An Coimisiún Pleanála

Third-Party Planning Appeal

Planning Authority:	Dún Laoghaire-Rathdown County Council
Planning Authority Reference:	LRD26A/0051/WEB
Decision Order:	P/1527/26
Date of Decision:	28th. July 2026
Appellant:	Carolyn Gregg
Address:	28 St. Vincent's Park, Temple Hill, Blackrock A94 FH72
Acknowledgement of Receipt of Submission:	4th. March 2026
Residential area principally affected:	St Vincent's Park, Blackrock

I reside at 28 St. Vincent's Park. My property forms part of the established residential area adjoining the St Teresa's site. I rely principally on the grounds below concerning the relationship between the proposed development and St. Vincent's Park as a whole.

This is a third-party appeal against the decision of Dún Laoghaire-Rathdown County Council to grant permission under planning reference LRD26A/0051/WEB for the proposed development at the St Teresa's site, Temple Hill/Temple Road, Blackrock.

I previously made a submission/observation to the Planning Authority, dated 3rd. March and acknowledged on 4th. March 2026. I am making a final Grounds of Appeal because I consider that the proposal in its current form, does not achieve an appropriate balance between the objective of delivering compact residential development and the protection of the established residential amenity and area of St. Vincent's Park.

I respectfully request that An Coimisiún Pleanála refuse permission. If the Commission is otherwise minded to grant permission, I request that it consider material amendments and conditions capable of addressing the identified impacts to St. Vincent's Park.

SUMMARY OF FINAL GROUNDS OF APPEAL

Loss of Mature Trees, Landscape Buffer, Noise and Residential Amenity

The mature trees, woodland, hedgerows and established vegetation within and along the boundaries of the site form an important landscape and environmental buffer between the proposed development, Temple Road and the established residential properties at St. Vincent's Park.

For residents of St. Vincent's Park, this vegetation contributes to the existing character of the area, provides visual screening and separation from the development site and Temple Road, and contributes to biodiversity, habitat connectivity and the perception of noise attenuation.

Scale of Vegetation Loss

The applicant's revised biodiversity information acknowledges substantial vegetation loss associated with the development, including:

- 86 individual trees
- approximately 296 metres of hedgerow/treeline
- approximately 2,117m² of woodland/tree groups
- an overall vegetated habitat loss of approximately 4,591m² (EIAR Chapter 6 – Biodiversity, PDF p. 122)

The applicant acknowledges that full quantitative replacement of existing canopy cover is not feasible within the site. (EIAR Chapter 6 – Biodiversity, PDF p. 122). While extensive replacement planting and landscape mitigation are proposed, newly planted vegetation cannot immediately reproduce the height, canopy spread, visual screening, habitat value or maturity of established trees and woodland. The effect therefore needs to be considered not simply by comparing the number of trees removed with the number proposed to be planted, but by considering the quality, maturity and functions of the vegetation being lost.

Impact on St. Vincent's Park

The existing vegetation provides an important transition between the established low-rise residential environment at St. Vincent's Park and the substantially larger buildings proposed within the development. Removal or reduction of established vegetation will increase the visual exposure of existing homes to the proposed buildings and reduce the effectiveness of the existing landscape buffer.

Replacement planting may provide benefits in the long term, but there will be a substantial period during where new planting will not approach the scale or screening function of mature vegetation.

Landscaping can soften the appearance of development; it cannot remove inappropriate height, massing or proximity.

Noise and Environmental Buffering

The existing wall, trees and vegetation contribute collectively to the separation between St. Vincent's Park and the heavily trafficked Temple Road environment.

Their alteration must therefore be considered cumulatively with:

- increased traffic associated with the development
- changes to the principal access
- increased residential activity
- balconies and external amenity areas
- the D1 communal roof terrace
- the substantially increased residential population within the site

The established wall and vegetation together form part of the existing physical and perceptual buffer between neighbouring homes, Temple Road and the development site.

The significance of operational noise is also reflected in the Planning Authority's own decision. Condition 21 requires the applicant, prior to commencement of development, to submit an Inward/Outward Noise Impact Assessment including appropriate mitigation measures, expressly in the interest of residential amenity. (Notification of Decision to Grant Permission, Condition 21, PDF p. 15).

Condition 5 requires the hours of use and management arrangements for the communal roof terrace at Block D1 to be agreed prior to occupation, expressly in the interest of residential amenity.

