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1 Introduction

This addendum to our Statement of Consistency has been prepared for An Bord Pleanála in the event that the Dun Laoghaire Rathdown Draft Development Plan 2022-2028 is in effect when the Board is making its assessment on the subject application.

A Chief Executive's Draft Plan was circulated to members in October 2020. This was considered and amended by the 40 elected members at a series of Special County Development Plan meetings. At a meeting held on the 18th of December 2020 it was deemed to be the Draft Plan. The Draft Plan was then placed on public display from 12 January to 16 April 2021 with a total of 1263 no. submissions received. A Chief Executive's Report on all submissions / observations received was prepared and circulated to the Elected Members in July 2021. Having considered the Draft County Development Plan and the Chief Executive's Report on submissions received, it was resolved by the Elected Members to amend the Draft Development Plan. These amendments now constitute a Material Alteration and are on public display from 11 November 2021 to 17 January 2022 in accordance with Section 12(7)(b) of the Planning and Development Act 2000 (as amended).

As noted in the Main Statement of Consistency the proposed development will provide for 493 no. residential units in 10 no. Blocks, associated residential amenity facilities and a café, parking open space and site development works. A full description of the development is contained within the accompanying application documentation. For the purposes of this addendum, we specify the proposed development provides for:

- 1. Building Height**
- 2. Residential Mix**
- 3. Residential Density**
- 4. Trees**
- 5. Transitional Zone**
- 6. Protected Structure and St. Teresa's Lodge**
- 7. Institutional Designation and Open Space**

This addendum is intended to outline consistency with guidelines issued under Section 28 of the Planning and Development Act (as amended) and the key policies, objectives and development management standards contained within the Draft Dún Laoghaire Rathdown County Development Plan 2022-2028.

2 Dun Laoghaire Rathdown Development Plan 2022-2028

The relevant provisions of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (Draft Plan at the time of writing this Report) where relevant to the proposed development are outlined below.

2.1 Planning Policy

This section of the report reviews the compliance of the scheme with the Draft Development Plan policies as per the table set out below:

Table 1 - Evaluation of the proposed development in terms of relevant county plan development management policies

Policy Ref.	Policy	Applicant Response
PHP1	<p>That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:</p> <ul style="list-style-type: none"> - Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. - Accord with the Core Strategy set out in Chapter 2, the Housing Strategy, and Interim Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment -Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities. 	<p>The proposed development is in line with the NPF and the RSES, the site is zoned residential and is considered appropriately serviced with infrastructure to deliver on a sustainable residential development in close proximity to the main town centre and public transport nodes.</p> <p>In addition, the proposal also accords with the core strategy as Setout in Chapter 2 of the Draft Plan, the Housing Strategy and the HNDA, as it provides Social housing under Part V (50 no.).</p> <p>As part of this development, 50 units are to be provided for social housing. In keeping with Housing Strategy, the units which will be provided are:</p> <ul style="list-style-type: none"> • 1 no. studio unit • 29 x 1-bed units • 18 x 2-bed units • 2 x 3-bed units <p>The proposed social housing provisions has been discussed in detail with the DLRCC Housing Department and detailed proposals are submitted to ABP with the application for permission</p>
PHP5	<p>It It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Implement a strategy for residential development based on a concept of sustainable urban villages. -Promote and facilitate the provision of '10-minute' neighbourhoods. 	<p>The proposed development is well served by public transport with high capacity, frequent service. It is within 550m of Seapoint and 700m from Blackrock DART Stations. In addition, the site is located within 500m of Blackrock Village Centre.</p>
PHP 6	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> -Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential 	<p>The new scheme delivers on a childcare facility of 392 sq. m located in Block C2 of the proposal. This is the focal point within the overall design, with easy vehicular and pedestrian access from the N31.</p> <p>Appropriate surface parking, 8 no. car parking spaces, for ease of drop off is also delivered. The material enclosed herewith sets out this</p>

	<p>developments subject to demographic and geographic needs.</p> <p>-Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.</p>	<p>proposal is sufficient for addressing the childcare requirements of the proposed development.</p>
PHP18	<p>It is a Policy Objective to:</p> <p>-Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.</p> <p>- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.</p>	<p>The gross residential density in this case is identified as 123 units per ha gross figure and 165 units per ha net figure ha, which is considered appropriate given proximity of the site to a proposed Bus Priority Route along the N31 and given that Blackrock and Seapoint DART stations are both located within 700m of the site. The proposed development is an efficient and sustainable use of a key infill site, with a variety of amenities and facilities.</p> <p>Furthermore, the proposed residential density is supported by national policy and guidance, particularly given the quality of the proposal submitted. Notably, the proposed development successfully delivers on all relevant development management criteria and provides for an exceptional level of residential amenity.</p>
PHP20	<p>It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments</p>	<p>The proposed residential development is consistent with the relevant provisions of 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' and 'Irish Design Manual for Urban roads and streets.' This has been outlined in section 4.</p>
PHP25	<p>It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) 2022 - 2028.</p>	<p>As noted above the proposed development accords with Housing Strategy and HNDA.</p>
PHP26	<p>It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) and any future Regional HNDA.</p>	<p>The proposed development provides a variety of housing types which support a range of household sizes.</p> <p>This mix is considered appropriate and in line with ministerial guidance contained within the 2020 Apartment Guidelines. Given the specific requirements of the development plan in relation to mix, the Material Contravention Statement enclosed herewith outlines further details on the mix proposed vis a vis the Development Plan requirements. We note that the 2020 Apartment Guidelines are the overriding document in terms of guidance on development mix and the new proposal, as set out in the preceding sections of this document, complies in full of these guideline requirements.</p> <p>Furthermore, there is a large provision of residential amenity space as part of this development, along with a creche, which helps to establish a sustainable community.</p>

