

Planning Report

Proposed SHD

**Lands at 'St. Teresa's'
Temple Hill, Monkstown,
Blackrock, Co. Dublin**

Oval Target Limited

December 2021



Planning & Development Consultants

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1 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **Oval Target Limited, 1st Floor, 55 Percy Place, Dublin 4, (D04 CX38)**, for a proposed development at **lands at St. Teresa's, Temple Hill, Monkstown, Blackrock, Co. Dublin**. For clarity, the site is located within the administrative boundary of Dun Laoghaire-Rathdown County Council.

A summary of the main points of this report are set out below (emphasis added in bold):

The Subject Site

1. The development site is approx. c.3.9 ha and is located at St. Teresa's, Temple Hill, Monkstown, Blackrock, Co. Dublin.
2. This site is currently occupied by the daughters of Charity, who will remain in residence until December 2022 as per the contract of sale for the lands.
3. The overall lands are bound to the North by established residential development along Temple Hill with St. Vincent's housing neighbourhood to the East and The Alzheimer's Society of Ireland to the West. The Southern edge of the site is characterised by rich woodland park area which adjoins to the public park facility and network of trails known as Rockfield Park.
4. 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. **This makes it an ideal site for increased residential density and height in line with national policy.**
5. The lands are within the bounds of Dun Laoghaire-Rathdown County Council and are approximately 1KM from the heart of Blackrock Village. There are 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 Proposed Development

6. Overall, a total of 493 no. residential apartment units are proposed together with residential amenity facilities, a creche facility and a café.
7. The residential element of the scheme will be delivered in the form of 11 no. residential blocks extending from 2 to 10 storeys in height.
8. New Block G (Relocated and Extended St. Teresa's Lodge/The Gate Lodge) (1 storey) is also proposed comprising a new café space of 67.4 sq m.
9. Block C2 provides for a creche facility of 392 sq.m. The crèche is located at ground floor level and incorporates 3 Homebase areas, a sleep room, reception area, managers office, pram store, meeting room, staff kitchen, storage and laundry and WC and shower facility.
10. 252 no. car parking spaces will be provided to cater for the proposed residential development and the Childcare Facility.
11. The proposed development provides for a residential density of c123 units per ha (gross) figure and 165 units per ha (net) dwellings on a site of 3.9ha. Given its location and proximity to Blackrock Village and excellent public transport infrastructure including bus and DART, the proposed density complies with planning policy.
12. Extensive 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, gardens, and roof terraces for Blocks B2 and B3, will be provided in the form of (a) a communal open space (approx. 3,527.4 sq m) and (b) Public open space (approx. 11,572.3 sq m) in accordance with planning policy. Provision is also made for new pedestrian



connections to Rockfield Park on the southern site boundary and Temple Hill along the northern site boundary.

13. 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.
14. Building layouts are informed by strong axial relationships with views and vistas reinforced between St. Teresa's House and Rockfield Park.
15. Variation in building height along with a mix of apartment types, the conversion of St. Teresa's House and the conversion of the gate lodge, all combine to provide a rich living environment close to a host of facilities and landscape amenities.
16. 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.
17. Four main residential character zones are woven together through landscape to provide an integrated environment while building orientation is informed by views and maximising good daylight to units and sunlight to the shared public open green spaces.
18. The public realm along Temple Road is enhanced by providing building set back and a green tree lined strip along this edge. Views through the development are provided to enhance openness and lightness.

Planning History

19. The only recent planning history for the site relates to a strategic housing development which was permitted for this site under SHD PL06D.303804-19. The 2019 permission provided for 294 residential units and Crèche facility.
20. There are 3 recent permissions of relevance to the subject site, which relate to temporary retention permission for the storage of cars on site: PA Reg. Ref. Nos. D19A/0398, D20A/0199 and D21A/0043). The temporary nature of car parking proposed for retention will cease when the new Frank Keane motor show room at Brookfield Terrace is constructed (D20A/0086). Equally, the temporary storage of cars on site will cease when development works for the permitted SHD commence on site.

Planning Context

1. The publication of the Urban Development and Building Heights Guidelines for Planning Authorities, and Regional Spatial and Economic Strategy for the Eastern and Midland Region has significantly changed the planning landscape of the site. This change in context is a key consideration for the density of the new proposal.
2. The majority of the subject site is zoned 'A' - "To Protect and/or improve residential amenity". Uses permitted in principle under this zoning include 'Residential' and 'Childcare Facility'. Accordingly, the proposed residential uses, crèche facility and gym element of the residential clubhouse are permitted in principle.
3. In addition, a portion of the site is zoned 'F' - "To preserve and provide for open space within ancillary recreational amenities". The only use proposed for this portion of the site is Open Space', which is a permitted use under the zoning objective.
4. 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.



5. The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with national planning policy.
6. The proposed development is in accordance with applicable national, regional, and local planning policy. In particular, the proposed heights and density for this scheme is supported by national planning policy.
7. There is a height sensitive area designated around the protected structure and its curtilage. The predominant height limit is 4 storeys within the central area of the site with a 3-storey limit along the entrance avenue to the East. An area to the North West corner is identified as having a limit of 5 storeys.
8. The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.

Ful details on the planning context in relation to the proposed development is included in the Statement of Consistency enclosed with this application. The Statement of Consistency details the scheme's compliance with relevant planning policy and ministerial guidelines.



2 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **Oval Target Limited, 1st Floor, 55 Percy Place, Dublin 4, (D04 CX38)**, for a proposed development at **'St. Teresa's', Temple Hill, Monkstown, Blackrock, Co. Dublin**. For clarity, the site is located within the administrative boundary of Dun Laoghaire-Rathdown County Council.

This planning report clearly sets out the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of An Bord Pleanála (ABP).

2.1 Planning Application Context

This planning application in respect of the proposed St. Teresa's strategic housing development [SHD] is submitted directly to An Bord Pleanála in accordance with the provisions of section 4 of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended ("the 2016 Act").

This application for permission complies with the applicable provisions of, inter alia, sections 4 and 8 of the 2016 Act and Part 23 of the Planning and Development Regulations 2001, as amended ("the 2001 Regulations").

2.2 Printed and Digital Copies

In addition, it is confirmed that, pursuant to the requirements of article 297(5) and (6) of the 2001 Regulations, the following have been submitted to the Board:

- 2 no. printed copies of the application for permission and 3 no. copies of the application in a machine readable form on digital devices is being submitted to An Bord Pleanála; and
- 6 no. printed copies of the application for permission and 1 no. copy of the application in a machine readable form on digital devices has been issued to Dun Laoghaire-Rathdown County Council ("the planning authority").

Moreover, in compliance with the requirements of section 8(1)(b)(ii) and article 295 of the Regulations, 1 no. copy of the application in electronic form has been sent to the following prescribed authorities. We note that prescribed bodies have confirmed that they do not require a hard copy of the application with their preference clearly cited for a digital copy only.



3 APPLICANT AND DESIGN TEAM

The applicant for permission is Oval Target Limited.

Oval Target Limited has appointed an experienced design team to prepare this Strategic Housing Development planning application as follows

- ARC Architectural Consultants - Visual Impact Consultants
- AWN Consulting - Waste Management, Hydrological and Noise Consultants
- B Fluid - Microclimate
- Brock McClure Consultants - Planning Consultants
- Cathal O'Neill Architects - Conservation Advisers
- JJ Campbell & Associates - Civil & Structural Engineers
- Mitchell & Associates - Landscape Architects
- Model Works - CGIs and Visuals
- NRB Consulting Engineers - Traffic Engineers
- OCSC - Mechanical and Electrical Engineers
- O'Mahony Pike Architects - Design Architects
- Scott Cawley - Ecologists
- The Tree File - Arboricultural Consultants
- IES - Integrated Environmental Solutions
- Franc Myles – Archaeology and Built Heritage
- Maurice Johnson & Partners – Chartered Engineers
- John Olley – Historic Landscape Impact Assessment
- Aramark – Aramark Property Management



4 SITE DESCRIPTION

4.1 Site Location

The proposed development site extends to c.3.9 ha and is located at St. Teresa's, Temple Hill, Monkstown, Blackrock, Co. Dublin. The extent of the proposed development site is outlined in Figure 1 below.



Figure 1 - Aerial Photo with lands at St. Teresa's outlined (Source: Google 2021)

Site Area

In total, the application red line boundary site extends to an overall site area of 4.7015ha (gross site area). Lands in the ownership of the applicant, outlined in blue, extends to c. 3.97 ha (the main site area). This is the main development site. The remainder of the lands are controlled by:

- Dun Laoghaire Rathdown County Council i.e., lands along Temple Hill and at St Vincent's Park. In compliance with the provisions of article 297 of the 2001 Regulations, a letter is enclosed with the application documentation comprising the written consent of the local authority to make an application under section 4 of the Act of 2016 in respect of that land.
- Lands at the 'Alzheimer's Society of Ireland' i.e., a building bounding the shared boundary. Again, we note that a letter is enclosed with the application documentation comprising the written consent of the Alzheimer's Society of Ireland to make an application under section 4 of the Act of 2016 in respect of that land.
- Lands at 'Carmond', Temple Hill. Again, we note that a letter is enclosed with the application documentation comprising the written consent of the property owner to make an application under section 4 of the Act of 2016 in respect of that land.



Figure 2 – Extract from OMP Ownership Drawing

Surrounding Context

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 'Carmond'); and existing residential development (St. Louise's Park and Barlcay Court) and the Alzheimer's Society of Ireland to the west.

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.

4.2 Protected Structures on Site

The portion of the site within the applicant's control extends to c. 3.97 ha (the main site area). This is the main development site, which contains 3 no. Protected Structures as follows:

- (a) 'St. Teresa's House' or Centre which is a 3 storey Victorian House (RPS 398);
- (b) 'St. Teresa's Lodge' known as 'The Gate Lodge', which is a single storey property located at the main entrance to the site off Temple Hill (RPS 1960); and
- (c) Entrance Gates along the north of the site (RPS 398).

St. Teresa's House

St. Teresa's House is a 2 - storey over basement detached country house, of five bays with central projecting granite porch, and semi-circular end bays.





The proposed development for this building provides for 5 no. 2 bed units and 1 no. 3 bed unit (as permitted under SHD PL06D.303804-19).



Figure 3 - View of the Front of St Teresa's

St. Teresa's Lodge ('The Gate Lodge')

The existing gate lodge building is a single storey double fronted lodge with a hipped roof.

Notwithstanding the fact that the dismantling/deconstruction of the existing St. Teresa's Lodge (67.8 sq.m m) and demolition of a lean-to extension (28.5 sq. m) was previously permitted under SHD PL06D.303804-19.

