (267 No. standard rooms, 5 No. accessible rooms, 2 No. twin studios (4 No. bedspaces), 10 No. accessible studios and 30 No. single studios) with associated facilities, which will be utilised for short-term let during student holiday periods. The 272 No. standard and accessible rooms are provided in 42 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (c. 644 sq m); 3 No. retail units (c. 216 sq m); a café/restaurant (c. 254 sq m); bicycle stores at basement and ground floor levels; visitor cycle parking spaces; bin stores; ESB substation; hard and soft landscaping; green/blue roofs; new telecommunications infrastructure at roof level, together with all associated equipment; boundary treatments; PV panels; plant; lift overruns; and all associated works above and below ground. The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level."

2.0 RESPONSE TO THE DUBLIN CITY COUNCIL OPINION

	Item to be Addressed	Response
2.1 PLANNING CONSIDERATIONS		
a)	The Planning Authority raise concern regarding the visual impact of the proposal on the wider vicinity of the site. Image 5 (Temple Bar) of the submitted visualisations show the significant impact of the proposal on the receiving environment. The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from the south Quays. In addition, it is requested to provide a bird's eye view/3D photomontage(s) of the subject site in relation to other recently granted planning permissions (i.e. Hammerson's Dublin Central Sites and Arnotts site) to facilitate a comparative study between the subject site and the future receiving environment.	The zone of theoretical visibility (ZTV) map included in the accompanying <i>Townscape and Visual Impact Assessment</i> shows that due to the density of built form surrounding the site and the concentration of the proposed built form/height away from Middle Abbey Street (behind Independent House and Emerald Chambers), <u>the area from which the proposed development would be visible is limited</u>. For a development of its scale, the visual impact of the proposal on the wider vicinity of the site would be limited. Temple Bar is an example of this. The <u>only</u> areas in Temple Bar potentially affected by the proposed development are Bedford Row/Anglesea Street and a short stretch of Aston Place. While the intrusion of the building in views north along Bedford Row/Anglesea Street would be notable (e.g. Viewpoint 5), seen at a distance of over 250 metres, this would not constitute a significant impact. The building would clearly be well outside of the Temple Bar character area in the foreground and would form part of the diverse and evolving city centre backdrop. The view from Bedford Row/Anglesea Street is not protected and the change in the view is not inappropriate for the location in our opinion. Nonetheless, it is important to recognise that the vast majority of Temple Bar would be unaffected by the proposed development. As requested, additional photomontages have been provided for positions on the south quays. Viewpoint 18 is to the south-east at Butt Bridge. Viewpoint 19 is to the south-west at Millennium Bridge. These complement Viewpoints 1 and 4, so that in total, four photomontages are provided from the south quays.

		As requested, two bird's eye photomontages have been provided, showing the proposed development in relation to other recently granted planning permissions in the area. Please refer to the <i>Aerials, CGIs and Verified Views</i> prepared by 3D Design Bureau for the updated and additional photomontages.
b)	The Planning Authority has serious concerns regarding the provision and positioning of new telecommunications equipment on a highly visible location near the parapet edge of the protected structures. The submitted CGIs/photomontage demonstrate the negative visual impact of this equipment which will be visible some distance from the site (CGI 5 Temple Bar). The Applicant is requested to relocate the equipment to be out of sight / reduced or a less visible location where possible so that they are not visible from principle elevations / more sensitive parts of the streetscape.	The proposed telecommunications equipment on the roof has been substantially reduced in extent (from two clusters of antennae to one) and repositioned from the southern edge of the new building's roof to the northern edge. This has shifted the antennae out of view from Middle Abbey Street and substantially reduced its visibility in views from the south (including Views 2 and 3 on D'Olier Street and View 5 in Temple Bar). To function properly, telecommunications equipment cannot be positioned out of sight. It must be at a height and close to the parapet. Therefore, some degree of visibility/visual impact is unavoidable. However, in response to DCC's request, the proposed telecommunications equipment has been redesigned. The quantity has been significantly reduced and positioned so that it is more concealed and less unsightly (in isolation). They have also been painted to match the external façade features in order to minimise their appearance and visual impact from street and other elevated levels.
c)	The Applicant is requested to continue to liaise with DCC Arts office and submit any updates on potential end users within an updated Cultural Infrastructure (Impact) Assessment as part of the next stage.	The <i>Cultural Infrastructure (Impact) Assessment</i> has been updated by Turley and is submitted herewith. Turley have confirmed that they have continued their engagement with Dublin City Council Arts Office (Ray Yeates and Sinéad Connolly) regarding potential end users within the proposed cultural/community space.

