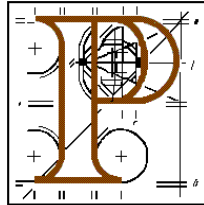


An Bord Pleanála



Inspector's Report

Development:

Permission sought for demolition of former Europa Motors Centre on site and the construction of a residential development of 1-4 storeys in height plus set back fifth floor element over 3 blocks. Overall the residential component shall provide for 44 No. apartments and 9. No. townhouses. The development proposal shall also provide for public open spaces, access via basement ramp from Newtown Avenue, basement car parking, bicycle parking, bin collection point and all associated site development works.

Planning Application

Planning Authority: Dun Laoghaire Rathdown County Council

Planning Authority Register Reference: D15A/ 0620

Type of Application: Permission

Applicant: Crekav Landbank Investments Ltd.

Planning Authority Decision: Refuse permission

Planning Appeal

Appellants: 1. Crekav Landbank Investments Ltd.

Type of Appeal: First Party

Observer(s):

1. Helen McKeever
2. Anne Whyte
3. Michael Caulfield
4. Janice Patterson and Mike Alexander
5. Jason Taylor and Sarah Rock and others
6. Kevin Conway
7. Grace Smith
8. Martin O' Brien
9. Phyllis Flynn
10. Myles Fleeton
11. Giovanni and Sarah Romoli
12. Margaret McCluskey
13. Kevin Fitzduff
14. Patrick Sheehan

Inspector: Emer Doyle

Date of Site Inspection: 8th March 2016

SITE LOCATION AND DESCRIPTION

The subject site with a stated area of 0.49 hectares is located approximately 300m to the south east of Blackrock village, Co. Dublin.

The site currently comprises of a former car garage sales showroom and a large hardstanding area. The site has dual frontage on Newtown Avenue to the north and east and is located close to the junction with Seapoint Avenue. There is a large, slightly overmature Sycamore tree on the eastern edge of the site and it is one of the key design principles of the Blackrock LAP Site Framework Strategy to retain this tree and to sensitively integrate same.

The site adjoins Newtown Villas Architectural Conservation Area to the west and Craigmore Gardens to the south and is in close proximity to a number of protected structures including Blackrock House and entrance gates, Newtown House and Seapoint Manor. The site is adjacent to the possible site of a castle of archaeological interest, Recorded Monument DU023-008. The site is bounded by a 2.4m high palisade fence.

A set of photographs of the site and its environs taken during the course of the site inspection is attached.

PROPOSED DEVELOPMENT

Permission is sought for development comprising the following:

- Demolition of existing buildings.
- Block A - 35 No. apartments in a 4 storey over basement block with set back fifth floor to provide for penthouse apartments.
- Block B - 9 No. apartments in a 4 storey building.
- 9 No. housing units- 2/3 storey.
- Basement car park accessed via a ramp from Newtown Avenue.

Documentation submitted with the application includes the following:

- Planning Report
- Urban Design Statement

- Housing Quality Assessment
- Environmental Strategy Report
- Engineering Services Report
- Traffic Impact Assessment
- Conservation Assessment
- Arborticultural Assessment
- Stormwater Impact Assessment
- Landscaping Drawings
- Tree Survey
- Tree Protection Strategy
- Appropriate Assessment Screening Report
- Construction Management Plan

Drawings submitted with the appeal provide for the option of a revised scheme with a height reduction of Block A which would reduce the parapet height from 16.2m to 13.05m and would lead to the loss of 4 No. units, with the remaining unit mix ratio being 11 No. 1 beds and 20 No. 2 beds.

PLANNING HISTORY

Relevant planning history includes the following:

PA Reg. Ref. D05A/1413E

Permission for extension of duration of permission was refused for demolition of existing motor showroom buildings and erection of 69 No. one and two bedroom apartments in two five and six storey blocks over basement car park; ESB substation, and associated ancillary site works with access from Newtown Avenue.

PA Reg. Ref. D05A/1413/ PL06D.216035

Permission refused by Planning Authority for 69 No. apartments units on this site. A total of 60 apartment units were granted on appeal to the Board.

PA Reg. Ref. D03A/1217

Permission was granted for the change of use from existing parts store to motor showroom along with new glazed façade and entrance doors, internal alterations, new ancillary office/ toilet accommodation, and ancillary site works; removal of existing folding door to car wash bay and fitting of new roller shutter door in a reduced opening and provision of a new illuminated pylon sign.