It is also proposed to dismantle and relocate 'St. Teresa's Lodge' (1 storey - gross floor area 69.63sq m) from its current location to a new location, 180 m southwest within the development adjacent to Rockfield Park. St. Teresa's Lodge (Block G) will be deconstructed in its original location and reconstructed in a new location using original roof timbers, decorative elements, and rubble stonework, with original brickwork cleaned and re-used where appropriate. A non - original extension (approx. 28.5 sq.m m) is proposed for demolition. The current proposal seeks further extension of this building (approx. 26.8 sq. m) and a change of use from residential to café use to deliver a Part M compliant single storey building of approx. 67.4 sq. m

The Gate Lodge is outlined in the photos below for contextual purposes. The red hatched area indicates the existing Gate Lodge to be relocated and the Blue hatched out area indicates the proposed relocation of the Gate Lodge.

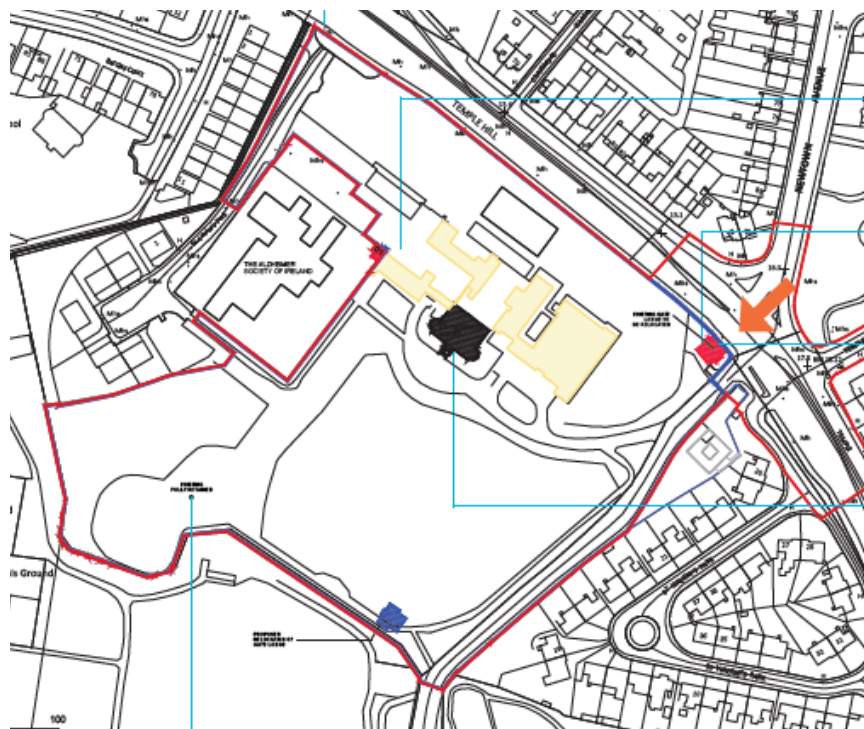


Figure 4: Existing (red) and proposed (blue) site plan of Gate Lodge

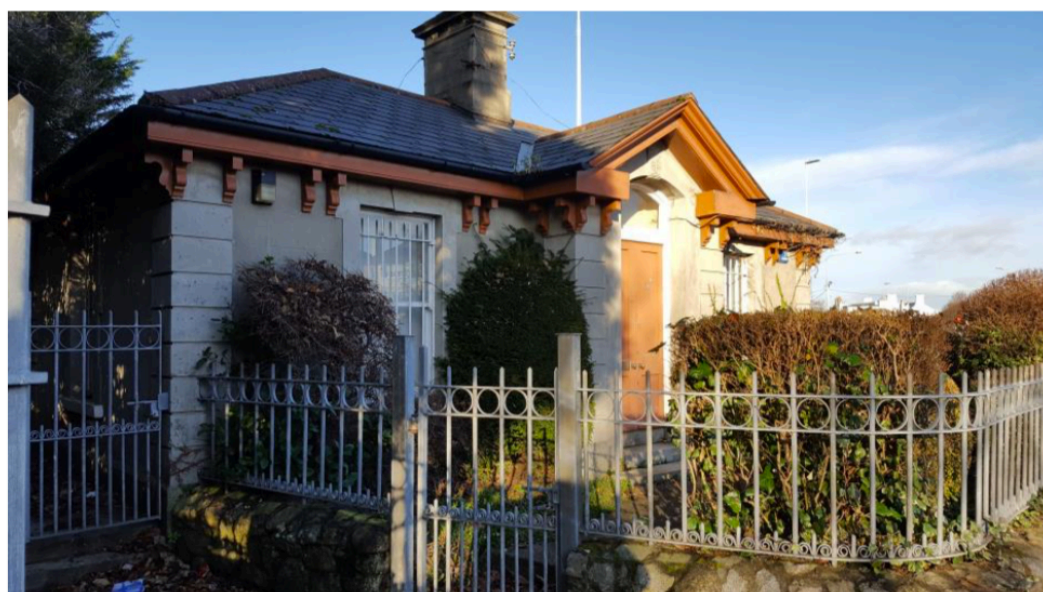


Figure 5 - Front of the Gate Lodge

4.3 Other Buildings Associated with St. Teresa's

In addition to the above, there are existing later extensions and ancillary buildings to the side and rear of St. Teresa's and The Gate Lodge, which are not considered of any architectural merit in this case. Again, notwithstanding the fact that permission to demolish these buildings was secured under SHD PL06D.303804-19, the current application seeks authorisation for demolition of these remnant buildings, as a component of the application for permission.



4.4 Site Context

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.

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.

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.

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 as a proposed Quality Bus Corridor (QBC). Blackrock Dart station and Seapoint Dart station are between 600 – 850m distance from the site.



5 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the subject site and adjoining sites is set out below.

5.1 Subject Site - Permitted SHD Development

A strategic housing development was permitted for this site under SHD PL06D.303804-19. This permission provided for 291 residential units and Crèche facility. A view of the proposal from Temple Hill as permitted and the relevant site layout is identified below.



Figure 6 - Permitted Site Layout



Figure 7 - Permitted Development (View from Temple Hill)



Block C3 was omitted by condition in the interest of safeguarding of the architectural heritage of the area. A recommendation was made to relocate the amenities provided for within Block C3 to either Block C1 or C2.

Whilst it is reiterated that this application for permission seeks authorisation for every aspect of the proposed development, regardless as to whether elements of that development were granted permission in 2019 (with the sole exception of the completed demolition works), for the sake of completeness, it should be noted that the following elements of the proposed development, which were permitted in 2019, remain unaltered:

- Works permitted to St. Teresa's House which provided for 6 apartment units (5 no. 2 beds and 1 no. 3 bed).
- The dismantling / deconstruction of the existing St. Teresa's Lodge (67.8 sq m) and demolition of a lean-to extension (28.5 sq m). In addition, as noted above, the current application seeks permission to reconstruct the St. Teresa's Lodge in a new location (180m south-west) with the further extension of this building and change of use from residential to café.
- Primary Access – which provides for works to the existing entrance of the overall site to deliver the realignment and upgrade of the existing signalised junction and associated footpaths to provide for improved and safer vehicular access/egress to the site and to/from St Vincent's Park. In addition, the current application seeks a minor alteration to the geometry at the vehicular access to St. Vincent's Park to provide for an improved alignment.
- Emergency vehicular access and pedestrian/cycle access, via a secondary long established existing access point along Temple Hill.

An Bord Pleanála Assessment

In assessing the development under SHD PL06D.303804-19, the following key points are highlighted from the Board's Inspector's report:

Height

1. *Density at approximately 74 units/ha is considered marginal for this urban location and is generally in compliance with relevant section 28 ministerial guidelines, although the site location a short distance from the district centre of Blackrock with its established services and facilities, in very close proximity to excellent transport ABP-303804-19 Inspector's Report Page 33 of 63 links is a location where higher densities and greater heights may be achievable, as per the Urban Development and Building Heights, Guidelines for Planning Authorities (2018). While the site constraints are noted, **a greater density may have been achievable on the overall site, in particular towards the southern end of the site overlooking the public park and the area fronting onto Temple Hill Road. This is a wide dual-carriageway which, in my opinion would have capacity to accommodate a greater height** (page 32 and 33) [Emphasis added]*

The current proposal for 493 residential units has been prepared as a response to this assessment, with additional height proposed along Temple Hill and along the southern portion of the site overlooking Rockfield Park.

Tree Retention

2. *Where possible and with the adoption of **controlled construction techniques and tree protection measures, the potential for tree retention has been maximised as best as possible and tree losses have been mitigated by what is a substantial planting scheme incorporating numerous large tree specimens.** This is considered reasonable, I consider that the proposal is a sensitive intervention in terms of landscaping, tree retention and open space provision (page 34). [Emphasis added]*

Arboricultural input and assessment has again informed the current design and this has been the case from the onset of the revised design evolution. Tree protection measures, controlled construction techniques and potential for tree retention have been maximised within the site layout, insofar as is possible. Consequently, a sensitive intervention in terms of landscaping, tree retention and open space provision is delivered. This report sets out the proposals for same in further detail below.

Gate Lodge Proposals

3. I am of the opinion that that the **justification before the Board as outlined in the justification reports submitted is robust and 'exceptional circumstances' exist such that the removal of the Gate Lodge from its current location is acceptable** (page 40).
4. I would concur with the opinion of the planning authority when they state that given the existing condition of the Protected Structure and its current isolated location on the periphery of the site, **there is significant merit in considering its relocation within the site to form a focal point of the overall scheme**. I consider that the proposal before me creates such a focal point. (page 40)
5. I consider the location proposed by the applicants to be acceptable. It will **have its own independent setting, appropriate in scale to its role; will have a visual link to St. Teresa's House and will announce the arrival into the proposed scheme** (page 41). [Emphases added]

The design team has carefully considered the issue of the Gate Lodge in the context of the current application. Fundamentally, the objective has been to retain the key positives of the permitted location, i.e., an independent setting; a location which maintains a visual link to St. Teresa's House; and a location which announces the arrival into the proposed scheme. The currently proposed location for the Gate Lodge coupled with the new proposal for the change of use for this building is considered an improved option and this matter is further detailed below.

Impact on Amenity

6. This is an underdeveloped piece of serviceable land, where residential development is permitted in principle. As has been previously stated, the development site is located within an established part of the city where services and facilities are available, in close proximity to good public transport links and where pedestrian and cycle connectivity is good. **The proposal, if permitted will add to the variety of housing stock within the area in a quality manner. It offers a benefit to the wider community by virtue of its public open space provision, which includes for a playground and direct access into Rockfield Park** (page 42 and 43).
7. The level of amenity being afforded to future occupants is considered good. Adequate separation distances are proposed between blocks to avoid issues of overshadowing or overlooking. Unit sizes are considered acceptable and are generally in accordance with national policy. Development Plan standards have been met in relation to parameters such as number of dual aspect units, ceiling heights, floor areas and private open space provision. Private open space is provided to all units, with the exception of the units within St. Teresa's House. This is considered acceptable. I note the extent of open space surrounding St. Teresa's House which will be available for future occupiers of St. Teresa's House (page 43).
8. Having regard to all of the above, I am satisfied that **the level of amenity being afforded to future occupiers of the proposed scheme is acceptable and the proposal if permitted would be an attractive place in which to reside**. I am also satisfied that impacts on existing residential amenity would not be so great as to warrant a refusal of permission (page 44).
[Emphases added]

Again, an appropriate mix, significant public open space provision (including a playground and connection to Rockfield Park), appropriate dual aspect, floor areas, private open space and separation distances are maintained within the current revised development proposal. In particular, it should be noted that separation distances and setbacks along boundaries are maintained to ensure that established relationships here are maintained.

