



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-303694-19

Strategic Housing Development	229 apartments, 2 retail units, tenant amenity floorspace.
Location	Leisureplex Stillorgan, Co. Dublin
Planning Authority	Dun Laoghaire Rathdown County Council
Prospective Applicant	KW Investment Funds ICAV (acting for & on behalf of its sub-fund KW Investment Fund)
Date of Consultation Meeting	20 th March 2019
Date of Site Inspection	13 th March 2019
Inspector	Sarah Moran

1.0 Introduction

- 1.1. 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

- 2.1. The site is located in the centre of Stillorgan, Co. Dublin. It has a stated area of 0.79 ha and is currently occupied by the Leisureplex building and associated surface car park. The applicant has indicated ownership of two small areas of land to the north east (incorporating two houses) and south east (an area of open space). Aside from those areas, the site is bound by a 2 storey commercial block to the west, a Council owned area of land including an existing library and housing units to the east and St. Laurence Park to the north. The site has frontage to the Old Dublin Road to the west and to Kilmacud Road Lower to the south. Ground levels fall from west to east across the site. Stillorgan Village Centre is located to the west of the site and a student accommodation development has recently been permitted at the 'Blakes' site on the opposite side of Kilmacud Road Lower to the south, ref. ABP-300520-18.
- 2.2. The documentation on file states that Dun Laoghaire Rathdown County Council (DLRCC) are currently developing proposals for a new residential development and library at their lands to the immediate east of the site, facing the N11, and are currently at an advanced stage of submitting a Part VIII proposal. It has been agreed that the areas of land owned by the applicant within the blue line site boundary will be developed as part of the DLRCC lands.

3.0 Proposed Strategic Housing Development

3.1. The proposed development is described as a 'private rental sector scheme', i.e. Build to Rent (BTR). The Statement of Consistency states that the development is designed to comply with the general standards of the Sustainable Urban Housing Guidelines for Planning Authorities and therefore SPPRs 7 and 8, applicable to BTR development, do not apply in this instance. The development involves 229 no. apartments as follows and has a stated net residential density of 289 units/ha.

Apt Type	No. of Units	%
Studio	21	9%
1 bed	89	39%
2 bed	119	52%
Total	229	

The development is laid out around a courtyard to the rear of the 'Nimble Fingers' complex with a plaza at the Lower Kilmacud Road frontage. There is a separate podium height courtyard at the interface with the DLRCC lands. The overall height is 4-9 storeys over a double basement. A total of 41% of units are dual aspect.

3.2. The scheme also includes:

- Demolition of existing buildings on the site.
- 2 retail units (883.6 sq.m.) facing a public plaza at the junction of Old Dublin Road and Lower Kilmacud Road.
- 4 restaurants, 1 café / restaurant (718.3 sq.m.)
- Internal tenant amenity area and gym (854.1 sq.m.) at the Lower Kilmacud Road frontage.
- Vehicular access to basement from Lower Kilmacud Road and St. Laurence Park
- 244 car parking spaces all at basement level, broken down as follows:
 - 171 spaces for residents, 0.76 spaces per residential unit
 - 69 spaces for the commercial element of the scheme

- 5 no. car club / car sharing spaces also at basement level
- 532 cycle parking spaces including 60 at surface level
- Improvements to the public realm including seating, hard and soft landscaping and removal of on street parking with set down areas. External lift to Lower Kilmacud Road to negotiate level differences.
- Part V proposal for a land transfer adjacent to the site. Alternatively, 23 no. units in Block 5 (addressing St. Laurence Park) to be part of a long term rental agreement.
- An indicative layout is provided for the DLRCC lands to the east of the site.

3.3. The site is sub-threshold for EIA with regard to schedule 5, Part 2, Class 10(b) of the Planning and Development Regulations 2001 (as amended).

