



An
Bord
Pleanála

Inspector's Report ABP-302572-18

Development	Demolition of existing house, 'The Leys', and construction of a residential development of 52 duplex apartments.
Location	The Leys, Glenamuck Road South, Dublin 18.
Planning Authority	Dun Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D18A/0623
Applicant(s)	Deane Homes Ltd.
Type of Application	Permission
Planning Authority Decision	To Refuse Permission
Type of Appeal	First Part v. Decision
Appellant(s)	Deane Homes Ltd.
Observer(s)	No observers
Date of Site Inspection	26 th November 2018
Inspector	Erika Casey

1.0 Site Location and Description

1.1. The subject site with an area of 1.08ha is located on the Glenamuck Road and currently accommodates a detached 5 bedroom house with a floor area of 624 sq. metres. The existing dwelling is surrounded by landscaped gardens. There is a separate detached garage and a number of other ancillary buildings on the site including a number of sheds and a greenhouse. A tennis court is located to the west of the site. The boundaries of the site are landscaped with trees and shrubs including a dense tree belt along the Glenamuck Road. There are two detached houses located to the north east and south west of the site. The proposed reservation for the Glenamuck District Distributor Road is located to the north of the site. The Park, Carrickmines Shopping Centre is located c. 600 m to the north east of the site.

2.0 Proposed Development

2.1. The proposed development comprises:

- Demolition of existing house 'The Leys' with a stated floor area of 624 sq. metres.
- Construction of 52 no. duplex apartment units comprising 26 no. 3 bedroom units over 26 no. 2 bedroom units in a 3 no. 4 unit, 3 storey blocks and 5 no. 8 unit 3 storey blocks. Each apartment is served by a terrace.
- 2 no. refuse and long stay bicycle stores (to provide 52 no. spaces).
- 4 no. refuse and short stay bicycle stores (to provide 16 no. spaces).
- New vehicular and pedestrian entrance.
- Associated car parking (95 no. spaces) and site works.

2.2 The eight blocks of duplex units are arranged around a central open space. The car parking is arranged to the front of the duplex blocks. The communal open space has an area of 1,379 sq. metres. Access to the site is proposed via the existing vehicular entrance with two separate pedestrian entrances also to be provided.

2.3 Amendments to the layout and car parking arrangement are proposed as part of the appeal submission and are detailed further in Section 6 below.

3.0 Planning Authority Decision

3.1. Decision

3.1.1 To Refuse Permission for 4 no. reasons:

1. *Having regard to the proposed height and proximity of Block B it is considered that the proposed development would appear overbearing when viewed from the adjoining property to the south-west: Hollybrook House. The proposed first floor window and first floor terrace of Block B would also lead to overlooking of the private open space of Hollybrook. The proposed development would, therefore, be seriously injurious to the residential amenity of Hollybrook House and depreciate the value of this property. This is contrary to the proper planning and sustainable development of the area.*
2. *The proposed development which is accessed off the Glenamuck Road has not demonstrated possible future linkages with an access to the proposed Glenamuck District Distributor Scheme, and, therefore, if permitted, would contravene the objectives of the Development Parcel 2 as contained in the Kiltiernan/Glenamuck Local Area Plan 2013 which requires access to the land parcel to be provided at an access point on the Glenamuck District Distributor Scheme. This would be contrary to the proper planning and sustainable development of the area.*
3. *As it has not been demonstrated that the proposed development has been designed to facilitate the orderly development of adjoining property/landholdings, has been planned within the context of an overall outline Masterplan or would achieve local road/footpath improvement and traffic measures, it is considered that the proposed development would contravene Section 10.6 of the Kiltiernan/Glenamuck Local Area Plan 2013. The proposed development would lead to piecemeal haphazard development and would, therefore, be contrary to the proper planning and orderly sustainable development of the area.*
4. *Due to the uniformity of the proposed duplex blocks, the positioning of the communal open space surrounded by parking and roads and the lack of connectivity, it is considered that the proposed development will be car*

dominated, will not promote a sense of place, and would be contrary to Policy UD1 Urban Design Principles of the 2016-2022 Dun Laoghaire Rathdown Development Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Report (21.08.2018)

