



An  
Bord  
Pleanála

**Case Reference:  
ABP-304985-19**

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**Planning and Development (Housing) and Residential Tenancies Act 2016**

**Notice of Pre-Application Consultation Opinion**

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**Proposed Development: Demolition of 3 no. houses and construction of 165 no. apartments with all associated site works.**

**“Dunluce”, “Drumkeen” and “Mulberry”, Glenamuck Road, Carrickmines, Dublin 18.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission 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.

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. Car Parking Provision

Further consideration and/or justification of the documents as they relate to the level of car parking provision proposed. A total of 169 no. car parking spaces are proposed, all of which save for 4 no. visitor spaces are accommodated in two separate basements on site, and this represents a 1:1 provision of car parking.

Given the proximity of the site to Ballyogan Wood Luas Station, which is approximately 1km to the north-west of the site, the site is considered to be within a public transport corridor as defined within the Section 5.8 of the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). Access to the Luas station may be further improved should permission be granted for the proposed Carrickmines District Centre (currently under appeal – ABP Ref PL06D.304396). It is national policy to seek higher densities on sites that are accessible to high quality, frequent public transport services, and seeks to minimise reliance on the private car. Further justification should be put forward in relation to the level of car parking proposed and/or the level of car parking should be reduced. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

## 2. Impacts on Existing Trees

Further consideration and/or justification of the documents as they relate to the existing tree coverage on site. It is of note that there is a specific local objective to protect and preserve trees and woodlands on this site. There is extensive tree removal proposed (302 of the 376 trees on the site are proposed to be removed). Regard should be had to the detailed comments of the Planning Authority, both in their opinion and at the pre-application meeting, and if possible, agreement in relation to the level of felling required, and in relation to appropriate replacement planting, should be sought. The impacts of the proposed basements on the trees to be retained should be further explored and details provided in relation to same. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

## 3. Flood Risk/Ground Water

Further consideration and/or justification of the documents as they relate to flood risk and ground water. In relation to flood risk, the risk of flooding arising from the stream running through the site should be explored in greater detail, and regard should had to the comments of the Drainage Division of the Planning Authority, both in their opinion and at the pre-application meeting. Relating to this issue, a groundwater analysis may be required which examines the source of the stream and the impacts of the development on same. The risk of pluvial flooding arising

from run off from Springfield Lane should be considered in greater detail, and the change in levels from Springfield Lane should be considered and any protective measures necessary set out in detail, both in the relevant documents and on the application drawings. A revised Flood Risk Assessment should be prepared in accordance with 'The Planning System and Flood Risk Management' (including associated 'Technical Appendices') (2009). Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

#### 4. Childcare Provision

Further consideration and/or justification of the documents as they relate to the provision of Childcare Facilities. The submitted Childcare Capacity Assessments states that there will be a demand of 10 childcare spaces arising from the development. It is noted that the calculation of 10 childcare spaces is based on Dublin wide data and it is considered that the calculated demand would require socio-economic and demographic data that is more specific to the area. In addition to this, a concern in relation to reliance on permitted creches not yet operational. This approach would not be acceptable to the Board, and certainty is required in relation to how the childcare demand generated by the scheme would be accommodated. Therefore, additional justification is required for the non-provision of childcare facilities. If justification is not possible, a childcare facility should be provided on the site. Particular regard should be had to the criteria as set out in Childcare Facilities – Guidelines for Planning Authorities (2001). Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Additional CGIs/visualisations/3D modelling showing the proposed development relative to existing development, including the surrounding

residential development. CGIs showing a winter scenario (no-leaf) scenario should be provided.

2. A report that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to daylight/sunlight analysis, overlooking, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development.
3. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.
4. A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.
5. Revised proposals in relation to surface water proposals having regard to the report of the Water Services Division of the Planning Authority, namely the need to more detail/clarification in attenuation volumes, details of attenuation tanks, details of SUDs measures, details of green roofs and the need to provide a stormwater audit.
6. Additional details in relation to Transport, having regard to the report of the Transportation Planning Department, namely to provide justification for the number of units proposed, based on the existing permissions and the level of available capacity within the LAP. Other required documents include a Quality Audit, a Travel Plan, a Traffic Impact Assessment, and a Site Specific Construction and Demolition Waste Management Plan.

7. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
8. Waste Management Details having regard to the report of the Waste Management Section of the Planning Authority.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. The Minister for Culture, Heritage and the Gaeltacht
2. The Heritage Council
3. An Taisce
4. An Comhairle Ealaíonn
5. Fáilte Ireland
6. Irish Water
7. National Transport Authority
8. Transport Infrastructure Ireland
9. Dun Laoghaire Rathdown County Council Childcare Committee

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Rachel Kenny

Director of Planning

September, 2019