



An  
Bord  
Pleanála

# Inspector's Report

## PL06D.246572

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<b>Development</b>	Construction of 14 no. dwellings.
<b>Planning Authority</b>	Dún Laoghaire-Rathdown County Council
<b>Planning Authority Reg. Ref.</b>	D16A/0111
<b>Applicants</b>	Ian & Dot Roberts
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	REFUSAL
<b>Appellants</b>	Ian & Dot Roberts
<b>Observers</b>	
<b>Date of Site Inspection</b>	22 <sup>nd</sup> August 2016
<b>Inspector</b>	Siobhan Carroll

## 1.0 Site Location and Description

- 1.1. The appeal site is located to the rear of No. 214 and No. 216, Rochestown Avenue, Dún Laoghaire, Co. Dublin. No. 214 'Beechfield' is a detached dormer bungalow which was constructed in the 1970's. No. 216 'Wungryn' is a single storey detached and flat roof dwelling. It was constructed in the 1930's. Permission was recently granted for the demolition of this dwelling and the construction of a detached dwelling. Both properties are served by a private lane with access off Rochestown Avenue to the east. The access lies adjacent to the roundabout at Killiney Shopping Centre.
- 1.2. The site comprises the western section of the plots of No. 214 and No. 216 and it has a stated area of 0.356 hectares. The western site boundary adjoins the rear gardens of six dwellings located on Auburn Road. The northern boundary adjoins the plot of No. 45a Auburn Road.
- 1.3. The site includes an existing gated lane which extends for 80m and is accessed off Auburn Road. The southern site boundary adjoins Auburn Lodge, a four-storey apartment building. Johnstown Parish Church and Johnstown Girls and Boys National Schools are situated to the south of Auburn Lodge.

## 2.0 Proposed Development

- Construction of 14 no. dwellings

## 3.0 Planning Authority Decision

### 3.1. Decision

Permission was refused for two reasons as follows;

1. The development as proposed is seriously deficient in useful public amenity space and does not meet current County Development Plan standards in this regard as set out under Sections 8.2.8.2(i) & 8.2.8.3 of the 2016-2022 Dún

Laoghaire-Rathdown County Development Plan. In addition, the semi-detached dwellings as proposed by virtue of their size and potential to function as 4 – bedroom houses, do not meet minimum size requirements for private rear garden areas as required under Section 8.2.8.4(i) of the 2016-2022 Dún Laoghaire-Rathdown County Development Plan. The proposed development would therefore be deficient in terms of public open space and private open space and would be seriously injurious to the amenities of future residents. The proposed development therefore does not comply with current County Development Plan requirements and would be contrary to the proper planning and sustainable development of this area.

2. The proposed development fails to maximise permeability and connectivity for pedestrians and cyclists in order to create direct attractive links to adjacent retail and public transport services on Rochestown Avenue, as required under Section 2.2.7.1 of the 2016-2022 Dún Laoghaire-Rathdown County Development Plan. The proposed development therefore does not comply with current County Development Plan requirements in this regard and would be contrary to the proper planning and sustainable development of the area.

### **3.2. Planning Authority Reports**

The report of the Area Planner can be summarised as follows:

It was considered that the proposed development was seriously deficient in public amenity space as required under Section 8.2.8.2(i) of the Development Plan and that the areas of the rear gardens of the houses do not meet the standards as set out in Section 8.2.8.4(i) of the Development Plan. It was also stated that the proposed development failed to maximise permeability and connectivity for pedestrians and cyclists to create direct attractive links to adjacent road and public transport networks as required under Section 2.2.7.1 of the Development Plan. It was concluded that the proposed development would provide a sub-standard level of amenity for future

residents and that there was an opportunity to re-design the scheme and provide smaller dwelling types.

### 3.3. Other Technical Reports

Transportation Planning – Further information required.

Drainage Planning – Further information required regarding surface water drainage.

Housing Department – No objections subject to conditions.

Building Control Section – No objections subject to conditions.

Parks & Landscape Services Section – Further information required comprising the submission of a revised site layout incorporating sufficient public open space in accordance with Development Plan requirements. Otherwise permission should be refused on the grounds of failure to comply with open space requirements.

Irish Water – no objections

### 3.4. Third Party Observations

The Planning Authority received 29 no. submissions in relation to the planning application. The main issues raised are similar to those set out in the observations to the appeal.