PLANNING AUTHORITY REPORTS

Planning Report:

The planning report noted that 21 No. objections were received during the prescribed period. The main concerns raised were in relation to the quality of the development, impact on residential amenity, and the adjoining ACA and failure to comply with the Blackrock LAP.

Conservation Officer and Senior Architect Report

This report considered that the form, scale and massing of the main development is inappropriate and overbearing and that the design was considered to be poor in quality, generic in nature and would result in a significant diminution of the Architectural Conservation Area in which it is located. The report recommended refusal.

Irish Water

No objection subject to conditions.

Surface Water Drainage Report

This report required further information in relation to a number of items.

Transportation Planning:

The report noted that adequate car parking was provided and that the vehicular entrance did not match the indicative access type and location identified in the Blackrock Local Area Plan. It was considered that the applicant had not demonstrated a visibility splay for pedestrians and that if permission is contemplated, a setback of the development site boundary with reconfiguration of the Newtown Road layout was necessary. Refusal was recommended.

Parks and Landscape Services

The report considered that the landscape design was below the required standards and recommended further information.

Housing Section:

The report recommended a condition requiring the development to enter into an agreement in accordance with Part V of the Planning and Development Act.

Building Control:

No objection subject to conditions.

Prescribed Bodies

A submission was received from the Dept of Arts, Heritage and the Gaeltacht which can be summarised as follows:

The site is adjacent to the possible site of a castle of archaeological interest, Recorded Monument DU023-008 and a condition pertaining to pre-development testing is to be included in any grant of planning permission that may issue.

PLANNING AUTHORITY DECISION

The planning authority refused permission for 3 No. reasons as follows:

1. It is considered that the proposed development by reason of its height, layout and design, fails to accord with Section 3.4.2 (Map 12), and the Section 3.5.3 Site Framework Strategy for the former Europa Garage of the Blackrock Local Area Plan, 2015-2021, in particular, Specific Objectives ES1, ES4, ES5 and ES6. Therefore, the proposed development would materially contravene the Blackrock Local Area Plan, would seriously injure the amenities and depreciate the value, of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.
2. It is considered that the form, scale and massing of the main development is inappropriate and is overbearing when viewed from both directions along Newtown Avenue and on approach from Seapoint Avenue. The development does not recognise the particular character of the receiving environment. Its design is considered to be poor in quality, generic in nature and would result in a significant diminution of the Newtown Villas Architectural Conservation Area adjacent. Therefore, the development would materially contravene the zoning objective 'A', with the stated objective, 'to protect and/or improve Residential Amenity', would seriously injure the amenities, or depreciate the value, of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.
3. Due to inadequate sightline provision and proposed vehicular access arrangements likely to cause obstruction of road users, the proposed development would endanger public safety by reason of traffic hazard or obstruction of road users or otherwise.

GROUNDS OF APPEAL

The following is a summary of the main issues raised in the appeal submitted on behalf of the **first party (Crekav Landbank Investments Ltd.)**:

- It is considered that generally the revised scheme complies with the specific objectives of the Blackrock LAP.
- If the scale and bulk of the proposed scheme continues to be of concern, the respective apartment sizes could be reduced in line with national standards which would reduce the scale and bulk of the blocks and the footprint of the building. It is respectfully submitted that this matter could

be easily conditioned into a grant of permission to overcome the second reason for refusal.

- It is strongly disagreed that the proposed development would materially contravene the zoning.
- It is proposed to retain the tram shed brick wall which is an important conservation gain.
- The access is sited to provide for adequate sightlines to the east.
- The proposed development will close off two existing access onto Newtown Avenue and this will allow for the substitution of paid parking at this location in lieu of the spaces to be closed off elsewhere. It is also proposed to provide an on-road layby/ loading bay on the northern stretch of Newtown Avenue. Therefore no obstruction of road users would arise.
- Option of reducing height of Block A to 4 storeys. Revised drawings submitted with appeal which result in a height reduction and the loss of 4 No. apartments.
- Design mitigation measures have been taken to prevent overlooking.
- A shadow analysis has been submitted with the appeal which demonstrates that the overshadowing of external properties would be very limited.
- Height, scale, and mass are acceptable.