Traffic and Transportation

9. *The proposed new junction has been designed to function safely and resolve identified traffic safety issues at this location. The new junction will necessitate the relocation of the Gate Lodge from its existing location (page 45).*
10. *Given the location of the site within an urban area on zoned lands, I do not have undue concerns in relation to parking, traffic or transportation issues. The site is well served by both bus and rail transport, while footpaths and cycle paths are available on Temple Hill Road (page 46).*
11. *I acknowledge that there will be some increased traffic as a result of the proposed development, however there is a good road infrastructure in the vicinity of the site with good cycle/pedestrian facilities. Public transport is available in close proximity with a QBC along Temple Hill Road and two DART stations within 600 metres of the site. I concur with the applicants that the site is well placed to take advantage of non-car modes of travel. Having regard to all of the above, I have no information before me to believe that the proposal would lead to the creation of a traffic or obstruction of road users and I consider the proposal to be generally acceptable in this regard (page 46).*

It is worth reiterating that the proposal in respect of primary access is unaltered in the current application. There is a minor revision to the geometry of the entrance to St. Vincent's Park but otherwise, there is no change proposed to and, importantly, proposals including emergency access remain unaltered. Car parking and cycle parking provision has been revisited to ensure provision is reflective of the uplift to unit numbers.

Conclusion

12. *In conclusion, I consider the principle of residential development to be acceptable on this site. I am of the opinion that this is a zoned, serviceable site within an established suburban area where a wide range of services and facilities exist. I have no information before me to believe that the proposal, if permitted, would put undue strain on services and facilities in the area. In my opinion, the proposal will provide a high quality development, with an appropriate mix of units and notwithstanding my opinion in relation to height and density, an acceptable density of development catering to a range of people at varying stages of the lifecycle. The provision of the public open spaces will enhance the amenity of the area for both existing and future occupiers. 14.1.2. I am satisfied that the proposal will not impact on the visual or residential amenities of the area, to such an extent as to warrant a refusal of permission. The removal of Block C3 from its proposed position is such that it will aid in providing a more ABP-303804-19 Inspector's Report Page 51 of 63 appropriate setting for the Protected Structure, making it more visible from the public realm as was the intention of its original layout and design. This block may be relocated elsewhere within the site, to a more appropriate location, by means of a separate application for permission. 14.1.3. I consider the proposal to be generally in compliance with both national and local policy, together with relevant section 28 ministerial guidelines. I also consider it to be in compliance with the proper planning and sustainable development of the area and having regard to all of the above, I recommend that permission is granted, subject to conditions (page 50 and 51).*

It is evident from An Bord Pleanála's previous assessment that the principle of strategic housing development on this site is appropriate. Importantly, in the context of the 2019 application for permission – many aspects of which are replicated in the current application – the Board and its Inspector were satisfied that the permitted scheme did not impact on the visual or residential amenities of the area, and gave consent. The development was considered to deliver an appropriate residential mix and an excellent level of public open space provision. It is our submission that the current proposal maintains these key elements, whilst optimising the use of the lands in the context of, inter alia, higher density, sensitive Arboricultural input and assessment and relocation and use of the Gate Lodge.



5.2 Other Planning History

PA file Ref. D18A/ 0954 refers to a refusal of permission for the construction of a new entrance gateway at the entrance, consisting of 2 no. 2.1m high granite clad piers, each with the words 'Daughters of Charity' engraved thereon, a pair of 1.8m high single painted steel pedestrian gate and matching painted steel railings over a granite clad plinth wall, all with ancillary controls. The gateway will be across the existing entrance drive, inside the boundary with the adjoining property, St Teresa's House (also a Protected Structure).

PA file Ref. D21A/0525 Permission was refused in July 2021 for the construction of a new entrance gateway at the entrance, consisting of: 2 no. 2.1m high granite clad piers, each with the words "Daughters of Charity" engraved thereon. A pair of 1.8m high, automated, painted, steel gates to vehicular entrance c.5.4. wide; a 1.8m high single painted steel pedestrian gate and a matching painted steel railings over a granite clad plinth wall, all with ancillary controls. The gateway will be across the existing entrance drive, inside the boundary with the adjoining property, St. Theresa's House [also a Protected Structure].

In August 2021, this application was appealed with ABP under reference ABP-311224-21, and no decision has been made to date

PA File Ref. No. 05A/1596 refers to a grant of permission revisions and amendments to previously planning application reg. ref. D03A/1047 for the development of the grounds within the walled garden. The development will consist of a new day care and respite centre for people with Alzheimer's disease and new headquarters facilities for the Alzheimer Society of Ireland. The walls of the walled garden are a Protected Structure and are therefore to be retained. The building is to be contained within the walls of the walled garden and a new opening for access if to be formed in the elevation facing Temple Hill Road. The building is single storey with some rooms being double height and with clerestory windows. A large area of the existing garden is to be retained as smaller gardens for use by the Alzheimer patients and staff at the centre. A strip of the existing hard standing directly in-front of the wall is to be used for car parking and drop off. The proposal includes the demolition of the small greenhouse, the shed and out-building contained within the garden walls.

5.3 Frank Keane BMW

There are 3 recent permissions of relevance to the subject site, which relate temporary retention permission for the storage of cars on site. The references are identified as follows:

- D19A/0398
- D20A/0199
- D21A/0043 - currently with the Planning Authority

The temporary nature of car parking proposed for retention will cease when the new Frank Keane motor show room at Brookfield Terrace is constructed (D20A/0086). Equally, the temporary storage of cars on site will cease when development works in respect of the permitted SHD commence.

5.4 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

Do any statutory notices (e.g., Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

There are no statutory notices which apply to the site of the proposed development or any building thereon.



6 SECTION 247 PRE - PLANNING

Details on the Pre-Planning Meetings held are set out in brief below.

6.1 Design Iteration

It should be noted that the proposed strategic housing development and particularly the design layout now submitted is historically the product of a positive engagement process with the planning authority.

The proposed development, which forms the subject-matter of this application for development, has been progressed on the basis of careful consideration of the assessment contained in the Board's Inspector's report and Board Decision in respect of the 2019 application, which adverted to the prospect that additional height and density could be achieved at this site and particularly along Temple Hill and along the interface with Rockfield Park.

It is our view that the current proposals remain entirely consistent with the parameters previously developed through engagement with the planning authority and permitted by the Board in terms of the site layout and design.

6.2 Pre-Planning Meeting

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. The matters raised by the planning authority and the subsequent response to those issues from the applicant is detailed below.

Item	Planning Authority Discussion Point	Applicant Response
Planning		
1.	Although it is acknowledged that the scheme has been influenced by commentary included in the Planning Inspector's report to the extant permission, the Planning Authority has concerns regarding the overall height of blocks across the development site, which is considered to be contrary to the height limits prescribed in the Blackrock LAP.	<p>The current pre-application is a direct response to the Inspector's assessment of the permitted SHD scheme (SHD PL06D.303804-19). The design currently before An Bord Pleanála has had particular regard to areas across the site that have the ability absorb greater residential densities and heights.</p> <p>The Blackrock LAP 2015 contains blanket numerical limitations for height that are not supported by the current national policy mandate.</p>
2.	The Planning Authority highlighted concerns regarding the design and siting of Block B4 and the visual impact of this component of the scheme. This visual impact is compounded by the loss of previously proposed landscaping within this portion of the site.	<p>The visual impact of Block B4 has been reviewed by ARC (View 1 refers which looks at the view from Newtown Avenue towards the entrance to the site). ARC set out its opinion that "...Given that the lands of St Teresa's are zoned for development of the type proposed in the current application, since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass the proposed development is likely to be regarded by some observers as consistent with existing and emerging trends in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent". (page 24/25 LVIA)</p>



3.	Concerns were raised regarding the siting and height of Block F1 and its impact on the amenity of the adjoining residences within St. Vincent's Park. It is unclear from the submitted documentation whether overlooking would occur.	Block F1 has been removed from the design, as the application site boundary has been revised from that presented at consultation stage.
4.	The Applicant will need to put forward a robust argument for the relocation of the existing gate lodge from what was originally permitted under the parent permission.	<p>The Gate Lodge Conservation Report prepared by CONA & BMC (enclosed herewith) sets out how the current relocation proposals for the gate lodge have transpired. Detailed consideration of alternative locations vis a vis the current scheme are set out.</p> <p>The relocated Gate Lodge will have a clear purpose within the development. The Gate Lodge will provide animation and amenity at the link to the adjoining parkland.</p>
5.	The Planning Authority highlighted their reservations regarding the siting and design of Block C3. The proposal now relies on further interventions to provide connectivity between the block and the Protected Structure. The proposal is contrary to an existing condition of the extant permission and will not be supported by the Planning Authority.	Proposed Block C3 has been revisited as part of the current pre-application. The current design of Block C3 has been the subject of a significant design evolution process, which has ensured that development at this location is now appropriate in the context of St. Teresa's House. Further detail is included in Section 6 below.
6.	Concerns were highlighted regarding the design and form of Block D1. The design of the building fails to provide an appropriate graduation in height and will be visually impactful when viewed from St. Vincent's Park given its linear form and massing. Concerns were also raised with regard to the overshadowing impacts on the main communal open space area to the front of St. Teresa's and location of the play space area.	<p>The design team has reviewed this issue and given significant consideration to Block D1. The proposed height of this block is identified as 6 storeys with the main core of this block set back from properties at St. Vincent's Park by 39-41m. Within this set back lies a shared boundary; an access point to service lands further south at St. Catherine's; and a mature sylvan lined avenue of trees.</p> <p>Furthermore, we note the following commentary from ARC on View 3 from St. Vincent's Park: <i>"The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent (page 25 LVIA)"</i></p> <p>Lastly, we note the following comment from IES in terms of overshadowing impact amenity space within the development.</p> <p><i>"The total proposed amenity provision is of high quality with 92% receiving at least 2 hours of sunlight coverage on the 21st of March, thus complying with the BRE recommendation"</i></p> <p>All matters considered, the current proposal for Block D1 at 6 storeys is appropriate and is well founded in design terms.</p>
7.	The verified photomontages presented at the meeting demonstrated the overbearing visual impact of Blocks E1	The proposals for E1 and E2 remain unaltered in this application. In review of the proposed visual impact of these blocks, ARC note in their report <i>"While the proposed development is likely to result in a 'significant'</i>





	<p>and E2 when viewed from the residences to the north.</p> <p>A full daylight and overshadowing analysis is required, and shadow diagrams should have regard to the principal communal open space area within the Alzheimer's Society of Ireland grounds.</p>	<p><i>change in views from this location, some observers may consider this view to be consistent with emerging trends for development in the area or 'moderate' in extent. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent."</i> (pg 25 LVIA)</p> <p>Furthermore, we note that the daylight and sunlight analysis prepared by IES identifies that there is no significant impact on communal open space areas of the Alzheimer's Society of Ireland. Page 14 refers and sets out that 79% of the garden space analysed received more than 2 hours of sunshine a day, which is within the guideline recommendations.</p>
8.	<p>In addition to concerns raised regarding the height of the blocks fronting Temple Road (including the impact on the Block A1 on the amenity of the residences in Barclay Court), concern was highlighted regarding the modifications to the design of the blocks. This is particularly apparent in the design of the upper levels of the blocks.</p>	<p>The OMP Architectural Design Statement sets out a design rationale for the height and design of the Blocks along Temple Hill.</p> <p>It is important to set out that separation distance parameters set by the parent permission are retained within this application. With regard to the distances to Barclay Court, these are identified as 30-33m.</p>
9.	<p>The application should be supported by an acoustic report.</p>	<p>We refer the Board to the enclosed Noise Assessment prepared by AWN.</p>
10.	<p>An operational waste management plan should be submitted in support of any planning application. Regard should be had Guidance for Environmental Management of Construction Projects (see attached).</p>	<p>We refer the Board to the enclosed Operational Waste Management Plan prepared by AWN.</p>

6.3 Housing Department

Brock McClure Planning Consultants entered into discussions with the Housing Department of Dun Loaghaire Rathdown County Council in respect of Part V proposals in February 2021. An initial indicative proposal was submitted on 17 February 2021 and a final validation letter dated 23rd November 2021 is enclosed with this application.