4.0 Planning History

4.1. Subject Site Reg. Ref. D04A/1254 PI06D.211851

4.1.1. Permission granted by DLRCC for a mixed use development on a 1.59 hectare site comprising Stillorgan Leisureplex, Nos. 62-79 St. Laurence Park, Stillorgan Library and adjacent Council-owned land. The demolition of all existing buildings and construction of 314 no. residential units, 2,238 sq.m. retail floorspace, 3,938 sq.m. office floorspace, 3,719 sq.m. leisure/recreational floorspace, 486 sq.m. crèche, 1,019 sq.m. library and ancillary car parking in 15 no. mixed-use blocks up to 15 storeys high, 528 no. car parking spaces etc. This was subject of third party appeal. The Board refused for reasons relating to (i) premature pending the adoption of the Stillorgan LAP; (ii) premature pending the adoption of an integrated traffic management plan for Stillorgan and environs as per the County Development Plan; (iii) it would comprise overdevelopment of the site by reason of excessive density, scale, height, mass and bulk on a prominent corner site and would be visually obtrusive; (iv) that the design, layout and relationship with surrounding blocks would result in a substandard form of development providing for a poor standard of living in relation to daylight, shadowing and public and private amenity space and (v) by reason of layout, density, scale and height it would contravene the zoning objective for the site.

4.2. **ABP-300520-18 Former Blakes and Esmonde Motors Site**

- 4.2.1. Relating to the site on the opposite side of the Lower Kilmacud Road, fronting onto the N11 Stillorgan Road and The Hill, total site area 1.345 ha. Permission granted by ABP for a SHD development comprising 179 no. student accommodation units (576 no. bed spaces) including student amenities such as gym, study spaces and communal lounges; 103 no. residential apartment units including private balconies/terraces on all elevations and comprising of 24 no. 1 bed units, 70 no. 2 bed units and 9 no. 3 bed units; 907 sq.m. of retail/restaurant/café/co-working space, and a community sports hall (297.6 sq.m.).

5.0 **National and Local Planning Policy**

5.1. **Section 28 Ministerial Guidelines**

- 5.1.1. 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 section 28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual')
- Design Standards for New Apartments – Guidelines for Planning Authorities (2018)
- Design Manual for Urban Roads and Streets (DMURS)
- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Urban Development and Building Heights – Guidelines for Planning Authorities

5.2. **Dun Laoghaire Rathdown County Development Plan 2016-2022**

- 5.2.1. The site is zoned 'Objective DC To protect, provide for and/or improve mixed use district centre facilities'. The uses 'Residential', 'Restaurant', 'Shop – Major Convenience', 'Shop-Specialist', 'Shop-Neighbourhood', 'Shop-District', 'Sports Facility' and 'Tea Room/Café' are all permitted in principle.
- 5.2.2. Development plan Map 2 identifies the following Specific Local Objectives in the vicinity of the site:

- SLO 12 'To implement and develop the lands at Stillorgan in accordance with the Stillorgan LAP'.
- SLO151 'To support and facilitate the provision of a swimming pool and leisure facility within the Stillorgan area'.

5.2.3. Appendix 9 Building Height Strategy section 3.3 states that the N11, owing to its width, strategic importance and public transport facilities, has the potential to become an attractive urban corridor enclosed by taller buildings of high quality at locations which are also proximate to social and community infrastructure. Such developments have tended to range in height from 3 to 7 storeys. The width of the corridor at > 40m provides an opportunity for taller buildings to enclose this space.

5.3. **Stillorgan Local Area Plan 2018-2024**

5.3.1. The site has the zoning objective 'DC; to protect, provide for and-or improve mixed-use district centre facilities'.

5.3.2. The following building height policies are noted:

- BH1 *"It is an objective of the Council to promote higher densities and allow for increased building heights around public transport nodes and centres of activity. Guidelines for appropriate building heights will be set out in the 'Site Framework Strategies' for the Key Development Sites. To aid assessment, a design statement will be required for applications for taller buildings (any development where building heights exceed six storeys) in the Plan area. The design statement shall address development context, development objectives, urban design principles, scale and massing, density, materials, details, lighting (day and night time) existing and proposed land and building uses, ground floor uses, treatment of roof top/crown, ground floor treatment and public realm strategy."*
- BH2 *"An impact assessment study will also be required to illustrate the impact on the context, especially on residential amenities and significant views. This should be done through accurate visual modelling of proposals – photomontages or three-dimensional computer models (buildings fully rendered) – from relevant assessment points defined by the Council. Proposals should be shown in daylight and nightlight conditions. The micro-climate impact of the development on the surrounding environment (streets, public spaces and existing development)*

should also be tested in regards to wind funnelling, overshadowing and sun-reflection. Daylight, sunlight and overshadowing analysis will also be a requirement.”