## 4.0 Planning History

Reg. Ref. D15A/0243 - Permission was granted for the demolition of the existing single storey 5-bedroom house and garage and construction of a 4 bedroom part single storey and part two storey detached house at no. 216 Rochestown Avenue.

Neighbouring site to the east

**Reg. Ref. D07A/1269 & PL06D.229861** - Permission was refused for the demolition of Culgrenagh House and the construction of 76 no. apartments, a crèche, reconfiguration of existing roundabout and associated works.

## 5.0 Policy Context

### 5.0.1 National Policy

- “Sustainable Residential Development Guidelines for Planning Authorities” (2009).
- Urban Design Manual – A best Practice Guide, (2009).
- Design Manual for Urban Roads and Streets - ‘DMURS’, (2013)

## 6.0 Development Plan

### 6.0.1 Dún Laoghaire-Rathdown County Development Plan 2016 – 2022

The subject site is identified as being Zoned Objective A ‘to protect and/or improve residential amenity’.

#### Chapter 8 – Development Management

- Section 8.2.3 refers to Residential Development
- Table 8.2.3: Residential Land Use - Car Parking Standards  
  
Residential Dwelling: 1 space per 1-bed unit and per 2-bed unit, 2 spaces per 3-bed unit+ (depending on design and location).
- Section 8.2.8.2(i) refers to - Public/Communal Open Space - Open Space: For all developments with a residential component – 5+ units - the requirement of 15 sq.m- 20 sq.m. of Open Space per person shall apply based on the number of residential/housing units. For calculation purposes, open space requirements shall be based on a presumed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms. A lower quantity of open space (below 20 sq.m per person) will only be considered acceptable in instances where exceptionally high quality open space is provided on site.
- Section 8.2.8.3 refers to - Public/Communal Open Space Quality

- Section 2.2.7.1 - Policy ST5: Walking and Cycling - It is Council Policy to secure the development of a high quality walking and cycling network across the County in accordance with relevant Council and National policy and guidelines.

## 7.0 Natural Heritage Designations

None on site. Rockabill to Dalkey SAC (Site Code.003000) is c.3km to the east.

Dalkey Island SPA (Site Code.004172) is c.3.1km to the east.

## 8.0 The Appeal

### 8.1. Grounds of Appeal

A first party appeal was submitted by Jakkulla Architecture & Design on behalf of the applicants Ian & Dot Roberts on the 10<sup>th</sup> of May 2016. The contents of the appeal can be summarised as follows:

- In response to the first reason for refusal which refers to inadequate provision of public and private open space it is stated that the Parks Department stated that ‘the development proposals are generally acceptable in terms of compliance with the DM standards of the CPD 2010-2016 in respect of layout/open space provision/placemaking and landscape design.’
- The current Dún Laoghaire-Rathdown 2016-2022 Development Plan was adopted subsequent to the lodgement of the application. The current plan requires a more stringent requirement for public open space. The applicant’s propose to amend the scheme to increase the quantum of public open space.
- It is proposed to set back the red-line of the development along the north-eastern boundary to increase the site area and increase the quantum of public open space. The site area will increase by 213sq m. The depth of the public open space now proposed to 8.685m.

- Section 8.2.8.2(i) refers the quantum of public open space required for all residential developments of 5 or more dwellings the provision of 15sq m- 20sq m of open space per person based on the number of residential units. A lower quantum of open space will only be considered acceptable where exceptionally high quality open space is provided.
- The subject site is a small infill site in an established residential area and therefore has limited capacity to achieve residential density and appropriate house types having regard to its context and the provision of useable and attractive open space.
- A scheme entirely comprising apartments is not feasible as car parking and open space requirements could not be met. A small own door apartment block has been provided to the south-eastern corner to increase density and provide a dwelling mix. A combination of home zone and attractive open space has been provided which provides 565sq m of public open space or 15% of the site area. It is also noted that the site is within walking distance of Killboggett Park.
- Regarding the provision of private amenity space it is noted that the Planning Officer stated that *“..the semi-detached dwellings as proposed by virtue of their size and potential to function as 4 bedroom houses do not meet the minimum size requirements for private rear garden areas as required under Section 8.2.8.4(i) of the Development Plan.”*
- The proposed scheme comprises three bedroom houses with private amenity space of 60sq m which is in accordance with the Development Plan requirements. The three bedroom houses include a study which could also be used as a playroom, thus providing flexibility in the house layout. The study at 5.3sq m does not meet the minimum size requirement for a single bedroom and therefore cannot be used as a bedroom. The minimum floor area for a single bedroom is 7.1sq m as set out in the ‘Sustainable Urban Housing: Design Standards for New Apartments.