The Part V proposal in this case is set out in detail within the OMP Part V Booklet enclosed herewith and we note the following proposal in summary:

- Total Units Proposed (493)
- Part V Proposal (50 units) in Block E2 - as agreed in principle with the Housing Department.
- Proposals for Part V provide for 1 no. studio unit, 29 no. 1 beds units, 18 no. 2 bed units and 2 no. 3 bed units.

The applicant has prepared indicative costings for consideration by the Housing Department on this proposal, which are enclosed herewith in the Part V Booklet, for consideration by An Bord Pleanála.

Correspondence from the Housing Department and, specifically, an indicative Part V agreement letter is also included in this brochure confirming the acceptability in principle of proposals.



7 SHD PRE-PLANNING APPLICATION CONSULTATION REQUEST

On 15th March 2021, a Strategic Housing Development pre-application request was submitted to An Bord Pleanála. Reference ABP-3309696-21 refers.

The pre-application development proposal consisted of 500 no. residential apartments, residential amenity facilities and a new creche facility. A comprehensive pre-application request was submitted to An Bord Pleanála setting out the basis on which the pre-application request could be favourably considered.

The key changes between the pre-application proposal and the proposed development which forms the subject matter of this application for permission relate to a reduction in the number of units, building heights, and the location of the Gate Lodge.

7.1 Planning Authority Opinion

As part of this pre-application process, Dun Laoghaire Rathdown County Council issued an opinion of the proposal, dated 9th April 2021.

7.2 Pre-Application Consultation Meeting

A tri-partite pre-application consultation meeting was convened to discuss the proposal on 30th April 2021. Representatives from An Bord Pleanála, Dun Laoghaire Rathdown County Council and the Applicant attended this meeting.

7.3 An Bord Pleanála Opinion

Following consideration of the pre-application request, opinion of the planning authority and the matters raised at the tri-partite pre-application consultation meeting, An Bord Pleanála issued its Opinion on 30th June 2021. Having considered the issues raised during the pre-application consultation process, the Board's opinion was that the documents submitted with the request required **further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.**

The Board outlined issues that needed to be addressed in order to constitute a reasonable basis for an application for permission. Specific information was also requested to be submitted with the application. A separate report has been prepared addressing the issues raised and outlining the specific information submitted. As appears from that Response to Opinion of An Bord Pleanála, all issues raised in the Board's Opinion as requiring further consideration and amendment have now been addressed. All prescribed bodies have been notified of the lodgement of this application as appropriate.

8 DESCRIPTION OF PROPOSED DEVELOPMENT

8.1 Overview of Proposed Development



Figure 8 - CGI Image of Proposed Development

The proposed development for which permission is sought comprises: 493 residential units, a crèche facility, residential amenity facilities a creche facility, 252 car parking spaces and 1056 bicycle parking spaces.

Whilst this application for permission seeks authorisation for every aspect of the proposed development, regardless as to whether elements of that development were granted permission in 2019 (with the sole exception of demolition works permitted under the 2019 permission), for ease of reference, a summary of key development parameters as between the previously permitted scheme and current proposed development are set out below.



Permitted Scheme	Proposed Development
291 units	493 units
124 x 1 beds (42.6%) 112 x 2 beds (38.4%) 55 x 3 beds (19%)	18 studios (3%) 220 x 1 bedrooms (45%) 208 x 2 beds (43%) 47 x 3 beds (9%)
Crèche 286 sq. m	Crèche 392 sq. m
-	Café 67.4 sq. m
-	Residential Amenity 451 sq.m.
272	252 Car Parking Spaces
666 Cycle Parking Spaces	1056 Cycle Parking Spaces
14,887 sq. m	15,099.7 sq. m public open space
74 units per ha	123 units per ha(gross) and, 165 units per ha (net)
68%	52.5% dual aspect

8.2 Detailed Description of Proposed Development

Demolition

In circumstances where those structures have been demolished pursuant to the previous permission granted, the within application seeks permission for the demolition of the following extant structures:

Total Gross Floor space of proposed demolition is 207sq.m as follows:

01	Ground floor lean-to in A.S.O.I. garden	20.0 sq.m.
02	Ground floor switch room	24.9 sq.m.
03	Ground floor structures NW of St Teresa's House	26.8 sq.m.
04	Basement boiler room NW of St Teresa's House	17.0 sq.m.
05	Ground floor structures NE of St Teresa's House	22.0 sq.m.
06	Basement stores NE of St Teresa's House	67.8 sq.m.
07	Ground floor rear extension to gate lodge	28.5 sq.m.





Residential Development

493 residential units are now proposed as follows:

- Block A1 (5 storeys) comprising 37 no. apartments (33 no. 1 bed units and 4 no. 2 bed units)
- Block B1 (10 storeys) comprising 55 no. apartments (37 no. 1 bed units, 10 no. 2 bed units and 8 no. 3 bed units)
- Block B2 (8 storeys) comprising 42 no. apartments (28 no. 1 beds, 9 no. 2 beds and 5 no. 3 beds)
- Block B3 (8 storeys) comprising 42 no. apartments (28 no. 1 beds, 9 no. 2 beds and 5 no. 3 beds)
- Block B4 (5 storeys) comprising 41 no. apartments (4 no. studio units, 4 no. 1 bed units, 27 no. 2 bed units and 6 no. 3 bed units).
- Block C1 (3 storeys) comprising 10 no. apartments (1 no. studio unit, 3 no. 1 bed units and 6 no. 2 bed units).
- Block C2 (3 storeys) comprising 6 no. apartments (2 no. 1 bed units and 4 no. 2 bed units) together with a creche facility of 392 sq. m at ground floor level and outdoor play area space of 302 sq. m.
- Block C3 (2 storey plus basement level) comprising residential amenity space of 451 sq. m.
- Block D1 (6 storeys) comprising 134 no. apartments (12 no. studio units, 22 no. 1 bed units, 90 no. 2 bed units and 10 no. 3 bed units).
- Block E1 (6 storeys) comprising 70 apartment units (34 no. 1 bed units, 26 no. 2 bed units and 10 no. 3 bed units).
- Block E2 (6 storeys) comprising 50 units (1 no. studio unit, 29 no. 1 bed units, 18 no. 2 bed units and 2 no. 3 bed units).

A detailed breakdown of the units is set out in the accompanying schedules included in the Architectural and Master planning Design Statement prepared by O'Mahony Pike.

Development Mix

The total development mix proposed is identified as 18 studio units (4%), 220 x 1-bedroom units (44%), 208 x 2 bed units (43%) and 47 x 3 bed units (9%).

Dual Aspect

259 of the 493 units proposed will have the benefit of dual aspect, equating to a minimum of 52.5 % of the units.

Residential Density

The residential density proposed at this site will be 493 units on a site area of approx. 3.9ha. This equates to approx. 123 units per ha gross figure and 165 units per ha net figure. This residential density is supported by national policy which is aiming to deliver increased height and densities at appropriate locations. The site can accommodate this density given its proximity to public transport, e.g., Dart Stations and bus services.

The residential density is calculated as follows:

- Site area = 39917.1 m²
- Residential Density (site area) = $493/39917.1 = 123$ units / HA
- Residential density (site area – Tree belt 1 and Tree belt Avenue and Tree belt St Teresa's & gate lodge) = $493 / 29823.1 = 165$ units / Ha



Figure 9 Site Map of Tree Belts for calculation of Residential Density

This residential density is supported by national policy which is aiming to deliver increased height and densities at appropriate locations. The site can accommodate this density given its proximity to public transport, e.g., DART Stations and bus services.

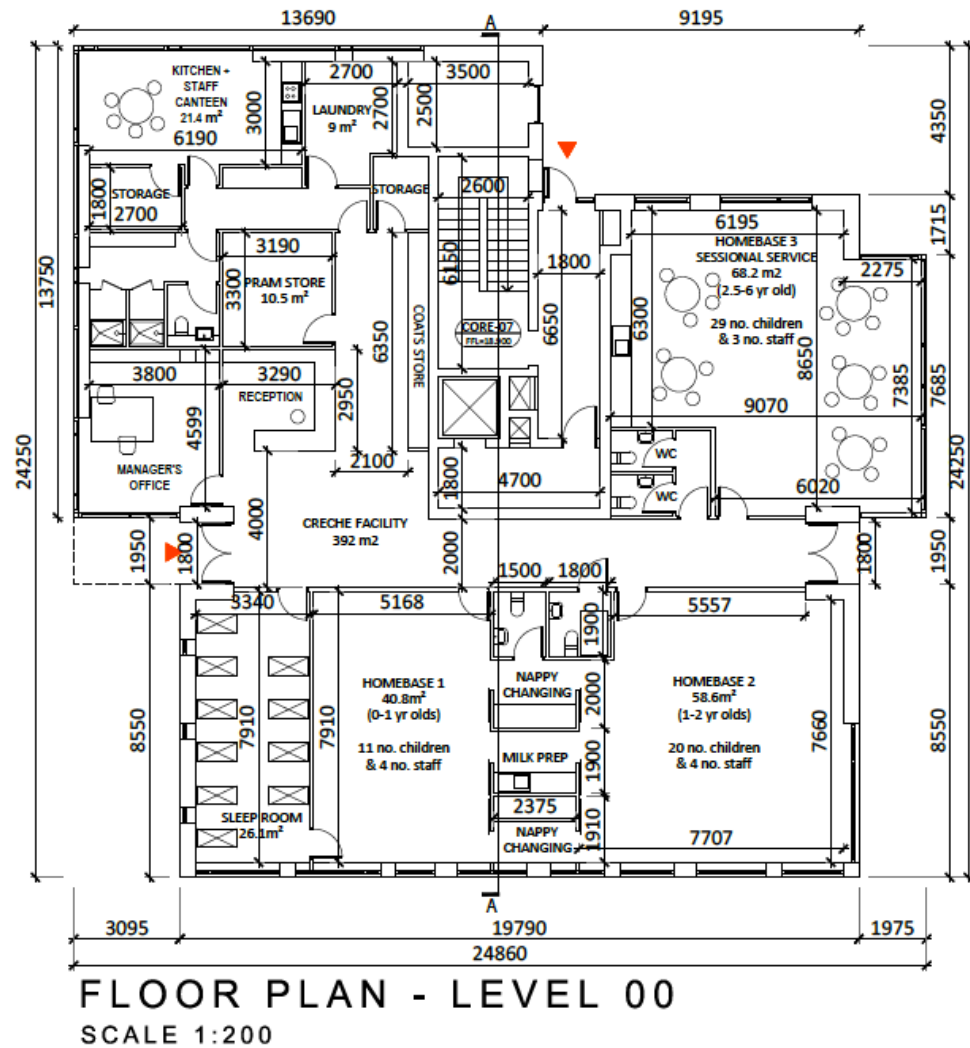
Crèche Facility

Block C2 provides for a crèche facility of 392 sqm, which is an increase from the permitted 286 sq. m facility. The associated play space is 302 sqm which is also an increase from that permission at 225 sq. m. The crèche space is located at ground floor level and incorporates:

- 3 Homebase Areas
- A Sleep Room
- Reception Area
- Manager's Office
- Pram Store



- Meeting Room
- Staff Kitchen
- Storage and Laundry
- WC and Showers



There are 8 no. designated surface car parking spaces for use in relation to the crèche, which will, in turn, accommodate staff and drop off. The crèche is conveniently located proximate to the main entrance of the site for ease of access and also maintains a central location within the development proposal.

New Block C3

Block C3 was previously omitted pursuant to Condition No 2 of the grants issued under SHD PL06D.303804-19 as follows:

"2. Prior to commencement of any works on site, revised details shall be submitted to and agreed in writing with the planning authority with regard to the following:

(a) Omission of Block C3 from the proposal and this area appropriately landscaped. The tenant amenity facilities located within Block C3 shall be relocated to another block, possibly Block C1 or C2. The number of residential units hereby permitted is 291 number.

Reason: In the interests of proper planning and sustainable development, to safeguard the architectural heritage of the area, to enhance permeability and to secure the integrity of the proposed development including the public park."

The design team have given significant consideration to this element of the overall masterplan design for the site and have prepared a revised proposal for consideration as part of this application for permission.

In terms of previous concerns raised in terms of this building, the design team have reviewed the reasoning behind the decision and specifically the following excerpt from the Inspector's Report of the parent permission:

*"In terms of the impact on the setting of St. Teresa's House, I note that both the planning authority and the DAU have raised concerns with regards to height/location of Block C3 and consider that it would have an adverse impact on the character of the property. It is considered by both bodies that Block C3 should be redesigned which may involve (i) **creating a greater separation distance and/or reducing the height and footprint** or (ii) relocating it elsewhere, allowing the rear elevation of St. Teresa's to become a focal point of the terraced pedestrian access route from Temple Hill. The DAU favours the second option, namely relocating this block to elsewhere on the site. The Conservation Officer concurs with this view. The Planning Authority also concurs but are also of the view that **one level be removed from the structure as proposed**. Presently, the house is not unduly visible from Temple Hill Road. In my opinion, the opening up of the site to increase its visibility from the public realm would be a welcome addition to the streetscape and architectural heritage at this location. It is considered to be a planning gain for the area. However, the positioning of Block C3 is such that it will obscure the view of the Protected Structure from the public realm. The DAU submission states that the structure was designed to be visible. It is clear from the documentation included with the application that Block C3 will almost entirely obscure visibility of the Protected ABP-303804-19 Inspector's Report Page 42 of 63 Structure from Temple Hill Road, even though the rationale in the gaps between the apartment blocks would appear to create an opening on axis with pedestrian access to the development. Having regard to all of the above, I am of the opinion that Block C3 should be omitted from the proposal and relocated elsewhere within the site, as part of a separate application. (page 41 and 42)"* [Emphasis added]

There is certainly potential for consideration of a redesign of the building in terms of height and separation distance, which results in a change in planning circumstances, and which is proposed as part of this application for permission.

As set out by OMP, the design team considered the possibility of relocation into Blocks C1 and C2, however, neither location was deemed suitable as the floor space would be insufficient. Alternative proposals for the residents' amenity area to be split into two separate locations (e.g., C1 ground floor and part of E1 ground floor) were also deemed undesirable because they would be fragmented and impractical to manage.

The revised proposal, for which permission is sought, provides for a new Block C3 building of completely revised design, which comprises residential amenity space in the region of 451 sq. m, which is a significant provision to the benefit of the scheme and future residents. The revised Block C3 provides for a new basement level with 1 storey over ground floor level. The building accommodates a gym and studio space at basement level; resident's dining/function room, library/snug room, and games lounge at ground floor level; and resident's lounge and café, work booths and reception/foyer/parcel store at first floor level. There are external east and west facing terraces proposed to service this building also.



Figure 10 - Plaza looking West to Block C3



Figure 11 - Plaza looking south to Block C3

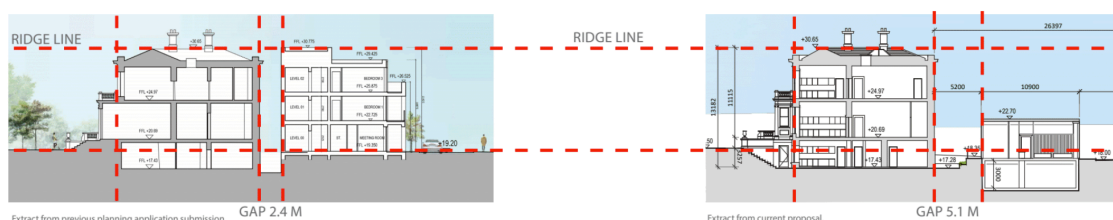
It is important to set out that the new proposal is set back further from St. Teresa's House (now separated by 5.1 m) and the height of the building has been reduced to 1 storey over ground level with new basement level to deliver the extent of facilities required. These are significant changes to the iteration of the building which was previously refused permission in 2019.

As set out by OMP, the floor-to-floor heights are also reduced, and the architectural expression is notably different. The proposed residents' amenity building is a glass clad pavilion with a distinctly rectilinear form located to the rear of St Teresa's House. The building footprint is reduced and simplified in form. The circulation core (of the previous Block C3) that occupied the gap between St Teresa's House and Block C3 is removed.

Accessed from the plaza and availing of open spaces to the east and west, the residents' amenity facilities are located centrally within the site becoming the focal point and the social hub of the entire development. The residents' amenity building provides a generous facility located at the heart of the development, becoming the focal point for social interaction and the enjoyment of leisure activities.

The new Block C3 also provides for Part M access.

A comparison of the heights and separation distances from the previously proposed C3 building and the current proposed development is set out below.



Issue	Previously Proposed (SHD PL06D.303804-19)	Current Proposal
Overall Height	11.4m	4.3m over basement
Separation	2.4m	5.1m

Evidently, there is a significant decrease in height (of some 7 metres) and an appropriate increase in separation distance to the current proposed Block C3, as compared to the previously proposed Block C3, as can be seen in the table above, which clearly complies with recommendations from the Planning Authority and DAU as set out in the assessment of the previous proposal for Block C3.

In terms of the view to St. Teresa's House from Temple Hill, the Architectural Heritage Impact Assessment and Conservation Method Statement included with the application documentation establishes that the rear of St. Teresa's House was never designed to be viewed from Temple Hill. Rather, and to the contrary, the following is the case:

"As is evident from the photographs below, the rear elevation of the house was not designed to be viewed, especially from afar, and had outbuildings and stables obscuring it from the time of its original construction. Further accretions, in the form of the high-level and low-level link blocks, the open-sided shelter, the 1946 school and the 1962 building further detract from the appearance. The stripping away of these additions and their replacement with a well-designed lower and subordinate building, will greatly enhance the current setting (Page 3)"

A comparison of the proposals is set out in summary below:



Figure 12 - Image of Previously Proposed C3 Building (View from Temple Hill)



Figure 13 - Proposed Block C3

Accordingly, the revised design addresses the previous concerns raised in relation to omitted Block C3 and the inclusion of this building will improve and enhance the setting of St. Teresa's House (which, of course, is a protected structure); it will provide a focal point for residents to gather within the scheme; and will enhance the scheme when viewed from Temple Hill.

8.3 St. Teresa's House

Proposals for St. Teresa's House consist of the conversion of the building in to 6 no. apartments.

St. Teresa's House is a 2 - storey over basement detached country house, of five bays with central projecting granite porch, and semi-circular end bays.

The proposed development for this building remains as permitted under SHD PLo6D.303804-19 and provides for 5 no. 2 bed units and 1 no. 3 bed unit.



Figure 14- View from central Parkland towards St. Teresa's House flanked by pavilion blocks C1 and C2

8.4 Relocation of St. Teresa's Lodge (The Gate Lodge)

As part of this application for permission, in addition to the previously permitted dismantling/deconstruction of the Gate Lodge and the demolition of a lean-to extension, authorisation is also sought to reconstruct the Gate Lodge in a new location with the further extension of this building and change of use of the building from residential to café. This latter aspect of the proposed development, i.e., the reconstruction of the Gate Lodge in a new location differs from the development permitted under SHD PLo6D.303804-19 (which provided for the conversion of the newly reconstructed gate lodge as a residential unit at a location adjacent to previously permitted Block D1).

The current application, with its proposal to relocate and reuse the Gate Lodge building, has sensitively responded to the views expressed by the planning authority and the Board's Inspector in the context of the 2019 application for permission. By way of example, the Board's Inspector stated:

"I would concur with the opinion of the planning authority when they state that given the existing condition of the Protected Structure and its current isolated location on the periphery of the site, there is significant merit in considering its relocation within the site to form a focal point of the overall scheme. I consider that the proposal before me creates such a focal point. (page 40)"

As stated above, the basis for the current proposal is to increase height and density across this accessible site. 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.

In that context, the focus for the design team has been to consider alternative locations for the gate lodge within the revised scheme, with conservation input from Cathal O'Neill Architects. These alternatives are discussed in detail in the Gate Lodge Strategy Report enclosed with the application documentation.

The current proposed location for the Gate Lodge building ensures that the building has its own independent setting adjacent to Rockfield Park.

The proposals for this are set out in detail in the submitted drawings and reports prepared by OMP Architects (Design Statement & Response to DLR CoCo & An Bord Pleanála Opinion) and Cathal O'Neill Architects (Architectural Heritage Impact Assessment).