- Note that the existing dwelling is not an exemplar 19th/20th Century building, nor a protected structure. Demolition is, therefore, acceptable.
- Section 10.6 sets out the quota of dwelling units that may be permitted in Phase 1(a). The site is located in area A: Glenamuck Road Upper/North Portion where the quota is c. 300 units. This has not been reached, nor would it be reached by the development of 52 units.
- The density is 48 units per hectare. This complies with the requirements of the LAP which has a stated density range of 45-55 units per ha. It is considered that there is an acceptable mix of units and the development complies with the Design Standards for new apartments. All of the units are above the 10% minimum floor area requirement and are dual aspect. 15.5 sq. metres of communal open space per person is provided and all apartments meet the minimum floor area for private open space. Car parking is compliant with Development Plan standards.
- The Kiltiernan/Glenamuck LAP 2013 intends that access to the site in land parcel 2 is from an access point to the Glenamuck District Distributor Road (GDDR). Approval is not yet in place for this road. Between the subject site and the GDDR, there is a triangular shaped wedge of land, with only a small portion of the site abutting the GDDR directly. No evidence has been submitted that the site can be accessed from the GDDR in the future and, therefore, it is considered that this site has not been designed within the context of an over outline masterplan for the area.
- The layout of the duplex blocks does not allow for a direct access to the GDDR and the internal access roads do not directly abut the sites to the south west

and north east. Overcoming this is not feasible at present as the access roads could not be extended into the site to the south west and this land is not in the control of the applicant.

- The development would jeopardise future proposals along the distributor road as it would leave a very narrow strip to the rear of duplex block C-F. It would also make it difficult to achieve suitable enclosure along the GDDR. In addition, there is an attenuation pond within the land parcel in the triangular piece of land and full details of same will form part of the GDDR Road design.
- The road layout does not show a footpath to the front of the site along the Glenamuck Road.
- Concerns regarding significant overlooking of the private open space of adjoining property Hollybrook House. It is also considered that the three storey block will appear overbearing when viewed from the private open space of the adjoining property.
- It is considered that that the proposed development does not address the surrounding area especially the neighbouring sites and given the lack of footpaths does not connect with the area or promote inclusivity. The layout does not promote variety. The layout of the development with its central area of amenity space surrounded by roads and car parking will not create enjoyable public areas and will result in a car dominated layout.

3.2.2. Other Technical Reports

Drainage Planning (09.08. 2018): Recommends Further Information relating to the design of the culvert under the proposed access, suds and revised surface water calculations.

Transportation Report (09.08.2018): Recommends Further Information on 18 points including:

- Undertake a Quality Audit to demonstrate compliance with DMURS.
- Detailed plan showing no grass strips between future access roads and the site boundary wall to adjoining lands. This requirement is to provide future access to the Glenamuck District Distributor Road. The applicant shall confirm in writing their commitment to do this in the future in accordance with the

Kiltiernan/Glenamuck LAP. The Applicant shall also submit details of a written clause that identifies the requirement to close off the proposed vehicular entrance onto Glenamuck Road once a future access to the GDDR is operational to this site.

- The applicant shall show on detailed drawings all development works (i.e. proposed internal access roadway, required ramped entry detail, footpaths, street lighting etc. to meet Dun Laoghaire Rathdown County Council's Taking in Charge Policy Document (April 2016).
- Applicant shall submit a detailed drawing showing a 2m wide public footpath along the entire Glenamuck Road boundary frontage. The applicant shall also show a footpath with a minimum width of 2.0m along the south eastern perimeter of the proposed internal road in the interest of direct pedestrian connectivity.

Parks Department (26.07.2018): Notes that the removal of tree line 1 in the site is agreed with in principle. Recommends Further Information including additional tree planting and a landscape masterplan including details of hard and soft landscape and SuDS. Requests submission of a proposed Play Rationale Layout Plan.

Housing Department (24.07.2018): No objection subject to conditions.

3.3. Prescribed Bodies

Inland Fisheries Ireland (18.07.2018): Notes that the development is located on the Glenamuck Stream in the catchment of the Loughlinstown River which supports migratory Sea Trout and resident Brown Trout. Notes that best practice should be implemented if permission is granted to prevent any pollution of local surface waters.

Irish Water (19.07.2018 and 09.08.2018): No objection.