- BH3 “*Consideration will be given to the application of upward or downward modifiers in relation to building heights, with reference to site characteristics and the protection of residential amenity”.*

5.3.3. The site is identified as a ‘key development site’ in the LAP, along with the adjoining DLRCC lands. Section 4.5.2 provides a ‘Site Development Framework’ for the site. The following key points of same are noted

- Redevelopment should include a mix of uses – commercial, retail, community, cultural and residential including council housing, public library, appropriate mix of social and affordable housing on DLRCC lands. Commercial uses to include evening uses. Retail Impact Assessment to be submitted. The PA will carefully consider the potential negative impacts of any proposals for Fast Food Outlets/Takeaways along the northern boundary with St Laurence Park.
- Benchmark height of 5 storeys across the site, with a landmark building of up to 9 storeys at the corner of the N11/Lower Kilmacud Road junction. The transition between the landmark height and the benchmark height must be designed to ensure that excessive massing or bulk in the overall design does not detract from the ‘landmark’ nature of the 9 storey element. Height should graduate downward at mutual boundaries with adjoining 2 storey properties with a maximum 3 storeys directly facing dwellings at St Laurence Park. Indicative Plot Ratio of 1:2.5.
- Create a building line that enhances a vital street frontage onto the Old Dublin Road and also Lower Kilmacud Road. Provide a high-quality public plaza/civic space at the corner of Old Dublin Road / Lower Kilmacud Road. Re-align Lower Kilmacud Road/ Old Dublin Road junction to tighten corners and increase pavement / public space.
- Provide pedestrian and cycle permeability through the site and improved accessibility to the N11 pedestrian underpass. Establish a strong pedestrian link along upgraded streetscape from shopping centre eastwards directly to QBC bus stop on N11.

- Restrict access directly from the Old Dublin Road to the LeisurePlex site and to provide residential only access via St Laurence Park, with a 'left in/left out' at Lower Kilmacud Road for all other uses.

5.4. **Stillorgan Village Area Movement Framework Plan (SVAMFP) April 2017**

- 5.4.1. This non-statutory document produced by Dun Laoghaire Rathdown County Council dates to October 2015. It outlines proposals to enhance the public realm of the Stillorgan LAP area, including roads layouts for The Hill and Lower Kilmacud Road and improved pedestrian and cycle facilities. The redesign of the Lower Kilmacud Road / The Hill / Old Dublin Road junction is a critical element of the scheme.

6.0 **Forming of the Opinion**

- 6.1. 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 submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

6.2. **Documentation Submitted**

- 6.2.1. 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, the following:

Completed application form; Architectural Drawings, Schedule and Design Statement; Housing Quality Assessment and Schedule of Areas; Landscape Report and drawings; Environmental Report; Statement of Consistency; Childcare Services Audit; Engineering Assessment Report; DMURS Statement of Consistency; Outline Construction Management Plan; Mobility Management Plan; Car Parking Rationale; Flood Risk Assessment; Traffic and Transport Assessment; Sunlight and Daylight Access Analysis; Visual Impact Assessment; Archaeological Desktop Assessment; AA Screening; Life Cycle Report; Operational Waste Management Plan.

- 6.2.2. 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.

6.2.3. I have reviewed and considered all of the above-mentioned documents and drawings.

6.3. Planning Authority Submission

6.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Dun Laoghaire Rathdown County Council, submitted a copy of their section 247 consultations with the prospective applicant and also their opinion in relation to the proposal. These were received by An Bord Pleanála on 7th March 2019. The planning authority's 'opinion' included the following matters.

