

# S. 6(7) of Planning and Development (Housing) and Residential Tenancies Act 2016

# Inspector's Report on Recommended Opinion

ABP-300220-17

Strategic Housing Development 102 residential units comprising 68

apartments and 34 houses and all associated site development and infrastructural woks on a site of c.

2.39ha

**Location** Kylemore, Rockwinds, Smallacre,

Woodlawn, Church Road and 66 Watson Drive, Killiney, Co. Dublin

Planning Authority Dun Laoghaire Rathdown County

Council

Prospective Applicant Crekav Trading GP Limited

**Date of Consultation Meeting** 21<sup>st</sup> December 2017

Date of Site Inspection 18 December 2017

**Inspector** Una Crosse

#### 1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

# 2.0 Site Location and Description

The site comprises the residential properties of "Smallacre, Rockwinds" and "Woodlawn" located along Church Road and No. 66 Watson Drive and the Kylemore Clinic and its associated curtilage including the gate lodge at the entrance to the Clinic site at Church Road. The Kylemore Clinic property also adjoins a cul-de-sac on Watson Road with buildings within the Kylemore site adjoining the boundary with No. 45 Watson Road. The site is irregularly configured comprising two parts. The northern part comprises three dormer bungalows with large gardens and frontage onto Church Road. One of the dormer bungalows, "Woodlawn", is a fire damaged building. The southern part of the site comprises Kylemore Clinic, its gate lodge and its associated curtilage. Also included is No. 66 Watson Drive, a semi-detached two storey property.

Kylemore is a large two-storey over basement Victorian structure, previously in use as a nursing home, which is bounded by existing residential properties. Its single-storey gate lodge adjoins the entrance from Church Road. The site is bounded to the east by Church Road, to the north-east along Church Road by two-detached houses which separate the two parts of the site, to the north-west by a large detached house, to the south-west by the rear gardens of Nos. 67 and 70 Watson Road and Nos. 68-76 Watson Drive. The lower south-west section of the site bounds St. Matthias Wood residential estate, a small estate of detached two-storey houses. There is a wayleave from the Church Road entrance along the access road to the

Kylemore Clinic site and the entrance to St. Matthias Wood residential estate which is gated. It is noted that No. 43 Watson Road, a single-storey detached house is in the applicant's ownership but is not part of the site as is a strip of land to the south of the property known as Woodlawn.

# 3.0 Proposed Strategic Housing Development

Construction of a residential development of 102 units with access onto Watson Road comprising 68 apartments, 13 courtyard units and 21 houses.

The apartments are proposed in a series of 6 blocks (C, D, E, H, J, K) comprising 11 one-bed units, 56 two-bed units and 2 three-bed units. Five of the blocks, C, D, E, J and K are proposed new blocks accommodating 62 of the proposed apartments. The remaining six apartments are proposed in block H which is the renovated and extended Kylemore House which is located on the site.

The housing comprises 20 terraced dwellings with 12 three-bed units and 8 four-bed units in 3 house types. A detached three-bed house is proposed within the Gate Lodge to be refurbished (demolition & extension) and accessed from Church Road.

13 units are proposed within two courtyards with 3 one-bed units, 8 two-bed units and 2 three-bed units.

The proposal comprises the demolition of 4 dwellings located on the site. These are known as Smallacre, Rockwinds, 66 Watson Drive and Woodlawn which was damaged by fire.

Replacement of three vehicular entrances with two pedestrian and cycle access facilities. Drainage infrastructure to facilitate the site is proposed via the area created by the demolition of No. 66 Watson Road.

# 4.0 Planning History

**Ref. D15A/0778 (PL.06D.246228).** Permission for demolition of three dwellings, outbuildings and extensions to Kylemore Clinic, 65 residential units with access onto

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Watson Road, redesign of No. 43 Watson Road and redesign of a gate lodge accessed from Church Road. It was refused on appeal for 3 reasons as follows:

