

# **Statement of Response to An Bord Pleanála Opinion**

## **Proposed SHD Application**

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

**On behalf of  
Oval Target Limited.**

December 2021



Planning & Development Consultants  
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## 1 Introduction

Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Statement of Response on behalf of **Oval Target Limited, 1<sup>st</sup> Floor, 55 Percy Place, Dublin 4, D04 CX38.**

This Statement of Response is submitted with the application documentation in respect of the proposed St. Teresa's Strategic Housing Development [SHD].

This response has been prepared with direct input from:

- 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

## 2 Requirement for this Statement

This report is a response to the issues raised by An Bord Pleanála following the pre-application consultation in respect of the proposed SHD (ABP Pre-Application Reference ABP-309696-21 refers).

In June 2021, An Bord Pleanála issued a Notice of Pre-Application Consultation Opinion on 'St. Teresa's' Pre-Application Request which stated the following:

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

The opinion sets out that 3 key issues should be addressed in the documents submitted with any application for permission in respect of the proposed. These matters can be summarised as follows:

1. Design Strategy
2. Residential Amenities
3. Architectural, Cultural Heritage and Conservation Considerations

The opinion of An Bord Pleanála in relation to these matters and the response from the applicant are identified in Section 4 of this document for convenience purposes.

Furthermore, An Bord Pleanála requested the submission of the following specific information with any planning application for permission:

1. A Housing Quality Assessment
2. (a) Parking Management Strategy Report  
(b) A response to the issues raised in the report of the Transportation Planning Section of Dun Laoghaire Rathdown County Council.
3. Wind micro-climate study
4. An Ecological Impact Assessment
5. An Archaeological Impact Assessment
6. A Tree Survey and Arboricultural Assessment
7. A Landscape Impact Assessment and a Visual Impact Assessment
8. A Site layout Plan clearly indicating what areas are to be taken in charge by the Local Authority
9. A response to the issues raised in the Planning Authority's Opinion received by An Bord Pleanála on 9<sup>th</sup> April 2021.
10. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
11. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant Development Plan or Local Area Plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000.

Section 5 of this report sets out the applicant's and design team's response to the above requested items.

In addition, the opinion sets out that the applicant shall notify the following authorities in the event of the making of an application for permission:

1. Irish Water
2. Transport Infrastructure Ireland
3. The Minister for Housing, Local Government and Heritage





4. Heritage Council
5. An Taisce
6. Failte Ireland
7. An Comhairle Ealaíon
8. DLR Childcare Committee

It is confirmed that a full digital copy of the planning application currently under consideration has been furnished to the authorities referenced. We confirm that the digital copy was the preferred format for prescribed bodies of the formal strategic housing development planning application. Where required by the prescribed body a USB of the digital material has also been issued.

In addition to the above, we note that the application form in respect of Strategic Housing Development references the following information:

*12 (e) Where An Bord Pleanála notified the applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, a statement setting out any changes made to the proposals in consequence.*

A statement setting out the key changes made to the proposal as a consequence of the opinion requesting further consideration of the Development Strategy, Residential Amenity and Foul Water proposals for the scheme has been incorporated into Section 3 of this report.

*12 (f) Where An Bord Pleanála notified the applicant that specified additional information should be submitted with any application for permission, a statement setting out that such information accompanies the application.*

As set out above, Section 4 of this report sets out the applicant's and design team's response to the above requested items

### 3 Response to Issues Raised

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

1. Design Strategy
2. Residential Amenities
3. Architectural, Cultural Heritage and Conservation Considerations

The opinion of An Bord Pleanála in relation to these matters and the response from the applicant are identified below.

#### 3.1 Design Strategy

##### An Bord Pleanála Opinion:

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

- (a) *The interface with The Alzheimer Society, interface with Temple Hill Road, interface with Rockfield Park and interface with St. Teresa's House as they relate to the design, scale and layout of the proposed development and the desire to ensure that the proposal provides a high quality, positive intervention at this location. This should include a contextual layout plan which indicates the layout of adjoining developments, photomontages and cross sections at appropriate levels.”*

##### Applicant Response:

For a detailed response on this issue, we refer the Board to the enclosed report from O' Mahony Pike Architects entitled “Response to ABP Opinion and DCLRCC Opinion”. This Report clearly details the design strategy as it relates to the key interfaces identified in the Board's Opinion.

This application also includes additional, extended site cross sections between the proposed SHD and adjoining lands and properties, which illustrate the relationships between the proposed development and The Alzheimer Society, Temple Hill Road, Rockfield Park and St Teresa's House in terms of design, scale, and layout of the proposed development. We refer to OMP Drawings nos 1706A-OMP-00-00-DR-A-3101 Proposed Site Elevations/Sections and 706A-OMP-00-00-DR-aA-3102 Proposed Site Elevations/Sections.

The Landscape Masterplan drawing, detailed drawings and Landscape Architect's report enclosed with the application documentation also describes the interfaces at these identified locations. Mitchell and Associates drawings STT-MAS-XX-XX-DL-R-0100 Landscape Masterplan, ST-MAS-XX-XX-DR-L-0101 Boundary Treatment and STT-MAS-XX-XX-RP-L-0001 Landscape Report should be specifically reviewed in this case.

A justification of the proposed heights vis a vis National policy and Ministerial Guidance has been outlined in detail in the accompanying Planning Report and Statement of Consistency prepared by Brock McClure Consultants.

CGI's and photomontages are provided that also serve to illustrate the development context at these locations. The imagery is located in the Design Statement prepared by OMP Architects and in the booklet of Photomontages prepared by Modelworks.

For the convenience of the Board, we now provide a visual summary of the main interfaces as listed above. Firstly, the location of the detailed cross sections is shown as follows:





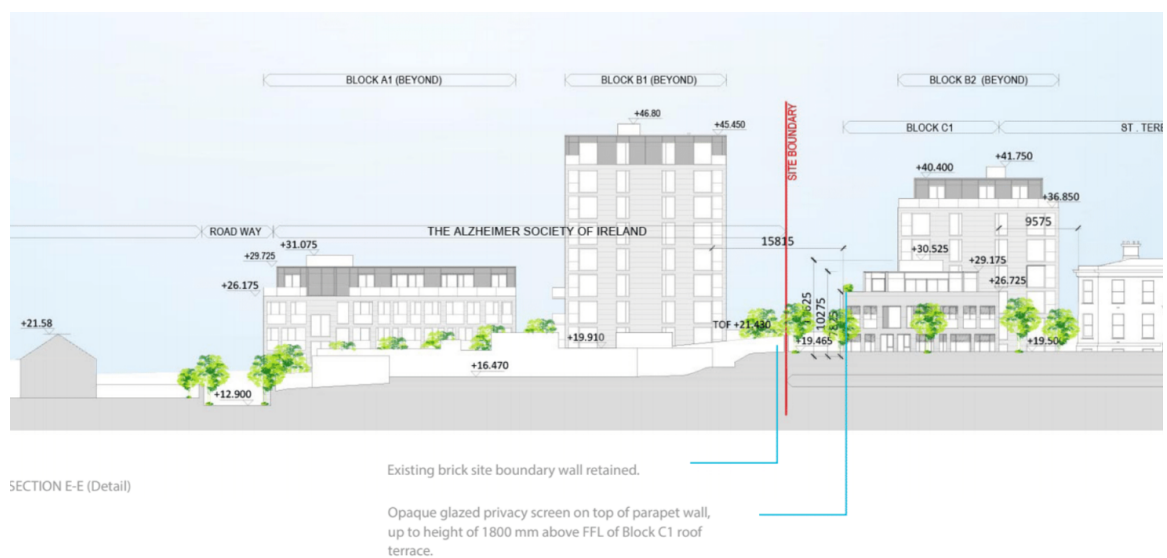
### OMP Site Plan showing section lines

## Interface with The Alzheimer's Society

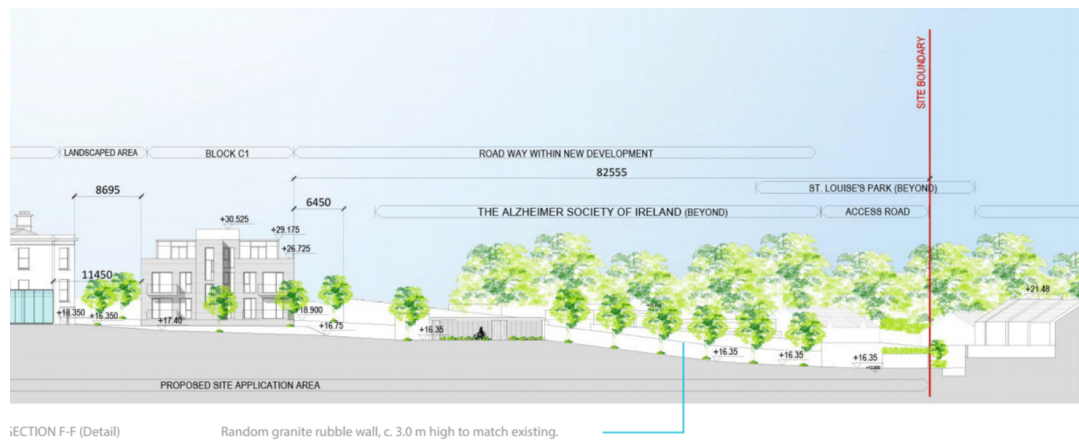
Sections E-E, F-F, G-G and I-I by OMP Architects illustrate the interference with The Alzheimer Society. The site boundary along the south-east boundary with the Alzheimer Society is the existing brick wall that is to be retained.

The site boundary along the north-east boundary with the Alzheimer Society car parking area is a new random granite rubble wall, 3.0 m high to match existing.

