



An
Bord
Pleanála

**Case Reference:
ABP-308298-20**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of existing buildings on site, construction of 216 Build to Rent apartments, office, restaurant, café and associated site works.

Former Siemens Site, Blackthorn Avenue and Ballymoss Road, Sandyford Industrial Estate, 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. Height and Placemaking

Further consideration/justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2016-2022, specifically Appendix 15: Sandyford Urban Framework Plan, in relation to the scale, height, and design of the

proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford. While increased residential densities and changes to the townscape in terms of higher elements and taller buildings at this location may be appropriate, the applicant is required to provide adequate rationale and justification to support such additions to the area, including further consideration/justification of the documents as they relate to the potential visual impact of the development and its interaction with adjacent permitted development to the west and underlined by greater consideration of stated objectives in the local plan regarding notable building design and urban plazas. The further consideration/justification should address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the plot ratio and height strategy in the development plan, reference should be made to legibility, visual impact, and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

2. Residential Amenity

Further consideration/justification of the documents as they relate to the residential amenity strategy for the proposed scheme. The twin block layout outlined for the site should ensure adequate levels of residential amenity for future occupants. In this context the documentation should appropriately and reasonably describe and illustrate good levels of sunlight and daylight penetration to the courtyard amenity spaces north and south of the blocks and illustrate the comfort index and usability of roof terraces and private balconies located at upper levels. In terms of the wider amenity, convenience and public realm, the documentation should demonstrate how apartment block positioning and articulation will assist with activated and comfortable street frontages around the site. All in the context of assisting modern placemaking and improving the overall quality of the urban environment at this key and notable location. The further consideration of these issues 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. A detailed landscaping plan for the site which clearly differentiates between areas of public, communal and private open space and which details exact figures for same. In addition, proposals could be presented that detail how the development will interact and complement the existing or emerging public realm along Blackthorn Avenue and Ballymoss Road. Details should also include proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Pedestrian permeability through and beyond the site should be outlined. Details of the interface between private and communal areas on and off the site should also be detailed. Additional cross sections, CGIs and visualisations should be included in this regard. The landscaping plan should critically assess the best and most appropriate way to incorporate underground car parking ventilation structures.

2. Detailed quantum and design of open space proposals at all levels including consideration of issues related to wind micro-climate, design, and usability of spaces, in particular at the upper levels.

3. Details of boundary treatment across the site and specifically along the southern and western boundary of the site where levels may change. Detailed cross sections should show any changes in level and the boundary treatment proposed.

4. Detail and justification of location and quantum of resident support facilities and resident services and amenities as defined by the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018) and accessibility/ease of access to those spaces by future residents.

5. Provide further justification for the level of car and cycle parking proposed and detail the design of cycle parking spaces and secure storage areas. The justification should include an analysis of car and cycle parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators. Given the location and availability of public transport, a rationale for the proposed car parking provision should be prepared, to include details of mobility management plans, car parking management strategies and car share schemes.

6. A Materials Strategy that details all materials proposed for buildings, open spaces, paved areas and boundaries. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials on each block. The documents should also have regard to the durability of materials and the long-term management and maintenance of the proposed development.

7. A detailed schedule of accommodation (Housing Quality Assessment) which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018 (2020), including its specific planning policy requirements. Particular attention shall be directed to the provision of adequately designed and an appropriate quantum of dual aspect apartments.

8. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.

9. Information for the purposes of screening for EIA as set out in schedule 7A of the Planning and Development Regulations 2001 (as amended) where the application is not accompanied by a full EIAR. The information should be submitted as a standalone document and refer to the potential for cumulative effects in conjunction with other permitted and planned housing and road developments in the area.

10. A detailed Site Specific Construction and Demolition Waste Management Plan.

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. Response to issues raised by the Transportation, Drainage Planning, Architects and Parks Divisions of Dun Laoghaire Rathdown County Council, as per the reports submitted in Appendix B of the Planning Authority Report, received 28 October 2020.

13. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

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. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Luas Operator – Transdev Ireland
5. Córas Iompair Éireann

6. Commission for Railway Regulation
7. Dun Laoghaire Rathdown County 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.

Stephen O' Sullivan
Assistant Director of Planning
February,2021