



An
Bord
Pleanála

Case Reference:
ABP-307157-20

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

**Proposed Development: 153 no. residential units (53 no. houses, 100 no. apartments), childcare facility and associated site works.
Blackglan Road, Sandyford, 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. Residential Density

Further consideration and/or justification of documents as they relate to the proposed residential density having regard to the accessibility of the site to surrounding public transport options, including existing Luas connections and to the nearest bus stops/routes, by foot and cycle. Particular regard should be had to the criteria relating to appropriate residential density, as set out in Sustainable Residential

Development in Urban Areas Guidelines (2009). Further consideration of this issue may require amendments to the documents and/or design proposals submitted.

2. Detailed Design

The prospective applicant should provide further justification and/or detail in relation to the detailed design of the proposed apartments, houses and duplexes. In particular, the prospective applicant should provide further justification and/or detail in relation to the floor layout of duplexes and overlooking between apartment units, as well as elevational design, that in the case of houses and duplexes replicates the previous 2007 application. Design should be informed by recent planning guidance and the Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual') (2009). Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

3. Compliance with DMURS

The prospective applicant should provide further justification and/or detail in relation to compliance with DMURS, in particular the prioritisation of safe walking and cycling routes both within and around the development, the treatment and nature of the proposed 'Homezones' and the number of cul-de-sacs within the site. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

4. Irish Water Confirmation of Feasibility

Article 297 of the Planning and Development (Strategic Housing Development) Regulations 2017 sets out the requirements relating to applications and in (2)(d) that an application shall be accompanied by evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant network or networks have capacity to service the development. Irish Water have confirmed to the Board that it requires the applicant to reengage in order to reassess the feasibility of connection for the development.

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. An up to date tree survey to be provided, to include trees outside of the boundary but proximate to the proposed construction works. Any trees identified for removal should be within the site. If trees are identified for removal outside the redline boundary, consent of the landowner should be demonstrated. Tree protection measures should be explained in detail.
2. A plan showing separation distances between the development and to existing dwellings should also be included, annotating key distances to boundaries, buildings and windows.
3. The application submission should demonstrate that the quality of Part V Housing to be included as part of the development is indistinguishable from comparable private housing within the scheme. Details should be provided of the usability and quality of the external amenity area proposed as part of the Part V Housing, with particular regard to the attenuation and drainage function of such areas and how this will impact the quality and usability of the space. North facing single aspect units should also be avoided in Part V Housing to ensure a commensurate level of quality when compared to the private housing apartments proposed.
4. Additional details and/or revised proposals in relation to site services, having regard to the report of the Drainage Planning Section of the Planning Authority. Additional detail and/or revised proposals in relation to the SuDS, attenuation measures and drainage calculations; Further consultation is also required with Irish Water to confirm the feasibility of connection to the network.
5. The Design Statement should include consideration of the comments provided by the Planning Authority Heritage Officer and how the design responds to the

derelict cottage outside of the site boundary with historic associations with Padraic Colum and Countess Marchievicz.

6. Overshadowing and daylight/sunlight analysis of potential impact on adjoining residential dwellings and areas. Daylight/Sunlight analysis, should also be submitted showing an acceptable level of residential amenity for future occupiers of the proposed development; within the proposed residential units, in private and shared open space, and in public areas within the development. The methodology should follow BRE Guidelines and analysis is expected of each floor, until achievement of BRE target levels can be demonstrated to all units on a floor. For example, if all units do not meet target levels on the ground floor, units on the first floor will require assessment, until it can be shown that all units on a floor achieve target levels and a reasonable assumption can be reached in relation to units above.
7. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated, only windows with a true dual aspect will be considered as contributing to meeting the minimum quantum required. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines and point 3 above.
8. 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.
9. A plan of the proposed open and communal spaces clearly delineating public, semi-private and private spaces should be provided, as well as a detailed breakdown of the total area of same.
10. Additional CGIs are required, as well as a Landscape and Visual Impact Assessment with photomontages, to include, consideration of visual impacts on the surrounding areas.

11. A building life cycle report shall be submitted in accordance with section 6.3 of the 'Sustainable Urban housing: Design Standards for New Apartments (2018)'. The report should have regard to the long term management and maintenance of the proposed development.
12. A plan identifying the location of cycle storage and corresponding units to be allocated spaces, with annotation to explain the cycle storage provision.
13. Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development.
14. Traffic and Transport Impact Analysis, to be prepared in consultation with Dun Laoghaire Rathdown County Council.
15. Waste Management Details.
16. Site Specific Construction and Demolition Waste Management Plan.
17. Road Safety Audit and Quality Audit.
18. AA 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. Minister for Culture, Heritage and the Gaeltacht
2. The Heritage Council
3. An Taisce – The National Trust for Ireland
4. Irish Water
5. Inland Fisheries Ireland
6. Waterways Ireland
7. Transport Infrastructure Ireland
8. National Transport Authority
9. 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.

Tom Rabbette

Assistant Director of Planning

August, 2020