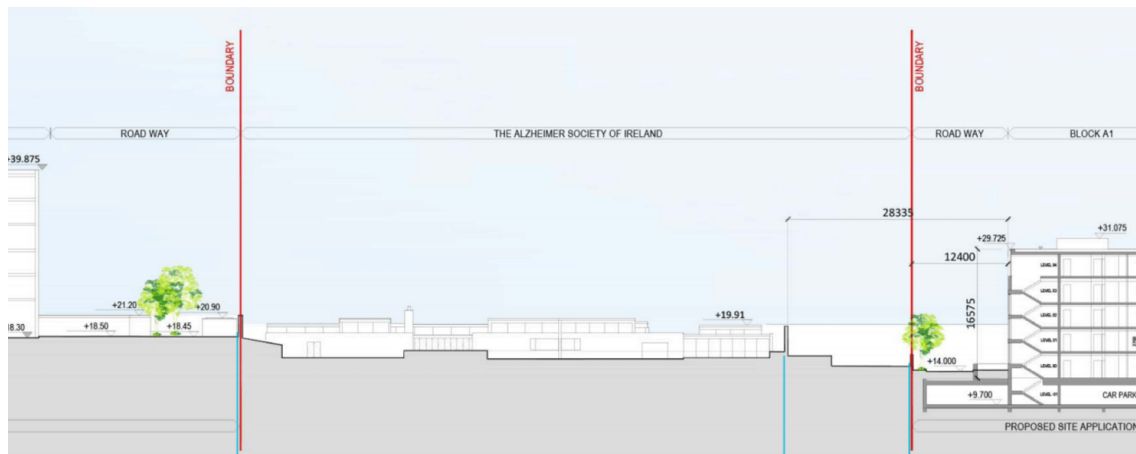
The existing enclosing wall of the ASOI is constructed of random rubble with a yellow brick facing on all four inner faces except for along the south-east boundary where it is faced both sides.



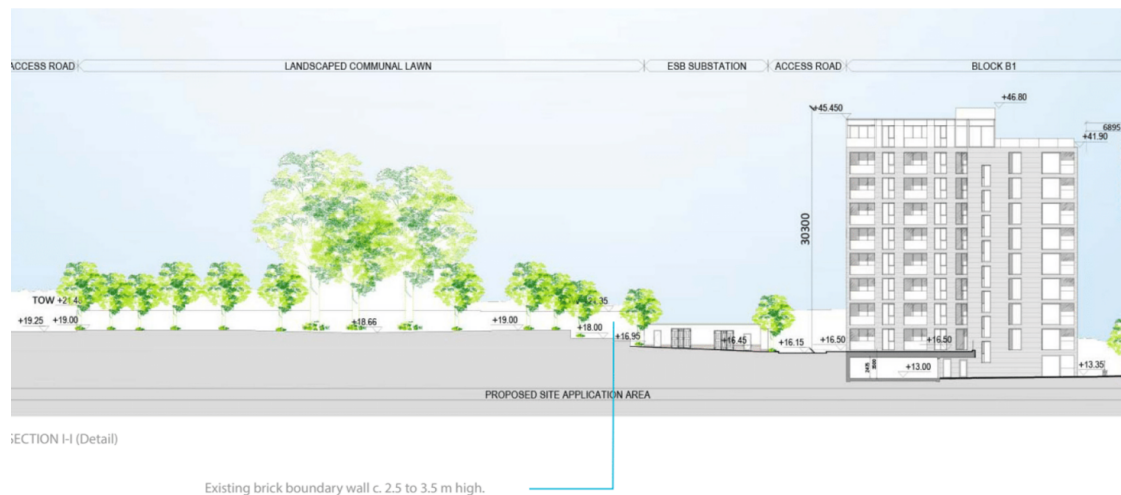
### Section E-E Detail



### Section F-F Detail



Section G-G



Section I-I

### Interface with Temple Hill Road

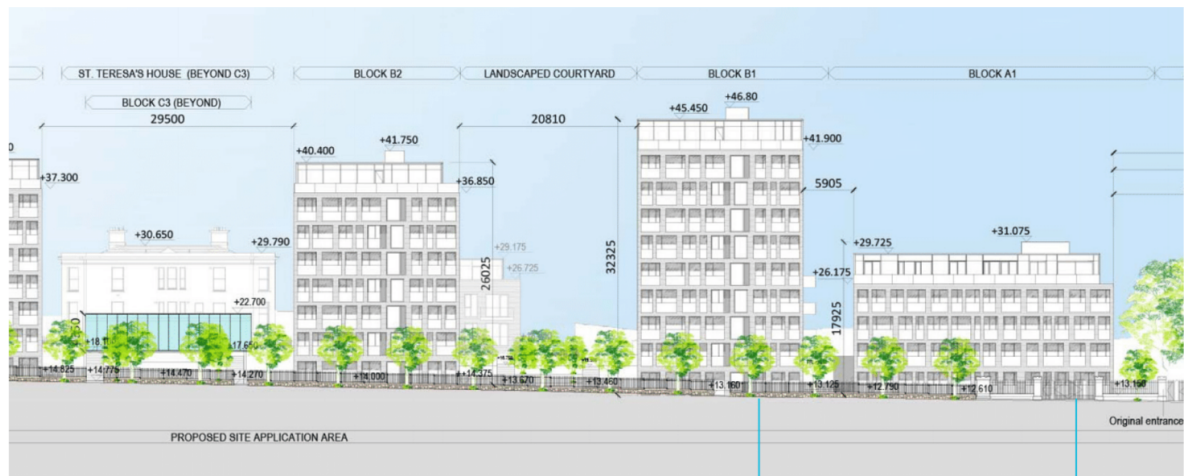
Sections A-A, B-B, G-G, H-H and I-I illustrate the interface with Temple Hill Road. The proposed site boundary along the north-east boundary of the site along Temple Hill Road is a proposed new granite wall 600mm high, with a railing extending to a high of 1.8m.

The line of the new wall and railings is set back from the property ownership line in order to create a widened and tree lined verge between the public footpath and the development. This tree lined verge



allows an extension of the public realm and creates a softened and permeable edge to the site. The trees are to be London Planes, the same species as on the central median on Temple Hill Road.

The existing former entrance gates remain in place at the northernmost corner of the site.



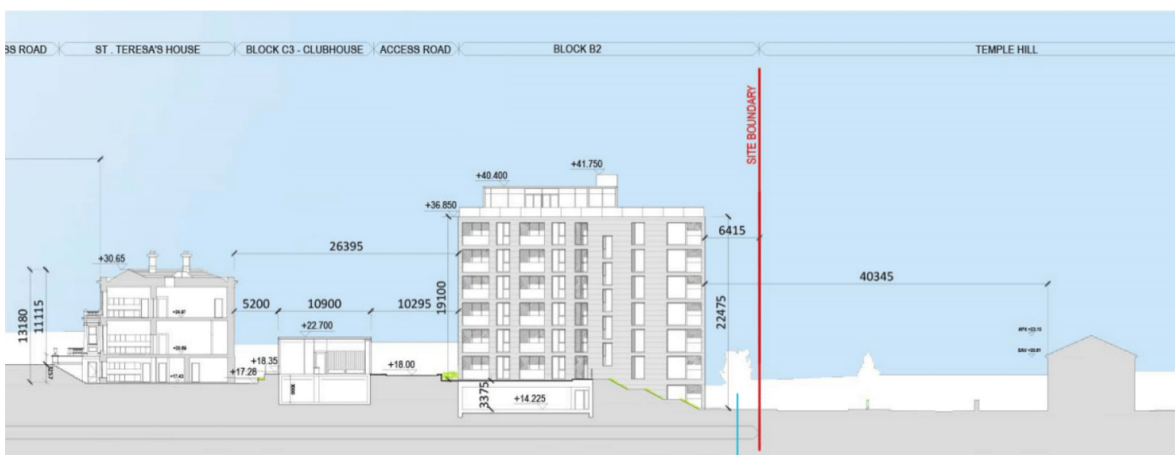
SECTION A-A (Detail)

Proposed new low boundary wall and railing c. 1.8 m high.

Existing entrance gates.

New London Plane trees planted in widened verge.

### Section A-A



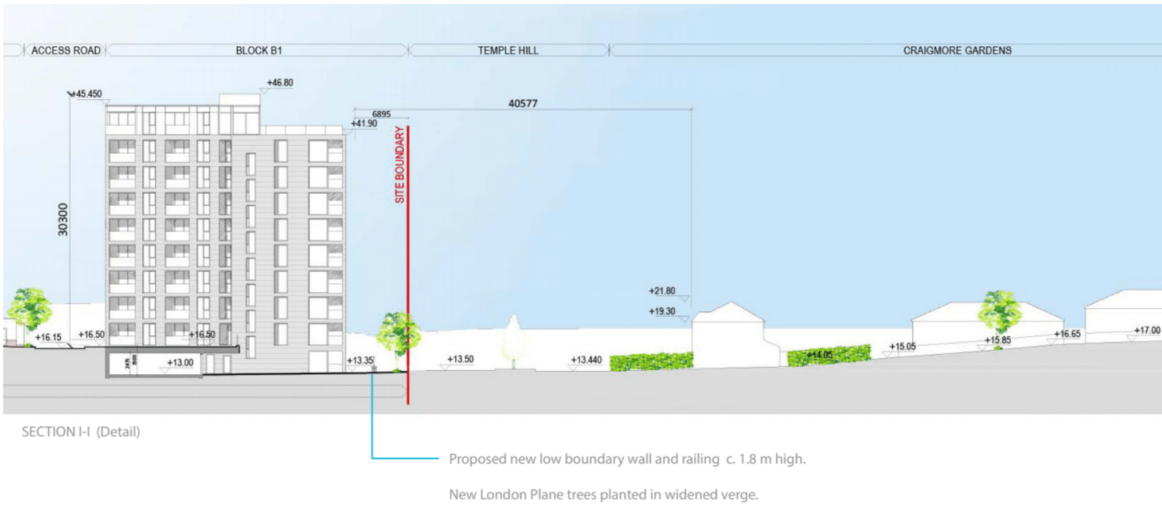
SECTION B-B (Detail)

Proposed new low boundary wall and railing c. 1.8 m high.

New London Plane trees planted in widened verge.