These conditions demonstrate that noise and activity associated with the development require continuing control. However, management measures cannot replace the permanent screening and separation functions of mature landscape features once removed.

The applicant's surveys confirm that the site's woodland, mature trees and linear vegetation have ecological value and are used by bats for commuting and foraging.

The revised biodiversity information also acknowledges the loss of woodland, treelines and hedgerows and assesses a residual effect on woodland habitat even after mitigation, with the longer-term outcome dependent upon replacement planting successfully establishing. The same chapter assesses the residual woodland effect as slight to moderate at local level, with potential improvement only as planting establishes over the medium to long term (EIAR Chapter 6 – Biodiversity, PDF p. 122).

The applicant acknowledges substantial loss of mature vegetation and accepts that full quantitative replacement of canopy cover is not feasible. At the same time, the development substantially increases built form at the boundary adjoining St Vincent's Park. (EIAR Chapter 6 – Biodiversity, PDF p. 122).

In these circumstances, greater weight should be afforded to the contribution of existing mature vegetation to landscape character, visual screening, ecological connectivity and the residential environment of adjoining properties.

I respectfully request that the Commission consider this loss cumulatively with the increased height and massing of Blocks D1 and B4 and, should permission be granted, require the maximum practicable retention of mature boundary vegetation together with any reduction or setback in built form necessary to achieve an appropriate and durable transition to the wider St. Vincent's Park residential area.

Traffic Capacity and Access to St. Vincent's Park.

This appeal raises concerns regarding peak-period junction performance, the altered relationship between the development access and St. Vincent's Park, and the fact that Condition 8 requires further demonstration of the acceptability of the proposed junction arrangement.

I have significant concerns regarding the capacity and operation of the proposed access junction and, in particular, the consequences for existing residents of St. Vincent's Park who will share this junction with traffic generated by the proposed development. These are not based simply on the fact that Temple Road is already heavily trafficked. It arises from the applicant's own traffic modelling, the Planning Authority's Further Information request, the subsequent assessment by the Transportation Department, and the wording of Condition 8 of the decision to grant permission.

The Applicant's Original Traffic Modelling - The Applicant's Traffic and Transport Assessment identified significant capacity constraints at the relevant junction during peak periods. The Planning Authority subsequently recorded that the modelling showed the junction operating at or above capacity, including Degree of Saturation values approaching or exceeding 100% and negative Practical Reserve Capacity values. (Planning Authority transportation assessment / Further Information traffic review; see Planning Officer's Report and Transportation Department assessment). Despite those results, the applicant concluded that the impact of development-generated traffic would be limited and that the effect on the surrounding road network would be negligible or unnoticeable.

The Planning Authority was sufficiently concerned by the apparent difference between the modelling results and this conclusion that it specifically required the applicant, through Further Information, to explain and reconcile the position. In response to the Further Information request, additional traffic analysis and explanation were provided.

The Transportation Department ultimately accepted the applicant's position that the development would not materially worsen the operation of the junction. However, the revised assessment did not establish that the junction would cease to operate at or above capacity. The underlying constrained condition therefore remains.

I believe adding additional traffic movements to an already constrained junction does not provide a safe, efficient and acceptable access arrangement for both the proposed development and the established residents who already depend upon that junction.

This issue has a direct consequence for St. Vincent's Park. Residents already use the Temple Road junction to enter and leave the estate. Under the proposed arrangement, that established residential access becomes integrated with the principal access serving a development of 414 apartments together with associated childcare, café, visitor, delivery and servicing activity. The proposal therefore does not simply add vehicles to Temple Road. It changes the function and intensity of the existing access environment at St. Vincent's Park.

Most disappointingly, the junction drawings indicate that residents of St. Vincent's Park will not have a dedicated signal phase giving them independent priority when exiting the estate. This is particularly relevant during peak periods when the applicant's own modelling identifies the greatest capacity constraints.

For St. Vincent's Park residents, the issue is that increased development traffic will result in:

- longer delays entering or leaving St. Vincent's Park
- increased queueing at the estate entrance
- greater interaction between existing residential traffic and development-generated traffic
- increased conflict between vehicles, pedestrians and cyclists
- reduced convenience and reliability of access during peak periods

These effects should be considered from the perspective of the existing residential community and not solely by reference to the percentage increase in traffic on the wider N31 network.

