

John Dorman & Others
9 Pembroke Road
Dublin
Dublin 4

Date: 25 July 2022

Re: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme
Co. Dublin

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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D01 V902	D01 V902

AN BORD PLEANÁLA
 LDG- 055241-22
 ABP- 313509-22
 12 JUL 2022
 Fee: € 50.00 Type: CARD-
 Time: 15.11 By: HAND

JOHN DORRAN + OTHERS

9 Pembroke Road

Dublin 4

8.7.22

RE: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme

Ref: Case reference: HA29N.313509

To whom it may concern

We wish to object to the proposed alterations to the historic railings and gates at Nos 1-11 Pembroke Road and to the use of the front gardens as a temporary storage and construction compound for Busconnects.

The proposal is to

- close the vehicular gate on Pembroke Road at No.1 to vehicular traffic leaving it accessible to pedestrians and cyclists
- proposed new controlled access to the existing vehicular gate at No.11 Pembroke Road
- create a vehicular gate onto Waterloo Road at No.1 in the location of the existing single gate
- to the use of the front gardens as a temporary storage and construction compound

Nos 1-11 Pembroke Road are Protected Structures constructed in the late 1840's. The cast iron railings and granite plinths date to construction of the terrace. They form part of the curtilage of the protected structures. This fine terrace, with its front garden parkland setting along with the carriage gateways at either end, has remained virtually intact since it was first set out by the Pembroke Estate 175 years ago.

Any proposed works within the curtilage of a protected structure require planning permission and the necessary documentation in support of the application. We have reviewed the documentation provided by the Applicant and note the following:

- No Description of the proposed works, the existing condition of the boundary treatment or its relationship with houses and their setting has been provided.
- No Architectural Heritage Impact Assessment has been carried out.
- No drawings of the existing and proposed railings, plinths and gates have been provided.
- No Declarations have been provided

Proposals to remove and/or alter the boundary features will adversely affect the character of the Protected Structures by altering the scale and visual characteristics of the gates, railings, granite plinths and the parkland setting.

An Bord Pleanála have not been provided with adequate information on which to make an informed decision on the potential impact on the architectural heritage of the Protected Structures and their attendant grounds.

Dublin City Council Development Plan and Protected Structures

We note below relevant sections from Dublin City Council Development Plan with respect to Protected Structures

11.5 Policies and Objectives

11.5.1 The Record of Protected Structures

Curtilage of a Protected Structure

The curtilage of a Protected Structure is often an essential part of the structure's special interest. In certain circumstances, the curtilage may comprise a clearly defined garden or grounds, which may have been laid out to complement the design or function. However, the curtilage of a structure can also be expansive and be affected by development at some distance away. The Architectural Heritage Impact Assessment submitted with any development proposal should also include an appraisal of the wider context of the site or structure including potential visual impacts on curtilage of a protected structure.

All planning applications relating to Protected Structures shall contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning and Development Regulations, 2001 (as amended) and chapter 6 and appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011), or any variation thereof including where relevant an Architectural Heritage Impact Assessment.

DCC Development Standards note

16.2.2.4 Boundary Walls and Railings:

Boundary Walls and Railings:

Dublin City Council will seek to ensure that development will not result in the loss or insensitive alteration of characteristic boundary walls or railings.

Where appropriate, boundary features will be reinstated. New boundary walls or railings should:

- Replicate an existing or traditional pattern which is characteristic of the immediate locality*
- Use a design and materials appropriate to the existing or proposed building and street-scene.*

The applicant does not meet any of the basic standards and requirements noted in the development plan to ensure the protection of boundary walls and railings.

Bus Connect Generic/catch all Documentation

The documentation provided by the applicant does not recognise the architectural or historical significance of the proposals on the Protected Structures. The Preliminary Design report provides only scant generic detail on Demolition and Alterations to existing railings and gates reducing them down to the vagueness of 'inherent value':

Demolition p.188

Where metal railings and gates are removed, typically these have inherent value due to their metal content. These will be source-segregated and delivered for metal recycling to an authorised waste facility.

In their Landscape and Character Analysis the report refers to the designs team's identification of the character and heritage of buildings including any protected structures and private gardens or grounds; the nature and presentation of any boundary walls, railings or hedgerows but there is no evidence to support this:

14.3 Landscape and Character Analysis p 212

The landscape and urban realm proposals are derived from analysis of the existing urban realm, including existing street and public space character, heritage features, boundaries, tree planting and vegetation, and the range of contemporary and heritage materials in use that inform the quality and character of different parts of the overall route. The design team identified the range of character areas along different parts of the route informed by adjacent land uses fronting onto the route; the character and heritage of buildings including any protected structures and private gardens or grounds; the nature and presentation of any boundary walls, railings or hedgerows; existing street trees or vegetation and the nature and quality of streetscape materials. This analysis provided an understanding of the existing character areas along the route and facilitated detailed and iterative consideration as to the integration of the proposed scheme. This analysis informed design changes to the initial proposals so as to avoid adverse impacts of existing streetscape character, and also identified opportunities for enhancement and creation of new spaces along the route. Character analysis also informed the development of mitigation proposals where public or private property would be directly impacted by the preferred scheme.