### Section B-B





Section I-I

Submitted views by Modelworks detail the new proposed context onto Temple Hill, extracted as follows:



CGI P01- Temple Hill Road Looking south-east

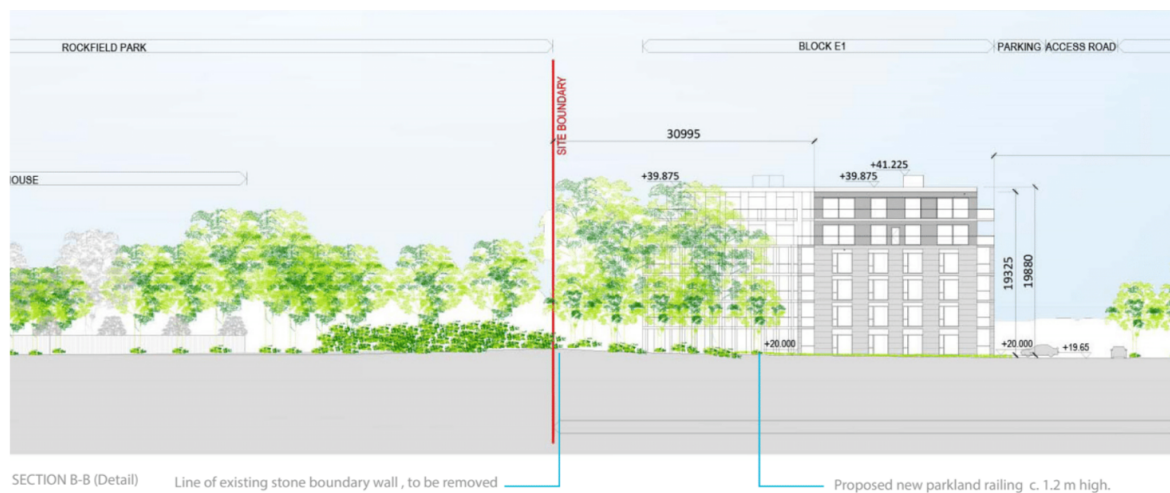


CGI P02 – Temple Hill Road looking west.

### Interface with Rockfield Park

Site sections B-B, C-C, G-G and H-H illustrate the interface with Rockfield Park. The existing stone site boundary along the south of the subject site is proposed to be demolished in order to allow for the parkland to extend northwards to include the exiting woodland area. The removal of the wall will allow for connectivity and permeability through the site.

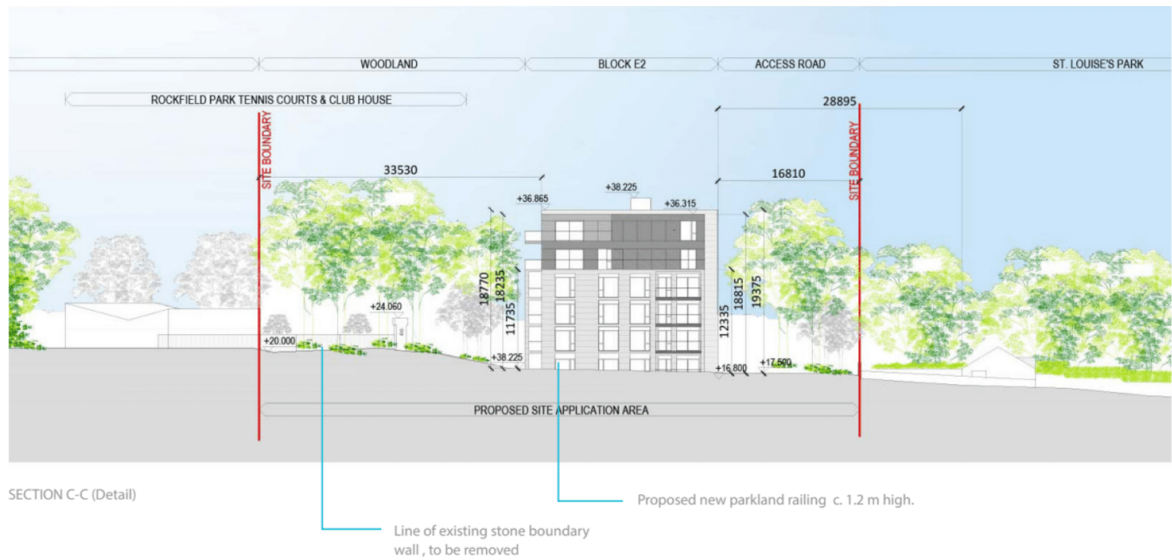
A proposed new low parkland railing c1.2m high, will be provided running parallel to the northern edge of the wooded area.



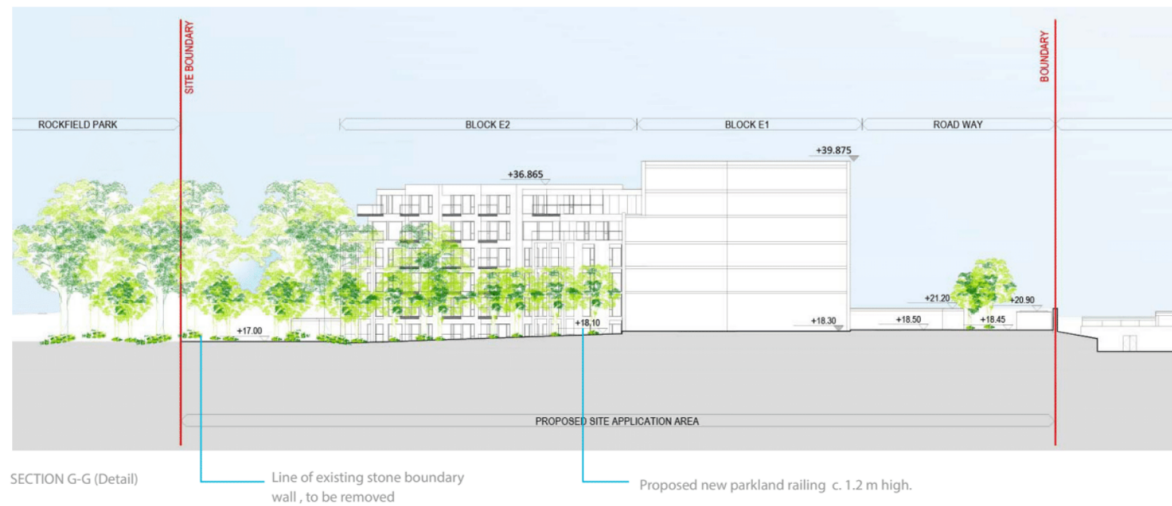
Section B-B







Section C-C



Section CG-G





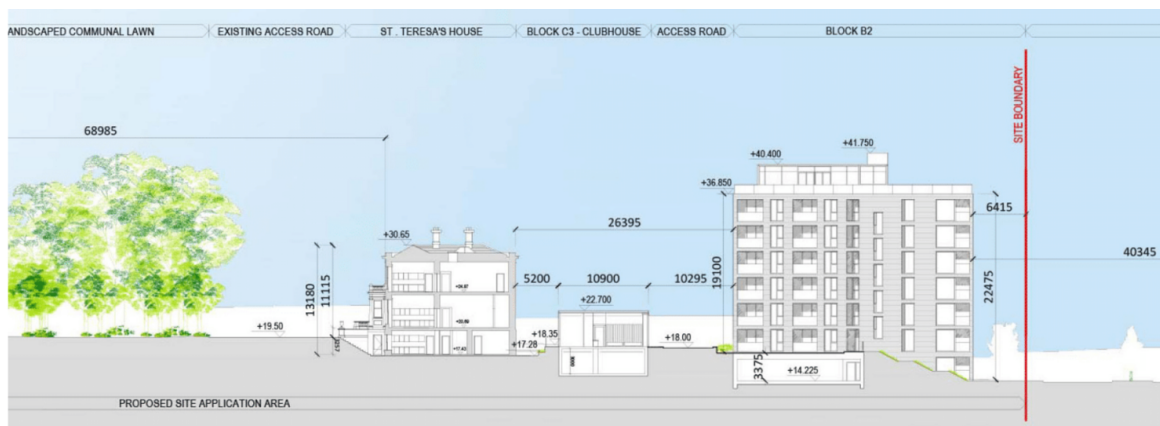
Photomontage View 04 – Looking north-east from Rockfield Park towards St. Teresa's House



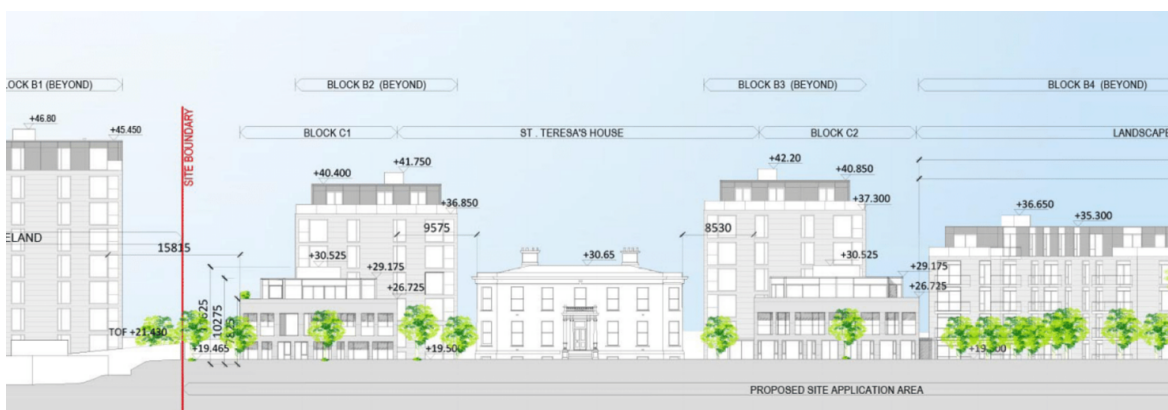
CGI P11 – Looking east from Rockfield Park towards proposed gatelodge café.

## Interface with St. Teresa's House

Sections BB, EE- and F-F illustrate the interface with St. Teresa's Lodge.



Section B-B



Section E-E

St. Teresa's House is to be refurbished and converted into 6 no. apartments. All existing extensions and abutting buildings to the north and west are to be removed. All existing adjacent structures are also to be demolished.

To the east and west, St. Teresa's House is flanked by the detached 3 storey blocks C1 and C2. Their position and forms are largely similar to the permitted development however the creche facility in C2 has been increased in area and the layouts of both buildings have been modified.

