

# **SOUTH DUBLIN COUNTY COUNCIL**

## **ARCHITECTURAL CONSERVATION OFFICERS REPORT**

### **RE: SD22A/0035 – Tallaght Priory, Old Greenhills Rd, Tallaght**

#### **Record of Protected Structures**

The Priory, Tallaght is referred to in the Council's Record of Protected Structures - Schedule 2 of the South Dublin County Development Plan 2016-2022 under Map Ref. No. 269. The site also includes St. Mary's Dominican Priory RPS Ref. 270 and St. Mary's Dominican Church, RPS Ref. 273.

Under Section 2 of the Planning and Development Act 2000, the term 'structure' means "*any building, structure, excavation, or other thing constructed or made on, in, or under any land, or any part of a structure so defined, (a) where the context so admits, includes the land on, in or under which the structure is situate, and (b) in relation to a protected structure or proposed protected structure, includes (i) the interior of the structure, (ii) the land lying within the curtilage of the structure, (iii) any other structures lying within that curtilage and their interiors, and (iv) all fixtures and features which form part of the interior or exterior of any structure or structures*". Therefore, the entire site is a protected structure, including all existing buildings on site including their exteriors, interiors, fixtures, and fittings. The protection also extends to the lands of the site and as such come under the provisions of the Planning and Development Act 2000.

The following Protected Structure is adjacent to the subject site, St. Basil's Training Centre, Greenhills Road, Tallaght (RPS Ref. 268).

#### **Architectural Conservation Area**

The subject site is partially within and adjoining an Architectural Conservation Area. Tallaght Village is designated as an Architectural Conservation Area in accordance with Part IV of the Planning and Development Act (2000) as such related policy is included in South Dublin County Development Plan 2016-2022.

#### **Appraisal**

The current application is for (a) Construction of a 4 storey nursing home building consisting of: (i) 106 bedrooms (with ensuite); (ii) associated residents welfare facilities; (iii) administration areas and staff facilities; (iv) multi-function space and pharmacy proposed at ground level; (b) construction of 60 one bed independent living units in 3 blocks as follows: (1) Block A, a 4 storey building comprising 11 one-bed units; (2) Block B, a part 4/part 5 storey building comprising 35 one-bed units; and (3) Block C, a 5 storey building comprising 14 one-bed unit. Each unit will be provided with a private open space in the form of a balcony terrace (6sq.m.) (c) The development will include communal open space and landscaping (including new tree planting and tree retention), 30 car park spaces (including 3 limited mobility parking spaces; 3 EV parking and 1 car sharing spaces); and 52 bicycle parking spaces (d) The development will be served by a new pedestrian and vehicular access from Old Greenhills Road through existing boundary wall. Material from the removed wall will be repurposed within the landscape areas; and (e) The development includes landscaping, boundary treatments (including wells

and railings to southern and western boundaries), and ESB Substation SuDs drainage, road infrastructure and all ancillary site works necessary to facilitate the development.

The subject site is located within the site of Tallaght Priory, a Protected Structure site detailed above. The proposed Nursing Home and Independent living Units for Older People is located in the northern corner of the existing Priory Lands.

A previous planning application for this site under Reg. Ref. SD21A/0136 was refused for a number of reasons. On foot of the refusal a pre-planning meeting took place to discuss a revision to the initial proposals. The undersigned reiterated the main concerns raised and detailed in the report issued by the Architectural Conservation Officer under the previous application (SD21A/0136). As part of the pre-planning submission blocks were reduced and the site layout was revised to allow for a greater separation along the boundary of the adjoining Priory Complex. However it was clearly stated by the undersigned that the revisions presented at pre-planning did not address the main concerns as raised in the reasons for refusal in that the site layout and building type, overall design and form needed to reflect a more residential village feel which would be more appropriate within the site context and wider location.

One of the main concerns from an architectural conservation and design view point was that “the proposed development failed to be sensitive within its proposed location and does not reflect the most suitable layout or design for the intended use on the subject site. The proposed new build completely dominated this part of the site due to its proposed height, scale and form. It was considered at the time that the overall site context was not fully considered in providing an appropriate new development”.

