



An
Bord
Pleanála

**Case Reference:
ABP-309696-21**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of 'Carmond', construction of 500 no. apartments, childcare facility and associated site works.

Lands at 'St. Teresa's House/Centre', 'St. Teresa's Lodge', 'Alzheimer's Society of Ireland'. 'Carmond' and 'St. Vincent's Park'. Temple Hill, Monkstown, Blackrock, Co. Dublin.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Design Strategy

Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

- (a)** The interface with The Alzheimer Society, interface with Temple Hill Road, interface with Rockfield Park and interface with St. Teresa's House as they

relate to the design, scale and layout of the proposed development and the desire to ensure that the proposal provides a high quality, positive intervention at this location. This should include a contextual layout plan which indicates the layout of adjoining developments, photomontages and cross sections at appropriate levels.

- (b)** In addition to the consideration of local statutory policy and national policy and guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome for the subject lands.
- (c)** The quantum and quality of public and communal open space provision. The response should include a detailed landscaping plan for the site which includes a schedule of open space and address the design and function of open spaces within the development. This should also clearly set out proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Additional cross sections, CGIs and visualisations should be included in this regard.
- (d)** The layout of the development, hierarchy of open space, compliance with DMURS and provision of connections with adjoining lands and surrounding area.

The response should also include a report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details Particular attention is required in the context of the visibility of the site and to the long-term management and maintenance of the proposed development. A Building Life Cycle report shall also be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

The further consideration / justification should have regard to, inter alia, the guidance contained in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020, the Urban

Development and Building Height Guidelines for Planning Authorities 2018; the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual; the Design Manual for Urban Roads and Streets 2013; and the Dun Laoghaire Rathdown Development Plan 2016-2022.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Residential Amenities

- (a)** Further consideration and / or justification of the documents as they relate to residential amenity, having particular regard to the potential for overlooking, overshadowing, access to daylight and sunlight and overbearing impacts on existing adjoining residential properties, the Alzheimer Society and proposed residential units within the scheme. The response should include a Sunlight, Daylight and Shadow Analysis of inter alia units proposed, communal open spaces, public open spaces and adjoining lands and properties, and in any event should address the full extent of requirements of BRE209/BS2011, as applicable.
- (b)** Further consideration of the details and mitigation proposed, to ensure that the proposed development has been designed to avoid direct overlooking of adjacent residential properties and units within the scheme. The response should include a report that addresses issues of residential amenity (both of adjoining developments and future occupants), specifically with regards to overlooking, overshadowing, visual dominance and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development (permitted or built).

Further consideration of this issue may require an amendment to the documents and/or design proposal submitted.

3. Architectural, Cultural Heritage and Conservation Considerations

- (a)** Further consideration and/or justification of the documents as they relate to the architectural, heritage and cultural value of existing structures on site. Details should provide reference to all former historical and contemporary uses of structures on the site. A photographic record of all existing structures on site including those proposed for demolition should be provided. Consideration of the inter-connectivity of former and current land-uses both within the site and surrounding area, in particular lands at Dunardagh, should also be considered in the context of heritage and cultural assessment.
- (b)** Further consideration for the rationale for the deconstruction, relocation and extension of the Gate Lodge, a protected structure. A detailed method statement for such is also required. Further consideration should also be given to the new proposed location of the Gate Lodge having regard to the original function and association of the lodge with St. Teresa's House and the original entrance gates and avenue that serve the house.
- (c)** Further consideration and / or justification of the documents as they relate to architectural heritage, having particular regard to Block C3 and its impact on St. Teresa's House. And further consideration of the potential impact of the proposed development on Newtown Villas ACA.
- (d)** Further consideration should also be given to the Planning Authority's opinion and concerns raised therein with regard to the potential impact on protected structures and consideration of an appropriate response to such matters having regard to the overall design strategy proposed by the prospective applicant.

The response shall include a detailed Architectural Impact Assessment and a Historical Landscape Impact Assessment.

Further consideration of this issue may require an amendment to the documents and/or design proposal submitted.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2020 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.
2. **(a)** The Car Parking Strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended to be assigned and managed.
(b) A response to the issues raised in the report of the Transportation Planning Section of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion received by An Bord Pleanála on 9th April 2021.
3. Wind micro-climate study, including analysis of roof terraces, balconies, pedestrian areas and amenity areas.
4. An Ecological Impact Assessment.
5. An Archaeological Impact Assessment.
6. A Tree Survey and Arboricultural Assessment.
7. A Landscape Impact Assessment and a Visual Impact Assessment including CGIs and details of proposed materials and finishes that would address the impact of the proposed development on Temple Hill Road and neighbouring residential areas, as well as the environment provided within the scheme. The assessment should include long views of the site from all approaches.
8. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
9. A response to the issues raised in the Planning Authority's Opinion received by An Bord Pleanála on 9th April 2021.

- 10.** A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
- 11.** Where the prospective applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

1. **Irish Water**
2. **Transport Infrastructure Ireland**
3. **The Minister for Housing, Local Government and Heritage.**
4. **Heritage Council.**
5. **An Taisce.**
6. **Failte Ireland.**
7. **An Comhairle Ealaíon.**
8. **DLR Childcare Committee.**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Rachel Kenny
Director of Planning
June, 2021