To the north of St. Teresa's House is Block C3, a detached single storey building over basement level, containing the proposed resident amenity facilities. The resident amenity building opens to a plaza in front of landscaped terraces that descend to the level of Temple Hill Road.

St Teresa's House and its parkland setting continue to be the visual and focal point of the proposed development. The positioning of building on site, the opening up of the southern boundary and extension of the parkland into the site particularly emphasise the attractive vista of the house from Rockfield park.

The resident amenity building, positioned centrally within the scheme, becomes the focal point for social activity and a critical element in the success of the proposed scheme.







CGI Po6 – Looking north-east from central open space towards St. Teresa's House.



CGI Po8 – Looking west across plaza towards St.Teresa's House

- (b) *“In addition to the consideration of local statutory policy and national policy guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome for the subject lands.”*



### **Applicant Response:**

This response has been prepared with direct input from O' Mahony Pike Architects who have enclosed a report entitled "Response to ABP Opinion and DCLRCC Opinion". The enclosed report clearly demonstrates the manner in which the proposed development satisfies the relevant Development Management Criteria & SPPR 3. We summarise the main points as follows:

### **SPPR 3 (A)**

***"It is a specific planning policy requirement that where;***

- (A)** *1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."*

The manner in which the proposed St. Teresa's SHD complies with the relevant criteria set out in the Building Height Guidelines 2018 is demonstrated below in sub-section 'Development Management Criteria'. The consistency of the proposal with the National Planning Framework has been considered above.

### **Development Management Criteria**

The Guidelines, clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies a number of criteria. The relevant criteria, following by an applicant response is set out below, followed by the applicant's response:

**At the scale of the relevant city/town:**

- ***"The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.***
- ***Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.***
- ***On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape."***

### **Applicant Response:**

- 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). 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.
- Careful consideration has been given to the successful integration of the proposed development, including buildings of increased height, into the existing character and topography of the site and area. It should be noted that additional height is only proposed at locations where topography and existing site characteristics are favourable i.e. along Temple Hill and Rockfield Park.

The topography along Temple Hill allows for a split-level urban block, which forms a strong relationship with the natural topography and natural level change at this location.

At Rockfield Park the proposal for additional height at Blocks E1-E5 forms a legible and defined edge to the Park area, where passive surveillance and views are the focus in terms of design.





Block D1 overlooks the open space area to the fore of St. Teresa's and also provides for the passive surveillance of the tree lined avenue to the southeast of the site. The proposal for additional height at this location frames the development.

A Landscape and Visual Impact Assessment prepared by ARC Architectural Consultants is submitted with the application for permission in compliance with the above criteria. The report makes the following conclusion:

*"Visibility of the proposed development is likely to be largely restricted to locations in close proximity to the application site. While the construction of the proposed development is likely to result in a significant change to the visual environment from some nearby viewpoints, having regard to the planning history of the site, the pattern of residential and apartment development that has taken place on the sites of larger detached houses in the area and local, regional and national planning policy for the densification of the urban area, these changes are considered to be consistent with emerging trends for development in the area."*

- 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.
- It is proposed that a new café at the edge of Rockfield Park will bring a new public use into the development that can be enjoyed by all. When seen from Rockfield Park, its association with St. Teresa's House can be understood. Its immediate surrounding area will be suitably landscaped with gravel paths, permanent seating and additional planting to enhance the public realm.
- The scale and height of the 'C' blocks are subordinate to St. Teresa's House completing a composition whereby the protected structure remains the focal point of the development while enjoying clear uninterrupted views directly south towards Rockfield Park and the Wicklow mountains.
- The location and orientation of the buildings within the centre of the scheme are derived from the objectives of the master layout plan and the integration with identified character zones, landscaped areas, view corridor and protection of the setting of St. Teresa's House.

**At the scale of district/ neighbourhood/ street:**

- ***"The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape."***
- ***The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered."***
- ***The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)."***
- ***The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner."***
- ***The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood."***

Applicant Response:

- The proposed removal of the site boundary wall along the southern boundary with Rockfield Park allows for the extension of the parkland into the development. The proposed development will result in the site being opened and made accessible to the public. The central open space to the south of St. Teresa's House will become part of the public realm and a focal point of the site landscape. A network of streets and paths link spaces and create new routes through the site. Variations in building heights, scales and forms are considered in relation to adjoining



developments and create a visual interest in the streetscapes both external and internal to the site.

- The proposal responds to its natural and built environment and makes a positive contribution to the urban neighbourhood. Around the site, due consideration is given to the different physical conditions and characteristics of the neighbourhood. The site layout allows for retention of the majority of important trees and retains the woodland characteristic found at the southern and eastern boundaries and to the front of St Teresa's House.
- 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.
- The buildings along Temple Hill are proposed as simple, elegant forms with a limited palette of materials selected to offer a coherent architectural language that is utilised across all buildings in the site. The main cladding material is to be brick with the selected areas finished in either metal cladding panels or glass gladding with an opaque coloured backing. Principal facades are extensively glazed, and balconies and terraces will be completed with metal guarding with glass infill. Overall, there is considerable variety in the scale and forms of buildings that is made to appear cohesive by the use of a limited number of construction materials and the use of similar elements and detailing across the elevations. Thus, the materials and building fabric are well considered.
- Temple Hill Road (N31) is a key thoroughfare, built as a dual carriageway to skirt around Blackrock 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.
- Block B1 provides an opportunity for a sense of arrival and to make this gateway location into Blackrock Village with a 'visual marker' building which in turn enhances legibility and improves urban design by knitting the proposed development into the wider urban structure.
- A 10m setback verge with a line of semi-mature trees is proposed along the length of the boundary along Temple Road in order to enhance the public realm and provide a green buffer to the street edge.
- Blocks A1 and B4 are proposed as 5 storey blocks located at either end of this frontage. Blocks B2 and B3 are proposed as 8 storey blocks flanking a terraced new open space that connects Temple Hill Road with a plaza at the north side of St Teresa's House. This open space provides direct access to the raised level of the site and reveals views through to the resident amenity building and to the newly exposed rear of St. Teresa's House. Block B1 is proposed as a 10-storey block, located at the point where Temple Hill Road leads into the more urban context of Blackrock bypass. This taller block marks the transition from the suburban to the more urbanised part of Blackrock. Thus, the proposed development makes a positive contribution to the improvement of legibility through the site.
- 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.

- 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.

#### At the scale of the site/building:

- *"The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 - 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."*

#### Applicant Response:

- The form, massing and heights of the proposed buildings in the development have been carefully modulated to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. The entire development has been analysed in a study carried out by Integrated Environmental Solutions (IES). The detailed analysis has informed the design and modifications have been made to the buildings and /or to layouts in response to the test results achieved.
- According to IES "Across the proposed development, 92% of the tested rooms are achieving ADF values above the BRE and BS 8206-2:2008 guidelines when Living/Kitchen/Dining spaces are assessed as whole rooms against a 2% ADF target. This increases to 94% when the results from the sample set are extrapolated to account for all spaces within the development.

Furthermore, 95% of the tested rooms are achieving ADF values above the BRE and BS 8206-2:2008 guidelines when Living/Kitchen/Dining spaces are assessed as whole rooms against a 1.5% ADF target. This increases to 97% when the results from the sample set are extrapolated to account for all spaces within the development.

- As noted by IES Compensatory measures have been incorporated into the design of the proposed development to offset reduced daylight performance in a number of bedrooms and LKDs. The floor areas of 91.68% of all apartment units are above the minimum area requirements set out within national policy. Incorporating larger apartment units makes it more difficult to achieve the recommended internal daylight levels. Furthermore, the number of dual aspect units and communal open space provisions are above minimum recommendations. The incorporation of these compensatory measures more than offset the reduced daylight performance when the proposed development as a whole is considered.



### **Specific Assessments**

The guidelines set out that in order to support proposals at some or all of these scales, specific assessments may be required, and these may include:

- ***“Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.***
- ***In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.***
- ***An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.***
- ***An assessment that the proposal maintains safe air navigation.***
- ***An urban design statement including, as appropriate, impact on the historic built environment.***

***Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.”***

### **Applicant Response:**

- Matters of wind, microclimate, birds and bats are fully assessed within the EIAR submitted with this application.
- OCSC has advised that microwave links used by the telecoms 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. OCSC further stated that there are two types of links, the main trunk routes which typically use tall masts and high sites to avoid obstructions, and the smaller mini-links that connect from one mobile phone site to another and are at lower levels.

It is more likely that buildings would interfere with a mini-link, however, this is not regarded as an “important telecommunication channel” as it can be re-directed and an alternative route found. The most likely interference with a main microwave link would occur in the city where there are a smaller number of tall masts operating. It is in consideration of the above, the proposal allows for the retention of telecommunications channels, including microwave links.

- 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 that the (then proposed and now permitted) development did not raise issues of concern. Copies of the 2021 application for permission have been sent to both the IAA and DAA, so as to enable those bodies to make submissions or observations on the application to the Board.
- A Design Statement has been prepared by O’Mahony Pike Architects and is submitted with this application for permission.
- An EIAR has been prepared and has been submitted with the application for permission. In addition, an Appropriate Assessment Screening Report has been prepared and is submitted with the application for permission. Accordingly, the relevant environmental assessment requirements have been complied with.





Also, as set out in Section 4.10 of the accompanying "Statement of Consistency" report prepared by Brock McClure Consultants, the proposed development fully complies with the relevant standards set out in the "Urban Development and Building Heights, Guidelines for Planning Authorities (2018)".

The application documentation has taken into consideration and, as outlined in the relevant documentation and plans, demonstrates the manner in which the proposed development accords with the assessment criteria outlined in SPPR3, including daylight/shadow studies, ecological assessments, Housing Quality Assessments, DMURS and with national planning policy including that of the NPF.

Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with SPPR 3. In particular, the site's location attains the policies and objectives of the Guidelines, as it is proximate to public transport with high frequency services. The development site is therefore appropriate for increased building height and residential densities.