Other items raised under the previous application and report of the Councils Architectural Conservation Officer included;

*The overall visual impact, form and mass of the proposed new build within the context of the Priory site it is felt that the blocks are dense and require redesign to allow a more subtle and mixed architectural type to reflect a more village/community feel development. There is reference to a “Village Hub” with regard to the location and connection of the associated facilities with the Nursing Home and Independent Living for Older People, however there is also reference to a campus style development, which does not reflect the type of development appropriate at this location or in keeping with a development for Older People Living. The development type is appropriate in terms of its location to Tallaght Village and other facilities but the design and layout of the proposed Nursing Home and in particular, the Independent Living Accommodation needs to be more cognisant of the proposed development type in providing a development that is more suited to this use.*

*It is considered that a ‘village hub’ would provide a more lower scale development with a different building style and building form to allow specific buildings to be recognisable and be distinguished within the setting of the site, making the overall development more in keeping with its overall use and accommodation type. It is considered that an overall design that provides different building styles, heights and mass would provide a ‘Village Type’ development which would add to the adjacent village area.*

*Reference to building heights is also provided within the design statement, in that the existing Retreat House acts as a benchmark for the building closest to the western boundary, however the Retreat House is 4-Storeys and the building form and plot size is narrow and therefore does not mirror the scale and mass of the proposed new development. The Priory complex is made up of different design styles which reflects the development of the site at particular stages, this allows for a more visually interesting site context, with linear and softer forms with subtle design elements.*

It is stated in the architectural design statement that *“designs for the proposed development have been significantly changed...The Nursing Home has been reduced in height to 4 storeys with the floor plan now designed as a T shape and located in the northern part of the site. The floor plan has been reduced. This redesign reduces the overall height, massing and scale of the building whilst the shape creates separate communal and private external amenity spaces and increases the distance of the building form the eastern boundary wall”*.

The revisions are welcomed and show that some consideration has been given to the position of the Nursing Home building within the site. The issue of height and block form still remains an issue which was raised previously. The overall design is good quality and the use of materials makes an effort to reflect those found in the Priory however the mass, scale and height remains a concern. Although it is noted that the Nursing Home element requires a larger mass in order to facilitate this use, the overall design and form could have allowed for a more sensitive building mass and height in providing varying levels and using the Nursing Home as the hub with other smaller scale buildings to house additional services/function.

As previously stated it is important for the new development to sit sensitively into the site and integrate with the adjoining village area, as such it has been previously advised that the architectural form and style of the Nursing Home and independent living units would provide a unique character to the site with identifiable character and not large block forms. It is stated by the applicant that *“Independent Living Units accommodation is provided in a number of smaller buildings rather than buildings with larger footprints to reduce massing and scale and also provide view to the Priory beyond”*. Providing smaller buildings and breaking up the mass and scale of the units is welcomed, however not enough has been done to provide for lower level and identifiable buildings which are considered suitable for the proposed use. Although the design has sought to reflect the varying heights and varying roof profiles of the existing Priory Buildings, the overall sense of a village hub has not been achieved.

Under the *‘Urban Development and Building Height Guidelines (2018)’* specific requirements and guidance for the design of new build are provided. In accordance with these Guidelines (particularly Section 2.10), when considering new developments within the ACA of Tallaght, or areas adjacent to the designated area in close proximity to the village core, the design rationale and overall site context should act as the main driver for the overall scale, mass, height and design in achieving the best possible new development in these sensitive areas.

Reference to building heights is also provided within the design statement, in that the existing Retreat House acts as a benchmark for the building closest to the western boundary, however the Retreat House is 4-Storeys and the building form and plot size is narrow and therefore does not mirror the scale and mass of the proposed new development. The Priory complex is made up of different design styles which reflects the development of the site at particular stages, this allows for a more visually interesting site context, with linear and softer forms with subtle design elements.

The idea of providing the Nursing Home as the main anchor building of a ‘Village Hub’ with the buildings at a smaller scale linking to the hub to reflect a village setting was highlighted in the previous report of the Councils Architectural Conservation Officer. This design type was reiterated at Pre-Planning when a revised design submitted was discussed.

It is felt that given the location of the site adjoining the Priory Complex and in such proximity to the village centre any new development at this location should provide an identifiable contemporary addition, adding the architectural interest to the adjoining Priory and Tallaght Village. It should be noted that Block A, Block B and Block C are the same design and materials which does not allow for variation and unique building types that can add to the character of the site and identity.

It is considered that the blocks are dense and require redesign to allow a more subtle and mixed architectural type to reflect a more village/community feel development. There is reference to a "Village Hub" with regard to the location and connection of the associated facilities with the Nursing Home and Independent Living for Older People however this is not reflected in the overall design of the proposed development. The proposed use on the site is ideal in terms of its location to Tallaght Village and other facilities but the design and layout of the proposed Nursing Home and in particular, the Independent Living Accommodation needs to be more cognisant of the proposed type of development in providing a development that is more suited to this use. It is considered that a 'village hub' would provide a more lower scale development with a different building style and building form to allow specific buildings to be recognisable and be distinguished within the setting of the site, making the overall development more in keeping with its overall use and accommodation type.