<p>PHP29</p>	<p>It is a Policy of the Council to;</p> <ul style="list-style-type: none"> -Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES. -Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties. -Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community. 	<p>The proposed SHD has incorporated own-door units and social units within the scheme.</p> <p>We note also that the site is proximate to Blackrock Village, public transport facilities and included a residential club house, which are considered significant amenities for any ageing population associated with the development.</p>
<p>PHP30</p>	<p>It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'</p>	<p>The Part V proposal is based on the provision of 10% of the units. These units are identified on plan and schedules submitted herewith. 50 no. units are proposed.</p> <p>We refer An Bord Pleanála to the OMP Part V Brochure enclosed herewith, which details the location of the Part V units; the floor plans, elevations, and layouts for the units; and the appropriate costings.</p>
<p>PHP31</p>	<p>It is a Policy Objective to support the provision of homeless accommodation and/or support services throughout the County.</p>	<p>This proposal contributes positively to the current national shortfall in housing supply. Large residential developments will assist in addressing the ongoing housing and homelessness crisis, in an effort to increase housing supply.</p>
<p>PHP34</p>	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> -Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. -Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013). -Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design. 	<p>The proposed development takes into account, and is consistent with, the Urban Design Manual and Design Manual for Urban Roads and Streets in order to help develop a sense of place.</p> <p>We note specifically that Section 3.4 of this statement reviews in detail the manner in which the proposed development is consistent with the requirements of the Urban Design Manual.</p> <p>Reference is also made to the Design Statement submitted by O'Mahony Pike Architecture for further details on matters of context, connectivity, inclusivity, public realm, adaptability, privacy and amenity, parking, wayfinding, and detailed design items.</p> <p>The proposed development takes the context of its surrounding developments into account to develop a high-density design in keeping with its surroundings. The layout and public realm elements of the proposed development prioritise pedestrian linkages and amenity in order to best utilise the transport amenities in the immediate facility, for example, by placing parking at a basement level in order to yield priority to people-friendly spaces and providing significant enhancements to the streetscape and public realm along Temple Hill.</p>

PHP35	It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability, or disability consistent with RPO 9.12 and 9.13 of the RSES.	The proposed development is accessible universally. OMP Architects have included a detailed drawing detail with the drawing pack submitted setting this out.
PHP36	It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.	<p>The proposed development will reinstate a strong edge to the site, creating passive surveillance along Temple Hill Road. This will help to develop a sense of place along the road and better define the area as being an area of landmark height and high-quality residential development along a transport corridor.</p> <p>Reference is made to the Design Statement prepared by O'Mahony Pike Architects and the Landscape Design Report prepared by Mitchell Associates, both submitted with the application. As demonstrated, the proposed development contributes positively to, and enhances, the public realm and incorporates high quality public realm design.</p>
PHP37	It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).	<p>There are pedestrian and cycle links through the proposed development site to Blackrock village through Temple Road and to Rockfield park. This includes footpaths, landscaping and planting, connectivity, and generally improved permeability.</p> <p>The permeability of Rockfield park is enhanced by the proposed development due to the additional routes and "trim trail" which provide access from the main route through the development and as well as from Dunardagh Avenue.</p> <p>The applicant has made provision for appropriate future access to lands at St. Catherine's to the south. Notably, appropriate rights of way are in place to ensure that any future development of these lands can be accessed. The applicant is aware that no through route can be delivered at this location. Appropriate provision is made for pedestrian and cyclist facilities within the lands controlled by the applicant. Material submitted by NRB Consulting Engineers and Mitchell Associates Landscape Architects provides further details on pedestrian and cyclist permeability across the site.</p>
PHP39	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> -Encourage high quality design of all new development. -Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF). 	<p>Each block is designed for its location within the site and responds to Rockfield Park; the presence of St. Teresa's; and the requirement for active frontage at Temple Hill.</p> <p>Issues of building access and orientation inform the internal plan arrangement of each new apartment block.</p> <p>The materials and external design make reference to the local aesthetic.</p>