- The second reason for refusal refers to the failure to maximise permeability and connectivity for pedestrians and cyclists to create direct links to adjacent retail and public transport. In response the applicants have stated that they have no objection to the creation of linkages from Auburn Road to Rochestown Avenue once it can be reasonably achieved.
- While it is noted that a link could be provided running between no's 214 & 216 along the existing driveway it would impact upon their residential amenity and those of the three dwellings to the north.
- It is proposed that a straight linkage could be provided from Auburn Road to Rochestown Avenue. This is indicated running immediately to the south of the site on the map extract submitted with the appeal. The applicants can facilitate the link to the edge of their property via the 3m wide shared footpath along the access road off Auburn Road and then with the expectation that the link would be completed on the adjoining site that fronts onto Rochestown Avenue.
- In relation to car parking it is stated that the car parking layout and Home Zone have been amended to take into account the requirements of the Transportation Department. The width of the Home Zone has been increased from 5.8m to 6m. The car parking spaces have a depth of 5m which complies with Section 8.2.4.6 of the Development Plan.
- The applicant have addressed the issues raised in the third party submissions to the application. Regarding traffic volumes it is considered that 14 no. dwellings would have a minimal impact. The proposed vehicular access off Auburn road is existing. The Planning Authority and Transportation Department have concerns regarding access onto Rochestown Avenue having regard to the proximity to the roundabout.
- Regarding the proximity to the primary schools, it is reiterated that the proposed 14 no. dwellings would have a minimal impact upon traffic and that the majority



of traffic movements would not coincide with the school's opening and closing times.

- The proposed development would not result in overlooking or a loss of privacy of adjacent dwellings.
- Construction traffic associated with the development will be accommodated on site and therefore would not cause congestion on the public road. A detailed plan will be put in place to ensure that access will not be impeded for Emergency Vehicles.
- The proposed three-storey dwellings and apartment block are suitable for the backland site and would not exceed the height of surrounding properties.
- The access is existing and is within the ownership of the applicants'. The applicants' have provided consent to the Auburn Lodge apartment development to use the access road for emergency access but it remains in the ownership of the applicants.
- An on-site surface attenuation tank is proposed as indicated on Drawing No. 3.0\_101. This addresses the concerns of the Drainage Section.
- It is submitted that the proposed development is in accordance with the proper planning and surrounding residential amenity.

## **8.2. Planning Authority Response**

- Notwithstanding the proposed increase in the site area, the Planning Authority still has serious concerns regarding the proposed public open space. The open space is seriously deficient in terms of its layout and usefulness as a recreational space.
- Having regard to the overall size of the proposed dwellings the Planning Authority is not satisfied that they constitute 3 bedroom units and as such are deficient in

terms of compliance with private garden requirements for four bedroom plus dwellings.

- Serious concerns also remain in relation to the failure to maximise on the opportunity to improve permeability and connectivity locally as required under Section 2.2.7.1 of the Development.
- Overall, it is not considered that the reasons for refusal have been overcome.
- It is respectfully requested that the Board uphold the decision of the Planning Authority to refuse permission.

### 8.3. Observations

Observations to the appeal have been received from the following;

Johnstown Residents Association, N Mc Evoy & Others, Olyia Power, P Dunphy, N Mc Carty, P&A Fay, M Mc Cully, Mary Molloy, Jean Maxwell and B&D Crowley. The main issues raised concern the following matters;

- Proposed vehicular access arrangements from Auburn Road.
- The proposed access road is part of the Auburn Lodge apartment scheme
- Volume of traffic the scheme would generate
- Construction traffic
- Access for emergency vehicles
- Deficiencies in the public sewer
- Impact upon residential and visual amenity

### 9.0 Assessment

9.0.1 Having regard to the above, and having inspected the site and reviewed all documents on file, the following is my assessment of this case. Issues to be considered in the assessment of this case are as follows:

- Development Plan policy
- Design and layout
- Impact upon residential amenity
- Access and Traffic
- Services
- Appropriate Assessment

**9.1. Development Plan policy:**

9.1.1 This appeal relates to the development of a residential scheme comprising 14 no. residential units on an infill site to the west of Rochestown Avenue. The site contains a single storey dwelling. Permission has been granted for the demolition of this dwelling and the development of a replacement dwelling to the east of the existing dwelling and roughly in line with the dormer bungalow to the south-east.

