



An  
Bord  
Pleanála

**Case Reference:  
ABP-306159-19**

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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 structures on site, construction of 119 no. apartments and associated site works.**

**Frankfort Castle, Old Frankfort, Dundrum, Dublin 14.**

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.

**Nature of the Application**

Clarification as to the nature and type of residential accommodation proposed in Block D. While it appears from the documentation submitted that the development is not a 'build to rent' proposal, the 'Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities' (March 2018) clearly indicates that 'shared accommodation' is primarily for rental accommodation. If the proposal is intended as a 'shared accommodation' model, then the provisions of

sections 5.13 to 5.24 of the above mentioned guidelines apply. If the proposal is not intended as rental accommodation, then the provisions of, inter alia, Appendix 1 of the above mentioned guidelines apply (e.g. studio/bedrooms should have a minimum floor area of 37 sq.m.). 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. Planning rationale/justification as it relates to the level of car parking provision proposed, specifically noting the site's location close to public transport and that it is national policy to minimise reliance on the private car.
2. Notwithstanding the need to justify the levels of car parking proposed on the site, as noted above, additional details in relation to Transport, having regard to the report of the Transportation Planning Department (dated 14th January 2020), and having regards to discussions at the tripartite meeting, in particular (i) the provision of a pedestrian footpath to the south of the site, along Frankfort, to the eastern extent of the site. If this is not being provided, detailed justification will be required; (ii) details of pedestrian priority crossings, as detailed in the report (iii) details of electric vehicle infrastructure (iv) additional cycle parking provision (v) details of the proposed pedestrian access to the north-west, if this is being provided; (vi) Mobility Management Plan; and (vii) Quality Audit.
3. A report (or reports) that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to daylight/sunlight analysis, overshadowing and potential overlooking. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development.

4. Rationale/ justification as to the provision of Childcare Facilities, or otherwise. Justification is required for the non-provision of childcare facilities, having regard to the criteria as set out in Childcare Facilities – Guidelines for Planning Authorities (2001).
5. Rationale/ justification for the removal of 78% of the existing trees on the site, having regard in particular to the report of the Parks and Landscape Section of the Planning Authority (dated 17th January), and having regards to discussions at the tripartite meeting. The impacts of the proposed development on the trees proposed to be retained and the proposed replacement planting, should be further explored, and detailed drawings provided in relation to same.
6. A plan of the proposed open space clearly delineating public, semi-private and private spaces should also be provided, as well as a detailed breakdown of the total area of same. These plans should clearly highlight how the proposals provide for an appropriate variety and suitable location(s) of children's play spaces.
7. 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.
8. Addition detail in relation to surface water proposals, having regard to the report of the Drainage Division of the Planning Authority (dated 16th January 2020), and having regards to discussions at the tripartite meeting, namely the need to provide more detail in relation to the surface water infrastructure to be provided on site, the feasibility or otherwise of the proposed planting over the attenuation tanks as well as details of green roofs. In addition, a Stormwater Audit will be required at application stage.
9. Additional detail in relation to Flood Risk, having regard to the report of the Drainage Division of the Planning Authority (dated 16th January 2020), namely the need to provide a surcharge analysis of the surface water drainage system and details of safe overland flow routes.

10. Additional details in relation to waste management, having regard to the report of the Waste Management Division of the Planning Authority (dated 15th January 2020) namely a Construction and Demolition Waste Management Plan, an Environmental Management Construction Plan and a Waste Management Operational Plan.
11. A detailed Housing Quality Assessment.
12. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
13. Appropriate Assessment Screening Report.

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. Inland Fisheries Ireland
2. Irish Water
3. National Transport Authority
4. Transport Infrastructure Ireland
5. Dun Laoghaire Rathdown County Council Childcare Committee

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic

housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Tom Rabbette  
Assistant Director of Planning  
February, 2020