It is proposed to insert a new entrance into the original boundary wall, concerns for the insertion of a new vehicular entrance was raised under the previous and current planning applications. The undersigned advised during pre-planning discussions that the use of the existing prior access on to the Old Greenhill Road was preferable and that a new entrance would have to be justified. The proposed new entrance is described as a break in the wall in order to provide a new entrance that is minimal in design and interventions in order to lessen the visual impact. It is considered that this approach would be acceptable, however allowing a new access at this point can only be justified once a balance is reached that provides a scheme that addressed the concerns and allows for a development which is sensitive to the site context and one that delivers a suitable type at this location. Currently this is not the case and therefore a compromise between allowing a section of the original boundary wall to be removed to facilitate the proposed development cannot be considered based on the current scheme. Allowing a new entrance at this location will only be considered when a proposed development is deemed to make a contribution to Tallaght Village and the adjoining Protected Structure site in providing for a visually attractive and smaller scale scheme and sustainable development.

It should be noted that based on items raised and the comments provided under the previous planning application (SD21A/0136) and during a pre-planning meeting prior to the current application being formally lodged. The concerns with regard to the proposed scale, mass and height of the new blocks and overall visual impact on the historic built environment have not been addressed. The proposed development fails to provide a sensitive overall development at this location.

Having assessed the details of the planning application and based on the above it is considered that the applicant has failed to address the initial concerns raised in relation to the overall visual impact of the scale and height that the proposed development will have within such close proximity to Protected Structures and within the curtilage of 'The Priory' Tallaght, within the Architectural Conservation Area (ACA) and along the Old Greenhills Road.

## **Conclusion**

Given the issues and concerns detailed within the appraisal above. It is considered that the proposed development is not acceptable and should therefore be refused for the following reasons:

1. Concerns remain in that the character of the Protected Structures will be significantly affected by the proposed Nursing Home and Independent Living Accommodation blocks as the new build will completely dominate this part of the site due to its proposed, height, scale and mass which will be visible within The Priory Demesne and along Old Greenhills Road. The consequences of the proposed development may result in a diminished quality of character, which fails to address and adhere to existing policies for development within the curtilage of a Protected Structure or New development within or in close proximity to an ACA in line with SDCC County Development Plan (2016-2022) and the Tallaght Local Area Plan 2020.
2. It is considered that the proposed design with the use of contemporary materials and building elements found within the existing building stocks tries to address the issue of a contemporary design within a historic site. However, given that the issue of building height, mass and dense form of the proposed blocks, the overall impact cannot be negated by the design elements and finishes alone. It is considered that the proposed development fails to be sensitive within its proposed location and does not reflect the most suitable layout or design for the intended use. A lower scale development providing different levels and design styles would allow for a high quality unique development within the curtilage of a Protected Structure, historical setting and within such close proximity to a village centre.
3. It is felt that given the location of the site adjoining the Priory Complex and in such proximity to the village centre any new development at this location should provide an identifiable contemporary addition, adding the architectural interest to the adjoining Priory and Tallaght Village. It should be noted that Block A, Block B and Block C are the same overall design, which does not allow for variation and unique building types that can add to the character and identity of the site.
4. It is considered that the proposed blocks are dense and require redesign to allow a more subtle and mixed architectural type to reflect a more village/community feel development. There is reference to a "Village Hub" with regard to the location and connection of the associated facilities with the Nursing Home and Independent Living for Older People, however this is not reflected in the overall design of the proposed development. The proposed use on the site is ideal in terms of its location to Tallaght Village and other facilities but the design and layout of the proposed Nursing Home and in particular, the Independent Living Accommodation needs to be more cognisance of the proposed type of development in providing a development that is more suited to this use.
5. It is proposed to insert a new entrance within the existing original boundary wall of the Priory. It should be noted that in order to provide a new entrance and justify the removal of an original boundary feature a scheme that addressed the concerns and allows for a development which is sensitive to the site context and one that delivers a suitable type at this location is required. Currently this is not the case and therefore a compromise between allowing a section of the original boundary wall to be removed to facilitate the proposed development cannot be considered based on the current scheme.

Allowing a new entrance at this location will only be considered when a proposed development is deemed to make a contribution to Tallaght Village and the adjoining Protected Structure site in providing for a visually attractive and smaller scale scheme and sustainable development.

**Irenie McLoughlin**  
**Architectural Conservation Officer**

**Date: 1<sup>st</sup> April 2022**