		<p>The landscape design facilitates the use of existing trees in the design of the public spaces.</p> <p>We refer the Bord to the Architectural and Master planning Design Statement prepared by OMP and the Planning Report prepared by Brock McClure for further details on design</p>
PHP38	<p>It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.</p>	<p>The layout provides an interconnected and pedestrian permeable development. The routes are legible and animated with active frontages and front doors directly serving the street.</p> <p>The street hierarchy favours the pedestrians and cyclists over drivers. Traffic speeds are controlled by design and layout. The nature of the proposed internal road network is the principal element that enhances the setting for this development. As it allows for the promotion of the public realm over that of vehicular access.</p> <p>There are no 'through roads' within the new development proposal and the objective is to reduce car speeds to a minimum. There is a mix of apartment types that provide a balance of accommodation in a variety of formats. Each apartment block has its own distinctive character.</p>
PHP41	<p>It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.</p>	<p>A Design Statement has been prepared and submitted by OMP and accompanies this application which sets out how the proposed development addresses or responds to the design criteria set out in the Urban Design Manual – A Best Practice Guide.</p>
T16	<p>It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)</p>	<p>A Traffic and Transport Plan has been submitted by NRB Consultants as part of this application. In addition, the site is location in proximity to a proposed Bus Priority Route along the N31 and Blackrock and Seapoint DART stations are both located within 700m of the site.</p>
OSR4	<p>It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban</p>	<p>The provision of public open spaces in the proposed developments is over and above the requirements of the relevant Development Plan and Apartment Guideline requirements.</p> <p>We refer An Bord Pleanála to the Housing Quality Assessment prepared by O'Mahony Pike Architects for full details on private open space provision and other residential amenity requirements set out by the 'Sustainable Urban</p>

	Housing: Design Standards for new Apartments', (2018).	Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)'. An Bord Pleanála will note that all proposals are consistent with requirements.
T17	It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.	The proposed development can benefit from 4 No. Car Club/Car Sharing spaces provided under the SHD development which will provide residents with access to a car when they need one
T18	It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.	The proposed development is located within Parking Zone 2 in the Draft Plan. Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. The plan stated for residential uses reduced provision may be acceptable dependent on certain criteria which include, proximity to public transport services, walking and cycling accessibility and availability of car-sharing.
T28	It is a Policy Objective to introduce Traffic Management Schemes on particular roads and in appropriate areas throughout the County to reduce vehicle speeds to an acceptable level and to reduce the potential for traffic congestion and associated vehicular emissions in urban areas	<p>The layout provides an interconnected and pedestrian permeable development. The routes are legible and animated with active frontages and front doors directly serving the street.</p> <p>The street hierarchy favours the pedestrians and cyclists over drivers. Traffic speeds are controlled by design and layout. The nature of the proposed internal road network is the principal element that enhances the setting for this development. As it allows for the promotion of the public realm over that of vehicular access.</p> <p>There are no 'through roads' within the new development proposal and the objective is to reduce car speeds to a minimum. There is a mix of apartment types that provide a balance of accommodation in a variety of formats. Each apartment block has its own distinctive character.</p>
El14	It is a Policy Objective to adhere to the recommendations of the 'National Hazardous Waste Management Plan 2014-2020' and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.	The Operational Waste Management Plan prepared by AWN Consultants provides further detail on how waste will be managed during the operation of the scheme
El23	It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (20010/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on 'The Planning System and Flood Risk Management' (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and	There is no inland waterway or marine frontage within the current proposal. We can confirm that a Flood Risk Assessment prepared by JJ Campbells has been prepared as appropriate and we defer An Bord Pleanála to this document for further detail on the matter of flooding as it relates to the site.

	Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives of the Strategic Flood Risk Assessment set out in Appendix 16 of this Plan.	
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2.1.1 Height

The Draft Development Plan contains a Building Height Strategy (Appendix 5), which is considered of particular relevance to the subject site. However, we acknowledge that the recently published 'Building Height Guidelines' entitled 'Urban Development and Building Heights - Guidelines for Planning Authorities December (2018)' supersede the requirements of the Building Height Strategy. Section 34(2) (ba) of the 2000 Act, provides in effect that the requirements of an SPPR will take precedence over any conflicting provisions of the Development Plan:

“(ba) where specific planning policy requirements of Guidelines referred to in sub-section 2(aa) differ from the provisions of the Development Plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the Development Plan.”

We note also that this is reflected in the terms of section 1.14 of the Building Height Guidelines specifically states:

“1.14 Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”

In consideration of the above, we consider the Building Height Guidelines to be the predominant context for assessment of building heights in this case and we direct An Bord Pleanála to Section 3 of the main Statement of Consistency and Planning report, which clearly demonstrates compliance of the scheme with the provisions of same.

Notwithstanding the above, it is considered appropriate to consider the development vis a vis the objectives and general principles of the Building Height Strategy in the Draft Plan. The sections below deliver this review.