3.4. Third Party Observations

- No third party observations.

4.0 Planning History

4.1 There is no recent planning history pertaining to the site.

5.0 Policy Context

5.1. Development Plan

Dun Laoghaire Rathdown County Development Plan

5.1.1 The operative Development Plan is the Dun Laoghaire Rathdown County Development Plan 2016-2022. The site is zoned Objective A: *To protect and/or improve residential amenity*. There is an objective to protect trees and woodlands on the site. A zone of archaeological potential (DU026-135) relating to a Fulacht Fia is also identified. It should be noted that it is detailed in the Archaeological Appraisal submitted with the application that this is a mapping error arising from an incorrect coordinate within the National Monuments Service and the correct location of this feature is c. 925 metres to the north east of the site.

5.1.2 Relevant policies and objectives include:

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.*

Where a site is located within 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 of 50 units per hectare will be encouraged.

Section 8.2.3.4 (vii) Infill: *“New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.”*

Section 2.1.3.4 Existing Housing Stock Densification: *“Encourage densification of the existing suburbs in order to help retain population levels - by ‘infill housing.*

Infill housing in existing suburbs should respect or complement the established dwelling type in terms of materials used, roof type, etc.

In older residential suburbs, infill will be encouraged while still protecting the character of these areas.”

5.1.3 **Section 8.2.3.2** sets out the relevant guidance on quantitative and qualitative, and development management criteria for **residential developments**. **Section 8.2.3.3** refers to **apartment developments** and standards required in relation to (i) design, (ii) dual aspect, (iii) mix of units, (iv) separation between blocks), (v) internal storage, (vi) penthouse development, (vii) minimum floor areas, (viii) public, private and communal open space standards and (ix) play facilities. **Section 8.2.8.6** addresses **Trees and Hedgerows** and states that Arboricultural Assessments carried out by an independent, qualified arborist shall be submitted as part of planning applications for sites that contain trees or other significant vegetation. The assessment shall contain a tree survey, implications assessment and method statement.

Kiltiernan/Glenamuck Local Area Plan

5.1.4 The site is also located within the boundary of the Kiltiernan/Glenamuck Local Area Plan 2013. The life of the LAP has been extended to 2023.

5.1.5 It is identified as being within Development Parcel 2 – medium/higher density residential – apartments, duplexes, terraces. A density range of 45-55 dwelling units per hectare is encouraged in this area. Section 4.8 addresses housing design issues and promotes a variety of house types and design. Within Parcel 2, heights of 2-5 storeys are encouraged, with 5 storey elements to be focussed on the proposed distributor road. Specific comments regarding land Parcel 2 are:

- Northern and southern portion constrained by 110kV overhead powerline.
- Part of parcel has planning permission for residential schemes – D05A/0315 and D09A/0316 incorporating both apartments and traditional housing.
- Subject to Luas Line Special Development Construction (Section 49 Scheme).
- Access to land parcel to be provided at an access point on the GDDR.

5.1.6 Section 10 of the Plan notes that future development in the LAP area is dependent on the construction of new roads including the Glenamuck District Distributor Road (GDDR). The road reservation for the GDDR is located to the north of the site. It is

acknowledged that in the interim period, pending approval and construction of the GDDR, some development will be facilitated to meet the central objectives of the LAP and up to 700 dwellings could be accommodated within this first phase. The subject site is identified as Phase 1(a) – Glenamuck Road Upper/North Portion.

5.1.7 The LAP sets out in section 10.6 criteria to apply to development in the first phase of development on the LAP lands, in advance of the GDDR. These include:

- Demonstrate a high level of architectural quality and urban design and are sympathetic to the special character of Kiltiernan/Glenamuck.
- Achievement of local road/footpath improvement and traffic management measures.
- Planned within the context of an overall outline Masterplan Plan for individual and affiliated land holdings (in order to prevent piecemeal development).
- Facilitation of the orderly development of adjoining property/landholdings.
- Compatibility with later phases of development.
- Availability of environmental services and incorporation of SUDS measures.
- Likelihood of early construction.

5.2. Other Policy

National Planning Framework

5.2.1 **Objective 33** seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. **Objective 35** seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities. (DHPLG 2018).