9.1.2 The site is zoned Objective A 'to protect and/or improve residential amenity'. Accordingly, residential development is permitted in principle. I note that the site is well-located in close proximity to all amenities including a shopping centre, primary school, church and existing public transport and therefore the proposal is in principle in accordance with the general policy desirability to increase densities within serviced urban areas in the interest of efficient land use resources.

9.1.3 Accordingly, while the residential development of the site may be acceptable in principle, in terms of zoning, it is subject to all other relevant planning issues being satisfactorily addressed. In particular whether the proposed design of the development is acceptable subject to a design which does not impinge on the

residential amenities of adjoining residences, offers sufficient residential amenities for the future occupants and is acceptable in terms of traffic and servicing.

## 9.2. Design and layout

9.2.1. The first reason for refusal refers to the deficient provision of useful public amenity space within the scheme and also the shortfall in rear garden areas. Section 8.2.8.2(i) of the Development Plan refers to the provision of Public/Communal Open Space and requires for all residential developments in excess of five units that between 15sq m – 20sq m of open space shall be provide per person based on the number of residential units. The calculation is based on an occupancy rate of 3.5 persons per household in dwellings with three or more bedrooms and an occupancy rate of 1.5 persons per household in dwellings with two or fewer bedrooms. Section 8.2.8.2(i) states that a lower quantity of open space i.e. below 20sq m per person will only be considered acceptable in instances where exceptionally high quality open space is provided on site.

9.2.2. The 11 no. dwellings all have three or more bedrooms. The 3 no. apartments have two bedrooms. Therefore the total occupancy of the scheme would be 43 based on the household size assumptions. The required Public/Communal Open Space provision at a rate of 15sq m per person is 645sq m and at a rate of 20sq m per person it is 860sq m. In response to the refusal issued by the Planning Authority the applicants are proposing to increase the site area by setting back the red-line boundary of the development along the north-eastern boundary to increase the site area and increase the quantum of public open space.

9.2.3. The main area of public open space on site is located along the eastern boundary of the site it has an area of 475sq m with a further 90sq m proposed along the southern

boundary. This area along the southern boundary is a narrow strip and it provides incidental open which can be landscaped but is not useable for recreational purposes. Therefore the proposed usable public open space as an area of 475sq m. This is 170sq m below the minimum requirement of 645sq m which is based on a provision of 15sq m per person. Section 8.2.8.3 refers to the quality of public/communal open space and requires that open spaces within new development should be capable of providing opportunities for play space and that narrow tracts and corridors of open space will not be acceptable. I note that Section 8.2.8.2(i) specifies that a lower quantity of open space i.e. below 20sq m per person will only be considered acceptable in instances where exceptionally high quality open space is provided on site. The proposed public open space area has a maximum depth of 8.6m and the linear nature of the open space means that its usefulness as a space for active recreational use is limited. Therefore, I would considered that while the on-site public open space provision has been increased it is still 170sq m below the minimum required area. Furthermore the proposed open space is not of an exceptionally high quality to warrant an under provision. Accordingly, the proposed public open space is seriously deficient and constitute a substandard form of development which would fail to provide an adequate standard of residential amenity for future occupants.

- 9.2.4. The first refusal reason also refers to the private open space provision. The Planning Authority are of the opinion that the proposed semi-detached houses by virtue of their design including a study have the potential to be used a four bedroom house and therefore the rear gardens do not meet minimum size requirements for private rear garden areas as required under Section 8.2.8.4(i) of the Development Plan. Section 8.2.8.4(i) specifies that three bedroom houses have a minimum of 60sq m private amenity space. The applicants in response to the matter state that the proposed development comprises three bedroom dwellings with private amenity space of 60sq m which is in accordance with the Development Plan requirements. The dwellings include a first floor study which could also be used as a playroom and

this would provide flexibility in the house layout. The proposed study has an area of 5.3sq m which does not meet the minimum size requirement for a single bedroom at 7.1sq m as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments. Therefore, the applicants confirm that the study cannot be used as a bedroom. While, I note the concerns of the Planning Authority in relation to the use of the room having regard to very limited size, I consider that it may not be practical to use the room as a bedroom. The proposed rear gardens with an area of 60sq m therefore are in accordance with the requirements as set out in Section 8.2.8.4(i) of the Plan.