RESPONSE SUBMISSIONS

PLANNING AUTHORITY RESPONSE TO GROUNDS OF APPEAL

- The proposed development is of a poor quality layout and design. The development does not accord with the specific objectives of the Blackrock Local Area Plan 2015. The proposed development, in terms of poor generic design, quality and excessive height, would negatively impact on Newtown Villas Architectural Conservation Area and the existing residential amenities of the area.
- The proposed amendments submitted as part of the appeal are unsatisfactory and will not provide for an appropriate high quality development on this key corner site.

- Sightlines for the vehicular access are inadequate.
- Finishes and boundary treatment are not of an appropriate quality.
- There is considerable overlooking and overshadowing of adjoining residential development, particularly Newtown Villas.

OBSERVATIONS

The following is a summary of the main issues raised in the appeal in the observations submitted by Helen McKeever, Anne Whyte, Michael Caulfield, Janice Patterson and Mike Alexander, Jason Taylor and Sarah Rock and others, Kevin Conway, Grace Smith, Martin O' Brien, Phyllis Flynn, Myles Fleeton, Sarah and Giovanni Romole, Margaret McCluskey, Kevin Fitzduff, and Patrick Sheehan.

- Concern regarding damage to foundations of existing dwellings.
- Concern regarding demolition of walls on the southern boundary.
- Development out of character with the area and would detract from the setting and heritage value of the ACA and the designated protected structures in the area, namely Newtown House and Lodge, Blackrock House and Lodge and Seapoint Manor.
- Water Services Section of the Council have concerns in relation to overloading of the public treatment plant.
- Height excessive and is not compliant with Objective ES1 of the Blackrock LAP.
- Density is excessive.
- Proposed development is overbearing and intrusive, visually dominant and fails to create an active frontage along the public road.
- Development breaks the building line along Newtown Avenue.
- Overlooking of adjacent properties.
- Overshadowing of properties at Newtown Villas.

- Amenity space around sycamore tree insufficient and proximity to Block A will damage the overall quality of the tree.
- Inadequate communal open space.
- Concern in relation to construction impacts.
- The proposed rate of parking should be reduced to a more appropriate level in accordance with the excellent public transport services in the area.
- Proposed ramp will create a traffic hazard, injure the residential amenities of Nos 1-5 Newtown Villas and comprise the private open space of 3 of the proposed dwellings.
- No visitor car parking spaces.
- Requirement for EIS.
- Concern regarding asbestos removal.
- Concerns regarding capacity of existing foul sewer.

POLICY CONTEXT

Development Plan – Dun Laoghaire Rathdown Development Plan 2016-2022

The appeal site is within the area covered by the Dun Laoghaire-Rathdown County Development Plan, 2016- 2022, and has a zoning objective ‘A’ –‘To protect and/or improve residential amenity.’

Policy RES 3 promotes higher densities with as a general rule a minimum default density of 35 units per hectare.

Policy RES 4 encourages the densification of existing built up areas.

Policy RES 7 encourages the establishment of sustainable residential communities by ensuring a wide variety of housing and apartment types.

Section 8.2.3 deals with Residential Development.

Appendix 9: Building Height Strategy.

Blackrock Local Area Plan 2015 - 2021

Relevant Sections include the following:

Section 3.4 Scale and Building Height

Section 3.5 Site Framework Strategy for this site

Map 12: Existing and Proposed Building Heights

Drawing No. 3 – Indicative Layout Plan for this site

DoEHLG (2015) Sustainable Urban Housing- Design Standards for New Apartments Guidelines.

DoEHLG (2009) Sustainable Residential Development in Urban Areas Guidelines.

ASSESSMENT

I consider the key issues in this case to be the following:

- Principle of Development
- Impact on Residential Amenity
- Density
- Design and Visual Impact
- Car Parking and Access
- Construction Issues
- Development Plan Standards
- Appropriate Assessment

Principle of Development

The subject site is zoned as 'A' - to protect and improve residential amenity. The demolition of existing former car sales buildings and the construction of 9 No. houses and 44 No. apartment units is therefore acceptable in principle under the provisions of the Development Plan. The principle of residential development on the site also accords with the Blackrock Local Area Plan 2015- 2021 which states that the site is considered to have considerable development potential having

regard to its residential zoning, proximity to Blackrock village core and quality transport links.

Impact on Residential Amenity

The main concerns raised regarding impact on residential amenity relate to overlooking and overshadowing.