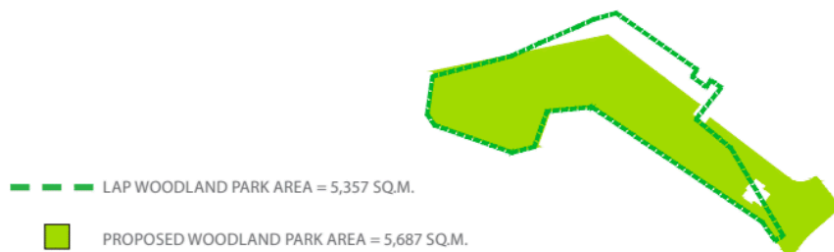
- (c) ***"The quantum and quality of public and communal open space provision. The response should include a detailed landscaping plan for the site which includes a schedule of open space and address the design and function of open spaces within the development. This should also clearly set out proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable, and available for all. Additional cross sections, CGIs and visualisations should be included in this regard."***

#### **Applicant Response:**

A landscape masterplan has been prepared for the overall site by Mitchell & Associates Landscape Architects and is enclosed herewith. Details pertaining to the quantity, type, and location of all proposed hard and soft landscaping details of play equipment, street furniture including public lighting and boundary treatments is also submitted.

This response has also been prepared with input from O' Mahony Pike Architects who have enclosed a report entitled "Response to ABP Opinion and DCLRCC Opinion".





The Blackrock LAP indicates a woodland park area at the south of the site that measures 5,375 sq.m. This proposal is for a realigned outline to the woodland park that relates to the proposed buildings. A greater area of woodland park is proposed measuring 5,687 sq.m. Rockfield Park will be extended into the site to encompass all of this woodland area.

The diagram above indicates the proposed open spaces within the development. A schedule of open space indicates the quantum of public and communal open space.

The design function of these spaces is described in the accompanying Landscape Report prepared by Mitchell and Associates, Landscape Architects, detailed design proposals are described in a series of drawings and in the Landscape Report.

**(d) “The layout of the development, hierarchy of open space, compliance with DMURS and provision of connections with adjoining lands and surrounding area. “**

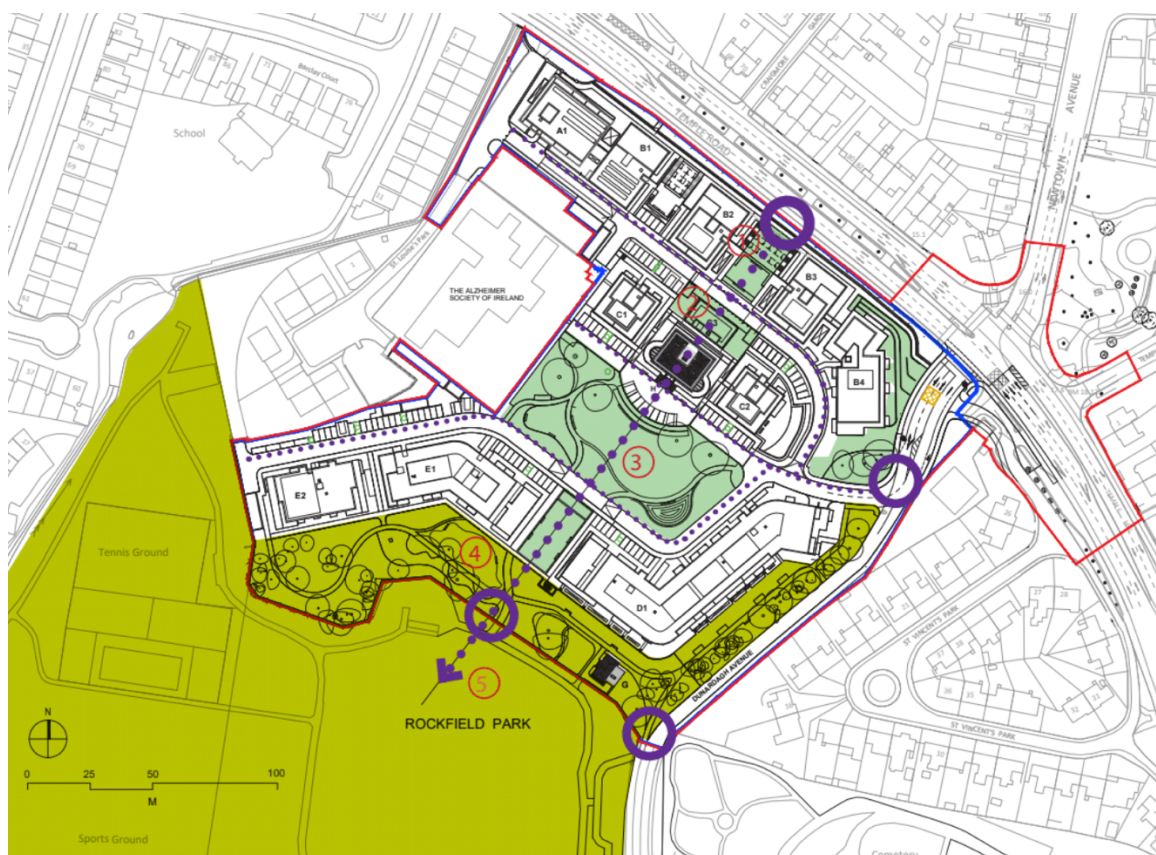
#### **Applicant Response:**

As noted by OMP Architects, 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.

Building layouts are informed by strong axial relationships with views and vistas reinforced between St. Teresa's House and Rockfield Park. Variation in building height along with a mix of apartment types units and the conversion of St. Teresa's House all combine to provide a rich living environment close to a host of facilities and landscape amenities.

Buildings along Temple Hill Road are 'Pavilion style blocks' set out to create a well-defined urban edge and to give permeability into the site. 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.





#### Sequence of open spaces & pedestrian connectivity (Proposed OMP Layout Plan)

Buildings to the east and south of the central open space are more extended, cranked blocks that hug the perimeter of the woodland area allowing retention of a maximum number of trees and thereby retaining the character of the woodland setting.

New greens and formal gardens are introduced to provide generous public open amenity spaces and connecting pathways and walking trails within the development. Connectivity for pedestrian and cycle pathways through the site linking Temple Hill Road and Blackrock Village to Rockfield Park to the south allows for a wider network of cycle and pedestrian routes to be provided.

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 open green spaces.

A sequence of running open spaces between Rockfield Park and Temple Hill Road are interwoven into the masterplan to provide a variety of amenity value and experience. These comprised of terraced gardens leading up from Temple Road and arriving at a plaza containing a Clubhouse and central residential amenities. Pedestrian routes either side of St. Teresa's House lead into the central parkland setting which connects to the woodland park and into Rockfield Park beyond to the South.

#### Compliance with DMURS

NRB were appointed to undertake a review and input to the Design Team in terms of DMURS Compliance, and this included a DMURS Statement of compliance (included as an Appendix to the TA). As set out in the NRB statement, the proposed SHD is consistent with the principles and guidance outlined within the *Design Manual for Urban Roads and Streets* (DMURS).

The proposed layout seeks to successfully create an appropriate balance between the functional requirements of different network users whilst enhancing the 'sense of place'. Design attributes of the proposed layout which contribute to achieving this **DMURS objective** include:

- A self-regulating street environment created through the introduction of on-street parking, tight corner radii, reduced visibility splays, raised tables where appropriate and staggered junctions.





- On-street activity promoted internally along the residential streets through the provision of on-street parking where appropriate,
- Through the provision of an improved vehicular access by way of a safer and higher capacity traffic signal controlled junction onto Temple Hill, the layout offers a well-connected but permeable traffic-calmed-by-design street network,
- Whilst the plan is to create a 30kph Home Zone, the proposed design deliberately seeks to specify minimal signage and line markings along the internal local streets, with such treatments used sensitively throughout and predominately at key nodes and 'transition' areas where raised platforms and road surface treatments are identified as appropriate.
- Where required, footpaths no less than 1.8m (generally 2.0m or wider) are provided throughout the scheme with connections and tie-ins to existing external pedestrian networks. Of course, the development plans include shared surfaces which is consistent with a home zone calmed environment.
- Appropriate clear unobstructed visibility splays, as per DMURS requirements, will be provided / safeguarded at all internal nodes, corners and junctions and at the site access junctions to the external road network
- Well designed and frequent pedestrian facilities are provided along key travel desire lines throughout the scheme in addition to those located at street nodes. All courtesy crossings will be provided with either dropped kerbs or a raised 'flat-top' treatment thereby allowing pedestrians to informally assert a degree of priority.
- All informal pedestrian crossing facilities will be at least 2.0m wide.
- With the objective of encouraging low vehicle speeds and maximising pedestrian safety and convenience, corner radii will be 6m where swept path analysis permits and radii will be further reduced where feasible in line with DMURS guidance.
- A variety of materials and finishes will be specified in the Shared Areas to indicate that the carriageway is an extension of the pedestrian domain (Refer to Landscape Architects Plans).
- Internally within the development carriageway kerb heights will be typically 75-80mm in accordance with the objectives of DMURS.
- Within the development, along the lightly trafficked internal Link streets, cyclists will share the carriageway with other street users as per the National Cycle Manual guidance for such situations, and in accordance with best practice.
- Once within the development, the proposed internal hierarchy of Local streets incorporates predominantly c 5.5-6.0m wide carriageways on main access routes, with 4.8m wide shared surface streets also incorporated.
- At any at-grade flat top pedestrian crossing / traffic calming table treatments, different surface material treatments will be proposed to alert and subsequently influence driver behaviour and vehicle speeds.
- Vertical deflections in the form of raised tables can be strategically placed across the internal local street network to promote lower design speeds and enable pedestrians to cross the streets at-grade. The maximum height of these raised flat-top treatments is designed to be 75mm with a minimum flat-top width of 2.0m.
- The provision of on-street car parking includes both parallel and perpendicular parking bays along either one or both sides of the internal streets.



- Any required street signage and road markings will be in accordance with the Department of Transport Traffic Signs Manual, and the location and form will be agreed in advance with Dun Laoghaire Rathdown County Council.
- The layout and access has been subjected to an independent Road Safety & Quality Audit as required under DMURS Section 5.4.

The proposed development is the outcome of an integrated design approach, which has implemented a design for a sustainable community connected by well-designed streets footpaths and cycleways, which combined deliver attractive, convenient and safe access in addition to promoting modal shift and viable alternatives to car based journeys.