		Additionally, a number of other engagements have been undertaken with the following potential operators and artform experts: • Former Director, Dublin Theatre Festival (Willie White) • Abbey Theatre (Mark O'Brien) • Luail (Miranda Driscoll) • Royal Hibernian Academy of the Arts (Patrick Murphy) • Pallas Projects (Mark Cullen) • Beyond the Pale (Declan Forde) • Give Us the Night (Sunil Sharpe) Initial information about the space was shared with the following operators, however, no response has been received to date: • Animation Ireland • Giant Animation • Dublin Circus Project Please refer to Section 7 of the <i>Cultural Infrastructure (Impact) Assessment</i> for details of the uses that have been ruled out and those under further consideration. In summary, the Applicant has narrowed down the potential community/cultural uses of the space to two or possibly three primary proposals: 1) A theatre or dance rehearsal space, with associated storage and administrative offices, with the potential for the space to also function as a small performance venue. 2) A dedicated cultural venue space, associated more directly with programmed gigs and performances, or a commercial or semi-commercial "club" or performance venue. 3) A fully commercial/natural heritage attraction, at present the details of which cannot be further divulged due to commercial sensitivities.
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		As concluded in the <i>Cultural Infrastructure (Impact) Assessment</i>, the feasibility of these options requires further consideration of the space's design, governance and operational model, including specialist consideration of lighting and sounding mitigation measures, whilst respecting the heritage characteristics of the space. This feasibility work and operator input cannot take place until post-planning and at detailed design stage as a potential user identified today may have found space elsewhere in the next few years between now and completion of the development, between the timeframes involved in securing planning permission, agreeing compliance conditions and then constructing this sensitive site.
2.2 TAFFIC AND TRANSPORT		
a)	i)	The applicant should provide a response to Objective SMT010 'Walking and Cycling Audits in order for this Division to ensure the development complies with Policy SMT16. The outcome of the Audits should inform the proposed works to the public realm to demonstrate how the development integrates with the immediate street context for pedestrians and cyclists A Quality Audit including a walking and cycling audit was carried out and is submitted herewith under the document entitled '<i>Quality Audit Inclusive of Stage 1 Road Safety Audit</i>'. All recommended measures and appointed problems were assessed to ensure the development will integrate with the existing pedestrian and cyclist environment. As demonstrated in the table responding to all relevant policies, objectives and sections of the <i>Development Plan</i> in Section 8.0 of the <i>Planning Report & Statement of Consistency</i> prepared by Thornton O'Connor Town Planning, the proposed development accords with Policy SMT16.
	ii)	The applicant is to ensure at stage 3 LRD application stage that all bicycle parking and floor area figures are consistent across all documentation and drawings. All bicycle parking figures are consistent across all submitted documentation.
b)	i)	The applicant should clarify using detailed drawings all proposed changes to the public road. The applicant should note that alterations to the public road must be agreed in writing with Dublin City Council Transportation Planning Division prior to submission of the LRD application. Details of the proposed changes to the public footpaths/roads can be found in Drawing No. 'IHSA-WMC-ZZ-XX-DR-C-P105' prepared by Waterman Moylan Consulting Engineers. The proposed changes to the public footpaths/roads have been agreed with Dublin City Council Transportation Division prior to the submission of this Application, with Dublin City Council providing a Letter of Consent in this regard.