In terms of overshadowing, I note that Appendix 7 of the appeal provides for a comparative shadow analysis comparing the proposed scheme to the scheme previously permitted in 2006. The shadow analysis in Appendix 6 demonstrates that there will be a very limited loss of sunlight and daylight to the Newtown Villas properties. These properties are currently bounded by the 6m high wall. The 3 storey terrace proposed would be set back further than the existing wall and would be of equivalent height to the existing wall. As such, I am not unduly concerned in relation to overshadowing of existing dwellings at this location.

In terms of overlooking, I consider that there would be significant overlooking of the existing single storey dwellings in Newtown Avenue notwithstanding the proposal to provide a 1.5m high screens at this location. I also have concerns in relation to overlooking both within the site and on adjoining residential development. I am of the view that the separation distance between the two blocks of apartments is inadequate and that the separation distance between Block A and a number of the proposed housing units is inadequate. I consider that the scheme is badly designed in that there are a number of examples where opaque windows are necessary and indicated on the plans in order to prevent overlooking (Drawing Nos. pAB (03)-03, pAB(02)-04, pAB(01)-05.) As such, I consider that the development does not comply with Objective ES4 of the LAP or the quantitative standard set out in the Development Plan which requires a minimum distance of c. 22 metres between opposing windows.

Density

It is the policy of the Council as stated in the current Development Plan and Local Area Plan 'to generally promote higher residential densities provided that proposals ensure a balance between reasonable protection of the residential amenities and the established character of the area.' Where a site is located within 1 kilometer pedestrian catchment of a rail station and/or Luas stop, and/or

500m of a Quality Bus Route, higher densities at a minimum of 50 units per hectare will generally be encouraged.

This is a serviced, residentially zoned site with both Seapoint and Blackrock Dart stations within 1km and close to a Quality Bus Corridor. The density proposed is 108 units per hectare which is considered by the Planning Authority to be 'on the high side'.

There is no doubt that having regard to the proximity of the site to good quality public transport links and Blackrock village that the site is suitable for higher residential densities. However, there are certain constraining factors including the proximity to existing residences including the Newtown Villas ACA and the site framework strategy Objective ES7 which requires the mature sycamore tree to be retained which may limit the type of density that can realistically be achieved on this site.

I am of the view that the primary considerations in this case relate to the quality and design of the layout of the proposed development. I am not satisfied that the design has had sufficient regard to the character of the site with particular regard to the proximity to the Architectural Conservation Area and the protection of the chestnut tree on the site. Whilst a better designed scheme might address these issues to some extent, I am not convinced that density of the scale proposed can be accommodated at this particular site without compromising the residential amenities of adjoining properties and of future residents of this site. It is essential to successfully balance the requirements to design the scheme in accordance with the Development Plan and LAP, respect residential amenities, protect the ACA and chestnut tree, with the requirement to promote and facilitate compact, good quality higher density forms of residential development.

Design and Visual Impact

Proposed building heights for the principal development/ redevelopment sites in the Blackrock are set out on Map 12 of the Blackrock LAP - 'Existing and Proposed Building Height'. Section 3.5.3 sets out a Site Framework Strategy for this site. The key design principles for this site include the retention of the mature sycamore tree on the site with high quality amenity space and seating, development along Newtown Avenue to be set back with a generous planted buffer zone to the street, high quality development parallel to the road to create active frontage and continuation of the building line along Newtown Avenue, pedestrian friendly home zone with no through routes for traffic, and development adjacent to Newtown Villas to be own door houses backing onto the boundary

wall at this location. An Indicative Layout Plan is shown in Drawing 3 of the Plan. Objectives for the site are set out in Section (iii) ES1-ES9.

In my view the key priorities for this site is the creation of a high quality development that recognises the local built heritage, respects the residential amenities of existing and proposed occupants and enhances the overall visual character of the area.

The proposed development is contrary to the height objectives outlined in ES1. Map 12 of the LAP indicates that the maximum building height for the site is 4 stories graduated to 2 storeys adjacent to the ACA at Newtown Villas. Part of Block A is 5 storeys in height and the townhouses adjacent to Newtown Villas are stepped in height from 3 storeys at the front elevation graduating to 2 storeys to the rear.

Revised drawings and photomontages submitted to the Board on appeal indicate an alternative scheme with no changes to the townhouses adjacent to Newtown Villas and the option of reducing the height of Block A from 4 storeys with a setback 5th floor to 4 storeys.

