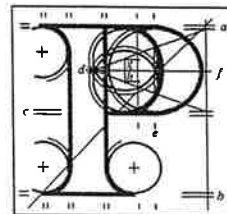


Our Ref: ABP-304028-19



**An
Bord
Pleanála**

Ailish Drake
Limerick Chapter of the Irish Georgian Society
Drake Hourigan Architects
Mona Lodge, Portcrusha
Montpelier
Co. Limerick

Date: 11th June 2019

Re: 10 year permission for opera site re-development including a mixed use scheme of primarily offices, supported by a range of retail and non-retail services, cafes/restaurants, licenced premises, apart-hotel, civic/cultural uses (including a city library in the existing town hall), residential, refurbishment of existing protected buildings and open space.
Site bounded by Michael Street, Ellen Street, Rutland Street, Patrick Street and Bank Place, Limerick.

Dear Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

A receipt for the fee lodged is enclosed.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7107

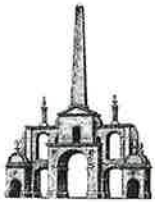
Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

AN BORD PLEANÁLA
LDG- 016305-19
ABP- _____
30 MAY 2019
Fee: € 50 Type: Cheque
Time: 10.55 By: Post

Limerick Chapter of the Irish Georgian Society

C/O Ailish Drake, Chairperson
Drake Hourigan Architects
Mona Lodge, Portcrusha,
Montpelier, Co. Limerick
T 087 6772602
E ailish@drakehourigan.com



**Irish
Georgian
Society**

Limerick Chapter of the Irish Georgian Society

C/O Ailish Drake, Chairperson
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Irish Georgian Foundation trading
as Irish Georgian Society.
Registered Charity Number: CHY
6372

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

29.05..2019

**Reference: PL91. 304028 Site bounded by Michael Street, Ellen Street, Rutland Street, Patrick Street and Bank Place, Limerick.
'Opera Site Redevelopment', Limerick City and County Council**

Dear Sir/Madam

The Committee of the Limerick Chapter of the Irish Georgian Society would like to make several observations on the planning application for the proposed development at the Opera Site in Limerick, reference PL91. 304028.

We would like to commend the approach taken to the conservation of the existing buildings on the site. The removal of the Architectural Conservation Area from this part of Newtown Pery in 2010 was a very negative step by Limerick City Council. It is very encouraging to see the new approach to the existing historic buildings on the site, which allows for both the conservation of the buildings individually but also recognizes their significance as a group of buildings and their importance to the remaining streetscape. There is reference to best conservation practice in the design brief and we would hope that this approach would be followed through. We welcome the library use proposed for the former Commercial Buildings (Town Hall) on Rutland Street.

Parcel 5 Bank Place

From the Architectural Design Statement *'The scale of these buildings, and the Hunt Museum on the opposite side of Rutland Street, demanded a careful exploration of the elevational treatment and massing of the new tower, whilst an assessment of the project's visual impact from further afield demonstrates that the scheme achieves a delicate balance between consideration for the existing buildings and a requirement for an ambitious and modern vision for Limerick City.'*

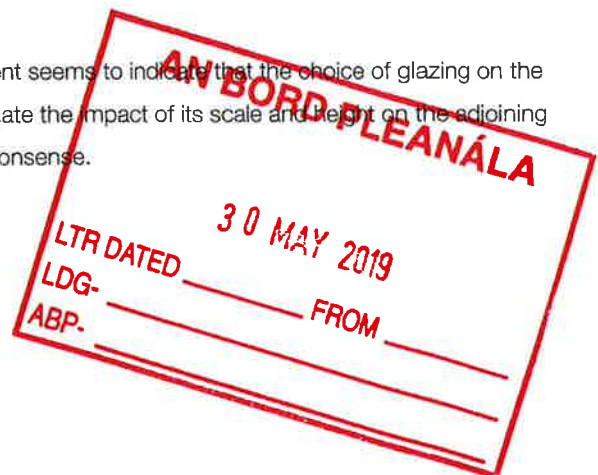
It is our view that the building is very tall at fourteen storeys and is certain to loom over this part of the city and have a negative visual effect. Bank Place retains the gable façade of the Granary as well as the three remaining townhouses and the proposal completely ignores the scale of these buildings. Furthermore, the former Customs House (The Hunt Museum) is immediately adjacent on Rutland Street and will also be significantly affected.