	ii) Having regard to the proposed change of intensity in front of the application site, proposed pedestrian crossings and intended delivery strategy including reversing movements along Prince's Street, the applicant should prepare a Stage 1 Road Safety Audit. All issues arising from the Stage 1 RSA should be addressed prior to lodgement.	Please refer to the <i>Quality Audit Inclusive of Stage 1 Road Safety Audit</i> prepared by Road Safety Matters Ltd. All recommended measures and appointed problems were assessed to ensure the development will integrate with the existing environment.
	iii) The submitted ground floor plan indicates outwards swinging doors across the public road which has the potential to create a pedestrian hazard and reduce the pedestrian footpath with the use of guardrails. A revised ground floor plan should be submitted addressing this concern.	Please refer to Drawing No. 'P 1010' prepared by Henry J Lyons which demonstrates that all doors along the public road are recessed except for the ESB substation doors which cannot be recessed any further or inward swinging doors due to ESB requirements.
c)	i) The submitted Delivery and Service Management Plan should be updated to include information on the number, type and frequency of delivery vehicles envisaged for the development and proposed uses.	Please refer to Section 3.6 of the updated <i>Delivery and Service Management Plan</i> prepared by Waterman Moylan Consulting Engineers for details of the number, type and frequency of delivery vehicles envisaged for the proposed development.
	ii) The applicant should submit a traffic survey to establish if the existing loading bay on Middle Abbey Street is sufficient enough to service the site or if the existing loading bay on Middle Abbey Street needs to be extended.	Please refer to Section 3.7 of the updated <i>Delivery and Service Management Plan</i> prepared by Waterman Moylan Consulting Engineers for details of the capacity of the existing loading bay along Middle Abbey Street. In summary, the occupancy survey carried out in January 2025 demonstrated that the existing loading bay has adequate spare capacity to accommodate the operational service traffic predicted to be generated by the proposed development.
d)	i) It is not clear from the submitted documentation how a universal design vehicle (2.8m long x 1.2m wide) can manoeuvre from the public road to the basement level spaces. The applicant should clarify this.	Please refer to Section 6.5 of the <i>Architectural Design Statement</i> prepared by Henry J Lyons for details of the proposed bicycle parking. The access arrangements to the bicycle store at basement level has been designed to be universally accessible. The bicycle lift has been sized appropriately to

		accommodate universally designed vehicles and the lobby to the lift has been designed so that a universally designed vehicle can manoeuvre from William's Lane to the designated bike store.
ii)	The applicant should provide detailed drawings on the type of double stack of the bicycle parking, including manufacturing details.	Please refer to Section 6.5 of the <i>Architectural Design Statement</i> prepared by Henry J Lyons for details of the proposed double stacked bicycle parking.
iii)	The applicant should clarify the quantum of e-bike spaces and details of the associated infrastructure proposed.	E-bike charging facilities has been accounted for in a separate room adjacent to the resident bicycle store at basement level. This room will provide an e-charging locker which has 8 No. compartments (approximately 600 mm x 400 m) to facilitate an e-bike's battery to be charged. Residents will be able to park their e-bike in one of the 4 No. Sheffield stands (8 No. spaces) in the dedicated bicycle store whilst its battery is being charged.
iv)	The applicant should indicate the location of the staff bicycle parking for the commercial and community units in the building.	The bicycle parking for the staff of the proposed retail units, café/restaurant, cultural/community space and student accommodation are proposed within a dedicated bike store at the ground floor of the building, accessed via William's Lane. The bike store area will provide 10 No. spaces and 2 No. staff shower facilities. Please refer to Drawing No. 'P 1010' prepared by Henry J Lyons for details of the proposed staff bicycle parking.
v)	The applicant should indicate the proposed lighting and additional bicycle infrastructure to ensure routes to and from the bicycle parking area is safe and easy to use. The applicant should consider the provision of stair rails.	An internal lighting design would not form part of the design at this stage of the application and will be considered at post-planning stage. However, Henry J Lyons can confirm that the bicycle store will be well lit and will comply with minimum lux levels. Section 6.5 of the <i>Architectural Design Statement</i> provides details of the safe and easy route to the basement level bicycle store. Stair rails have been proposed for the stairs dedicated for access to the bicycle store.