### **9.3. Impact on residential amenity:**

9.3.1 The proposed development contains a total of 14 no. residential units. This comprises 1 no. detached dwelling part 2 & 3 storey, 10 no. semi-detached dwellings part 2 & 3 storey and 3 no. apartments in a three storey block. A number of observers to the appeal have raised concern regarding the proximity of the proposed development to their properties on Auburn Road to the west and the issue of potential overlooking.

9.3.2 The proposed separation distance between the rear of the proposed development and the dwellings on Auburn Road is between 25m – 28m. While, it is noted that the proposed scheme includes three-storeys to the rear of the dwellings, the upper storeys are served by rooflights which mitigate potential overlooking. The three-storey apartment block is proposed to the southern corner of the site which adjoins the access road and adjacent to Auburn Lodge. Balconies are proposed to serve the apartments and first and second floor. The design includes a steel louvre privacy screen.

9.3.3 Accordingly, having reviewed the proposed site layout of the scheme relative to the existing surrounding properties, I consider having regard to the proposed siting and design of the dwellings and apartment building and the relative separation distances

to the existing dwellings to the west and south of the site that the proposed scheme would not result in any undue overlooking of residential properties.

#### 9.4. **Access and Traffic:**

##### 9.4.1 Vehicular access and traffic

Vehicular access is proposed off Auburn Road to the west. The proposed access road was constructed when the Auburn Lodge development was carried out. The applicants have confirmed in the appeal that the access road is in their ownership and it is also available for emergency access if required to Auburn Lodge.

9.4.2 The observers have raised concern at the capacity of Auburn Road to accommodate the additional traffic which the scheme would generate having regard to the proximity of Johnstown National Schools and the usage of the end of Auburn Road for drop off and collection. In terms of overall scale and intensity the proposed development is relatively modest in scale. The nature of the traffic associated is residential which is not out of character with the existing type of traffic that frequents the road network in the vicinity of the site. Having inspected the site and road network in the vicinity I would consider that such is of sufficient capacity to deal with level of traffic likely to be generated by the proposed development

##### Car parking

9.4.3 Table 8.2.3 of the Dún Laoghaire Rathdown County Development Plan 2016-2022 sets out the car parking standards for residential schemes. Generally 1 no. car parking space is required for a one bedroom unit and two bedroom unit and 2 car parking spaces are required for dwellings with three bedrooms and larger. The proposed scheme contains 3 no. two bedroom apartments. The apartments would require 3 car spaces. The proposed site layout plan on Drawing No. 3.0\_101 indicates that the 3 no. apartments would be served by 4 no. car parking spaces to the front. This is above the minimum requirement and therefore would be

acceptable. 11 no. three bedroom semi-detached dwellings and 1 no. five bedroom detached is proposed. Each dwelling has two on-site car parking spaces. The scheme requires 25 no. car parking spaces in accordance with Development Plan requirements and 26 spaces are proposed. Accordingly, I am satisfied with the proposed car parking provision.

#### Public transport

9.4.4 In relation to the proximity of the site to public transport I note that the bus routes 7, 7b, 45a, 59 and 111 operate along the road network in the immediate area. These routes serve Bray, Dun Laoghaire, Dalkey, Blackrock and the City Centre. Accordingly, it is evident that the site is well served by high quality and high frequency public transport.

#### Pedestrian access & permeability

9.4.5 The second refusal reason refers to the issue of permeability and connectivity for pedestrians and cyclists and states that the proposed development fails to create direct attractive links to adjacent retail and public transport services on Rochestown Avenue to the east. Section 2.2.7.1 of the Development Plan states that it is Council Policy to secure the development of a high quality walking and cycling network across the County in accordance with relevant Council and National policy and guidelines.

9.4.6 It is advise in Section 2.2.7.1 that as part of the application process, new development will be required to maximise permeability and connectivity for pedestrians and cyclists to create direct attractive links to adjacent road and public transport networks in accordance with in the 'Urban Design Manual – A Best Practice Guide', (2008) and 'Design Manual for Urban Roads and Streets' (DMURS) (2013).