gmc
This analysis and understanding is not evident as there are no supporting documents on the proposals directly affecting this terrace of protected structures. The garden parkland setting contains many fine mature trees, some who may be in excess of 100 years old. The trees are widely spaced in the gardens. The tree crowns create a canopy over the entire front gardens. The root zone matches the tree crowns. The placing of any machinery or storing of construction materials anywhere on the root zone is contrary to BS 4837 (2012) Trees in relation to Design, Demolition and Construction as it will endanger the trees.

Detailing p.214

Where private or commercial property boundaries are realigned, boundary walls and railings will be reinstated to match the existing and may be extended to other properties along the same street to enhance streetscape character

Boundary Planting p.218

The Proposed Scheme corridor is bounded by a wide range of established private, institutional, commercial and public land boundaries. While the design development has sought to avoid impacts on such boundaries, the Proposed Scheme will nonetheless require both temporary and permanent access to lands beyond the carriageway boundary. Impacted property boundaries will be reinstated following construction. In some instances, boundaries will be re-built along their original alignments. In other cases, boundaries will be re-built on a new setback alignment. In general, property boundaries will be reinstated on a 'like for like' basis, including any walls, piers, fences, railings, gates, driveway finishes and private landscaping. Private grounds that are utilised in part for construction access will be reinstated following completion of the works to match the existing landscaping of the property. Where private grounds are reduced by permanent land take required for

the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.

The vague catch all terms like 'match the existing' or 'like for like' are not acceptable when it comes to any proposed material alterations which may affect the character of Protected Structures. Any temporary use of the front gardens for a construction compound will endanger the magnificent trees as there is no space outside of the root zone where materials or machinery can be stored.

We request the Board refuse permission to allow any changes to the railings, gates and plinths of Nos ~~9-11~~ 1-3 Pembroke Road and to refuse Bus Connects use of the gardens as a construction storage compound.

Yours faithfully,

1 - 11
Aunne SRS
1 + 3 Pembroke Road
Dublin D04 N5 W6.

Vol Loman JOTTN DORMAN
9 Pembroke Road

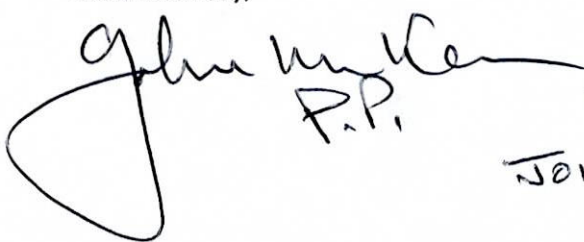
phots attached

the scheme, the remaining grounds will be reinstated to match the landscape and character of the existing grounds in consultation with the property owner.

The vague catch all terms like 'match the existing' or 'like for like' are not acceptable when it comes to any proposed material alterations which may affect the character of Protected Structures. Any temporary use of the front gardens for a construction compound will endanger the magnificent trees as there is no space outside of the root zone where materials or machinery can be stored.

We request the Board refuse permission to allow any changes to the railings, gates and plinths of ~~No. 11~~ 11 Pembroke Road and to refuse Bus Connects use of the gardens as a construction storage compound.