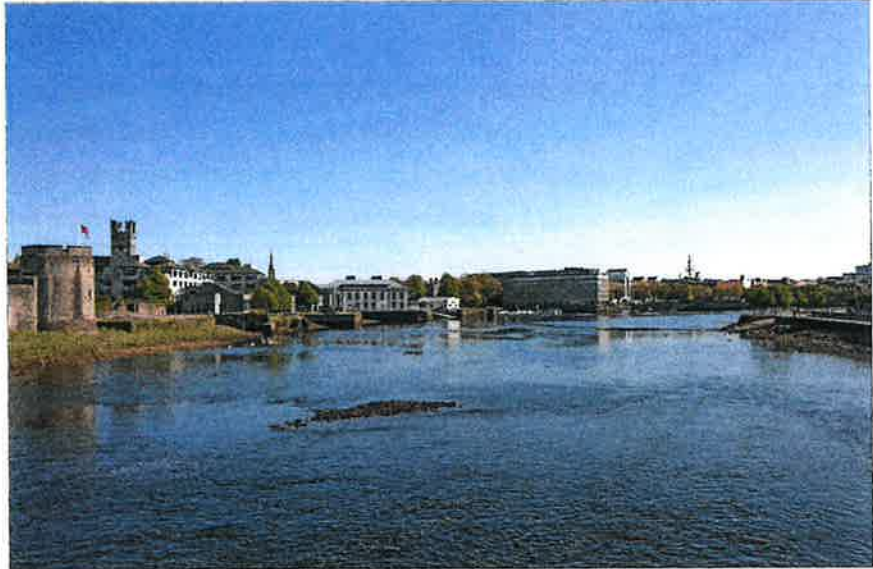
The conservation section of the EIAR of the application concurs with this assessment and acknowledges

"The proposed building to Bank Place (Parcel 5) will have a high visual impact on Bank Place and the immediate surrounding area. The proposed building is 14 storeys in height, and therefore considerably exceeds the ridgelines of the historic buildings in this area."

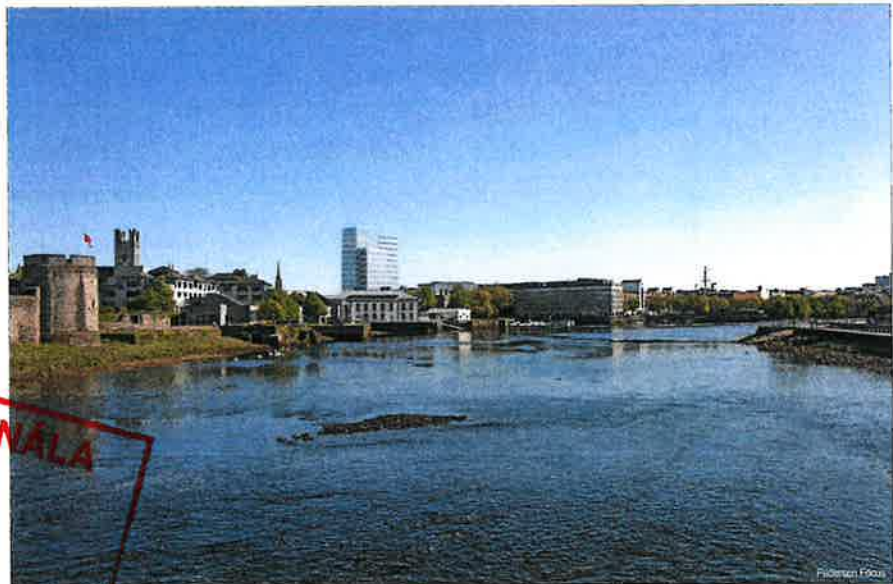
It is striking that the conservation section of the EIAR (Chapter 18) however makes no reference to the impact of the proposed tower on the adjacent historic buildings close to the site such as the former Customs House (The Hunt Museum). The assessment also make no reference to the wider impact of the tower on the historic riverfront and has nothing to say about the photomontages prepared to show this impact.