5.2.2 These guidelines provide recommended minimum standards for floor areas for different types of apartments; storage spaces; sizes of apartment balconies/patios and room dimensions for certain rooms.

Sustainable Urban Residential Development Guidelines (DoEHLG 2009) and the Urban Design Manual - A Best Practice Guide (DoEHLG 2009).

5.2.3 These include detailed advice on the role of Urban Design and planning for new sustainable neighbourhoods. In cities and larger towns, appropriate locations for increased densities, are identified, including outer suburban greenfield sites and public transport corridors.

5.3. Natural Heritage Designations

5.3.1 The nearest Natura 2000 sites are the Rockabill to Dalkey Island SAC located c. 6.3km to the east of the site and the Wicklow Mountain SPA and SAC located c. 6 km to the south west of the site.

6.0 The Appeal

6.1. Grounds of Appeal

- To address the concerns of the Local Authority a revised site layout plan is submitted. The principle changes in the amended layout relate to a decrease in the extent of car parking spaces from 95 no. spaces to 79 no. spaces and an increase in the percentage of open space from 12.7% to 18%. The revisions also provide for the re-location of Block A and B c. 5m to the south east in order to increase the separation distance to Hollybrook House, the relocation of Block E and F c. 8m to the north west and the provision of open space and planting between Block D and Block E.
- With regard to potential impacts to Hollybrook House, the revised layout relocates Block B approximately 5m to the south east. Given that Hollybrook House is a dormer bungalow, Block B will now be obscured from view from within the existing house, as no proposed development directly opposes the upper 2 no. dormer windows and no overbearing impacts will arise.
- It is considered that the primary private amenity area of Hollybrook House is located to the northwest of the dwelling. This area is adjacent to the living and dining areas of the house. There is c. 10 metre separation between this

amenity area and Block C, with only small 1st floor and 2nd floor bathroom windows facing towards the property. There are no directly opposing terraces.

- There is a further area of open space within Hollybrook House adjacent to Block B. This area is considered to be of secondary amenity. It is noted that there is little screening at present at this location. It is proposed to enhance landscaping along this boundary to include large specimen planting which will minimise overlooking.
- With regard to access to the GDDR, note that the Transportation Department did not object to the development on this basis and requested Further Information. It is clear that they did not have any significant concerns with regard to the future potential for the site to link into an access with the GDDR. They specifically refer to the indicated future accesses as provided on the site layout plan and require that these 2 accesses directly abut the site boundary with no interim grass strips.
- It is accepted that the LAP requires Land Parcel 2 to be accessed from an access point on the GDDR. However, there is no inference that each development site within the land parcel must provide a direct access onto the GDDR. It is unlikely that the subject site could link directly to the GDDR as only a very small section of the site abuts this road reservation area.
- It is submitted that development sites should demonstrate the ability to link to adjacent sites which will then include a link access to the GDDR once a detailed design for the road is finalised. The proposed access onto the existing Glenamuck Road could then be closed and the applicant is happy to enter into a written agreement in this regard. The revised layout plan demonstrates that once the Glenamuck Road access is closed, a hammerhead to allow turning vehicles can be provided. The proposal clearly demonstrates provision for future linkages to adjacent sites and is not prejudicial to these adjacent sites being brought forward for development and either directly accessing the GDDR or linking into any adjacent site which accesses the GDDR.
- The subject site is located within Phase A lands of the LAP and it is accepted that 300 units could be provided here in advance of the delivery of the GDDR.

The majority of Land Parcel 2 is undeveloped and it is clear that an additional 52 no. units will not breach the 300 unit cap allowed in the LAP.