9.4.7 In response to the matter the applicants have stated that they do not consider that a pedestrian access running between no's 214 & 216 along the existing driveway would be appropriate or suitable as it would negatively impact upon the residential amenity of the properties and also impact upon the amenities of the three dwellings to the north. The applicants confirm that they have no objection to the creation of linkages from Auburn Road to Rochestown Avenue once it can be achieved in an appropriate manner. They have provided an alternative proposal with a straight linkage running from Auburn Road to Rochestown Avenue immediately to the south of the site. This is indicated on Drawing No. 3.0\_117 submitted with the appeal. The applicants state that they can facilitate the link to the edge of their property via the 3m wide shared footpath along the access road off Auburn Road and then with the expectation that the link would be completed on the adjoining site that fronts onto Rochestown Avenue.

9.4.8 In response to this proposal the Planning Authority stated that their concerns remain regarding the failure to maximise on the opportunity to improve permeability and connectivity locally as required under Section 2.2.7.1 of the Development. In relation to the matter I consider that pedestrian access and permeability is important when considering the design and layout of a residential scheme. In the case of the proposed development I consider that a pedestrian access from the site and onto the existing private lane exiting at Rochestown Avenue opposite the shopping centre and close the would facilitate greater pedestrian access and permeability and will serve to integrate the scheme with the surrounding area. I note that it is recommended under Section 2.2.7.1 that where practicable, retrospective implementation of walking and cycling routes in order to maximise permeability and connectivity may also be required within existing neighbourhoods. I acknowledge that the applicants could facilitate a future pedestrian link to Rochestown Avenue via part of the site the however that link would be reliant on the residential development of the adjoining site to the east. Furthermore, I note that there is a pedestrian link from Auburn Road to the south of the site to the Johnstown Church and Schools and

onto Churchview Road which is served by several bus routes. Accordingly, I consider that the applicants have endeavoured to provide for improved permeability and connectivity.

## 9.5. **Services:**

### Foul Drainage

9.5.1 The proposed scheme features 14 no. residential units. The applicants are proposing a separate foul and surface water system. The proposed foul drainage layout is indicated on Drawing No. 3.0\_202. It is proposed to connect to the existing 225mm foul sewer and a section of existing foul sewer is indicated to be decommissioned and removed. I note that in relation to foul drainage the Drainage Planning Section of the Council have no objections to the proposed scheme.

### Surface water drainage

9.5.2 The surface water layout is indicated on Drawing No. 3.0\_202. A separate surface water system is proposed within the site including the installation of an attenuation tank to the eastern side of the site. The attenuation tank is indicated as having a capacity of 66m<sup>3</sup> with a restricted flow of 3.3l/s. It is also proposed to locate rainwater butts to the rear gardens of all dwellings. The Drainage Planning Section in their report dated the 4<sup>th</sup> of April 2016 required that surface water flows shall be attenuated to 2l/s/ha. Therefore as the rate of flow proposed is faster than that required by Drainage Planning Section the matter would have to be addressed by condition should the Board decide to grant permission for the scheme.

### Water supply

9.5.3 It is proposed to connect to the existing public water main. The watermain layout is indicated on Drawing No. 3.0\_203. Irish Water have in their report dated the 4th of April 2016 confirmed that there is a satisfactory water supply in area and have no objections in relation to water supply subject to compliance with conditions.

## 9.6. **Appropriate Assessment:**

9.6.1 Having regard to the nature and scale of the development proposed and the distance between the site and designated European Sites, I do not consider that significant effects on European Sites or their conservation objectives are likely to arise from the Scheme, either alone or in combination with other plans or projects.

## 10.0 **Recommendation**

10.1. I recommend that planning permission should be **REFUSED**, for the reasons and considerations as set out below.

## 11.0 **Reasons and Considerations**

1. Having regard to the provisions of the Dún Laoghaire-Rathdown County Development Plan 2016- 2022, specifically Section 8.2.8.2(i) and Section 8.2.8.3 which refer to the provision of Public/Communal Open Space, it is considered that the proposed development would be deficient in terms of public open space and would constitute a substandard form of development which would fail to provide an adequate standard of residential amenity for future occupants. Accordingly, the proposed development would seriously injure the amenities of the area and would set an undesirable precedent for such developments in the vicinity.

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**Siobhan Carroll,  
Inspectorate  
2<sup>nd</sup> of September 2016**