	vi) The designation of bicycle spaces is unclear and should be clarified. Equally, not one student should have access to all bicycle spaces and should be grouped internally.	The large bike store at basement level has been subdivided into 3 No. separate areas so that not one student can access all of the bicycle spaces. It is not feasible to separate any further areas due to fire safety regulations.
	vii) There are no shower facilities illustrated within the retail/ community/ commercial units for staff. This should be provided.	The bike store for the staff of the proposed development will provide 2 No. staff shower facilities. Additionally, the staff of the student accommodation are provided with their own shower facilities at basement level and is adjacent to the staff welfare room.
2.3 DRAINAGE – SURFACE WATER MANAGEMENT		
a)	The blue roof and green roof areas shall be maximised, with blue roof below plant if possible and an intensive green roof to be considered. The DCC Green and Blue Roof Guide 2021 shall be adhered to.	Green and blue roof areas are maximised where it is possible, with all the flat roofs and terraced areas being used as green or blue roofs. Please refer to the <i>Storm Water Management Plan</i> and Drawing No. 'IHSA-WMC-ZZ-XX-DR-C-P111' prepared by Waterman Moylan Consulting Engineers for further details and locations of the green and blue roofs, which have been designed in accordance with the <i>Dublin City Council's Green and Blue Roof Guide 2021</i> .
b)	If rainwater harvesting is to be considered on site, the Applicant to include its volume in the attenuation calculations.	Please refer to the <i>Storm Water Management Plan</i> and <i>Engineering Assessment Report</i> prepared by Waterman Moylan Consulting Engineers.
c)	The required Basement Impact Assessment and Flood Risk Assessment to be submitted to the Drainage Section prior to the formal submission of the next stage, to allow for a review and provide feedback.	We can confirm that the <i>Flood Risk Assessment</i> and the <i>Basement Impact Assessment</i> have been submitted to Dublin City Council's Drainage Section prior to the submission of this Application. All feedback provided have been taken into account in the updated documents.
2.4 ARCHAEOLOGY		
a)	In accordance with the current Dublin City Development Plan policies, objectives and standards, it is our opinion that an	IAC Archaeology consulted with DCC Archaeology regarding the request for wall-render stripping and testing (28 th January 2025) and to confirm that Fred Hamond

	updated archaeological assessment report with the results and analysis of archaeological testing and wall-render stripping should be submitted to inform the S3 application. This report should be prepared accordance with Section 3.6 of the Framework and Principles for the Protection of the Archaeological Heritage (1999). It should contain a carefully researched and referenced analysis of site.	had been appointed to carry out the Industrial Heritage Survey and that the requested photomontages were being prepared. In this correspondence, IAC Archaeology also noted that it was not possible to carry out archaeological testing and wall-render stripping within the existing basement due to the health and safety constraints presented by a large amount of asbestos and potential structural issues of breaking and excavating through the reinforced basement floor of what is a derelict structure. The following is noted by IAC Archaeology and was acknowledged by DCC Archaeology on 30th January 2025 and 6th February 2025: <i>"Based on the current derelict state of the site, the fact that c. 3m of the original ground surface has already been removed and the clear H&S issues relating to asbestos, we do not feel it is appropriate or possible to carry out fieldwork on this site and in turn put the safety of our staff at risk. In order to carry out testing, which the developer has committed to undertaking prior to construction, an enabling works contract will be needed, which will ensure that asbestos is removed prior to works, by the relevant specialist contractors. In addition, the structural safety measures can be assessed and mitigated within an enabling works contract, prior to excavating through the reinforced slab and carrying out analysis of potentially earlier basement walls. These H&S requirements, are well beyond the scope of services that any archaeological contractor can provide."</i> The <i>Archaeological Impact Assessment</i> that has been produced as part of this submission, is in accordance with Section 3.6 of the Framework and Principles for the Protection of the Archaeological Heritage (1999) and contains a carefully researched and referenced analysis of site. The assessment details potential impacts on the archaeological resource and provides mitigation measures, which the developer has committed to.
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b)	An Industrial Heritage survey and evaluation of the contents/fabric of Independent House should be prepared by a suitably qualified and recognised IH expert giving recommendations for the appropriate reuse of Industrial Heritage features in the proposed development. The applicant should seek to retain, maintain and conserve as much of the industrial fabric as possible in accordance with policy BHA16.	Please see the <i>Industrial Heritage Study</i> prepared by Fred Hamond for full details of the Industrial Heritage of the subject site.
c)	At nine stories in height the development could have a negative visual impact on the National Monument on Moore Street, associated with the Easter Rising of 1916. For this reason CGIs / photomontages of the proposed development viewed from the Moore Street National Monument are requested. This should be accompanied by an assessment of the visual impact.	There has been no reduction in the height of the proposed development which remains as a part 1 No. to part 9 No. storey above basement level building. The National Monument buildings, Nos. 14-17 Moore Street, are located c. 185m to the north of the proposed development. A new Verified View Montage has been prepared by 3D Design Bureau and enclosed in the <i>Aerials, CGIs and Verified Views</i> which includes for a position directly outside of the National Monument buildings on Moore Street. As demonstrated in the <i>Townscape and Visual Impact Assessment</i>, the proposed development, which retains the 9 No. storey elements as submitted previously for the Stage 2 Pre-Planning Meeting, would not be visible from the National Monument buildings on Moore Street (Viewpoint 20) and will not experience any visual effect.
d)	The information to be submitted at S3 will inform the appropriate archaeological and industrial heritage mitigation for the development. The consultant archaeologist and IH expert should consult with the Archaeology Section of Dublin City Council in preparing the S3 report.	The information within the <i>Archaeological Impact Assessment</i> has remained largely the same as what was submitted for the Stage 2 Pre-Planning Meeting as no further fieldwork could be carried out due to health and safety concerns. However, this was acknowledged by DCC Archaeology on 30 th January 2025 and 6 th February 2025 after IAC Archaeology had clarified the restriction of providing additional archaeological information at this stage of the Application.
e)	Please note that subject to planning permission being granted, the archaeology and heritage reports prepared for planning	This is noted.