- 1. Having regard to the nature, scale and location of the proposed four- storey apartment building and its proximity to Kylemore House, it is considered that the proposed development lacked in quality open space and compromised the integrity of the setting of the house and the open character of the area. In addition, the layout is contrary to Section 8.2, Development Management Part (xi): Institutional Lands as set out in the Dún Laoghaire-Rathdown County Development Plan 2016 2022 regarding the redevelopment of "institutional lands" which sets out to ensure that the essential setting of the lands and the integrity of the main buildings are retained. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
- 2. It is considered that the layout of the proposed development is deficient in terms of quality open space. In particular, serious concerns exist that the main area of public open space, by virtue of its location within the very southern end of the site and to the south of the proposed apartment block, will be separated both visually and physically from the majority of the development. This would contravene guidance set out in the Public Open Space Standards Section 4.2.2.4 Policy OSR5 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022, which emphasises "the need for quality in public open spaces in terms of design, robustness, accessibility, biodiversity and passive supervision/overlooking". The proposed development would, therefore, be sub-standard in terms of layout and public open space provision, would seriously injure the amenities of future residents and would be contrary to the proper planning and sustainable development of the area.
- 3. The Board was not satisfied, notwithstanding the proposed remedial works to the foul and surface water sewers in Watson Road, that the development could be adequately accommodated into the existing public foul and surface water systems, and in particular, was not satisfied that the applicant had adequately demonstrated that the foul drainage system in the wider area had sufficient capacity to accommodate additional flows from the proposed

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development (and related proposed development under An Bord Pleanála Reference Number PL06D.246229), even after the provision of these remedial works. It is considered that the proposed development would, therefore, be prejudicial to public health and contrary to the proper planning and sustainable development of the area.

# Kylemore

# ABP Ref. PL 06D.202169 (P.A. Ref. D99/0333)

Permission was granted for the development of 7 two-storey detached houses.

# ABP Ref. PL 06D.202189 (P.A. Ref. D00A/1168)

Permission was granted for a change of house type for the previously approved 5 houses.

# ABP Ref. PL 06D.202189 (P.A. Ref. D02A/1314)

Permission was refused for the demolition of the existing clinic building and the development of a 64-bed care centre for the elderly.

# ABP Ref. PL 06D.203680 (P.A. Ref. D02A/1218)

Permission was granted for a sheltered housing development comprising a block of 6 units, a block of 4 units and an apartment for residential staff with access from Watson Road cul-de-sac.

#### ABP PL 06D.212056 (P.A. Ref. D04A/1290)

Permission was granted for the consolidation and expansion of the residential institution.

#### P.A. ref. D04A/1418

Permission was granted for alterations to the approved plans for sheltered housing.

#### P.A. Ref. D05A/0008

Permission was granted for the retention of railings, gates and walls.

Smallacre, Woodlawn and No. 43 Watson Road

#### ABP Ref. PL 06D.244194 (P.A. Ref. D14A/0107)

Permission was refused in 2015 for the demolition of Woodlawn and Smallacre, the construction of 8 houses, the extension and alteration of No. 43 Watson Road, and

replacements of accesses for one reason relating to traffic impact. The reason for refusal was as follows:

It is considered that the additional traffic turning movements generated by the proposed development onto the heavily trafficked Church Road, which provides an important part of the link road between Dun Laoghaire Town Centre and the M50/N11, would endanger public safety by reason of traffic hazard and would have a seriously adverse impact on the carrying capacity of the link road. It is also considered that the proposed development, if granted, would set a precedent for further multiple dwelling access points with consequent implications for public safety and the carrying capacity of the road. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

#### P.A. Ref. D10A/0254

Permission was refused for the demolition of Smallacre and Woodlawn, the development of 20 houses, and part demolition and extension to No. 43 Watson Road.

#### ABP Ref. PL 06D.226711 (P.A. Ref. D07A/1322)

Permission was refused for the redesign of No. 43 Watson Road, the demolition of Woodlawn and Smallacre, and the construction of 44 apartments and 7 houses for reasons relating to injury to residential amenity, traffic hazard, and deficiency in foul sewerage.

#### ABP Ref. PL 06D.213079 (P.A. Ref. D04A/1114)

Permission was refused for the demolition of Smallacre and the construction of 8 houses for reasons relating to the deficiency in foul sewerage.

#### Related Site

Ref. D15A/0777 (PL06D.246229) – demolition of Arranmore and San Michele on Church Road and construction of 14 units with access through 19 Watson Road (0.9ha site). Permission refused for the following reason:

The Board was not satisfied, notwithstanding the proposed remedial works to the foul and surface water sewers in Watson Road, that the development could be

adequately accommodated into the existing public foul and surface water systems, and in particular was not satisfied that the applicant had adequately demonstrated that the foul drainage system in the wider area had sufficient capacity to accommodate additional flows from the proposed development (and related proposed development under An Bord Pleanála Reference Number PL06D.246228), even after the provision of these remedial works. It is considered that the proposed development would, therefore, be prejudicial to public health and contrary to the proper planning and sustainable development of the area.