- The proposed site layout demonstrates 2 accesses to the adjacent sites to the south west and north east which will be reliant on adjacent land to provide a connection for the GDDR. The most likely site to provide access to the GDDR is the large land parcel to the rear of the site. This parcel is land locked and is unlikely to come forward until the GDDR is delivered. Provided that each of the small land parcels adjacent to Glenamuck Road demonstrate the ability to connect to each other and provided that this linked access is then connected to the large rear site and conditioned correctly, it is considered that the orderly development of the area can be facilitated. There is no LAP requirement that these adjacent sites are immediately brought forward in order to enable development to progress on the subject site.
- Note that there is an established precedent for future developments to be required to tie into permitted access roads and cites previous example of Willow Glen (Planning Authority Reference D15A/0433) whereby applicant was required to provide internal access road which tied into the permitted internal road. In the event that development does not proceed on the adjacent sites, the development remains within the allocated capacity for dwellings to be served from the Glenamuck Road.
- With regard to the triangular piece of land between the subject site and the GDDR, this area has been identified as an attenuation pond which removes its development potential. This area of land is not within the ownership or control of the applicant.
- The revised site layout plan now provides for the required 2m footpath along the extent of the site's boundary with Glenamuck Road.
- Regarding concerns that the site does not address the surrounding area, it is submitted that the neighbouring sites have not yet been brought forward for development and comprise large detached dwellings on their own grounds. Although the proposed layout does not currently address these properties, there is ample scope for any future development on these lands to connect with the layout of the proposed development.

- It is considered that the design and provision of duplex blocks is an efficient method to achieve the required density and that the proposal should be seen in the context of the evolving nature of the area. Refers to a similar situation at Drumkeen where it was deemed the development provided a sufficient level of architectural quality. Note that the amended layout facilitates improved provision of high quality public open spaces and landscaping. An additional area of open space is provided between blocks D and E. The central area is now separated from the car parking areas, will be overlooked and is accessible to all residents. It is considered the most appropriate location due to the retention of a number of mature trees within this space. The revised layout results in reduced carparking which is appropriate in the context of the sites proximity to the Luas.

6.2. Planning Authority Response

- Notwithstanding the revised drawings that provide for the re-location of Block A and B c. 5m to the south east, it is considered that the separation distance is still not sufficient, especially from the first floor terrace.
- It is a requirement of Development Parcel 2 that access to this land parcel is to be provided at an access point on the Glenamuck Distributor Road (GDR). No evidence has been submitted that the site can be accessed from the GDR through Parcel 2 in the future and, therefore, it is considered that the site has not been designed within the context of an overall outline masterplan for the area. It is considered that if this development were to be built, it would also limit the development potential to the site to the northwest between the subject site and the GDR.
- It has not been demonstrated that the proposed development would achieve local road/footpath improvement and traffic measures. It is considered that the development would contravene Section 10.6 of the Kiltiernan/Glenamuck Local Area Plan 2013.
- Policy UD1 Urban Design principles of the 2016-2022 Dun Laoghaire Rathdown County Development Plan lists the primary principles of good design. These include the creation of neighbourhoods where developments

respond to their surroundings, connect with the surrounding areas, creates inclusivity and variety. It is considered that the proposed development does not address the surrounding area especially the neighbouring sites and given the lack of footpaths, does not connect with the area or promote inclusivity. The proposed layout of very similar block types does not promote variety. It is considered notwithstanding the content of the appeal, that due to the level of uniformity the duplex apartment block that the proposed development will not create a sense of place. The layout of the development with its central area of amenity space surrounded by roads will not create enjoyable public areas. It is considered that the development will not achieve a high quality of design that assists in promoting a sense of place and is, therefore, contrary to Policy UD1.

6.3. Observations

- No observations.

7.0 Assessment

7.1 Introduction

7.1.1 The main issues in this appeal are those raised in the grounds of the appeal and it is considered that no other substantive issues arise. Appropriate Assessment and EIA screening also needs to be addressed. The issues can be dealt with under the following headings:

- Principle of Development.
- Impact on Residential Amenity.
- Access and Compliance with the Kiltiernan/Glenamuck LAP 2013.
- Architectural Design.
- Appropriate Assessment.
- EIA Screening.

7.2 Principle of Development

- 7.2.1 The proposed development comprises an infill residential development of 52 apartments. The site currently accommodates a large detached dwelling and is underutilised. Policy at a national, regional and local development clearly promotes the intensification of such sites for residential development. The subject site is also subject to the provisions of the Glenamuck Kiltiernan LAP 2013. The site is identified as Land Parcel 2 where a density range of 45-55 dwelling units per hectare is encouraged. The development proposed a density of 48 units per hectare and is, therefore, consistent with the objectives of the LAP regarding density.
- 7.2.2 The LAP notes that the future development in the LAP area is dependent on the construction of new roads including the Glenamuck District Distributor Road (GDDR). It is acknowledged that in the interim period, pending approval and construction of the GDDR, that some development will be facilitated. It is detailed that up to 700 dwellings could be accommodated in a first phase of development in advance of the GDDR. The subject site is identified as Phase 1(a) – Glenamuck Road Upper/North Portion. Within Phase 1, there are extant permissions for a total of 170 units permitted under application references D10A/0026 and D15A/0433. The Planning Authority Planner's Report states that there is capacity for the development within the thresholds set out in the LAP.
- 7.2.3 Having regard to the density and quantum of development proposed, it is considered that the principle of the development at this location is acceptable in principle.