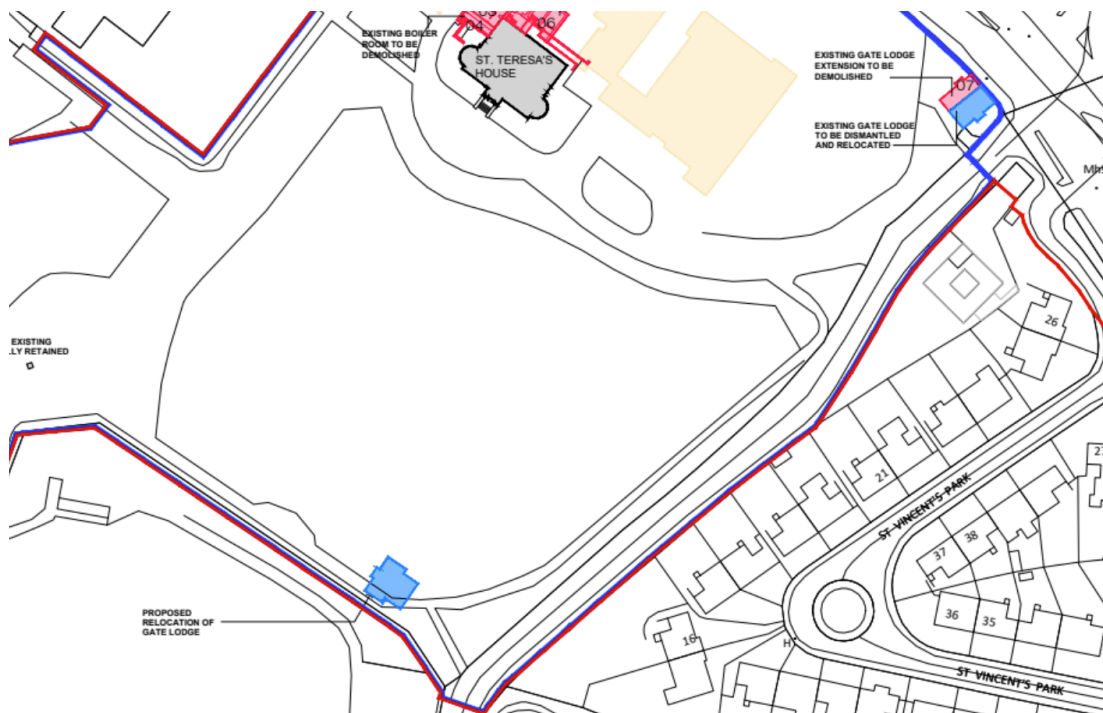


Figure 15 – Site Plan of Gatelodge Relocation Proposal

The proposal to change the use of the building from residential to café under the new application is also beneficial in terms of proper planning. As a result, the building will be brought to life and will have a more active use within the scheme, and provide a useful service at the gateway to the adjoining park.

In assessment of proposals, Cathal O'Neill Architects conclude as follows in terms of the new location:

"The lodge is now in a position as close as is reasonably possible to that preferred by the Local Authority and fulfils the same function as that envisaged in the LAP sketch, i.e., marking the entrance to the park, while retaining one of its original purposes in signifying the arrival at the St Teresa's grounds, but from the park rather than from Temple Road."

A CGI view of the proposed Gate Lodge is identified below for the purposes of context in terms of the proposed development and relocation of the Gate Lodge building.



Figure 15 - CGI View of the Gate Lodge –

Heights Proposed

As set out previously, the proposed development has been designed to optimise the potential for this site to absorb additional height, particularly along the south of the site and Temple Hill. Indeed, as also previously noted, the Board's Inspector's assessment of the (then) proposed development in the context of the 2019 application was that a greater density may have been achievable, with capacity to accommodate a greater height.

Significant work has been undertaken in analysis of locations within the site that have the capacity to absorb additional height. In addressing the key height differences, the table below compares the (then proposed) permitted and new development proposals:



Block	2019 Permission Height	Proposed Height	Change
Block A1	4 storeys	5 storeys	+1 storey
Block B1	8 storeys	10 storeys	+2 storeys
Block B2	6 storeys	8 storeys	+2 storeys
Block B3	6 storeys	8 storeys	+2 storeys
Block B4	5 storeys	5 storeys	No change
Block C1	3 storeys	3 storeys	No change
Block C2	3 storeys	3 storeys	No change
Block C3	3 storeys (omitted by ABP)	1 storey over basement	-2 storeys
Block D1	5 storeys	6 storeys	+1 storey
Block E1	2-5 storeys	6 storeys	+1 storey
Block E2	2-5 storeys	6 storeys	+1 storey
Block E3	2-5 storeys	Omitted	Omitted
Block E4	4 storeys	Omitted	Omitted
Block E5	4 storeys	Omitted	Omitted
Block G (Gate Lodge)	1 storey	1 storey	No change
Block H (St. Teresa's)	3 storeys	3 storeys	No change

Table 2 - Proposed Building Heights

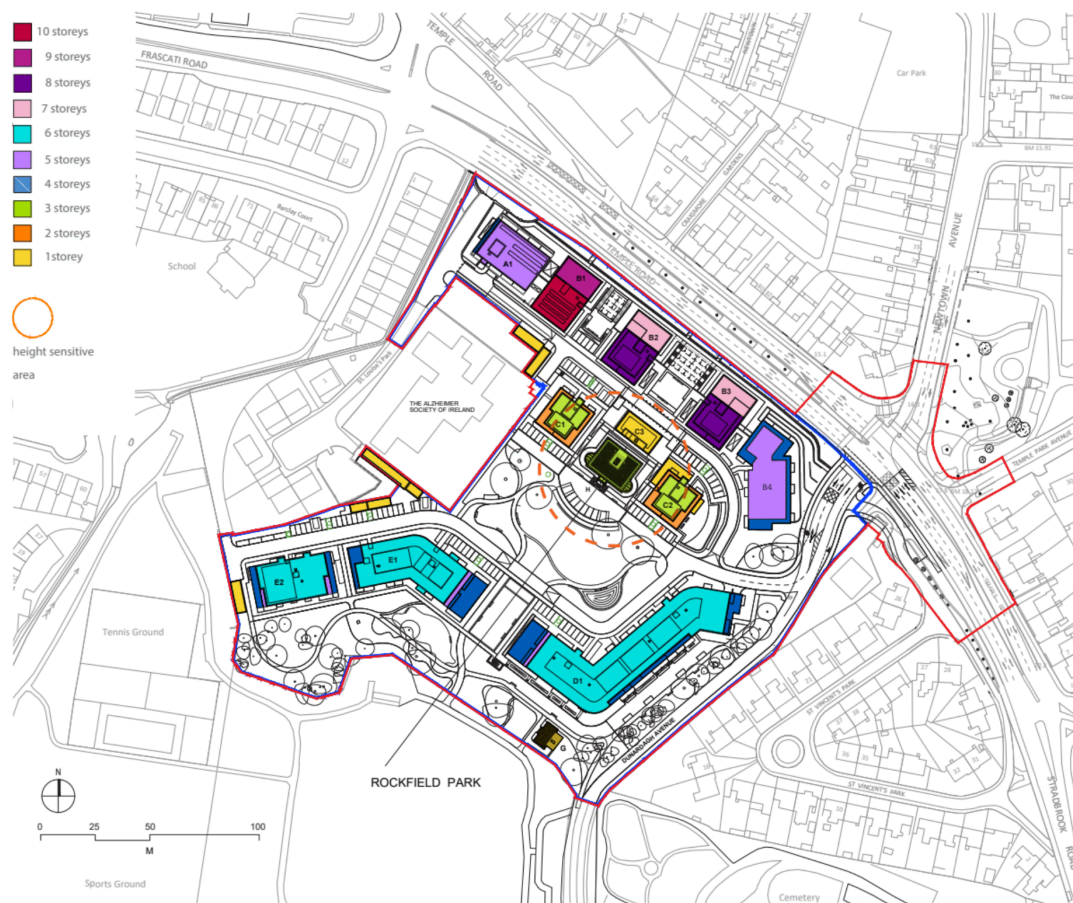


Figure 16 – Proposed Building Height Strategy

It is important to set out that the elements of additional height are generally proposed at the locations previously referenced in An Bord Pleanála's Inspector's report, (ABP-309696-21), as having the potential to absorb additional height. Specifically, along Temple Hill where modest increases of 1-2 storeys are proposed within blocks A1, B1, B2 and B3.

It should be noted that, in relation to these blocks proximate to the protected structure at St. Teresa's House, the height of newly proposed Block C3 is reduced by 2 storeys to ensure this building is subservient to the presence of St. Teresa's House.

New Block D1 is 6 storeys in height and replaces previously permitted height of D1 and E5, which ranged between 2-5 storeys.

New blocks E1 and E2 of 6 storeys replace the previously permitted Blocks E1 to E4 of 2-5 Storeys with overall increases in height identified as between 1 and 2 storeys depending on location.

The design architects have combined the increases to height with extended block layouts to deliver a higher residential density for this site. It is worth setting out that the parameters for density and height as currently proposed have been framed by the results of daylight and sunlight analysis and consideration of set-backs from adjoining properties and any perceived impacts on same.

Car / Motorcycle and Bicycle Parking



Proposals for car parking generally comprise the following:

252 car parking spaces (161 proposed at basement level and 91 proposed at surface level).

This is considered an appropriate provision and it is noted that the Development Plan makes provision for a reduced level of parking in cases where the site is located proximate to public transport.

Of the 91 spaces proposed at surface level, 8 spaces are designated for use by the crèche facility. There are 4 surface spaces proposed to be allocated to a Car Sharing/Car Club scheme.

Basement car parking is divided into 3 parking areas as follows:

- Area A (Level -1) – 44spaces
- Area B (Level 0) – 36 spaces
- Area D (Level -1) – 81 spaces

Accessible parking is provided at a rate of 5% of spaces, which is 13 spaces across the scheme proposal. A car parking ratio of 0.51 is proposed.

In addition, provision is made for 20 motorcycle spaces. (10 proposed at basement level and 10 at surface level)

A total of 50 no. electric charging points have been provided throughout the development.

- Basement car park A , 12 no. charging points
- Basement car park B , 14 no. charging points
- Basement car park D , 14 no. charging points
- Surface level parking , 10 no. charging points

A total of 1056 bicycle parking spaces are proposed within the development (656 at basement level and 400 at surface level).

Basement cycle parking is divided in 3 parking areas as follows:

- Area A (Level -1) – 100 spaces
- Area B (Level 0) – 226 spaces
- Area D (Level -1) – 246 spaces

These are provided in a combination of Sheffield stands and double stacked bays. All cycle spaces are conveniently located for ease of access for residents and close to lift/ stair cores.

Part V Provision

The proposal provides for 50 no. Part V residential units within the scheme (10% of the total 493 no. units), which meets the social housing requirements of Dun Laoghaire Rathdown County Council. These units are identified in Part V Report enclosed prepared by O'Mahony Pike Architects.