Policy Approach

Section 4.4 of the Building Height Strategy sets out a policy approach for residual suburban areas not included within Cumulative Areas of Control as set out in the Building Height Strategy. To ensure application of the 4 SPPRs (Specific Planning Policy Requirements) and having regard to the other content of the Guidelines a number of policies have been formulated, which support increased building height and/or taller buildings at appropriate locations while ensuring adequate protection of residential amenities and the very unique character and environmental sensitivities of the County.

A very detailed Performance Management Criteria table has also been developed. It is overall policy that all proposals for increased height and/or taller buildings;

- over and above the benchmarks of three to four storey in what are called residual suburban areas or,
- in other identified areas as set out in Policy BH1 below
- above what is set out in any of the Local Area Plans or

- above any other specified heights in this plan (SUF) must be assessed in accordance with the criteria set out in Section 5

Policy Ref.	Policy	Applicant Response
BHS1	<p>It is a Policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NPO 35, SPPR 1& 3).</p> <p>Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria. Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.</p>	<p>The site is situated immediately adjacent to a proposed Bus Priority Route as identified by the Dun Laoghaire Rathdown Development Plan 2016-2022 and is also located within 550m and 700m of 2 DART stations (Sea Point and Blackrock). In these circumstances, it is clear that the site is very well served by public transport with high capacity, frequent service, and good links to other modes of public transport.</p> <p>Appropriate building heights of 3-10 storeys are also proposed in this case. Again, following detailed analysis on the principle of height and following on-going engagement during the pre-planning process with relevant bodies, the proposals for height are considered appropriate to the site location and surrounding context.</p> <p>Careful consideration has been given to where additional height can be accommodated within the site and the overall framework for the site has been brought forward on this basis.</p> <p>The proposed development outlines a variety of building heights which all are in keeping with the visual character of the site. Notably, proposed heights are respectful of adjoining residential development and listed buildings through careful arrangement of blocks and the delivery of appropriate separation distances. Careful attention has also been given to height sensitive areas within the site with no more than 3 storeys proposed at these locations.</p> <p>Whilst the proposal in part exceeds the height objectives for the site as set out by the LAP, proposals are in keeping with the National Planning Framework and the provisions of the Urban Development and Building Height, Guidelines for Planning Authorities (2018).</p> <p>We refer An Bord Pleanála to the Material Contravention Statement enclosed herewith, which clearly sets out the rationale for favourable consideration of proposed building heights this regard.</p>

<p>BH3</p>	<p>It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area. Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria. Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.</p>	<p>As noted above please find table 2 below which sets out compliance with performance based criteria.</p>
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Table 2 - Performance Based Criteria

CRITERIA FOR ALL SUCH PROPOSALS	DM REQUIREMENT	COMPLIANCE
AT COUNTY LEVEL		
Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.		As per section 3.1 of the SOC which is submitted with this application the proposal secures the relevant objectives of the NPF
Site must be well served by public transport – i.e., within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service, and good links to other modes of public transport.		The site is situated immediately adjacent to a proposed Bus Priority Route as identified by the Dun Laoghaire Rathdown Development Plan 2016-2022 and is also located within 550m and 700m of 2 DART stations (Sea Point and Blackrock). In these circumstances, it is clear that the site is very well served by public transport with high capacity, frequent service, and good links to other modes of public transport.
Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or crossroads or public transport interchange to the benefit of the legibility, appearance, or character of the area.	Landscape and visual assessment by suitably qualified practitioner. Urban Design Statement. Street Design Audit (DMURS 2019).	The proposal does not affect any strategic protected views or prospects
Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground, or background. A proposal may frame an important view.		The protection of the exiting heritage of the site has been a key objective from the outset of the design. From the outset of the project, we have sought the services and expertise of Cathal O'Neill - Grade 2 Conservation Architects to advise on conservation matters. We refer An Bord Pleanála to accompanying documentation enclosed herewith for further review on matters of conservation.
Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.		Not applicable
<i>Proposed Material Amendment - Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development</i>		If this proposed amendment is adopted when the Board assesses this application, the applicant would be willing to submit the relevant assessment on carbon emissions in compliance with a condition, should the Board consider this necessary.
AT DISTRICT/NEIGHBOURHOOD/STREET LEVEL		

Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.	Proposal should demonstrate compliance with the 12 criteria as set out in "Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities" 2009. Street Design Audit (DMURS 2019).	Please find attached SOC and Planning Report which fully sets out compliance with the criteria as set out in the aforementioned guidelines.
Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.	Design Statement.	The proposed development comprises a range of building forms, from modest footprint point buildings to extended footprint buildings that hug the edge of the woodland areas. Accordingly, the proposed development is not monolithic and clearly avoids long, uninterrupted walls of building in the form of slab blocks. We refer An Bord Pleanála to the O'Mahony Pike drawings and the Design Statement enclosed herewith for further details.
Proposal must show use of high quality, well considered materials.	Design Statement. Building Life Cycle Report.	Appropriate use of materials and fenestration details as proposed by Mahony Pike Architects has ensured that the building fabric is well considered. We refer An Bord Pleanála again to the Design Statement and the Building Life Cycle report prepared by Aramark.
Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.	Must also meet the requirements of "The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009".	There is no inland waterway or marine frontage within the current proposal. We can confirm that a Flood Risk Assessment prepared by JJ Campbells Consulting Engineers has been prepared as appropriate and we refer An Bord Pleanála to this document for further detail on the matter of flooding as it relates to the site.
Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.		The proposed development is a residential apartment development offering a range of buildings and apartment types, from studio apartments to 3 bed apartments. St Teresa's House is to be fully refurbished and converted into 6 no. apartments. A number of units within the development in Blocks B1, B2, B3 and D1 will have "own door" access. Block E2 comprising 50 apartments is proposed as social and affordable housing. The gate lodge building is to be dismantled, moved to a new location on the southern boundary with Rockfield Park. It will be reconstructed, refurbished, extended, and converted into café use.

Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.	Design Statement.	An appropriate mix of units types and sizes are incorporated into the development proposal. Notably, 18 studio units, 220 no. 1 bed units, 39 no. 2 bed units (3P), 169 no. 2 bed units (4P) and 47 no. 3 bed units. are proposed within the new development. A number of own door units are delivered, which is a welcomed approach to development.
Proposal should provide an appropriate level of enclosure of streets or spaces.	Design Statement.	The subject proposal affords an opportunity for St. Teresa's development to address the street frontage on the Temple Hill, Monkstown corridor in order to create a greater sense of enclosure in line with policy outlined in the Design Manual for Urban Roads and Streets.
Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.		Temple Hill Road (N31) is a key thoroughfare, built as a dual carriageway to skirt around Blackrock village centre. Along this most public frontage, the boundary has been set back and the buildings are set back from the carriageway by c.10m. The arrangement of the 5 no. proposed buildings along Temple Hill Road allows visual and physical connection between the road and the centre of the site. The detached footprints of the buildings and the separation distances across Temple Hill Road which are between 30.5m and 33.3m allow for higher development along this frontage. The buildings on the north side of Temple Hill Road are for the most part 2 storey dwellings with a 2-storey car showroom building opposite the northernmost block A1. The considerable separation distances between buildings, the tree lined central median in the dual carriageway and the proposed tree lined recessed site boundary make it possible to propose taller structures along this frontage. Accordingly, the proposal enhances the urban design context key thoroughfares, thereby enabling additional height in development form to be favourably considered.
Proposal must make a positive contribution to the character and identity of the neighbourhood.		The proposed development takes the context of its surrounding developments into account to develop a high-density design in keeping with its surroundings. The layout and public realm elements of the proposed development prioritise pedestrian linkages and amenity in order to best utilise the transport

		amenities in the immediate facility, for example, by placing parking at a basement level in order to yield priority to people-friendly spaces and providing significant enhancements to the streetscape and public realm along Temple Hill.
Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties		The proposed buildings will be setback at all boundaries and the upper floors will be further setback where the boundary is shared with existing residential development. The massing of the buildings has been concentrated away from boundaries shared with existing residential development.
AT SITE/BUILDING SCALE		
Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.	Must address impact on adjoining properties/spaces/	A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Design Statement by O'Mahony Pike Architects.
Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.		The application for permission is accompanied by a Daylight and Sunlight Analysis, which confirms that there are acceptable levels of access to natural daylight and that overshadowing is minimised. In this regard, appropriate consideration has been given to the relevant guidance documents and specifically 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 - 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'
Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.		The material enclosed here with from O' Mahony Pike and Model Works has clearly demonstrated that there is no adverse impact posed by the development by way of overlooking or overshadowing or excessive bulk and scale.
Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.		The site is not located in or adjacent to an Architectural Conservation Area, nor does the site contain a protected structure.
COUNTY SPECIFIC CRITERIA		

Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.	An urban design study and visual impact assessment study should be submitted and should address where appropriate views from the sea and/or piers.	Not Applicable
Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height, and massing so as to avoid being obtrusive.	An urban design study and visual impact assessment study should be submitted.	The Blackrock Local Area Plan 2015-2025 outlines that the vista from St. Teresa's to Rockfield Park should be maintained. The historic view towards the Dublin Mountains is key here. An Bord Pleanála will note on review of proposals submitted from O'Mahony Pike Architects that this objective is now delivered through an appropriate layout and creation of a new setting for the Protected Structure, which maintains the view towards Rockfield Park and beyond. Notably, Blocks D2 and D3 have been removed from the foreground of St. Teresa's, with the revised proposal delivering on a new and improved setting for St. Teresa's.
Additional specific requirements (Applications are advised that requirement for same should be teased out at preplanning's stage).		An initial pre-planning submission was made to the planning authority in October 2020. A formal pre-planning meeting was scheduled for 3 December 2020 to discuss the proposal in principle. In addition, On 15 th March 2021, a Strategic Housing Development pre-application request was submitted to An Bord Pleanála. Reference ABP-3309696-21 refers.
Specific assessments such as assessment of microclimatic impacts such as down draft.		We refer An Bord Pleanála to the enclosed input from BFluid, which examines in detail the impacts of proposed development in terms of Wind and Microclimate.
Potential interaction of building, materials, and lighting on flight lines in locations in proximity to sensitive bird/bat areas.		The proposed development site is not a development location in proximity to sensitive bird or bat areas. In relation to safe air navigation, prior to the submission of the 2019 application for permission in respect of the site, the applicant contacted the Irish Aviation Authority (IAA) and the Dublin Airport Authority (DAA) to ensure that the permitted proposal maintains safe air navigation. Both the IAA and DAA confirmed at that time.
Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.		OCSC has advised that microwave links used by the telecom's companies use direct "line-of-sight" to connect from one point to another, so if a tall building is placed along that line, it could block the signal path.

An assessment that the proposal maintains safe air navigation.		We have engaged with the Irish Aviation Authority (IAA) and the Dublin Airport Authority (DAA) to ensure that the current proposal maintains safe air navigation.
Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.		An Appropriate Assessment Screening Report has been prepared and submitted by Scott Cawley. An Environmental Impact Assessment Report has also been Prepared by Brock McClure with inputs from all I consultants included with this application.
Additional criteria for larger redevelopment sites with taller buildings		Not applicable
Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.		The proposed development makes a positive contribution to place making by creating a new edge to Temple Hill Road dual carriageway. The removal of the existing site boundary wall, its replacement with a new low wall and railing and the widening of the planted verge along the full length of the northern site boundary with Temple Hill Road, provides open vistas into the site and lands beyond.
For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.		We refer the board to the accompanying Daylight and Sunlight assessment prepared by IES submitted with this application.

We note specifically that this addendum to the Statement of Consistency has also set out the consistency of the development proposal with the performance criteria of the Building Height Guidelines, which is the prevailing context for height in this case. It is submitted that there is a sufficient policy context to grant permission for the proposed development in line with the compliance of the scheme vis a vis SPPR 3A.

It is our view that additional height can be positively considered at this site in consideration of the above.

2.1.2 Car Parking

As noted above, section 12.4.5 of the Draft Plan sets out Car Parking standards. Within the Draft Plan parking has now been divided into four 'Parking Zones', reflecting the varying degrees to which parking criteria are met. The subject site is located within parking Zone 2. Within Zone 2, the plan states for residential uses reduced provision may be acceptable dependent on the following assessment criteria:

DRAFT DEVELOPMENT PLAN ASSESSMENT CRITERIA	APPLICANT RESPONSE
Proximity to public transport services and level of service and interchange available	The proposed development is well located in proximity to high quality public transport; The site is intensively serviced by public transport and the N31 is designated as a proposed Quality Bus Corridor (QBC). Blackrock Dart station and Seapoint Dart station are between 550-700m distance from the site. The proposed development is well located within 15min walk and 5min cycle to amenities and services in Blackrock.
Walking and cycling accessibility/permeability and any improvement to same.	There is excellent cycle infrastructure in the area with dedicated cycle lanes. Connectivity for pedestrian and cycle pathways through the site linking Temple Road and Blackrock Village to Rockfield Park to the South allows for a wider network of cycle and pedestrian routes to be provided. In addition, The proposed development takes the context of its surrounding developments into account to develop a high-density design in keeping with its surroundings. The layout and public realm elements of the proposed development prioritise pedestrian linkages and amenity in order to best utilise the transport amenities in the immediate facility, for example, by placing parking at a basement level in order to yield priority to people-friendly spaces and providing significant enhancements to the streetscape and public realm along Temple Hill Road.
The need to safeguard investment in sustainable transport and encourage a modal shift	These facilities make the subject site highly accessible for cyclists which will encourage residents to shift away from private car use. In addition, 1,056 no. cycle parking spaces are proposed which will further assist in increasing the attractiveness of cycling as an alternative for car based travel.
Availability of car sharing and bike / e-bike sharing facilities.	There is currently a GoCar station located within St. Teresa's development. There are 4 no. vehicles provided.
Existing availability of parking and its potential for dual use.	Car spaces will be provided in the development will be split between basement and street level and will be well maintained, safe and secure. Bicycle storage is delivered in compliance with national guidance and is located at passively surveyed areas at surface level and in