7.3 Impact on Residential Amenities

- 7.3.1 The subject site is an infill development in an area characterised by large detached dwellings on their own grounds. All of the adjacent landholdings are within the LAP boundary and are zoned for medium/higher residential density. The character of the subject lands is, therefore, likely to evolve considerably over the short to medium term as many of these sites will come forward for redevelopment. Potential impacts on existing residential amenities must be considered in this context.
- 7.3.2 Concerns have been raised by the Planning Authority regarding the potential impact of the development on the large detached house located to the south west of the site, known as Hollybrook House. In response to these concerns, the applicant has submitted a revised site layout plan which repositions Block B 5 m to the south east,

thus increasing the separation distances between the site and this existing dwelling. Block E and F are repositioned c. 8m to the north west.

7.3.3 I am satisfied that the separation distances between the development and the adjoining residential property are sufficient. Block C will be set back 8 metres from the common boundary and will have limited fenestration on the side elevation which serves kitchens and bathrooms. I concur with the comments of the applicant that the primary open space serving Hollybrook House is located to the north west of the dwelling and having regard to its orientation and separation from Block C, no material adverse overlooking impacts are likely to occur.

7.3.4 With regard to Block B, this is set back c. 5 metres from the boundary with Hollybrook House at its closet point. Particular concerns have been raised by the Planning Authority regarding potential overlooking from the first floor terraces serving this block. I am satisfied however, that given that the adjacent amenity area serving Hollybrook House is of secondary importance comprising an ancillary lawn area adjacent to the entrance drive, that this separation is adequate. I also consider that additional planting of mature trees along this boundary would further mitigate any potential overlooking impacts. This can be addressed by way of condition should the Board be minded to grant permission. In conclusion, I am satisfied that the development will have no adverse impacts on the amenities of Hollybrook House.

7.5 Access and Compliance with the Kiltiernan/Glenamuck LAP 2013

7.5.1 The reservation line of the proposed GDDR is located to the north of the subject site. It is detailed in the LAP that it a requirement that an access be provided to Land Parcel 2 from the GDDR. Parcel 2 comprises a number of different plots of land including the subject site. I would concur with the view of the applicant that it unlikely that it was the intent of the LAP that each land plot within Parcel 2 be served by its own independent access point from the GDDR as this would result in a multiplicity of new entrance points from this new strategic road infrastructure. I envisage that one entrance is likely to be provided from the GDDR to provide access to the all of the development plots within Parcel 2. The location of such an entrance will form part of the detailed design of the GDDR.

7.5.2 As highlighted by the applicant, the most logical place for such a new entrance to be created is from the large undeveloped triangular plot of land located to the north of

the site. The applicants have provided a layout that can facilitate access through adjacent lands and link to the GDDR in the future. Potential access points are indicated to the north west and south east of the site and it is detailed that such a proposal is not prejudicial to these sites being brought forward for development and either directly accessing the GDDR or linking into any adjacent site which accesses the GDDR.