	must be revised and reviewed by the Design Team and resubmitted for comment to DCC Archaeology for comment as the design detail of the scheme emerges. These reports should be used to inform the preparation of any contract documentation.	
2.5 CONSERVATION		
a)	All effort shall be made to ensure that the proposed works will be designed to cause minimum interference to the Protected Structure and fabric.	The submitted scheme is intended to celebrate the character of the former Independent Newspaper Group structures and, where possible, all features of heritage interest will be retained. The alterations to give effect to the new building use, including the integration of building services, have been considered in detail to minimise the impact on the Protected Structures. Please refer to the <i>Architectural Heritage Impact Assessment</i> prepared by Molloy & Associates Conservation Architects for further details.
b)	All sound historic material should be reused as far as practically possible. The applicant shall seek to upgrade as much of the historic fabric as possible rather than replacement.	It is intended to retain and reuse as much of the original building fabric as possible. Naturally the new building use will require upgrading of fire rating and thermal performance of the building fabric; this will be undertaken in a manner that is compatible with the historic building fabric. It is hoped to retain and reuse the existing concrete and steel structure throughout, subject to structural testing. Please refer to the <i>Architectural Heritage Impact Assessment</i> prepared by Molloy & Associates Conservation Architects for further details.
c)	The Applicant to revise the drawings so that demolition / fabric removal is clearly shown on drawings with all demolition / fabric removal highlighted in red.	Please refer to the suite of Architectural Drawings prepared by Henry J Lyons which demonstrates that the proposed demolition of fabric is now shown in red.
d)	The Applicant to submit a clear set of fabric removal general arrangement drawings alongside existing and proposed drawings.	A full suite of existing, fabric removal & proposed drawings have been prepared by Henry J Lyons as part of this application.

e)	The labelling of drawings to be revised to describe the full extent of what is included in the drawing in the title rather than just the drawing number. These drawings need to be very clearly labelled in the planning submission to avoid confusion.	Please refer to the suite of Architectural Drawings prepared by Henry J Lyons which have been updated to describe the full extent of what is included in each drawing.
f)	It is requested to submit more larger-scale general arrangement drawings (plan, section etc) through the Protected Structures. Drawings to be clearly annotated/dimensioned in order to clearly see the extent of works proposed to the interior of the Protected Structures.	A full suite of additional drawings (works to the Protected Structure) at 1:50 have been prepared by Henry J Lyons.
g)	All alterations/repairs/fabric removal to the Protected Structures be clearly denoted on the drawings a large scale (1:50).	A full suite of additional drawings (works to the Protected Structure) at 1:50 have been prepared by Henry J Lyons.
h)	There is concern regarding the height of the new structure and its impact on the wider receiving environment, in particular the GPO and GPO Buildings. The Applicant is requested to consider a reduction in height of one storey along the Princes Street elevation.	There has been no reduction in the height of the proposed development which remains as a part 1 No. to part 9 No. storey above basement level building. The proposed height has not changed as it was considered by the Design Team that proposed height will integrate contextually within its immediate surroundings by providing similar heights and scale of recently constructed / permitted developments, whilst limiting the impact to the GPO, which is demonstrated in the various impact assessment submitted herewith. Although the tallest element of the proposed development is 9 No. storeys (above basement level), it is limited in terms of floor space and is necessary to provide internal student amenity space, plant and to facilitate access to the eighth-floor student amenity terrace and rooftop plant. We note that a greater portion of the adjacent permitted Arnott's Hotel Development (Reg. Ref. 4880/22) is 9 No. storeys. The gross floor area permitted for the Hotel Development was 11,438 sq m and the eighth floor (9 No. storeys) represents c. 21.7% of the total gross floor area

