



An
Bord
Pleanála

**Case Reference:
ABP-309698-21**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 172 Build to Rent Apartments, 8 no. commercial units and associated site works.

Junction of Sallynoggin Road Lower and Glenageary Avenue, Glenageary, Co. Dublin.

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. Development Strategy

Further consideration and/or justification of the documents as they relate to the development strategy for the site in respect of the proposed density, height, scale and massing of the proposal, having regard to its locational context.

- a)** Justification/rationale for the proposed residential density and height with regard to the provisions of the Dun Laoghaire Rathdown County

Development Plan 2016-2022 and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).

- b)** In addition to the consideration of other national policy and guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome for the subject lands.
- c)** The interface with existing uses (Lidl and An Post Sorting Office) the interface with the public realm at Sallynoggin Road Lower and Glenageary Avenue as they relate to the design and layout of the proposed development and the desire to ensure that the proposal provides a high quality, positive intervention at this prominent location. Particular regard should also be had to creating suitable visual relief in the treatment of elevations and interface with adjacent lands. An architectural report, urban design statement, visual impact assessment and additional CGIs/visualisations should be submitted with the application, together with a report that specifically addresses proposed materials and finishes to the scheme.
- d)** Furthermore, the layout should address the creation of vibrant, amenable and high-quality communal and public open spaces within the development. Permeability through the site and connectivity.

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

2. Potential Impacts on Residential Amenities & adjoining lands

Further consideration/justification of the documents as they relate to potential impacts on residential amenities of adjacent residential properties, impacts on adjacent lands and impact within the proposed scheme to include:

- a) Daylight, Sunlight and Overshadowing analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within individual rooms within the development, in communal open spaces and in public areas within the development. The impact on adjoining lands, residential properties and uses should also form part of the assessment.
- b) Further consideration of the details and mitigation proposed, to ensure that the proposed development has been designed to avoid direct overlooking of adjacent residential properties and units within the scheme. The response should include a report that addresses issues of residential amenity (both of adjoining developments and future occupants), specifically with regards to overlooking, visual dominance and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining uses.
- c) The development should be designed so as not to have a negative impact on any potential redevelopment of adjoining lands.
- d) Consideration of the impact on the development/redevelopment potential of adjoining lands, having regard to, inter alia, the limited separation distances proposed between the development and site boundaries.

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

3. Traffic and Transportation

Further consideration and/or justification of the documents as they relate to:

- a) Justification/rationale for the Carparking Provision associated with the proposed Build to Rent Apartments.
- b) The provision of safe pedestrian and cycle access and to the safe provision of accessible cycle parking.
- c) Details of landownership and clarification of works proposed outside the site boundary outlined in red. And relevant thirdparty consents where required.
- d) A Carparking Strategy and Mobility Management Plan.
- e) A response to issues raised by Transportation Planning contained in the Planning Authority's Opinion received by An Bord Pleanála on the 9th April 2012.

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 housing quality assessment which provides the specific information regarding the proposed apartments required by the 2020 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.
2. Clarification of the number of units and type of units proposed within the scheme which are proposed as Build to Rent and compliance with the Sustainable Urban Housing: Design Standards for New Apartments 2020, specifically the guidance on Build to Rent Development and SPPR7 and SPPR8 in particular. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation, operation and management of the scheme.
The response should also include a Report that addresses the quantum and quality of services, facilities and amenities proposed having regard to the future needs of the occupants of the proposed development. And a Site Specific Management Plan which includes details on management of the communal areas, public space, residential amenity and apartments.
3. Landscape proposals.
4. Justification/rationale for approach to Childcare provision.
5. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
6. Respond to issues raised by the Drainage Division contained in the Planning Authority's Opinion received by An Bord Pleanála on the 9th April 2021.

7. Respond to issues raised in the Planning Authority Opinion received by An Bord Pleanála on the 9th April 2021.
8. Where the prospective 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, as amended:

1. **Irish Water**
2. **The Minister for Housing, Local Government and Heritage**
3. **The Heritage Council**
4. **An Taisce**
5. **Relevant Childcare Committee.**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
May, 2021