I am of the view that development on this site should comply fully with the height limits outlined in the LAP. Having examined both the original and the revised drawings and photomontages, I consider that in terms of impact, due to the poor design of the scheme, the proposed development would be excessive, overbearing, and detract from the visual amenities of the area. I consider that the scheme is not innovative and fails to take account of the unique context of the site. I consider that that the scheme both as originally designed and the 'alternative option' provided in the appeal do nothing to enhance the visual amenities of the area. Having regard to the context of the site, I consider that the buildings proposed would be visually prominent when viewed from Newtown Avenue and Seapoint Avenue. I am of the view that the revised scheme does not successfully address the visual prominence of the design.

Objective ES4 of the LAP requires that any redevelopment shall provide an innovative and attractive design response that defines the street boundary, incorporates and active street frontage, maintains a planted buffer and provides a continuation of the building line along Newtown Avenue, (e.g: own door residential units facing onto the streets.)

There is no comparison between the indicative scheme for the site as outlined Drawing 3 of the LAP and what is proposed for the site. The proposed development is not innovate or attractive, is monotonous in appearance, breaks the building line on Newtown Avenue, is unsympathetic to surrounding properties

and will be visually dominant and oppressive. The northern boundary treatment also fails to create an active frontage along Newtown Avenue. Whilst it is proposed to retain the mature sycamore tree in line with the design principles outlined in the LAP, little thought has gone into the layout and design of this area and the scheme does not provide for a high quality amenity space. The Parks and Landscape Services Report for the Planning Authority considered that the quality of placemaking is below the required development plan and urban design manual standards. It went on to state the following: 'There's a distinct lack of optimising the composition, siting, and lack of integration with building form and landscape design. For instance, there is little iteration between the admirable retained Sycamore tree and its relationship to the adjacent proposed apartment block. A curved or semi-circular architectural treatment of the apartment block would be preferable, thereby echoing/ 'resonating' with the circular form of the tree crown.' I agree fully with the concerns raised in this report. I would also have concerns that Block A may be too close to protect this tree in the future notwithstanding the proposed tree protection measures.

This site in my view is particularly sensitive having regard to established residential properties in the area and the proximity to protected structures and an ACA. It demands an innovative scheme which relates to the character of the area rather than the generic scheme proposed which is lacking in quality and fails to incorporate an active street frontage and provide a continuation of the building line along Newtown Avenue.

Car parking and Access

It has been suggested in some observations that there is not enough car parking whilst other observations consider that there is too much given the proximity to good public transport. The proposed development is for 83 car parking spaces which is in line with Development Plan standards and is satisfactory. Section 8.2.4.5 of the Development Plan states that reduced car parking standards may be acceptable dependant on the location of the proposed development and its proximity to public transport and town centres. I consider that there is no case for an increase in spaces to provide for additional visitor spaces as suggested by a number of the observations. There may well be a case for a reduction in spaces having regard to the proximity to public transport and the village of Blackrock.

In relation to access arrangements, the third reason for refusal stated that due to inadequate sightline provision and proposed vehicular access arrangements

likely to cause obstruction of road users, the proposed development would endanger public safety by reason of traffic hazard.

Drawing N276-C01, Rev P1 shows that sightlines of c.49m can be achieved to the east of the access. The public road onto which the development will egress, Newtown Avenue, is a one way westbound street. The provision of an access at this location would remove two public car parking spaces at this location. The appeal notes that two car parking spaces can be provided in the gap from where the existing access is being relocated so there will be no net loss of spaces.

I have concerns in relation to pedestrian safety as the applicant has not demonstrated a visibility splay for pedestrians on both sides of the proposed vehicular entrance. The development relies on the use of the public road for all service deliveries, loading, unloading and waste collection. Taking into account the existing single lane one way carriageway available for vehicles on this section of Newtown Avenue, this is likely to restrict traffic flow and cause a traffic hazard due to reduced visibility and obstruction of road users. The Transportation Planning Report recommends that if permission is contemplated, 'a setback of the development site boundary with reconfiguration of Newtown Avenue road layout is recommended. Provision of a low boundary treatment is required to allow for adequate pedestrian and vehicle visibility and reconfiguration of the Newtown Avenue road layout to maintain a suitable self-enforcing design speed...'

I am satisfied that the appeal response adequately addresses the issue of replacing the loss of car parking spaces on Newtown Avenue. However, I am not satisfied that the proposed access arrangements are satisfactory.