6.3.2. PA Comment of Principle, Density and Quantum of Development

- The development is considered to be consistent with the 'DC' zoning objective. The PA welcomes, in principle, a high quality redevelopment of this brownfield site for a mixed-use scheme
- No objection in principle to the demolition of the existing structures. They are of limited architectural merit, are not protected structures and are not located within an Architectural Conservation Area or an otherwise sensitive location.
- The development will result in a density of approx. 290 units/ha which is well in excess of the minimum required density of 50 no. units/ha at this location as per Policy RES 3 of the County Development Plan 2016-2022.

6.3.3. PA Comment on Consistency with LAP

- The proposed heights exceed the heights envisaged for this part of the overall site as expressed in the Site Development Framework and the overall quantum, form and massing of development is considered to be excessive. The PA is not in favour of the heights cited in the Site Development Framework being set aside for the development as proposed. It is not considered that the proposals comply with

Section 3.2 (Development Management Criteria) of the Urban Development and Building Heights Guidelines 2018.

- The Site Development Framework specifically states that the landmark 9 storey building should be at the junction of the N11/Kilmacud Road Lower. The proposed development is inconsistent with the Framework as to permit the development as proposed would significantly adversely affect the achievement of the Framework's objectives in terms of building height. It is considered that the massing and bulk of the design will detract from the 'landmark' nature of the 9 storey element to be provided adjacent to the east.
- Also inconsistent with LAP requirement for a maximum of 3 storeys facing St. Laurence Park.
- The PA states concerns around form and massing, overshadowing and overall overdevelopment of the site and does not consider that the heights specified in the LAP should be contravened for the development as proposed.
- LAP cites a plot ratio of 2.5. The development involves a plot ratio of approx. 2.87.
- Public pedestrian and cycle permeability through the site has not been provided and it is not considered that a high quality public plaza/civic space at the corner of Old Dublin Road and Kilmacud Road Lower has been provided.
- The proposed civic space area to Kilmacud Road Lower does not provide a meaningful civic space/public plaza at the junction of Old Dublin Road and Kilmacud Road Lower as envisaged in the Site Development Framework of the Stillorgan Local Area Plan 2018 - 2024.
- Commercial deliveries will be by way of St. Laurence Park, this conflicts with the "residential-only access via St. Laurence Park" statement in the LAP. No appropriate road markings and signage have been proposed.
- A Retail Impact Assessment has not been submitted as required by the LAP.
- It is unclear how the development supports an 'Age Friendly' Environment; there does not appear to have been any documentation submitted in this regard.
- Lack of clarity regarding signage strategy.

- The PA is not satisfied that the proposed development has adequately addressed the items as set out in the Site Development Framework for this site as specified in the LAP. The development should adequately address all aspects of the LAP e.g. Movement (MV) Objectives, Building Height (BH) Objectives etc.
- The development should comply with the provisions of the Stillorgan Village Area Movement Framework Plan.

6.3.4. PA Comment on Impacts on Adjoining Amenities

- Concerns in relation to the engagement with adjoining property due to balconies in the 9 storey block immediately adjacent to the eastern site boundary as well as in the 'St. Laurence Park' block. Also balconies and windows to both proposed 'St. Laurence Park' and 'Old Dublin Road' blocks that may significantly adversely affect the ability of the 'Nimble Fingers' area to be appropriately re-developed in future.
- Significant overshadowing of the site to the east is shown on March 21st in the afternoon and evening periods. The PA requests that additional information be submitted in any application in relation to shadowing impact.
- The siting of a 7 storey block so close to the eastern boundary is problematic in terms of impacts on adjoining sites by way of overshadowing and overbearing.

6.3.5. PA Comment on Housing Quality / Mix, Part V

- The PA considers that the development is not consistent with the Urban Design Manual 2009 in terms of context, connections, efficiency, layout and public realm.
- The development is not proposed as a 'Build to Rent' model. SPPR 4 (ii) requires a minimum of 50% dual aspect units in suburban or intermediate locations. The total number of dual aspect apartments provided is 94 no. (41%) in total (and only 5 out of 23 (21.7%) of the proposed Part V units. The PA does not accept that this site should be considered as a 'subsection (i)' site where a minimum of 33% of dual aspect units will be required in more central and accessible urban locations. This is a suburban site that is not overly constrained and a minimum of 50% dual aspect apartments should be provided.