Yours faithfully,


P.P.
7 PEMBROKE ROAD
MOMAW CREST LTD
JOHN MCKEE



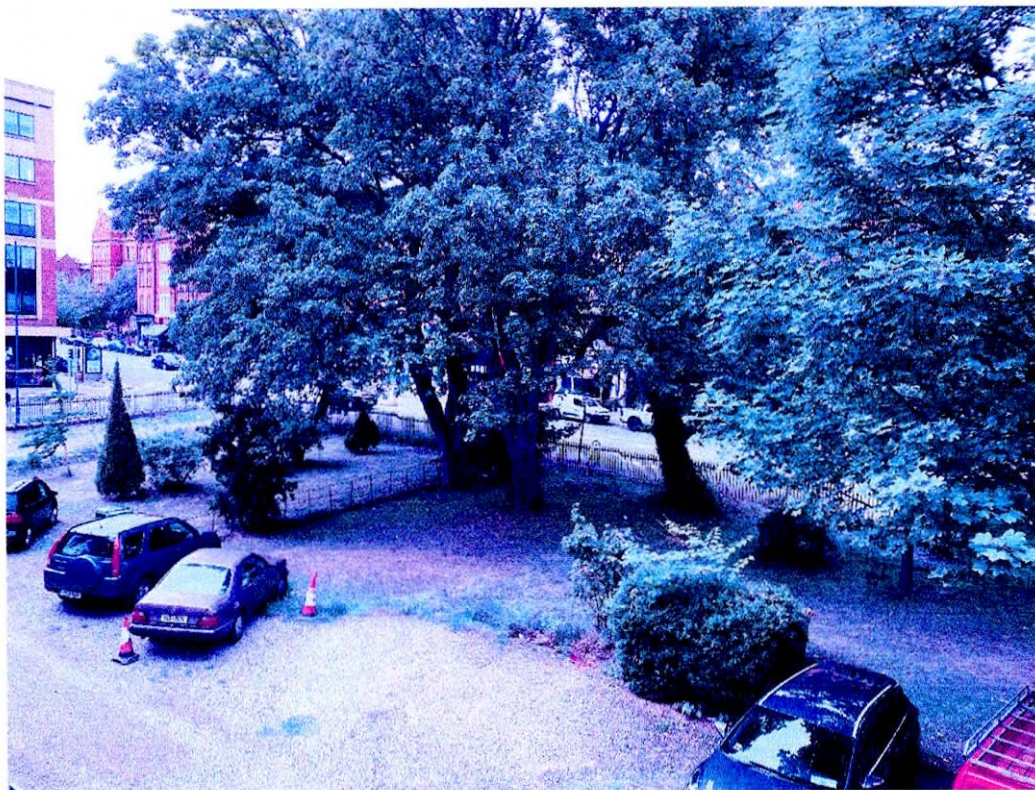
Waterloo Road View of 1-11 Pembroke Road

-cast iron railings, granite plinth, side gate (proposal to widen to vehicular traffic unacceptable)



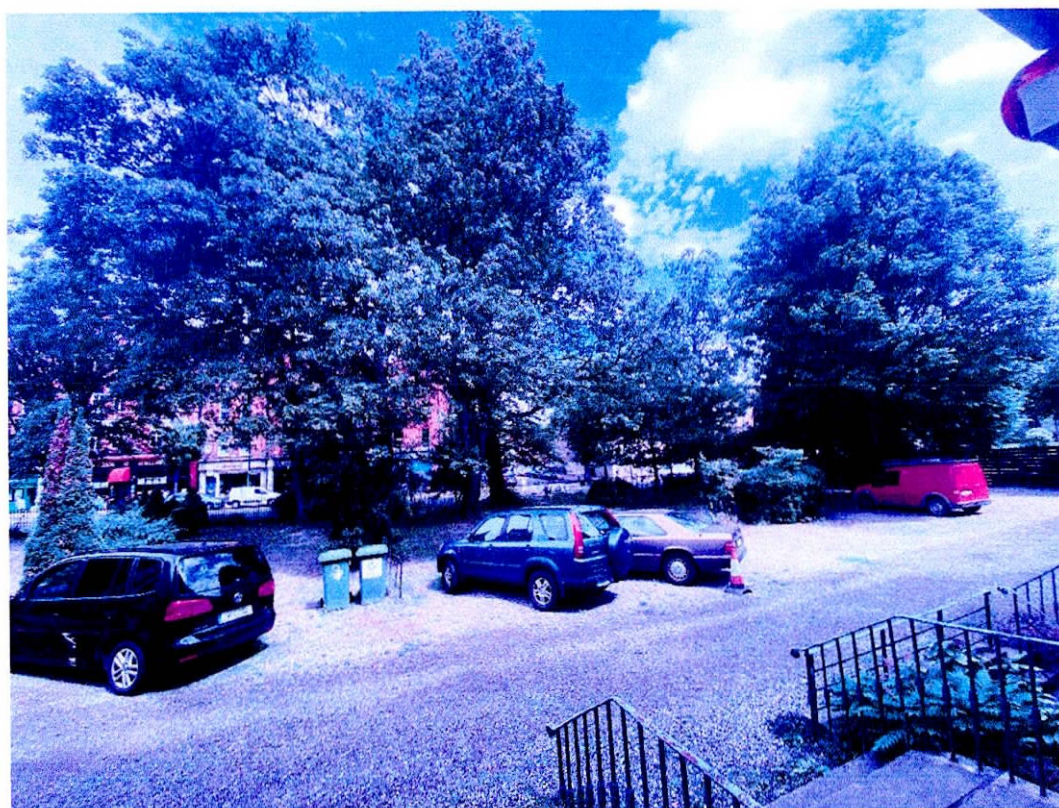
Pembroke Road view of Nos 1-11 Pembroke Road terrace with parkland gardens, mature trees

-proposal to create access control to left side gateway and close up right side gateway



View of parkland garden from No.9

- dense tree cover apparent to entire gardens



View of parkland garden from No.3 Pembroke Road

-tree canopy and root zone extends across entire gardens