Construction Issues

The main concerns regarding construction relate to removal of asbestos, damage to house foundations, construction of ramp adjacent to ACA and demolition of boundary walls particularly adjacent to Craigmole Gardens. I note that a construction management plan has been submitted for the proposed development. It is stated that asbestos surveys of the existing properties will be completed prior to demolition and a licensed contractor used for the removal to an approved treatment facility. This is considered to be satisfactory. I have concerns in relation to the construction of a ramp in close proximity to the high granite boundary wall of the Newtown Villas ACA and consider that this matter would need to be addressed by the developer. The joint report from the Conservation Officer and the Senior Architect states that 'there are concerns

about any potential structural impacts on this wall and the residential amenity of the adjoining cottages' and I would share these concerns. I note that the existing boundary wall with Craigmores Gardens is to be retained which is acceptable and will result in a conservation gain.

Development Plan Standards

I am of the view that the proposed development generally complies with the current quantitative standards in relation to unit sizes and mix, parking, dual aspect, public open space, internal storage, and floor sizes.

I note that the development has been designed in accordance with the standards set out in the 2010-2016 Dun Laoghaire Rathdown Development Plan. This has been superseded by the current Development Plan (2016-2022) and the DoEHLG 2015 'Sustainable Urban Housing - Design Standards for New Apartments' Guidelines.

The appeal response states that 'if the scale and bulk of the proposed scheme continues to be of concern, the respective apartment sizes could be reduced in line with national standards which would reduce the overall building footprint on the site....It is respectfully submitted that this could easily be conditioned into a grant of permission.' I do not consider that this would address the fundamental design issues with the scheme.

I note that house Nos. 1 and 2 have minimal rear private open space (7.4m² and 7.7m²) respectively due to the proposed ramp at this location which is unsatisfactory. House No. 3 has an area of 45.6m² which is also below the 60m² requirement set out in the Development Plan. Whilst a combination of terraces and balconies provide approximately 43.5m² of additional space, I consider that this is not of adequate quality.

Appropriate Assessment

A screening for Appropriate Assessment was submitted with the application. It concludes that the project will not, either alone or in combination with other plans or projects give rise to significant effects on the integrity of the Natura 2000 network. A number of Natura 2000 sites are located within 15km of the site, with the nearest being South Dublin Bay and River Tolka Estuary SPA 0.2km and South Dublin Bay SAC 0.2km from the site. The Appropriate Assessment Screening identifies that there is a potential link between the proposed

development and the South Dublin Bay SAC as treated foul water arising from the development will be discharged into the Irish Sea.

I note that this is a brownfield site, currently occupied by former car sales garages and extensive car parking/ hardstanding area. The development will be serviced from the mains water supply. All wastewater from the site will be discharged to the existing public network.

It is reasonable to conclude that on the basis of the information available, which I consider adequate in order to issue a screening determination, that the proposed development, individually and in combination with other plans or projects would not be likely to have a significant effect on any European site in view of the site's conservation objectives and an appropriate assessment is not therefore required of a European site.

RECOMMENDATION

Having considered the contents of the application, the provisions of the development plan, the grounds of appeal and the responses thereto, my site inspection and my assessment of the planning issues, I recommend that the Board refuse permission for the development for the reasons and considerations set out below.

REASONS AND CONSIDERATIONS

1. It is considered that the proposed development by reason of its height, bulk, scale, layout and design fails to comply with Section 3.4.2 (Map 12), and objectives ES1, ES4, ES5, ES6, and ES7 of Section 3.5.3 of the Blackrock Local Area Plan, 2015-2021. The proposed development would give rise to a poor quality of development and would contravene the Blackrock Local Area Plan 2015-2021, would seriously injure the amenities and depreciate the value of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.
2. It is considered that the proposed development would constitute significant overdevelopment of a restricted site, would be visually dominant and overbearing when viewed from both directions along Newtown Avenue

and on approach from Sepoint Avenue. The overall design is considered to be poor in quality, generic in nature and will result in a significant diminution of the Newtown Villas Architectural Conservation Area. Furthermore, the proposed development will not contribute positively to and enhance, complement or be appropriate to the character of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3. Due to inadequate sightline provision and proposed vehicular access arrangements likely to cause obstruction of road users, the proposed development would, therefore, endanger public safety by reason of traffic hazard. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Emer Doyle

6th April 2016