D17A/0868 – Additional Information sought on 20 November 2017 on application for Demolition of fire damaged 'Arranmore' (c.229 sqm) and fire damaged shed (c.13 sqm) and fire damaged 'San Michele' (c.250 sqm) at Church Road; the closing up of three existing vehicular accesses onto Church Road, while maintaining one as pedestrian/cycle access. Construction of residential development with new vehicular access through No. 19 Watson Road, consisting of 42 no. new residential units to include 18 no. dwelling houses comprising 8 no. 2 storey terraced 3 bed Type A units, 7 no. 3 storey terraced 4 bed Type B units, 2 no. 3 storey semi-detached Type BB units, 1 no. 3 storey end of terrace 4 bed Type B1 unit and 24 no. apartments within 2 no. 4 storey Blocks C and D with Block C comprising 4 no. 1 bed units and 12 no. 2 bed units with balconies/terraces to south-east, north-west and south-west elevations and Block D comprising 8 no. 2 bed units with balconies to north-east, south-east, north-west and south (ground floor only) elevations. Redesign of No. 19 Watson Road (c.175 sqm) to include removal of part of the house to provide a new access road and provision of a new rear extension (redesigned unit to be c.153 sgm).

# 5.0 National and Local Planning Policy

#### 5.1 Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

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- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual')
- Design Manual for Urban Roads and Streets
- Sustainable Urban Housing: Design Standards for New Apartments (2015)
- Childcare Facilities Guidelines for Planning Authorities.
- Architectural Heritage Protection Guidelines for Planning Authorities.
- The Planning System and Flood Risk Management (including associated Technical Appendices).

Other Guidelines to be noted include:

Framework and Principles for the Protection of Archaeological Heritage

#### 5.2 Statutory Plan for the area

The relevant statutory plan for the area is the Dun Laoghaire Rathdown Development Plan 2016-2022 within which the site is zoned A with the objective 'to protect and/or improve residential amenity'. The lands at Kylemore have a specific local objective "to protect and/or provide for Institutional Use in open lands." There is an objective to protect and preserve trees and woodland. An area of archaeological potential extends on the site (026-009). Along Church Road (R118) there is an objective for a 6 year road proposal and objectives for QBC routes on both Church Road and Churchview Road.

Policy AR5 - It is Council policy to retain, where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of a streetscape in preference to their demolition and redevelopment.

Policy RES 3 - It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. In promoting more compact, good quality,

higher density forms of residential development it is Council policy to have regard to the policies and objectives contained in Guidelines outlined. The Plan states that where a site is located within circa 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and/or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a minimum of 50 units per hectare will be encouraged.

Policy RES4 - It is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities.

Policy RES5: Institutional Lands - Where distinct parcels of land are in institutional use (such as education, residential or other such uses) and are proposed for redevelopment, it is Council policy to retain the open character and/or recreational amenity of these lands wherever possible, subject to the context of the quantity of provision of existing open space in the general environs. A minimum open space provision of 25% of the total site area will be required on Institutional Lands. This provision must be sufficient to maintain the open character of the site with development proposals structured around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council. In the development of such lands, average net densities should be in the region of 35 - 50 units p/ha. In certain instances higher densities will be allowed where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.

Policy OSR5: Public Open Space Standards - It is Council policy to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas –

Guidelines for Planning Authorities' (2009) and the accompanying 'Urban Design Manual - A Best Practice Guide'.

Public/Communal Open Space –Quality - Where any open space is to be provided on foot of a planning permission, the space in question should be well overlooked and designed and located to sympathetically complement the layout of the development and should be visible from, and accessible to, the maximum number of dwellings.

Trees and Hedgerows - New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerow.

Section 4.8 of Building Height Strategy (Appendix 9) refers to policy for residual suburban areas not included within Cumulative Areas of Control which states that a maximum of 3-4 storeys may be permitted in appropriate locations provided they have no detrimental impact on existing character and residential amenity.