	<p>designated areas at basement level.</p> <p>In addition, provision is made for motorcycle parking at basement level.</p> <p>The guidelines recommend 1 cycle parking space per bedroom and 1 visitor space for every 2 apartments. The proposed development provides c. 1,056 cycle parking spaces at basement and ground floor level to accommodate residents and visitor cycle parking requirements.</p> <p>This level of cycle parking provision is appropriate and justified in the context of the site location, public transport accessibility, the quantum of car parking proposed, and is supported by the Guidelines which states that “any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement.</p>
Particular nature, scale, and characteristics of the proposed development.	<p>The scheme design seeks to integrate the proposed development with the existing landscape as much as possible ensuring that the natural characteristics of the site are retained and become an opportunity to provide a sylvan setting for the proposed new development.</p> <p>The design which is comprised in the current proposed development has been the subject of a careful and considered design process where the layout and positioning of building has been carefully considered to ensure a balance is struck in meeting additional height and density parameters but also ensuring the protection of the architecturally sensitive nature of St. Teresa's House and the associated gate lodge.</p> <p>The vision for the project is to create a unique sense of place with a strong community identity characterised by the sylvan wooded nature of this mature site while integrating St. Teresa's House as a prominent focal point set within formal gardens and providing a rich historical backdrop to the new development.</p>
The range of services available within the area. Impact on traffic safety and the amenities of the area.	<p>The site has a mature landscaped setting and is bounded by Temple Hill Road to the north; Rockfield Park to the south; existing residential development to the East (St. Vincent's Park); and existing residential development (St. Louise's Park and Barclay Court) and the Alzheimer's Society of Ireland to the west.</p> <p>The site is within 1km of Blackrock Village and has high accessibility to public transport. The proposal is located adjacent to a proposed Bus Priority Route at Temple Hill (N31) and is proximate to DART stations at Seapoint (6m walk) and Blackrock (11 min walk) and is therefore well placed in terms of exceptional public transport accessibility.</p> <p>The subject site is bounded by Temple Hill to the north; Rockfield Park to the south; a residential development known as St. Vincent's Park to the east; the Alzheimer's Society of Ireland and residential developments at St. Louise's Park and Barclay Court to the west.</p> <p>The lands are within the bounds of Dun Laoghaire-Rathdown County Council and are approximately 1KM from the heart of Blackrock Village. There is a host of public amenities close by including the Frascati Shopping Centre and Blackrock Park along the seafront which are within easy walking distance. The site is intensively serviced by public transport and the N31 is designated</p>

	as a proposed Quality Bus Corridor (QBC). Blackrock Dart station and Seapoint Dart station are between 600 – 850m distance from the site
Capacity of the surrounding road network. Urban design, regeneration and civic benefits including street vibrancy.	The site is within 1km of Blackrock Village and has high accessibility to public transport. Notably, the N31 (Temple Road) is designated as a proposed QBC and both Blackrock and Seapoint DART stations are within easy walking distance
Robustness of Mobility Management Plan to support the development.	A robust Car Parking Strategy and Mobility Management Plan has been prepared by NRB and accompanies this application.
The availability of on street parking controls in the immediate vicinity	Parking Controls on street are managed by Dún Laoghaire Rathdown County Council.
Any specific sustainability measures being implemented including but not limited to: -The provision of bespoke public transport services. -The provision of bespoke mobility interventions.	The Bus Connects project currently being promoted by National Transport Authority (NTA) aims to deliver a much-enhanced bus service to the Greater Dublin Area (GDA). The proposed development will be served by the Bus Connects E Spine. Please refer to the attached Traffic and Transport Assessment for further detail on this network. In addition, proposals for the GDA cycle Network Plan were published by the NTA in December 2013. The plan set out a vision and a strategy for the construction and/or designation of a comprehensive network of cycling routes throughout the GDA.

Based on the above, it is our contention that there is provision made within the Draft Development Plan to reduce car parking standards that apply to this particular site.

Notwithstanding the above, we note that the DOE Apartment Guidelines (2020) generally encourage reduced standards of car parking and the content of these Guidelines supersede Development Plan requirements. As such, the DOE Apartment Guidelines are the predominant context for the provision of car parking.

The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

Our review of these 3 categories identified that the site can be categorized as a Central and/or Accessible Urban Location. Compliance to the DOE Apartment Guidelines is set out in detail in the attached Statement of Consistency and also in the Car Parking Strategy and Mobility Management Plan, prepared by NRB which also sets out a clear rationale behind the provision of car parking which should be duly considered by An Bord Pleanála.

2.1.3 Cycle Parking

Section 12.4.6 of the Draft Plan set out the standards for cycle Parking and accords with the 'Standards for Cycle Parking and Associated Cycling Facilities for New Development' (2018). It is a requirement that, new residential developments of 5 residential units or more or non-residential type developments of 400 sq. m. or over, submit a Cycle Audit as part of the planning application. The Cycle Audit must be prepared by a suitably qualified person and shall clearly demonstrate, in plan format, how all the requirements of Council's Standards for Cycle Parking and Associated Cycling Facilities for New Developments, are met within the development.