The layout and access has been subject to an independent Road Safety Audit as required under DMURS Section 5.4, which is submitted as part of this application to the Board. The RSA has been prepared by Bruton Consulting Engineers and is located in Appendix J of the material submitted by NRB Consulting Engineers.

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

#### **Applicant Response:**

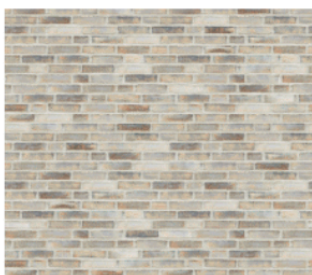
The Design Statement prepared by OMP Architects specifically addresses the proposed materials and finishes.

In compliance with both the Board's Opinion and the 2020 Apartment Guidelines, a Building Lifecycle Report has been prepared by Aramark and is enclosed with the application documentation.

We note the main palette of brick proposed has been selected by OMP as follows:



VANDERSANDEN OPTION A



VANDERSANDEN OPTION B



VANDERSANDEN OPTION C

In the design process, OMP tested a number of lighter brick tones through the 3-d working model. It was decided to use a richer tone of brick closer to terracotta red but to soften the overall tone by using it in combination with a light-coloured mortar. This colour toning combined with anthracite dark grey windows and aluminium panels will provide a striking yet modest and simple contemporary aesthetic.

#### **Building Form and Materials**

The setback penthouse units on each block are seen as a 'lantern' element, lightly perched on top of the more solid mass below. The finishes comprise of a combination of dark grey glazed doors and a reflective glass panel system. The preference is to provide a light aesthetic with the use of reflective solid intermediate panels. This can be achieved through the use of a dark backing film or grey panel behind a glass outer panel.





ANTHRACITE DARK GREY ALUMINIUM WINDOWS TO PENTHOUSE



OPAQUE GLASS BACKING PANEL TO PENTHOUSE FACADE

The facade comprises a simple rhythm of vertical brick piers set in front of a dark grey glad/metal panel façade. Balcony edges will be formed in glass balustrading.

*“The further consideration/justification should have regard to, inter alia, the guidance contained in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020, the Urban Development and Building Height Guidelines for Planning Authorities 2018; the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual; the Design Manual for Urban Roads and Streets 2013; and the Dun Laoghaire Rathdown Development Plan 2016-2022.*

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

#### **Applicant Response:**

The proposed residential development has been designed having regard to each of the guidance documents referenced in the Board's Opinion. All apartments have been designed in accordance with the relevant design standards.

A Housing Quality Assessment is provided by O'Mahony Pike Architects demonstrating compliance with the design standards. Please refer to 1706-OMP-ZZ-ZZ-SA-A-0001-HQA 1

The accompanying Design Statement (1706A-OMP-ZZ-ZZ-SA-A-007 Design Statement) provides details of consideration of the relevant guidance documents. A series of schedules is provided:

- 1706-OMP-ZZ-ZZ-SA-A-0001-Housing Quality Assessment
- 1706-OMP-ZZ-ZZ-SA-A-0002-Schedule of Accommodation
- 1706-OMP-ZZ-ZZ-SA-A-0003-Parking Schedule
- 1706-OMP-ZZ-ZZ-SA-A-0004-Open Space Schedule
- 1706-OMP-ZZ-ZZ-SA-A-0005- Summary Schedule

NRB Consulting Engineers, Mitchell and Associates Landscape Architect's and O'Mahony Pike Architects have collaborated to ensure that guidance contained in the Design Manual for Urban Roads and Streets (DMURS) has been fully considered in the development of this scheme.

### **3.2 Residential Amenities**

*“Further consideration and/or justification of the documents as they relate to residential amenity, having particular regard to the potential for overlooking, overshadowing, access to daylight and sunlight and overbearing impacts on existing adjoining residential properties, the Alzheimer Society and proposed residential units within the scheme. The response should include a Sunlight, Daylight and Shadow Analysis of inter alia units proposed, communal open spaces, public open spaces and adjoining lands and properties, and in any event should address the full extent of requirements of BRE209/BS2011, as applicable.”*

#### **Applicant Response:**

We refer the Board to the enclosed Report by O' Mahony Pike Architects entitled “Response to ABP Opinion and DCLRCC Opinion” which provides a detailed response on the noted issues relating to residential amenity for existing adjoining residential properties, the Alzheimer Society and proposed residential units within the scheme.



I.E.S has carried out a detailed Sunlight, Daylight and Shadow Analysis of the units proposed, communal open spaces, public open spaces and adjoining lands and properties.

We note the following main conclusions from the IES assessment:

### **Shadow Analysis**

#### St Louise's Park:

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.

#### Alzheimer Society of Ireland:

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, this amenity space will continue to receive above the recommended levels of sunlight and as such, overshadowing should not affect the quality of this amenity space.

#### Barclay Court:

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.

#### Temple Road:

Additional overshadowing noted from the proposed development during the afternoon in March (1600) and December (1200 – 1600). 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.

#### St Vincent's Park:

No additional overshadowing noted from the proposed development throughout the year to these existing dwellings.

### **Sunlight to Amenity Areas**

#### Existing Amenities

The sunlight to existing amenity gardens achieves at least receive at least 2 hours of sunlight on 21st March on nearly all the surrounding private and public amenity areas. Only one garden area on St Louise Park will notice a moderate impact with all other gardens adjacent to the site having an imperceptible Impact. This equates to 37 out of 38 gardens neighbouring the proposed development.

#### Proposed Amenities

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 recommendations

### **Daylight Analysis to Existing Buildings**

This study considers the Proposed Scheme and tests if the VSC results are greater than either 27% or 0.8 times their former value. Of the 177 tested windows, 171 points (96%) exceed the BRE requirement. The remaining 6 no. windows located in St. Louise's Park have a VSC value between 20.11 and 27%, which should still receive adequate internal daylight as these windows are secondary openings to dual aspect spaces that have large main openings on the other elevations.

Thus, the overall impact of the proposed development on the surrounding adjacent buildings can be considered as a negligible adverse impact.



### Daylight Analysis of proposed buildings

Across the proposed development, 92% of the tested rooms are achieving ADF values above the BRE and BS 8206-2:2008 guidelines when Living/Kitchen/Dining spaces are assessed as whole rooms against a 2% ADF target. This increases to 94% when the results from the sample set are extrapolated to account for all spaces within the development.

Furthermore, 95% of the tested rooms are achieving ADF values above the BRE and BS 8206-2:2008 guidelines when Living/Kitchen/Dining spaces are assessed as whole rooms against a 1.5% ADF target. This increases to 97% when the results from the sample set are extrapolated to account for all spaces within the development.

Compensatory measures have been incorporated into the design of the proposed development to offset reduced daylight performance in a number of bedrooms and LKDs. The floor areas of 91.68% of all apartment units are above the minimum area requirements set out within national policy. Incorporating larger apartment units makes it more difficult to achieve the recommended internal daylight levels. Furthermore, the number of dual aspect units and communal open space provisions are above minimum recommendations. The incorporation of these compensatory measures more than offset the reduced daylight performance when the proposed development as a whole is considered.

The details of the analysis are available in the accompanying Daylight, Sunlight and overshadowing report prepared by I.E.S. The report constitutes Chapter 16 of the EIAR Document accompanying this application.

***“Further consideration of the details and mitigation proposed, to ensure that the proposed development has been designed to avoid direct overlooking of adjacent residential properties and units within the scheme. The response should include a report that addresses issues of residential amenity (both of adjoining developments and future occupants), specifically with regards to overlooking, overshadowing, visual dominance, and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development (permitted or built).***

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

### Applicant Response:

Item 9 of the report entitled “Response to ABP Opinion and DCLRCC Opinion” by OMP Architects describes the manner in which the proposed development has been modified to address the potential for overlooking of proposed residential units within the scheme.

Potential issues of overshadowing and dominance are addressed in the accompanying Daylight, Sunlight and Overshadowing Study report prepared by I.E.S. The report also examines communal open spaces, public open spaces and, addresses the full extent of requirements of BRE209/BS2011, as applicable.

Potential issues of noise are addressed in the Noise and Vibration report by AWN that constitutes Chapter 8 of the EIAR submitted as an accompanying document to this application.

Site plan drawings with levels, sections with levels and separation distances showing the relationship between the proposed development and adjoining residential development (permitted and built) are included in Section 1 of this response to An Bord Pleanála and form part of the drawing pack prepared by OMP Architects and submitted to the Board. As demonstrated by the architectural approach and separation distances achieved, the proposed scheme has been designed to avoid direct overlooking of adjacent residential properties and units within the scheme.

## 3.3 Architectural, Cultural Heritage and Conservation Considerations

- (a) ***“Further consideration and/or justification of the documents as they related to the architectural, heritage and cultural value of existing structures on site. Details should provide reference to all former historical and contemporary uses of structures on the site. A photographic record of all existing structures on site including those proposed for demolition should be provided. Consideration of the***





***inter-connectivity of former and current land-use both within the site and surrounding area, in particular lands at Dunardagh, should also be considered in the context of heritage and cultural assessment.***

**Applicant Response:**

We refer the Board to the enclosed suite of material prepared by Cathal O'Neill Architects in relation to Conservation matters. This includes a full Architectural Heritage Impact Assessment and associated chapter within the submitted EIAR. We submit that the material prepared has fully considered the historical and cultural value of the former land use within the site and associated relationship with the Dunardagh lands.

A photographic record of St. Teresa's House and Lodge was made in 2019. Inspections of both those existing structures were carried out in August 2021 and again in late October 2021, and no changes have been made to either building except, in the case of St Teresa's House, later accretions to the west and north have been removed, on foot of the 2019 permission. These removals have had no impact on the interior of St Teresa's House, and an appendix has been added to the photographic record, showing the visual impact of the removal/demolition works carried out pursuant to the 2019 permission, which have not resulted in any loss of historic fabric.

All the buildings were the subject of a dimensional and photographic survey. The historic uses of the site are described in detail in para 2.0 of the revised *Architectural Heritage Impact Assessment and Conservation Method Statement*, which is included with this application. We note for the Board that the lands at Dunardagh have been given specific consideration as part of this Assessment.

