



An
Bord
Pleanála

Case Reference:
ABP-308723-20

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 172 no. units (89 no. houses, 83 no. apartments), creche and associated site works.

Lands at Edmondstown (west of Kilmashogue Bridge and Coil Avon), Whitechurch Road, Rathfarnham, Dublin 16.

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. Principle of proposal:

Further consideration/justification of the documents as they relate to the principle of the proposed development in the context of the requirements of H3 SLO 1 of South Dublin County Development Plan 2016. The documentation submitted at application stage should demonstrate that the proposal is not premature pending

determination of a road layout/increased accessibility for the area. The applicant should address why the proposed development could not be considered to be ad hoc, piecemeal, premature development in the absence of a comprehensive approach to the development of these residentially zoned lands.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Height, Density, Car Parking and Layout

- (i) Further consideration and/or justification of the documents as they relate to the height and density strategy for the site. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site as it relates to height and density provides the optimal architectural solution for this site, in line with both local and national policy, and should submit a rationale/justification for the heights/setbacks and density proposed. CGIs, visualisations and cross sections, as necessary, including from strategic viewpoints along the M50, should be submitted which clearly show the relationship between the proposed development and existing/permitted development in the immediate and wider area and which illustrates the topography of the area.
- (ii) Further consideration/justification of the documents as they relate to the proposed car parking strategy. The prospective applicant should also satisfy themselves that the proposed car parking strategy provides the optimal solution for the site, given its locational context and should provide justification for extent of car parking proposed.
- (iii) Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above mentioned Guidelines and the Design Manual for Urban Roads and Streets. The matters of arrangement and hierarchy of streets; the creation of a defined urban edge along the proposed link road; connectivity with adjoining lands; provision of well supervised, quality, usable open space and the creation of character areas within a high quality scheme should be given further consideration.

This further consideration should be undertaken in an holistic manner, examining the entirety of the development site and should examine areas of the site where increased height and density may be appropriate, for example along the proposed link road and overlooking the areas of open space. The proposed development shall have regard to inter alia, national policy including the National Planning Framework; Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018) and Sustainable Urban Housing: Design Standards for New Apartments (December 2020), together with local planning policy, the site's context and locational attributes.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

3. Design and Materiality

Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should demonstrate that the elevational treatments, external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. Details of the colour, tone and texture of materials and the modelling and profiling of the materials (including any cladding or framework system) on each block. Particular attention is required in the context of the strategic location and visibility of the site and to the long term management and maintenance of the proposed development. A Building Lifecycle Report, in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) should also be submitted in this regard.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

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 site layout plan which clearly identifies which areas are being included for the purposes of calculation of net and gross areas.
2. A report which address existing and future residential amenity and which includes matters such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts, together with proposals to address any such impacts, if necessary. A Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers and neighbours of the proposed development, should include details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties.
3. A housing quality assessment which provides specific information regarding the proposed apartments/duplex units and which demonstrates compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit.
4. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority.
5. Construction and Demolition Waste Management Plan
6. Waste management details
7. Archaeological Impact Assessment
8. Childcare Demand Assessment
9. Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated in Appendix 1 of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development

proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.

- 10.** Additional details in relation to transportation matters, having regard to the requirements of the Roads Department Planning Report as indicated in Appendix 1 of the Planning Authority's Opinion
- 11.** Additional details and justification for the proposed development, having regard to the report of the Parks and Landscape Services Division of the Planning Authority as detailed in Appendix 1 of their Opinion.

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.** Department of Culture, Heritage and the Gaeltacht
- 3.** Transport Infrastructure Ireland
- 4.** National Transport Authority
- 5.** An Taisce-the National Trust for Ireland
- 6.** Heritage Council
- 7.** South Dublin County Childcare Committee
- 8.** Inland Fisheries Ireland

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.

Rachel Kenny

Director of Planning

March, 2020