		at 2,481.8 sq m. The 9 No. storey element of the proposed development will only provide 230 sq m of gross floor space, which represents c. 1.49% of the total gross floor space of the proposed development and is significantly less than that permitted for the adjacent Hotel Development. The northern portion of the building provides various setbacks between sixth and eighth floor level. The closest part of the proposed building to the GPO is c. 2.7 metres lower than the maximum height of the GPO. The proposed building then steps back at sixth floor level, where it is generally the same height of the GPO building, before stepping back further at seventh floor level where the height of the building is c. 4 metres higher than the GPO and further again at eighth floor level where the height of the building (excluding plant) is c. 6.8 metres higher than the GPO. The stepped approach of the buildings heights transitions positively to the adjacent GPO building so as not to cause any overbearing impacts. Various assessments were carried out to determine the impact of the proposed development on the GPO building. We direct the Council to the <i>Townscape and Visual Impact Assessment</i> prepared by ModelWorks, which assesses the visual impact of the proposed development on the GPO. The only views in which the proposed development would be visible along with the GPO are views along Prince's Street North and from O'Connell Street at its junction with Prince's Street North. The four photomontages produced for views west along Prince's Street North (Viewpoints 11, 21, 12, 22) show that the nine storey elements of the new building would mostly not be visible in these views. The building would read as six storeys tall fronting Prince's Street North, stepping up to seven and eight storeys back from the street, away from the GPO. The <i>Townscape and Visual Impact Assessment</i> makes the following assessment of the potential impact from the proposed development along these Viewpoints: <i>"The development would have only positive effects on the GPO, by enhancing an important part of its townscape setting, i.e. Prince's Street</i>
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		<i>North, which currently is in poor condition and detracts from the setting of the GPO.” [Our Emphasis]</i> <i>“The photomontages show that the height of the proposal would not cause any negative effect on the GPO (e.g. by screening, ‘crowding’ or distracting from it). In views of the GPO (Viewpoints 11, 21), the GPO would remain the defining feature of the composition, with the proposed development a secondary element. In views from alongside the GPO (Viewpoints 12, 22), the proposed development’s main effect would be to enhance the streetscape of Prince’s Street North, and thereby enhance the townscape setting of the GPO to its benefit.” [Our Emphasis]</i> The assessment concluded by stating that <i>“the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O’Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity”</i>. The <i>Daylight and Sunlight Assessment</i> prepared by 3D Design Bureau has considered alternative massing proposals to try and balance the need to viably redevelop the site whilst delivering a scheme that has the least impact on the surrounding environment. Although there would be some impact in terms of daylight (Vertical Sky Component), the assessment notes that given the proximity of the subject site to the GPO site, <i>“some level of impact is inevitable if the subject site is to be developed in a viable manner”</i>. In terms of the impact to sunlight (Annual Probable Sunlight Hours/Winter Probable Sunlight Hours) we note that the Assessment states: <i>“sunlight access is less important in a commercial premises than it is in a residential property”</i> and that in an office, <i>“excessive sunlight can be considered a negative, particularly during the winter months, when it can lead to unwanted screen glare”</i>.
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		The Assessment ultimately concluded the following: <i>"The relationship between the proposed development and the GPO was a key consideration in the design of the proposed development. The primary focus of the daylight and sunlight assessment was to ensure a measured approach was taken regarding the potential impact on the GPO.</i> <i>It is the opinion of 3DDB that a balance has been achieved in delivering an appropriately dense development that will provide much-needed bedspaces for students within the city centre. Care was taken to minimize any unreasonable impact on neighbouring properties, with particular consideration given to the GPO, due to its historical and cultural significance."</i> Having regard to the above, it is firmly contended that there is strong merit in supporting the principle of part 1 No. to part 9 No. storey (above basement level) building as part of the redevelopment of the subject site. The proposal has sought to provide a development that both adheres to local planning policy and exceed minimum policy requirements whilst also assimilating into its receiving environment and ensuring the protection and enhancement of the Protected Structures and surrounding historic character, including the GPO building. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the GPO.
i)	It is recommended that the elevation treatment of the roof extensions be further refined. It is requested that additional detail be provided in relation to the design/elevation treatment/materials of the proposed roof extensions, particularly along Abbey Street. It is recommended to revise the proposed materials to a darker colour—lead/zinc/copper/bronze etc. The use of red cladding is inappropriate and not acceptable.	The roof extension previously proposed at Emerald Chambers has been omitted from the proposed development. We note that the roof level will be increased by c. 245 mm to provide sufficient floor-to-ceiling height at fourth floor level; however, the increase to the roof level will be confined below the existing parapet level and will not be visible from the streetscape.