- (b) "Further consideration for the rationale for the deconstruction, relocation and extension of the Gate Lodge, a protected structure. A detailed method statement for such is also required. Further consideration should also be given to the new proposed location of the Gate Lodge having regard to the function and association of the lodge with St. Teresa's House and the original function and association of the lodge with St. Teresa's House and the original entrance gates and avenue that serve the house."***

**Applicant Response:**

We refer the Board to the enclosed suite of material prepared by Cathal O'Neill Architects in relation to Conservation matters and the *Gate Lodge Conservation Report* prepared by Brock McClure Consultants and Cathal O'Neill Architects.

Careful additional consideration has been given to the proposed deconstruction, relocation and extension of the Gate Lodge and a detailed method statement in this respect is enclosed with the application documentation. There are two significant differences between the 2019 design and the current application: firstly, the original room forms are retained, and the ancillary spaces are relegated to a smaller extension; and, secondly, the outside ground level will be raised to permit universal access. This is an acceptable manner in which to address the matter of level access and has been used in more important state buildings, such as The National Gallery.

In the development permitted in 2019, a number of options for the location of the gate lodge were considered. As is clear from the documentation available on the file in relation to the previous application, both the Planning Authority and the Board concluded that the principle of relocating the gate lodge was acceptable. Moreover, the Department of Arts Culture and Heritage concurred. The enclosed *Gate Lodge Conservation Report* sets out various alternatives considered for the Gate Lodge in the context of the new scheme for the subject site.

We trust the Board will consider the material presented and conclude that the rationale for the Gate Lodge design and relocation has been given detailed consideration and justification by the design team.

- (c) "Further consideration and/or justification of the documents as they relate to architectural heritage, having particular regard to Block C3 and its impact on St. Teresa's House. And further consideration of the potential impact of the proposed development on Newtown Villas ACA."***



### **Applicant Response:**

The Design Team have given detailed consideration to the new proposal for Block C3, as set out in the OMP Design Statement and accompanying imagery prepared by Modelworks. From a Conservation perspective, CONA Architects note the following:

*The massing of Block C3 has been greatly reduced and, as currently proposed, presents a perfectly reasonable and deferential design which is subordinate in scale and massing. St. Teresa's House was clearly intended to have distinct front and rear facades, with the latter having much lesser importance in the overall composition. St. Teresa's House is not a "double fronted" house, of which there are some fine examples. It is obvious that the building was intended to be approached from the south, up a sweeping drive arriving in a generous gravelled "forecourt" overlooked/addressed by a grandiose entrance portico (vestibule). The rear (north) facade, although geometrically similar, is nowhere as rigorous, with an off-centre rear door leading to a bridge over a basement service area. The cast iron wastewater pipes are exposed and from the date of its construction a number of buildings would have either abutted or were in close proximity to the rear facade, for much of the building's period in institutional use, the rear facade was further compromised by the addition of various buildings of uneven and sometimes very poor quality, the last being a demountable building which appears to be about 40 years old.*

*In place of this unsightly collection of later inappropriate buildings, which have now been removed, it is now proposed to construct an elegant, detached single storey (above ground) pavilion with basement. The proposed pavilion will be separated from the main house by a gap of approximately 5 m and will be subordinate in scale to the house which will remain visible above it. From within the site, the main house will not suffer any loss of legibility and indeed this will be improved from all angles. The new C3 block will align with the main rectangular plan of the house, not the projecting bay windows at the side and so, from the front and a short distance each side it will not be visible, and as a result, there will be no disimprovement to any view of the house.*

The detailed Conservation Principles, set out at para 7.2.2 of the Guidelines state that "Entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good Conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance". Further analysis of this issue is set out in the Architectural Heritage Impact Assessment.

The addition of a relatively small single storey pavilion, for the communal use of the residents and in lieu of numerous poor quality mid-20th century buildings, might be considered in the context of the restoration of the house to residential use, the restoration of its principal internal spaces where these have been previously subdivided, and the reinstatement of some of its missing decorative fabric, most notably the first-floor ceilings.

In relation to the impact on the Newtown Villas ACA, we note that this issue has been given full consideration in the enclosed Landscape & Visual Impact Assessment prepared by ARC based on views by Modelworks. We note that in relation to View 14 which is proposed as follows:



**View from Newtown Villas ACA towards Development (Modelworks)**

This view looks south along Newtown Villas. Some of the trees on the site of the proposed development are seen in the middle distance in the centre of the view, behind a wall at the end of Newtown Villas and the roofs of houses in Craigmore Gardens. Newtown Villas is an Architectural Conservation Area.

In the view as proposed, the top four storeys of one of the proposed apartment buildings is seen in the centre of the view in the middle distance, with the top of another similar building seen to the left. The top three storeys of the proposed 10 storey apartment building are visible above the roofs of houses to the right. The proposed development occupies only a minor part of the view, but, nonetheless, is a central focus. It is also noted that a large residential development has been approved on the former Europa Garage site which immediately adjoins Newtown Villas to the east, ABP Reference 303804-19. The existence of the approved Europa Garage development will give rise to far greater landscape and visual impacts on Newtown Villas than the development on the St Teresa's lands, which are over 100 metres distant from Newtown Villas. While the proposed development is likely to result in a 'significant' change in views from this location, given the existence of considerable large scale modern development in Blackrock, and the approval for a large development immediately next door to Newtown Villas on the Europa Garage site, the potential visual impact of the proposed development on views from this location may be considered by some observers to be consistent with emerging trends for development 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.

It is noted that a line of London plane trees has been planted in the central reservation of the Blackrock Bypass, directly opposite the site of the proposed development. Further London plane trees are proposed to be planted just inside the northern boundary of the proposed development along Temple Road. As these trees mature, they will considerably change the character of the Blackrock Bypass and will reduce the visibility of the proposed development from locations to the north and northwest.

We trust this addresses the issue to the satisfaction of the Board.

- (d) ***“Further consideration should also be given to the Planning Authority’s opinion and concerns raised therein with regard to the potential impact on protected structures and consideration of an appropriate response to such matters having regard to the overall design strategy proposed by the prospective applicant.***

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

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

**Applicant Response:**

The planning authority’s principal concerns may be summarised as follows:

- (a) New location of gate lodge and impact of location on same
- (b) Require more detailed method statement for dismantling and reconstruction of lodge
- (c) Require more detailed conservation on St. Teresa’s House
- (d) Room by room inventory of St. Teresa’s House
- (e) Specific reference to stained glass windows
- (f) Impact of Block C3 on St. Teresa’s House

The information at (a) and (b) above relating to the gate lodge is contained within the Gate Lodge Conservation Report prepared by Brock McClure Consultants and Cathal O’Neill Architects.

The remainder of the information is contained within the Cathal O’Neill main Architectural Heritage Impact Assessment and Conservation Method Statement as follows:

- (c) This item is addressed at Sections 1.0 – 5.0. of the Architectural Heritage Impact Assessment.
- (d) This item is addressed within the Photographic Inventory, which includes a room-by-room inventory of St. Teresa’s House.



(e) This item is addressed Appendix 3 - Schedule of Works - Rooms 1.5; 1.6; 1.7 and 1.10 and Appendix 5 – Window Schedule - Windows FW 14, FW 15 and FW16.

As noted in the schedule of works within the Architectural Heritage Impact Assessment, the stained glass appears in Windows FW14, 15 and 16 :

*“Original sash window with plate glass, shutters and original ironmongery in good condition generally. Windows FW14, FW 15 and FW16 have had stained glass panels added to inside the original glass which is likely to remain in-situ.*



**Extract from Photographic Inventory by CONA showing Stained Glass Windows FW14,15,16**

(f) This item is addressed at Section 5.0 of the Architectural Heritage Impact Assessment as follows:

*“Block C3, which houses the residents’ amenity facilities, forms a new north-eastern elevation to replace the existing, unsightly, jumble of forms, and will provide a new enhanced relationship with Temple Hill and the proposed entrance plaza, forming a new focal point for the house. Although not abutting the house, it is, in effect, an extension to it, and uses light and complementary materials. Legibility is enhanced though the provision of a generous 5.2m metre separation distance which also affords “breathing space” to the rear elevation.”*

We also refer the Board to the commentary in Item 3.3 (c) above, which details the rationale for the proposed Block C3 in the context of the Protected Structure.

#### **Historic Landscape Assessment**

We refer the Board to the enclosed Historic Landscape Assessment, prepared by John Olley which details the assessment of St. Teresa's Lands and environs. The Assessment includes analysis of the early development of Blackrock and the origins of Rockfield and 'Craigmore' (the original name for St Teresa's).

There is an informed analysis on the development of the urban fabric of Blackrock, and the new scale of building that began to develop from the 1980s onwards.

We trust the Board will review this Assessment and conclude that the proposed development accords with the emerging built context of Blackrock, whilst maintaining key heritage features associated with the lands of St Teresa's.





## 4 Response to Specific Information Requested

In its Opinion An Bord Pleanála also requested submission of the following specific information with any application for permission:

1. ***“A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.***

### **Applicant Response:**

A Housing Quality Assessment has been produced by O'Mahony Pike and is appended to their Design Statement. This Assessment sets out full details of compliance with the standards contained in the Apartment Guidelines (2020).

2. ***(a) The Car Parking Strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended to be assigned and managed.***

### **Applicant Response:**

We refer the Board to the enclosed Parking Strategy Report prepared by NRB Consulting Engineers and submitted as Appendix K of their overall Transport Statement.

This document presents the rationale behind the provision of vehicle parking (including mobility impaired parking, motorcycle parking, service vehicle parking and car club spaces) and cycle parking being proposed. The Report sets out the management measures which will be implemented to allocate the use and control the parking provided at the development.

The Report should be read in conjunction with the overall Traffic & Transportation Assessment and Mobility Management Plan as submitted to the Board.