# 6.0 Forming of the Opinion

Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

#### 6.1 Documentation Submitted

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, a Completed Application, Part V details, environmental report, Statement of consistency, planning report, A3 booklet of Drawings (Architectural, Engineering and Landscape), Architectural Drawings, Architectural Design Statement, Housing Quality Assessment and Schedule of Areas, Photomontages, Engineering Drawings, Infrastructure Report,

Flood Risk Assessment, Traffic and Transport Assessment Report, Road Safety Audit, Quality Audit, Road Quality Audit, Landscape Drawings, Landscape Report, AA Screening Report, Ecological Impact Assessment Report, Tree Survey Report and Drawings and Tress Constraints Plan, Conservation Assessment Report, Childcare Assessment, Construction and Demolition Waste Management Plan. Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required. The applicant's case is summarised as follows:

- Layout allows for maximum permeability through the site, respects the setting
  of the retained Kylemore House with proposed units respecting amenities of
  adjoining properties;
- High quality landscaping proposed, open space principally located around Kylemore House and apartment blocks with important trees integrated and building line set back along Church Road;
- Proposal allows for reuse of Kylemore House in accordance with Policy AR5
   of CDP which seeks the reuse of older buildings not on RPS;
- Access proposed via Watson Road with access proposal previously considered acceptable by the Board's Inspector;
- Proposal accords with the zoning objective, policy objective RES5 for institutional lands and the 12 urban design principles outlined in CDP Policy UD1;
- Proposed density of 43 units/per ha accords with CDP and National policy;
- Height proposed suitable given built environment, screening and topography;
- Public open space provided at 32% of the site significantly exceeds CDP requirement with private open space standards met for all units;

- Dwellings designed to ensure no overlooking with single storey mews and sufficient rear garden depths with apartment blocks located to avoid overlooking;
- Parking proposed via surface and underground parking with 166 spaces above the CDP requirement.
- Particular care to be taken in demolition of No. 66 Watson Drive which is
  proposed in order to facilitate space for the proposed drainage infrastructure
  with a proposal to discharge surface water run-off and foul (separately) by
  gravity via two new 225mm diameter sewers to the existing DLRCC sewers
  located on Watson Drive;

#### 6.2 Planning Authority Submission

A submission was received by An Bord Pleanála on the 11th day of December 2017. The report of the planning authority is summarised as follows:

- Discrepancy noted in description with 102 units and 103 units referenced;
- Density of 43 units per hectare is acceptable and provides an appropriate mix of house types, sizes and tenures.
- Layout allows for maximum permeability through the site, open spaces provided with extensive passive surveillance and positive street frontage created to Church Road.
- Considered that subject site has the potential to accommodate a significant residential development, subject to an appropriate design and layout.
- Noting proposed separation distances between courtyard units and adjoining dwellings on Watson Road (Slous & Carraun), applicant to consider the relationship of the proposed units with detailed contextual elevations and sections of this area required.
- Applicant advised to submit photomontages and an Architectural Visual Assessment from various viewpoints.

- Public and private open space acceptable with permeability through the site welcomed.
- Landscape proposal generally satisfactory but concern about extent of tree loss, open space, layout/place making and landscape design specifically the lack of new tree planting and limited diversity of species.
- Revised planting proposals recommended and revisions to proposed play area as well as appointment of Arboricultural consultant for the construction period with recommendations in tree report to be implemented
- Applicant advised at pre-planning to consider provision of crèche facility also having regard to adjoining lands to north and current application D17A/0868 and requirement should be considered as part of any application.
- No taking in charge drawing was submitted and are required.
- Part V proposal acceptable but should permission be granted Council may review the proposal and seek an alternative mix.
- Further details required in respect of surface water are outlined including revised flood risk assessment. It is also required that the applicant outline proposal that system can be adapted for future additional development lands to the north of the site.
- It is stated that the applicant should be aware that site lies in catchment of surface water sewer system that has existing deficiencies confirmed by CCTV survey. While Municipal services are not aware of these deficiencies causing problems in the public SW sewerage system they have been cited by ABP as a reason for refusal. Municipal Services have completed some elements of a rehabilitation scheme to address these issues. It is also noted that the surface water outflow from the development will be less than the maximum allowable runoff.
- Applicant requested to submit a detailed layout plan drawing showing future access road to the adjacent sites (to the northwest of the proposed site) to accommodate future development to ensure permeability and to rationalise the number and type of accesses onto Watson Road;

- Front boundary wall along Church Road to be set back to facilitate QBC and land offered to be taken in charge;
- Detailed drawings to show development works to meet Taking in Charge
   Policy and Procedure Documents with a range of other details required;
- Stated that at pre-planning meeting the applicant advised to consider a connection between the adjoining sites with respect to the future development potential of adjoining lands.