Public and Communal Open Space

Total Public Open Space Provision is identified as 15,099.7sq m across the entire site. OMP Architects have broken down provision into communal, public open space and a woodland park for visual purposes and to show that all requirements are being met by way of the institutional 25% open space /population equivalent standards (DLR Development Plan) governing this site but also the communal requirements of the Apartment Guidelines 2020.

In summary, the provision is broken down as follows:

- Public Open Space – 11,572.3 sq m

- Communal Open Space – 3,527.4 sq m
- **Total Provision – 15,099.7 sq m**

A detailed breakdown of open space is included in the OMP Architectural Design Statement enclosed herewith. The following reference images are identified.



Figure 17 – Landscape Masterplan Proposal

9 RELATIONSHIP TO SURROUNDING DEVELOPMENT

This section of the report provides a summary of the relationship of the proposed development to existing surrounding development. This section will refer to enclosed assessments of the proposal i.e., daylight/sunlight, visual impact etc., which we refer the Board to for a more in-depth analysis.

9.1 St. Vincent's Park

With regard to St. Vincent's Park, the relationship to Block D1 is the key area for consideration. The site layout and relationship with St. Vincent's Park is set out below:

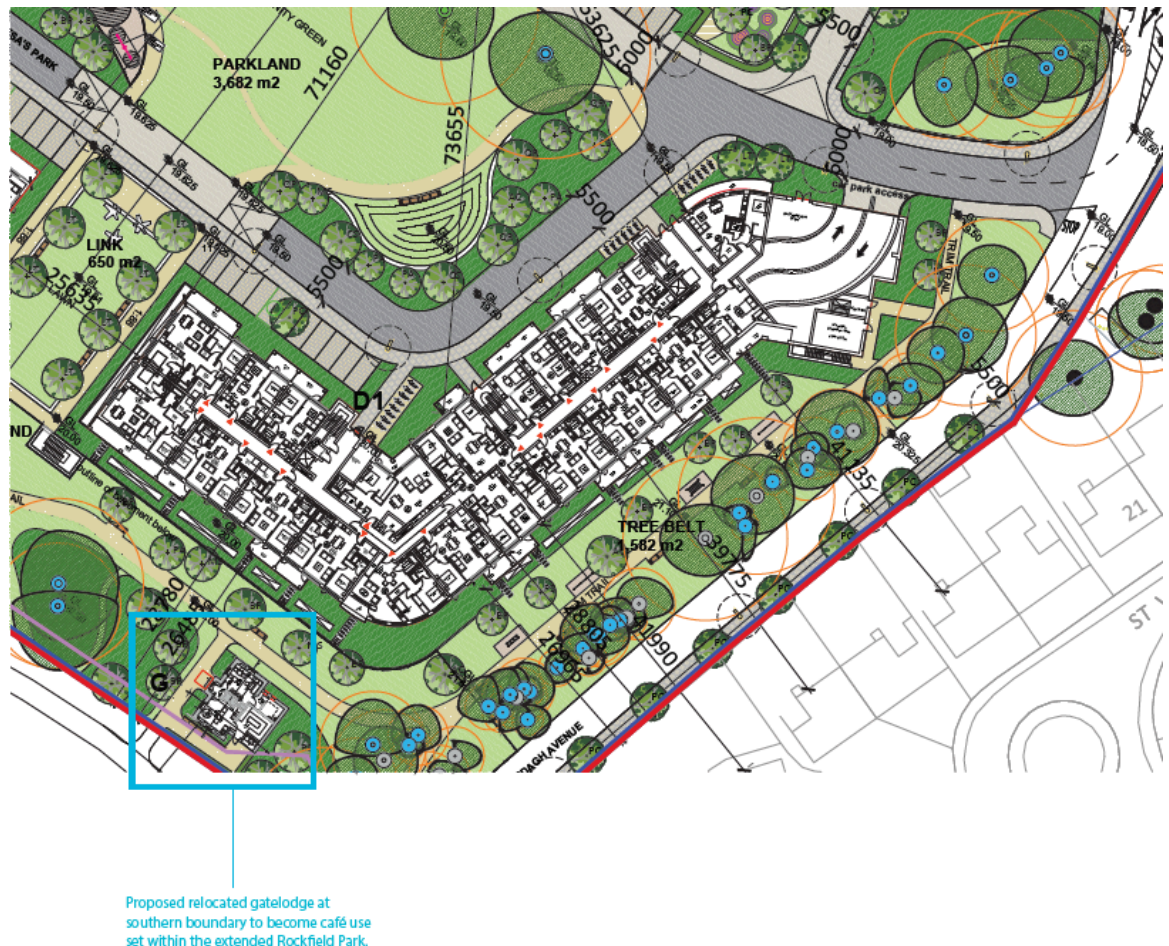


Figure 18 - Proposed Block D1 vis a vis St. Vincent's Park

Overall, it is worth noting that there is a modest increase to the height of block D1 (by 1 storey) and the building footprint of the block has increased, however, and importantly, the key permitted relationship in terms of set back and separation distance has been maintained. Separation distances are identified as falling within 39-41m, which maintains the relationship of this building in terms of proximity to St. Vincent's Park as was proposed in the context of the 2019 application for permission (and subsequent decision to grant permission), i.e., distances of 38-41m.

Furthermore, we note that the landscape treatment at this location generally provides for the retention of the existing boundary conditions as set out in the image below and further supplemental planting is proposed.



EXISTING WALL TO THE EASTERN BOUNDARY OF THE ENTRANCE AVENUE

Figure 19 - Boundary Wall with St. Vincent's Park Retained

With regard to daylight and sunlight analysis, we refer to page 125 of the IES report in discussion of the impact on St. Vincent's Park, where it is stated that there is *"No additional overshadowing noted from the proposed development throughout the year to these existing dwellings."* With regard to daylight, the report concludes that *"these adjacent buildings were not analysed for APSH as their windows do not lie within 90 degrees of due South. Thus, the overall impact of the proposed development on the surrounding adjacent buildings can be considered as a negligible adverse impact (page 127)."*

It is worth considering here that the difference between the previously permitted scheme and the current proposed development is a single additional storey from 5 to 6 storeys. All considered, the established levels of residential amenity afforded to St. Vincent's Park are maintained within the proposed development and the increase to building height is therefore well founded.

9.2 St. Louise's Park

With regard to St. Louise's Park, the relationship to Block E1 and E2 is the key area for consideration. The site layout and relationship with St. Louise's Park is set out below:

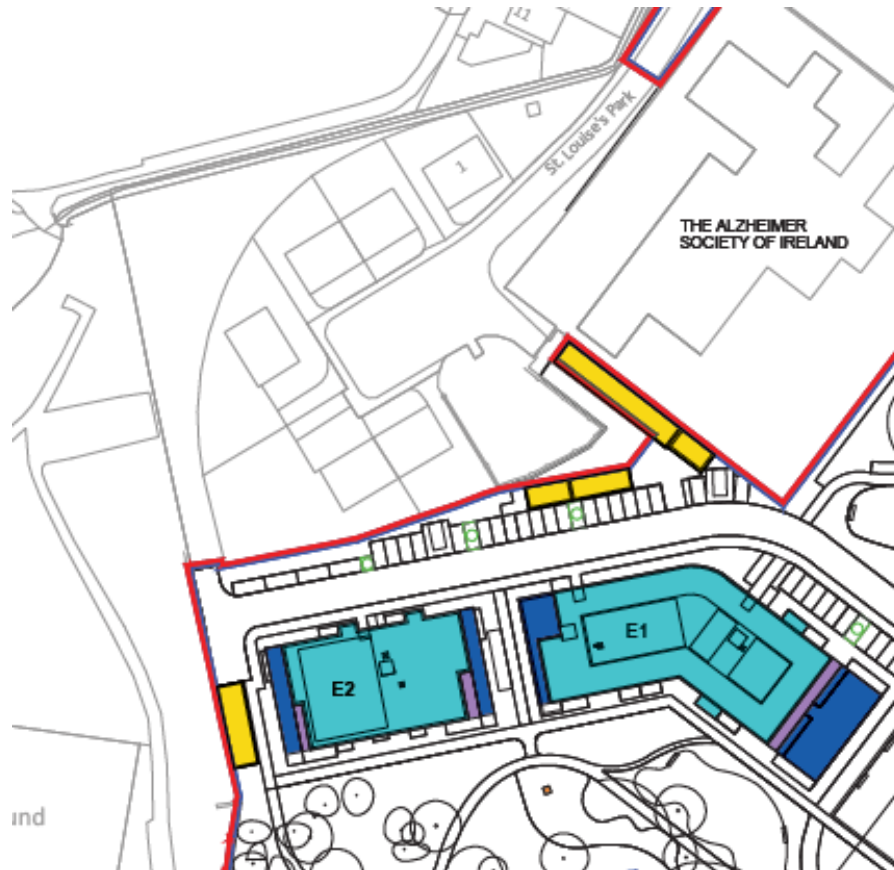


Figure 20 - Proposed Block E1 and E2 vis-à-vis St. Louise's Park

Overall, it is worth noting that there is a modest increase to the height of block E1 (by 1 storey) and the building footprint of the block has increased but importantly the key permitted relationship in terms of set back and separation distance has been maintained. Separation Distances here are identified as falling within 24.9m, which maintains the same relationship of this building in terms of proximity to St. Louise's Park as the previously proposed (and ultimately permitted) development, i.e., distances of c.24m.

With regard to daylight and sunlight analysis, we refer to page 91 of the IES report in discussion of the impact on St. Louise's Park, where it is stated that there is "Additional overshadowing noted from the proposed development during March and December. No additional shading noted in June during the summer months. As outlined in the sunlight analysis section, the garden amenities and playground will continue to receive above the recommended levels of sunlight and as such, overshadowing should not affect the quality of these amenity spaces."

Page 42 of the assessment by IES states in relation to the windows tested in St Louise's Park "Of the 17 points tested, all points will continue to receive at least 25% of annual probable sunlight hours, or 0.8 times their former value. 14 no. points will continue to receive at least 5% of winter probable sunlight hours, or 0.8 times their former value. Only 3 no. points (17%) will not achieve the recommended sunlight levels during the winter months, however, these points will still receive the recommended sunlight levels over the annual period."

With regard to the Visual Impact of the proposed development from St. Louise's Park, we draw attention to the following point of the Visual Impact Assessment (View 18) submitted by ARC

Consultants, which again concludes that, “This view looks southeast from the centre of St Louise’s Park towards the boundary of the St Teresa’s lands. A single storey house is seen to the right. In the proposed view, the upper three storeys of proposed apartment blocks are visible, as is planting and trees proposed along the boundaries of the St Teresa’s lands. From nearby locations in St Louise’s Park, glimpses of the lower floors of these blocks will be intermittently visible through gaps in boundary planting and existing development at St Louise’s Park. While the proposed development is likely to result in a ‘significant’ change in views from this location, given the extent of large new developments existing or approved in the area, some observers may consider this view to be consistent with emerging trends for development in the area. The visual impact of the proposed development from this view location is assessed to be ‘moderate’ to ‘significant’ in extent.