- 7.5.3 It is evident that the layout depends on access through adjacent lands in order to facilitate a future connection to the GDDR. Whilst I have no objection to such an approach, in the absence of a coordinated masterplan for the subject site and adjacent lands, it is uncertain whether the proposed access points are optimally located or will connect appropriately to a future access point to the GDDR.
- 7.5.4 It is a specific requirement of the LAP that any development permitted in advance of the GDDR scheme should be planned within the context of an overall outline Masterplan for individual and affiliated land holdings (in order to prevent piecemeal development). The applicant has not provided a masterplan layout for adjoining sites and argues that the development will not prejudice the future development of adjacent lands. Whilst this may be the case, it has not been proven in my view that the layout of the scheme and potential link points are appropriately located and designed in the context of the wider land parcel.
- 7.5.5 I also have concerns regarding the layout of the development and whether it will have an appropriate interface with future development that may occur on adjacent sites. It has evidently been developed as a standalone entity with little consideration of how the buildings will relate to its wider context and setting.
- 7.5.6 I note the concerns of the Planning Authority regarding the small residual piece of triangular land that will be left between the site boundary and the proposed route of the GDDR. It is argued by the Planning Authority that insufficient depth remains to provide any development along this. I note that this area of the land is outside the control of the applicant and has been identified as an attenuation area to serve the subject lands. Notwithstanding the fact that development may not occur in this area, there is a paucity of detail as to how the scheme will appropriately integrate with this feature.

7.5.7 In conclusion, whilst I am satisfied that the layout of the development could potentially link to an access to the GDDR through adjoining lands, I consider that the layout of the development has been considered as an isolated site. It is stated by the applicant that provided that each of the smaller land parcels adjacent to Glenamuck Road demonstrate the ability to connect to each other and provided that the linked access is then connected to the large rear site and conditioned correctly, that the orderly development of the area can be easily facilitated.

7.5.8 Notwithstanding the fact that the layout provides connections to adjacent sites, it is my view that the appropriate future orderly development of this area is not just dependent on vehicular connections but should be appropriately designed to ensure that each land parcel connects and integrates with each other in terms of the design of blocks, disposition of open space, pedestrian and vehicular routes and connections. In the absence of an appropriate masterplan for the site and adjoining lands, I am not satisfied that the development will provide an appropriate interface with adjoining sites, provide appropriate levels of connectivity and amenity and in this regard, represents an ad hoc and piecemeal approach to the future development of the subject lands.

7.6 **Architectural Design**

7.6.1 Concerns have been raised by the Planning Authority regarding the quality of the proposed architectural design and that the development is contrary to Policy UD1 of the County Development Plan due to the uniformity of the duplex blocks, positioning of open space and lack of connectivity.

7.6.2 To address the concerns of the Planning Authority, the applicant has made some minor amendments to the design including the provision of a 2 metre wide footpath along Glenamuck Road. The open space layout is also amended with the provision of a new space to the north of the sites between Blocks D and E. The car parking layout is reconfigured, with an overall reduction in spaces and separation of the spaces from the open space area.

7.6.3 The amendments proposed with the appeal submission are noted and welcomed and improve the overall quality of the development. However, I would have concerns regarding the quality of the proposal and do not consider that it provides an appropriate architectural response to the site. The development comprises a series

of uniform duplex blocks with little character or variety. Whilst I acknowledge that the character of this area is evolving, I am not satisfied that the development represents a high quality design and is, therefore contrary to Policy UD1 of the Dun Laoghaire Rathdown County Development Plan 2016-2022.

7.7 Appropriate Assessment

7.7.1 Having regard to the nature and scale of the proposed development, an infill residential scheme within an established urban area, and the distance to the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

7.6 EIA Screening

7.6.1 Having regard to nature of the development comprising an infill residential scheme and the urban location of the site there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

8.0 Recommendation

8.1 It is recommended that permission be refused for the reasons set out below.

9.0 Reasons and Considerations

1. Having regard to the design and layout of the development, it has not been demonstrated that the proposed development will facilitate the orderly development of adjoining properties/landholdings and has not been planned in the context of a coherent overall outline Masterplan for the subject lands. It is considered that the proposed development would be contrary to the provisions of the Kiltiernan/Glenamuck Local Area Plan 2013. The proposed development would lead to piecemeal haphazard development, would set an undesirable precedent and be contrary to the proper planning and sustainable development of the area.

2. The "Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas" published by the Department of the Environment, Heritage and Local Government in May, 2009, require a high quality approach to the design and layout of new housing. Having regard to the proposed site layout, and in particular the uniformity and design of the proposed duplex blocks, the proposed development would thereby constitute a substandard form of development and, therefore, conflict with provisions of the said guidelines and Policy UD1 of the Dun Laoghaire Rathdown County Development Plan 2016-2022. The development would be contrary to the proper planning and sustainable development of the area.

Erika Casey
Senior Planning Inspector

29th November 2018