***(b) A response to the issues raised in the report of the Transportation Planning Section of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion received by An Bord Pleanála on 9<sup>th</sup> April 2021.***

### **Applicant Response:**

The response to the matters raised by the Transportation Planning Section of DLRCC has been prepared by NRB Consulting Engineers and is set out under the following headings:

- Bicycle Parking Quantum & Design,
- Block D Basement Ramp Gradient,
- Car Parking Quantum,
- Electric Vehicle Charging Spaces,
- Car Sharing,
- Pedestrian Permeability to Adjacent Lands,
- Requirement for a Stage 2 Road Safety Audit,
- Requirement for a Quality Audit,
- Preliminary Travel Plan (Noted),
- Transportation Assessment Report (Noted),
- Construction Management Plan (Noted),
- Taking in Charge Drawing,

### **Bicycle Parking Quantum & Design**

The 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' requires a provision of 1 no. residential bicycle parking space per bedroom plus 1 no. visitor bicycle parking space per apartment unit. In this case there are a total of 795 bedrooms, requiring 795 residential bicycle parking spaces) and with 493 units, requiring 493 visitor bicycle parking spaces. In excess of these numbers are provided, with a total of 804 Residents Spaces and 252 Visitor Spaces contained within the proposed development (Reference TA Section 2.12



and 2.13). The Bicycle Parking has been redesigned in response to the DLRCC submission to provide a much greater number of 'Sheffield Stands'.

#### **Block D Basement Ramp Gradient**

The Block D basement access to cyclists has been revised in response to the DLRCC submission. A dedicated direct Bicycle Lift has been introduced at the northeast end of the Block, and in addition a stair opening direct to the exterior has also been introduced at the northeast end.

#### **Car Park Quantum**

The car parking provision is comprehensively addressed under Section 2.10 to 2.26 of the TA Report in terms of the requirements of 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities'. It concludes; -

A total of 252 private car parking spaces are being provided as part of the development. With 493 apartments, this represents a car parking 'Ratio' of 0.51 parking spaces per unit. This level of parking is appropriate given the highly sustainable location characteristics of the apartment scheme, and in consideration of National Guidance.

#### **EV Charging Spaces**

The scheme provides 50no. Electric vehicle charging points dispersed through the development in accordance, with Development Plan requirements. The spaces are located as follows:

- 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

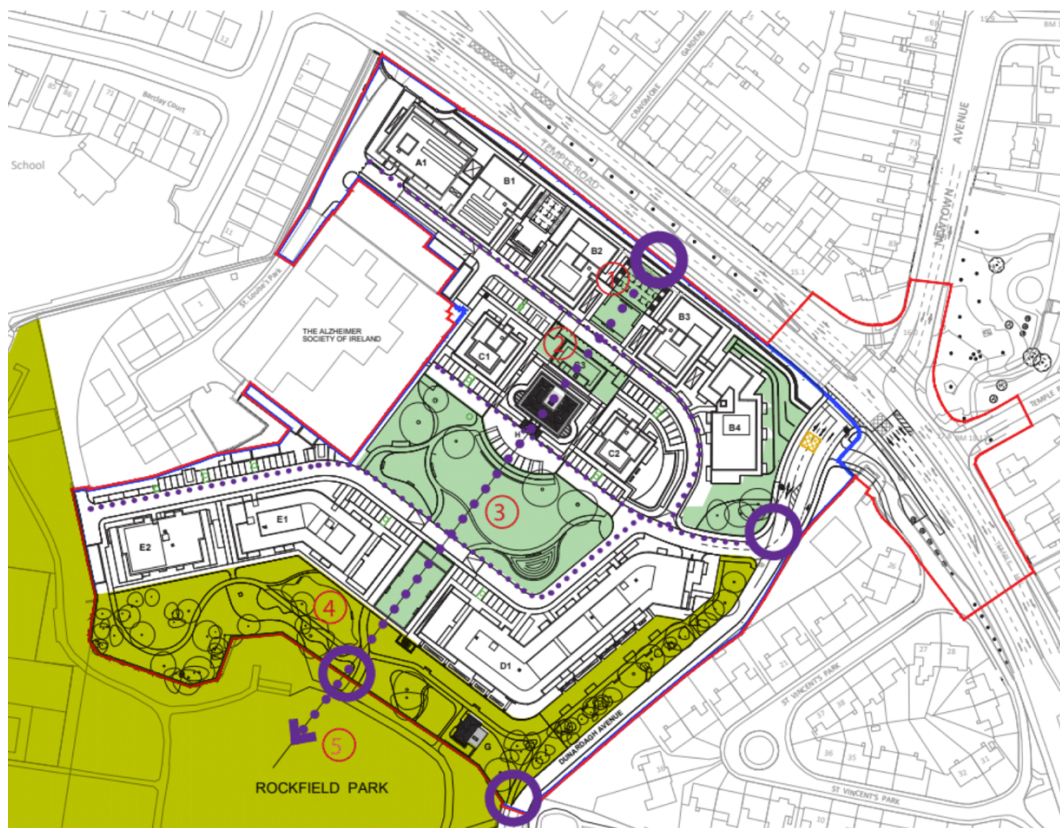
Furthermore, the entire car park will therefore be ducted to facilitate installation of cabling in the future to serve a charging point for every car space, as required. Within the basement area, conduits will be run on the walls where charging points can also be mounted. Where residents request a charging point to be installed, the relevant charging point will be pre-wired back to their home electricity meter in the designated meter location. The socket point will have a lockable cover on it so that only that resident may use the power point. This provision around the entire parking area allows future charging points to be installed at any of the car parking spaces with minimum works as and when required.

#### **Pedestrian Permeability to Adjacent Lands**

We refer the Board to the detail contained in the Planning Report, Design Statement and Landscape Report which detail the excellent levels of pedestrian permeability provided by way of this development, with new connections linking the N31 to Rockfield Park. There are 3no. access points for pedestrians off the N31:

- via the existing gates providing access closest to Blackrock Village and DART Station
- via the upgraded new junction which maintains the pedestrian route along Dunardagh Avenue to Rockfield Park
- directly through the development, along the axial relationship between St Teresa's House and Rockfield Park.





**Pedestrian Permeability (OMP Design Statement)**

We trust the Board will concur with our professional opinion that the proposed development provides extensive pedestrian permeability throughout its hierarchy of routes, open spaces and amenity areas.

#### **Requirement for a Stage 2 Road Safety Audit**

NRB advise that there are generally 3 stages in the Road Safety Audit process. Stage 1 is Preliminary Design/Planning, Stage 2 is at Detailed design Stage and Stage 3 is Post Construction. The applicant for permission commissioned an independent Stage 1 Safety/Quality Audit, which represents best practice at Planning Stage. Full detailed design has not been completed, as this is a planning application with the associated uncertainty, and therefore a Stage 2 Audit is neither possible or required at this stage.

#### **Requirement for a Quality Audit**

An independent Stage 1 Road Safety/Quality Audit, together with the associated Designer Feedback Form, has been completed and is included as Appendix J to the TA Report.

#### **Preliminary Travel Plan**

A Preliminary Travel Plan (Mobility Management Plan) has been completed and is included as Appendix H to the TA Report.

#### **Transportation Assessment Report**

A comprehensive TA Report has been completed

#### **Taking in Charge Drawing (TIC)**

We confirm that no aspects of this development are proposed to be taken in charge.



**3 Wind micro-climate study, including analysis of roof terraces, balconies, pedestrian areas, and amenity areas.**

**Applicant Response:**

A Micro-Climate Study has been prepared and submitted by BFluid, and is included in Chapter 11 of the EIAR, which has been submitted with this application for permission.

**4 An Ecological Impact Assessment**

**Applicant Response:**

As this application has been subject to a full Environmental Impact Assessment Report (EIAR), there is no requirement for a separate Ecological Impact Assessment. A complete assessment in relation to all ecology matters is contained within the EIAR chapter 'Biodiversity' as prepared by Scott Cawley Ecologists.

**5 An Archaeological Impact Assessment**

**Applicant Response:**

An Archaeological Impact Assessment has been prepared and submitted by Frank Myles. We refer the Bord to this document for further consideration as part of this application.

**6. A Tree Survey and Arboricultural Assessment**

**Applicant Response:**

A Tree Survey and Arboricultural Assessment has been prepared and submitted by The Tree File. We refer the Bord to this document for further consideration as part of this application.

**7 A Landscape Impact Assessment and a Visual Impact Assessment including CGIs and details of proposed materials and finishes that would address the impact of the proposed development on Temple Hill Road and neighbouring residential areas, as well as the environment provided within the scheme. The assessment should include long view of the site from all approaches.**

**Applicant Response:**

A Landscape Impact Assessment and Visual Impact Assessment has been prepared and submitted by Arc, based on photomontage views prepared by Modelworks. We refer the Bord to this document for further consideration as part of this application

**8 A site layout plan clearly indicating what areas to be taken in charge by the Local Authority.**

**Applicant Response:**

We confirm that no aspects of this development are proposed to be taken in charge.



**9 A response to the issues raised in the Planning Authority's Opinion received by An Bord Pleanála on 9 April 2021.**

**Applicant Response:**

All issues raised in the Planning Authority's Opinion with regard to planning have been addressed in the various reports produced by Brock McClure Planning Consultants.

**Traffic/Transportation**

The issues raised by DLRCC are addressed above under the general heading as set out within section 2(b).

**O'Mahony Pike Architects**

The opinion issued by DLRCC to An Bord Pleanála on 9 April 2021 includes a Conclusion and Summary of Considerations/ Issues that may have a bearing on the Board's decision. The summary comprises a list of items and concerns requiring consideration that extends to 18 no. items, all of which are addressed in the SHD application documentation. Items 2 to 11 are specifically architectural items that are addressed the OMP Response document.

**10 A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.**

**Applicant Response:**

A construction and demolition waste management plan and Operational Waste Management Plan have been prepared by AWN, and are included as appendices to the submitted EIAR. A Construction and Environmental Management Plan has been prepared by JJ Campbell Consulting Engineers and is enclosed herewith for further consideration by An Bord Pleanála.

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

**Applicant Response:**

A Material Contravention Statement has been prepared and submitted by Brock McClure. We refer the Bord to this document for further consideration as part of this application.

## **5 Conclusion**

This Statement and the suite of documentation which is referred to in this Statement and which has been submitted to the Board with the application for permission, fully addresses the issues raised and specific information requested in An Bord Pleanála's Opinion.