Again, the landscape masterplan for this location is worth identifying, in that proposals provide for retention of the boundary in situ with supplementary planting.

All considered, the established levels of residential amenity afforded to St. Louise’s Park are maintained within the current proposal application and the increase to building height is acceptable in planning terms.

9.3 Barclay Court

With regard to Barclay Court, the relationship to Block A1 is the key area for consideration. The site layout and relationship with Barclay Court is set out below:

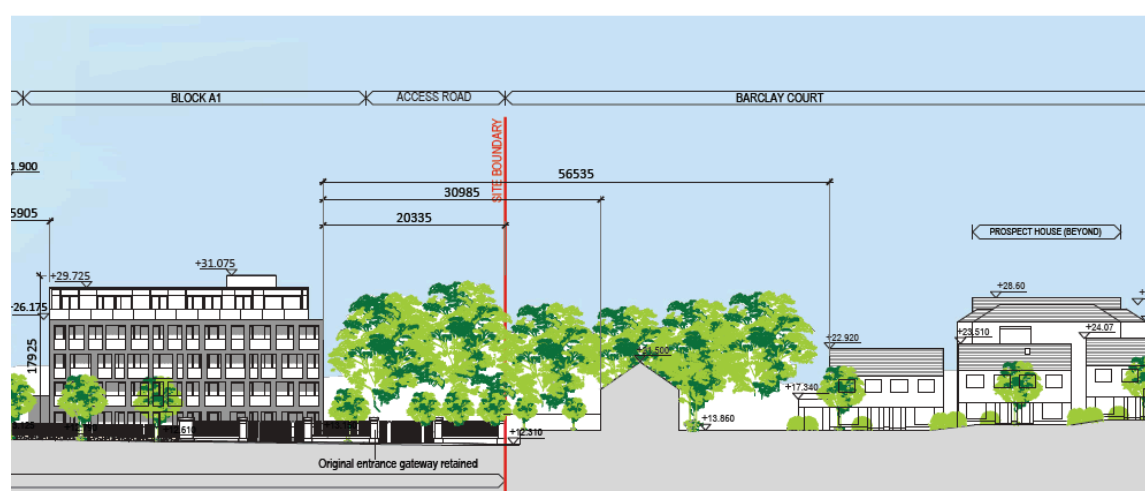


Figure 21 - Proposed Block A1 vis-à-vis Barclays Court

Overall, there is a modest increase to the height of block A1 (by 1 storey) but, once again, the key relationship in terms of set back and separation distance has been maintained with Barclay Court. Separation Distances here are identified as falling within 30.5-33.8m, which maintains and marginally improves the previous relationship of this building in terms of proximity to Barclay Court under the previous proposal, being distances of c.30-32m.

With regard to daylight and sunlight analysis, we refer to page 91 of the IES report in discussion of the impact on Barclay Court, where it is stated that there is “Additional overshadowing noted from the proposed development during the mornings of March and December. No additional shading noted in June during the summer months. As outlined in the sunlight analysis section, the garden amenities and playground will continue to receive above the recommended levels of sunlight and as such, overshadowing should not affect the quality of these amenity spaces”

Page 42 of the Assessment notes that for the windows tested “The results for these windows demonstrate they would continue to receive at least 25% of annual probable sunlight hours and at least

5% of winter probable sunlight hours (or 0.8 times their former value), thus complying with the BRE recommendations.”

With regard to the Visual Impact of the proposed development when viewed from Barclay Court, we draw attention to the following points of the Visual Impact Assessment submitted by ARC Consultants, which again concludes the following:

View 7: From the entrance to Rockfield Park from Brookfield Court

This view looks northeast across part of Rockfield Park towards Carraig Lawn Tennis Club, beyond which are trees in the park and on St Teresa's lands. The club house of Carraig Lawn Tennis Club is seen to the right of the existing view. In the proposed view, parts of the proposed development are seen in the middle distance through trees and the netting around tennis courts. The remainder of the development is hidden by trees and is represented by a red outline. In winter conditions, some other parts of the proposed development may be just visible through winter trees. The proposed development is a minor element in the view and the landscape and visual impact of the proposed development from this view location is assessed as to 'slight'.

View 8: From the entrance to Rockfield Park from the south end of Barclay Court

This view looks northeast across a turning circle in the foreground and then across part of Rockfield Park. Most of the view is taken up by trees and shrubs on open space that is part of Barclay Court, beyond which are trees in the park and on other lands between the park and St Teresa's. The proposed development is not visible in the view and is represented by a red outline. In winter conditions it is likely that some parts of the proposed development will be visible. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

View 9: From a junction at the south end of Barclay Court

This view looks east into a cul de sac at the south end of Barclay Court. Houses in Barclay Court are seen at the left and right of the view. The centre of the view is taken up by trees and shrubs. The proposed development is not visible in the view and is represented by a red outline. In winter conditions it is likely that some parts of the proposed development will be visible. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

View 10: From a residential road at the north end of Barclay Court

This view looks east along a residential road at the north end of Barclay Court. Houses within the Barclay Court development occupy most of the view. In the proposed view, upper floors of three of the blocks that form part of the proposed development are seen above houses at the east end Barclay Court at some distance from the viewpoint. The proposed 10 storey block is prominent in the centre of the view. The remainder of the proposed development is not visible in the view and is represented by a red outline. While the construction of the proposed development is likely to result in a 'significant' change in the visual environment from this location, given that the lands of St Teresa's are zoned for residential development, and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. Given this, the landscape and visual impact of the proposed development from this view location is assessed as 'moderate' to 'significant'. From the rear of a number of west facing houses at the north end of Barclay Court other parts of the proposed development are likely to be more openly visible, also resulting in 'moderate' to 'significant' visual impacts.

View 11: From Temple Road opposite Barclay Court

This view looks southeast along Temple Road towards the site of the proposed development. The entrance to Barclay Court is seen to the right. The site of the proposed development is seen in the centre of the view behind the large, recessed gateway that give access to St Louise's Park and the Alzheimer Society of Ireland. Houses along the north side of Temple Road (Blackrock Bypass) are seen to the left, and Temple Hill is seen in the distance. On the site of the proposed development extensive stands of

trees are visible in the centre of the view, with large trees behind a stone wall along the boundary with Temple Road.

In the view as proposed, the large trees on the site are gone are replaced by three tall blocks of apartments seen behind a new railings and new tree planting along the boundary with Temple Road, and, nearer to the viewpoint, a lower block. This lower block is seen behind the piers and railings of the existing large, recessed gateway. The upper elements of another apartment block are visible above the roofs of houses at Barclay Court. The new development is seen openly in this view and occupies a substantial part of the view. In the view, the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north. While the construction of the proposed development is likely to result in a 'significant' change to the visual environment, given that the lands of St Teresa's are zoned for development of the type proposed in the application for permission and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass, the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. The visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

Again, the landscape masterplan for this location is worth consideration, in that proposals provide for retention of the boundary in situ with supplementary planting. It is also worth noting that Barclay Court does not directly adjoin the proposed development in that a generous access avenue is provided to St. Louise's Park, which provides a further hard buffer from Block A1. The Board will be aware that an extensive tree planting plan is proposed as part of this development. As the landscape matures, the tree growth with further soften the view of the new development in its quality landscaped setting.

All considered, the established levels of residential amenity afforded to St. Louise's Park, when compared to the previously proposed (and permitted) development are maintained within the current proposed development application and the increase to building height is acceptable in planning terms.

9.4 Alzheimer's Society

Block C2 is the main building for consideration and the footprint and height of same remains unchanged in the new application. We note that there are some additional bin/bike storage and ESB substations on this shared boundary but the landscape treatment along this shared boundary (3m high random rubble wall) ensures that there is no further additional impact to this building.

Equally, the daylight and sunlight analysis prepared sets out that there is no significant impact on communal open space areas of the Alzheimer's Society of Ireland

9.5 Properties at Temple Hill

With regard to properties at Temple Hill, again separation distances are maintained between proposed Blocks A1 to B1, B2 and B3 as set by the 2019 permission, those being 39-41m. It is worth highlighting that the dual carriageway is generous in size at this location and, as referenced by the Board's Inspector in the context of the 2019 permission, additional height is appropriate at this location overlooking Temple Hill. To this end, buildings with additional heights of between 1 and 2 storeys are now proposed under this new SHD application.

With regard to the Visual Impact of the proposed development when viewed from Temple Hill, we draw attention to the following points of the Visual Impact Assessment submitted by ARC Consultants, which again concludes the following:

View 2: From the east end of Temple Road at Temple Hill

"This view looks west towards the junction of the Blackrock Bypass with Newtown Avenue, which is seen the right of the view. Beyond the junction, two storey houses are seen on the north side of the Bypass, Temple Road, and the Church of St John the Baptist Blackrock is seen in the distance. In the existing view, the present gate lodge to St Teresa's is seen in the centre of the view, behind which there is heavy existing tree planting. To the left of the view a line of trees is seen behind the stone boundary wall to St Vincent's Park.

In the proposed view, the entrance to the St Teresa's lands is seen widened and changed substantially. The former gate lodge is gone, as are many of the existing trees behind the gate lodge, though replaced by new tree planting. Parts of two of the new apartment blocks, set in new landscaping are seen behind the new entrance and behind trees at St Vincent's Park. It is likely that, in winter conditions, more of the proposed development will be visible from this view location through winter trees. The new development is seen openly in this view but is not a dominant element of the views. In the view, the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent."

10 CONCLUSION

In considering the proposed development, we ask the Board to note the following:

1. The site is zoned Objective A *"To protect and/or improve residential amenity"* which explicitly provides for residential development.
2. The proposed development responds to the recognized further potential for increased heights and densities at particular locations with this site.
3. Many of the elements of the current proposed development are unaltered from the development permitted by the Board in 2019, and follow the masterplan principles established for the site in the 2019 application.
4. This planning application has been prepared in the context of current national planning policy, which ultimately seeks the expedient delivery of critically required quality residential development at strategically located sites proximate to public transport nodes and corridors.
5. The current proposal maintains all established development parameters established pursuant to the previous proposed (and, ultimately, permitted) development, in terms of design layout and orientation of buildings and separation distances to adjoining development.
6. The current proposal includes a new design for Block C3, which was previously omitted pursuant to the Board's decision on the 2019 application for permission. The current proposal delivers a more sensitive design in planning terms, whereby the building height has decreased and separation distance to St. Teresa's House is more pronounced.
7. Permission is also sought for a new location and new purpose for the Gate Lodge. Careful consideration has been given to the design rationale for Gate Lodge.
8. Proposals for access to the scheme remain generally as previously proposed (and ultimately permitted), with minor changes to the geometry of the entrance to St. Vincent's Park. Emergency Access remains unaltered.

In all the circumstances as set out in this report and in the suite of application documentation, the Board is requested to carefully consider the proposed development and to grant permission for this SHD which will optimise the use of these suitably zoned lands in a manner which is consistent with the proper planning and sustainable development of the area.