Furthermore, the visual assessment seems to indicate that the choice of glazing on the base of the new building will mitigate the impact of its scale and height on the adjoining historic buildings. This is clearly nonsense.





View 12 - Existing



View 12 - Proposed

AN BORD PLEANÁLA
 30 MAY 2019
 LTR DATED _____ FROM _____
 LDG- _____
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As well as the impact on the immediate surroundings, a building of fourteen storeys has a negative impact on the wider views around Limerick. The photomontages included with this application show views from Thomond Bridge and Clancy Strand. Views 12 existing and proposed above contain from left to right; King John's Castle, St Mary's Cathedral, St John's Cathedral (in the distance), the Court House and the former Customs House (The Hunt Museum). These are civic and cultural buildings and are the physical expression of Limerick's cultural heritage over the last eight hundred years. Into this

riverscape a new building is to be introduced. It is taller by far than any other building and yet it has no civic function. It is not open to the public and is solely for commercial office use. The new office building makes a hugely negative impact on this historic view of the city. It is a vertical version of the hideous groundscraper that is Sarsfield House. This monstrous carbuncle should not be used as a typology to allow the construction of further architectural eyesores.



View 13 - Existing



View 13 - Proposed

AN BORD PLEANALA
30 MAY 2019
LTR DATED _____ FROM _____
LDG- _____
ABP- _____

Views 13 existing and proposed above show how the setting of the Hunt Museum is completely compromised by the tower, and does not achieve the *'delicate balance between consideration for the existing buildings and a requirement for an ambitious and modern vision for Limerick City.'* This is a commercial office development. It adds little of significance to the fabric of the city, it is not a large public or cultural building (like a courthouse or library) and yet presents itself as a landmark.

Finally, we would like to make reference to the proposed uses on the site. The Opera site is a full city block. It should reflect a broad range of uses and reinforce the idea of making Limerick a liveable city. The proposed uses are predominantly office space. Residential is given only a cursory indication in the design brief synopsis (2.0 Project Brief and Design Drivers)

to provide a primarily office-based scheme complimented by a range of other uses, including inter alia retail/ commercial, educational, civic/cultural, hotel, restaurant/bars and residential uses

The plans include 15% residential, however this is broken into 4.16% actual residential use (21 No. Apartments) and 10.43% to be used as an aparthotel. The aparthotel element of the scheme should not be classed as residential as it is in fact commercial short-term accommodation and cannot satisfy any future long-term housing need in the city centre.

Residential occupancy is at an all time low in Newtown Pery. This is in the middle of a national housing crisis. The Washington Charter for the conservation of historic towns says that, *"the improvement of housing is one of the basic objectives of conservation"*. It is vital that the local authority take a long-term strategic view of the uses on this site. Modern cities are plagued by large areas of commercial offices, 'the business district', which retain activity during the day but at night become unoccupied wastelands. While we welcome the inclusion of residential use in the existing Georgian town houses, we would argue that 4.16% residential is not enough for an entire city block.

Phasing over 10 years.

There is proposed phasing plan included in the masterplan document. (13.0 Phasing, Implementation and Delivery) It is proposed to carry out demolition and build the basement first. Phase 2 includes the 14 storey tower and works to the Granary. The last

phase includes the conservation works to the historic buildings on the site, restaurant and the small residential element of the scheme. This phasing plan indicates that Limerick City and County Council are not serious about tackling the conservation works required to the existing buildings or providing the residential element of the scheme. It would be a travesty for Limerick City if this city block was left in a continued state of vacancy while a 14 storey tower is built to house commercial offices.

We call on An Bord Pleanála to refuse this application in its entirety.

On behalf of the Limerick Chapter of the Irish Georgian Society Committee,

Yours sincerely,

Ailish Drake

Ailish Drake, B. Arch Sc., MA, MRIBA
Limerick Chapter Chairperson.

Irish Georgian Foundation trading as Irish Georgian Society. Registered Charity Number: CHY 6372