These standards require the following provision for residential use:

- Long Stay: 1 space per unit.
- Short Stay: 1 space per 5 units

According to the parking standards a total of 591.6 no. cycle spaces are required to comply with the Draft Plan. A total of 1056 bicycle spaces are proposed, 656 no. spaces at basement level and 400 no. spaces at surface level which fully comply with the above standards.

2.1.4 Public Open Space

Section 12.8 of the Draft Plans sets out the requirements for public open space and recreation. It states that for developments of 10+ residential units, a Landscape Design Rationale must be submitted with the application. We can confirm that a detailed 'Landscape Design Statement' has been prepared by Mitchell and Associates and submitted with the application.

Public open space is proposed in the form of a central parkland, garden link, woodland parkland (incorporating an existing folly), a tree belt, entrance gardens, plazas, terraces, and garden totalling with an area of c.15,099 sq.m. We note specifically that an area of c. 15,099.7 sq.m m is proposed for public open space in the form public open space (approx. 11,572.3 sq m) in the form of a central parkland, garden link, woodland parkland (incorporating an existing folly), a tree belt; and (b) residential communal open space (approx. 3,527.4 sq m) in the form of entrance gardens, plazas, terraces, gardens, and roof terraces for Blocks B2 and B3

The population equivalent figure is identified as 3.5 persons for units with 3 or more bedrooms and 1.5 persons for units with 2 or fewer bedrooms. The requirements for open space per person are 15-20 sqm. The proposed development will have a total population equivalent of 833.5 persons (based on a mix of 18 x studios, 220 x 1 beds, 208 x 2 beds, and 47 x 3 beds).

This population of 833.5 persons therefore applies a requirement for **12,502.5 - 16,670 sq m open space, which equates to 15-20 sq m per person**. The Development Plan sets out in Section 8.2.3.2 that *"a lower quantity of open space (below 20 sq m per person) will only be considered acceptable in instances where exceptionally high quality open space is provided on site and such schemes may be subject to financial contributions..."*

We note that the current proposal provides for **15,099.7 sq m** of open space (broken down as 11,572.3 sq m public open space and 3,527.4 sq m of communal open space). This equates to a provision of 17.9 sq m per person, which is higher than the required minimum of 15% of the site area. It is our understanding that this level of open space provision will only be acceptable where the open space provided is of an exceptionally high quality. The documentation submitted with the application confirms that the open space offering is significant in this case with large open space areas, tree trails, play areas and permeable access to the adjoining Rockfield Park, which in itself is a significant open space offering

2.1.5 Private Open Space

Section 12.8.3.3 (ii) of the Draft Plans sets out the requirements for private open space for apartment developments where relevant to the proposed development as follows:

Table 3 - Private Open Space Requirements as set out in the Draft Plan 2022-2028

Type/No. of bedrooms	Min sq.m
Studio	4 sq m
1 Bed	5 sq m
2 Bed (3 persons)	6 sq m
2 Bed (4 persons)	7 sq m

We refer An Bord Pleanála to the Housing Quality Assessment prepared by O'Mahony Pike Architects for full details on private open space provision and other residential amenity requirements. Each new residential unit has an associated area of private open space in the form of a terrace/balcony. An Bord Pleanála will note that all proposals are consistent with the above requirements.

2.1.6 Density

Section 12.3.3.2 of the Draft Plans sets out the requirements for Residential Density. The draft plan states that *'the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document: 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport'*.

Policy PHP18 of the Draft Development Plan generally promotes higher residential densities residential densities subject to the reasonable protection of residential amenity and the established character of the area. The residential density in this case is considered in the context of the masterplan development for the site. Being located adjacent a busy Bus Corridor, with high quality pedestrian and cyclist provision, and within a short walking distance of both Seapoint and Blackrock Dart Stations, the site is very well placed to take advantage of non-car modes of travel to support the increased scale of development. The site is therefore well placed in terms of exceptional public transport accessibility. The new density proposal of approx. 123 units per ha gross figure and 165 units per ha net figure (based on 493 unit on a site of 3.9ha gross and 2.98 ha net) is considered an appropriate residential density for a suburban site proximate to public transport infrastructure.

The site is considered to offer a unique opportunity to achieve greater building height and residential density and is considered to deliver on the very spirit and intent of the requirements of the national policy mandate for higher residential densities at key locations.

3 Conclusion

This addendum to the Statement of Consistency has identified the compliance of the scheme with the Dun Laoghaire Development Plan 2022-2028 and we trust that the Board will now accept that the key objectives of each of the documents cited in this report have been met.

We invite the Board to consider the proposal now in front of them. We direct the attention of the Board to other material submitted herewith for further detail on the context of the site and a clear and concise development description.

We ask that the Board consider these points in their review of proposals, and we trust that they will view this application as a positive move towards delivery of sustainable development on zoned lands.