Alternative Access Arrangements. Given the scale of the development and the sensitivity of the existing St. Vincent's Park access, I believe that the application should demonstrate that the chosen access arrangement represents an appropriate solution having regard to the effect on existing residents. The site has substantial road frontage. It is therefore reasonable to ask whether alternative access arrangements or configurations were sufficiently examined with the objective of reducing the concentration of development traffic at the established St. Vincent's Park entrance.

Given the acknowledged capacity constraints at the proposed junction, the application should clearly demonstrate why the selected arrangement represents the most appropriate solution and why a materially different access configuration would not provide a better outcome for existing residents and the road network.

Alteration of the Existing Entrance Environment. The proposal changes this location from an established residential entrance adjoining a largely enclosed boundary into the principal access serving a substantial residential development. This will introduce significantly greater levels of:

- vehicle movements
- visitor traffic
- deliveries and servicing
- pedestrian activity
- cycling movements
- general activity throughout the day

The applicant's own modelling identifies a constrained junction operating at or above practical capacity during peak periods.

I therefore request that the Commission independently examine the junction modelling, forecast queue lengths and delays, the operation of the St. Vincent's Park arm, and the feasibility and effectiveness of the mitigation contemplated by Condition 8 before determining that the proposed access arrangement is acceptable.

Overall Conclusion

I recognise the need for additional housing and the policy support for compact development on appropriately located urban land. I do not seek to prevent residential redevelopment of the St. Teresa's site. I ask that the scale and distribution of the development now proposed, particularly at the St. Vincent's Park boundary, achieve an acceptable relationship with the established residential environment.

The evidence considered across this appeal should not be viewed in isolation. D1 is materially larger and taller than the previously permitted building; B4 remains at an interface that has repeatedly attracted planning concern; the current Planning Officer's Report acknowledges additional overshadowing of development in St. Vincent's Park; mature vegetation and landscape buffering altered and lost; and traffic/access matters remain subject to further requirements and conditions.

Earlier assessments recognised the need for an appropriate transition in height and scale towards St. Vincent's Park, while the 2022 ABP-312325-21 Inspector's Report recommended the omission of B4 in the context of landscape and visual impact.

I respectfully submit that the current proposal represents excessive intensification at and near the St. Vincent's Park boundary and that the cumulative effect on existing residential amenity has not been adequately resolved by the present design and proposed mitigation.

Accordingly, I request that An Coimisiún Pleanála refuse permission.

If the Commission is minded to grant permission, I respectfully request that it requires material amendments sufficient to address the grounds of appeal. In particular, the upper levels and/or overall massing of D1 should be reduced and/or further set back from St. Vincent's Park to provide a clear and durable step down towards the established low-rise residential area. The Commission should also ensure that where appropriate, any traffic/access, landscaping, lighting, noise or management measures on which the acceptability of the development depends are precise, enforceable and secured before occupation.

Such an approach would allow substantial housing delivery on the St. Teresa's site while achieving a more proportionate balance between a compact development and the protection of the established residential amenity of my property and St. Vincent's Park as a whole.

Thank you.

Comhairle Contae County Council

Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Halla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire
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ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION ON A PLANNING APPLICATION

THIS IS AN IMPORTANT DOCUMENT

Keep this document safely. You will be required to produce this acknowledgement to An Bord Pleanala if you wish to appeal the decision of the Planning Authority. It is the only form of evidence which will be accepted by An Bord Pleanala that a Submission or Observation has been made to the Planning Authority on the Planning Application.

DÚN LAOGHAIRE RATHDOWN COUNTY COUNCIL

Planning Application Reference Number: LRD26A/0051/WEB

A Submission/Observation in writing has been received from:
Carolyn Gregg
28 St Vincents Park
Temple Hill
Blackrock
Co Dublin

On: 04/03/2026 in relation to the above planning application.

The appropriate fee of €20 has been paid. (fee not applicable to prescribed bodies / Local Authority Elected Members).

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations 2001, (as amended) and will be taken into account by the Planning Authority in its determination of the planning application.

Mary Quinlan
Mary Quinlan
For Senior Executive Officer

Date 04/03/2026

Planning Authority Stamp

04/03/2026

dlr
Comhairle Contae County Council