	Additional CGIs of the proposed elevation treatment of the roof extension shall be submitted. The design of the new roofscape shall be carefully articulated to avoid monolithic and unsympathetic ('boxy') forms.	The form of the extension to Independent House has been revised and reduced in scale such that it constitutes a recladding and increased fenestration in the same form as the existing roof extension. This design choice aims to reduce the visual prominence of the structure, allowing it to subtly blend into the surroundings. The extension will be clad in PPC aluminium in dark grey/black which will help it recede into the background and does not interfere with the more intricate and decorative elements of the historic roofscape of Independent House.
j)	It is recommended that the windows and fenestration within the roof extensions relate to the proportions, vertical lines, rhythm and fenestration pattern of the windows on the Protected Structures below. This is also relevant for the Princes Street elevation. One and a half windows are not appropriate as they are associated with a more traditional suburban aesthetic. A fenestration pattern that relates to the special character and proportion of the windows of the early 20th Century façade is required.	The subdivision of the fenestration has been revised. The narrow side windows have been removed, and a simpler aesthetic is proposed to better complement the industrial aesthetic of the retained façade on Prince's Street North. The Design Team considers that it is important to distinguish between the restored fenestration and the new fenestration to avoid pastiche.
k)	There is concern that the façade retention of the protected façade at Princes Street is overly one-dimensional. The Applicant is requested to consider a refinement to the design so that some depth is provided and the façade is given a deeper / thicker edge as it turns the corner against Penneys Department Store. It would be preferable for the façade to read as a "book-end" - a 3D piece rather than a 2D façade.	The design of the corner has been amended to form a less one-dimensional arrangement. It is proposed to retain part of the gable of the existing building on Prince's Street North so that the retained façade is more substantial in appearance. A vertical window opening has been introduced to serve as a transition between the new and historic façades.
l)	The Applicant is recommended to undertake further investigation and consideration to the required services to facilitate the proposed development in order to ensure that all	Please refer to the suite of drawings prepared by OCSC for the initial coordination layouts for the Protected Structure elements, highlighting key services routes and strategies. The services have been stacked to minimise the requirement for lateral

	services required are identified co-ordinated and resolved sufficiently with the extant historic structure.	circulation through the existing buildings, and have carefully been routed through the structures to avoid interfering with fabric of particular heritage interest.
m)	It is requested that the language within the Architects' Statement be reconsidered and reviewed in a manner that will highlight and adequately describe the positive attributes and the uniqueness of the site.	The language within the <i>Architectural Design Statement</i> has been updated. There are many positive attributes to the proposal, including but not limited to retention and restoration, adaptation and sustainable reuse of key buildings on the site.
2.6 OTHER ITEMS		
	The relevant required documentation as set out in Table 15.1 of the Dublin City Development Plan 2022 — 2028 Planning Application Documentation - Planning Thresholds shall be provided in addition to the specified reports requested above and as outlined in the applicant's Stage 2 Planning Letter.	All required documentation set out in Table 15.1 of the <i>Development Plan</i> has been provided, in addition to other relevant documentation as outlined in Appendix A & B of the LRD Application Form 19 submitted herewith.

3.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in Dublin City Council's Opinion. We trust that this document fully responds to all of the points raised by Dublin City Council in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this currently underutilised, vacant, brownfield site.

Yours sincerely



Patricia Thornton
Director
Thornton O'Connor Town Planning