# 6.3 Consultation Meeting

A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 21<sup>st</sup> December 2017, commencing at 2 PM. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

- 1. Traffic and Transportation including pedestrian and vehicular connections
- 2. Surface water drainage
- 3. Existing Residential Amenity and Separation Distances to Boundaries
- 4. Landscaping and Trees
- 5. Architectural Heritage and Archaeology
- 6. Childcare
- 7. Any other matters

In relation to traffic and transportation An Bord Pleanála sought further elaboration/discussion/consideration of the following: potential for future access to lands in vicinity of the site, proposal to create a new entrance via Watson Road, permeability through the site, accessibility to local services including local parks.

In relation to surface water drainage An Bord Pleanála sought further elaboration/discussion/consideration of the following: the previous reason for refusal and the proposal to create an infrastructure corridor through No. 66 Watson Drive.

In relation to Existing Residential Amenity and Separation Distances to Boundaries An Bord Pleanála sought further elaboration/discussion/consideration of the following: the treatment of the boundary with Watson Road particularly the interface between the proposed courtyard units and the existing properties on Watson Road;

In relation to Landscaping and Trees An Bord Pleanála sought further elaboration/discussion/consideration of the following: the scale of tree removal on site, the rational for play provision, biodiversity including bats and requirement to undertaken surveys.

In relation to Architectural Heritage and Archaeology, An Bord Pleanála sought further elaboration/discussion/consideration of the following: the status of Kylemore House and the submission from the Department of Culture, Heritage and the Gaeltacht on the nearby recorded monument site.

In relation to Childcare An Bord Pleanála sought further elaboration/discussion/consideration of the following: further justification for the omission of a crèche facility particularly given other proposed residential developments on Church Road.

In relation to any other matters An Bord Pleanála sought further elaboration/discussion/consideration of the following: taking in charge, the detail included in the contiguous elevations, the area of ground indicated on blue on the site location plan, clarification on the number of units proposed and the construction and ecological management plan.

Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 300220' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

#### 7.0 Conclusion and Recommendation

Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.

Having regard to all of the above, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the following elements: surface water management, details of which are set out in the Recommended Opinion below.

Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

# 8.0 Recommended Opinion

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the

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Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

#### Surface Water Management

1. Further consideration of the documents as they relate to surface water management for the site. This further consideration should have regard to the requirements of the Drainage Division as indicated in their report dated 27th November 2017 and contained in Appendix A of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management' (including the associated 'Technical Appendices'). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

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. Additional photomontage images and a series of drawings, specifically detailed cross sections at appropriate intervals showing the proposed development and the

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relationship with existing dwellings adjoining the site and in particular the interface between the proposed courtyard units and the existing properties on Watson Road. Drawings should be appropriately scaled. Site sections and contiguous elevations should be clearly detailed and labelled and located on a layout 'key' plan.

- 2. A detailed demolition and construction plan for No. 66 Watson Drive including treatment of proposed new gable end and the pedestrian/cycleway proposed.
- 3. An archaeological impact assessment should be submitted having regard to the comments of the Department of Culture, Heritage and the Gaeltacht to the Board dated 14 December 2017.
- 4. Childcare demand analysis and the likely demand for childcare places resulting from the proposed development.
- 5. A detailed tree survey should indicate the quantum of trees proposed for removal and the planting proposed should be outlined in detailed with the diversity of species to be addressed.
- 6. Details of bat surveys undertaken and a lighting plan appropriate to recommendations of same.
- 7. A full and complete drawing that details all boundary treatments.
- 8. A phasing plan for the proposed development.
- 9. A site layout that details areas to be taken in charge by the local authority.

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. National Transport Authority
- Minister for Culture, Heritage and the Gaeltacht (archaeology and architectural heritage)
- 3. Heritage Council (archaeology and architectural heritage)

- 4. An Taisce the National Trust for Ireland (archaeology and architectural heritage)
- 5. Irish Water
- 6. 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.

Una Crosse

Senior Planning Inspector

January 2018