- SPPR 5 requires that ground floor apartment's floor to ceiling heights should be a minimum of 2.7m high and increased in certain circumstances. It is possible the units fronting St. Laurence Park may be used as a future commercial use. While the 'Section CC' drawing shows a 2.825m height the 'Section AA' drawing reduces floor to ceiling height to as low as 2.55m high at ground floor level.
- Housing Section report. The applicant's preferred approach is considered to be acceptable to the Housing Section. However, these lands are outlined in blue and are not contained within the red line site boundary. Therefore they "may be deemed 'off-site' and not in accordance with the provisions of Section 96(3) of the Planning and Development Act, 2000, as amended by Section 3 of the Planning and Development (Amendment) Act, 2002." This area could be contained within the red line site boundary to avoid any ambiguity.

6.3.6. PA Comment on Other Matters

- The PA accepts the conclusion of the submitted 'Environmental Report' that a sub-threshold EIAR is not required.
- The Drainage Planning Section has outlined a number of areas where further information should be sought as per its report. It is recommended that these issues are addressed prior to lodgement of a planning application.
- Parks & Landscape Services Section report. The development is low on high quality public open space. Recommends submission of additional detail in relation to trees, landscape design and play provision.

6.3.7. PA Conclusion

- Overall the PA considers the proposed development responds poorly to its context and surrounding buildings and sites, provides for poor permeability, fails to provide an adequate public plaza/civic space at the junction of the Old Dublin Road/Kilmacud Road Lower and in term of its heights, form and massing represents an overdevelopment of the site and does not accord with the Site

Development Framework as set out in the LAP. These issues have been raised at S247 stage.

6.4. Irish Water Submission

6.4.1. The following points are noted:

- Irish Water has issued a Confirmation of Feasibility for 250 residential units at this site.
- The Confirmation of Feasibility states that the applicant must enter into a Project Works Services Agreement with Irish Water. However, this is not correct. The water network must be upgraded to accommodate the development. No third party or statutory consents are required for this upgrade other than a road opening licence from the local authority.
- No upgrades are required for the wastewater network.

6.5. Consultation Meeting

6.5.1. A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 20th March 2019. 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.

6.5.2. 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. Stillorgan Local Area Plan 2018-2024 and Stillorgan Village Area Movement Framework Plan; design and layout of residential development; impacts on visual and residential amenities; interaction with Dun Laoghaire Rathdown County Council lands to the east.
2. Design and amenity of proposed residential units.
3. Roads and transportation issues; vehicular access; interaction with the adjacent public transport corridor; pedestrian and cycle connections; car and cycle parking provision.
4. Any other matters.

6.5.3. In relation to the Stillorgan Local Area Plan 2018-2024 and Stillorgan Village Area Movement Framework Plan; design and layout of residential development; interaction with Dun Laoghaire Rathdown County Council lands to the east, ABP representatives sought further elaboration / discussion on:

- Site specific framework
- Land under PA ownership, limited information available
- Issues raised in PA Opinion

6.5.4. In relation to Impacts on Visual and Residential Amenities, ABP representatives sought further elaboration / discussion on:

- Residential amenity in relation to St. Laurence Park
- Visual impact, height/scale in relation to PA lands
- Issue to be considered in the context of the Stillorgan LAP, development plan policy on building height and the Building Height Guidelines.

6.5.5. In relation to roads and transportation issues; vehicular access; interaction with the adjacent public transport corridor; pedestrian and cycle connections; car and cycle parking provision, ABP representatives sought further elaboration / discussion on:

- Proposed roads layout with regard to the LAP and the Stillorgan Village Area Movement Framework Plan
- Details of proposed parking provision
- Pedestrian connections

6.5.6. In relation to Drainage and Flood Risk, ABP representatives sought further elaboration / discussion on:

- Have regard to issues raised in PA Opinion including drainage and SuDs measures

6.5.7. In relation to any other matters, ABP representatives sought further elaboration / discussion on:

- Social and community infrastructure

6.5.8. 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 ABP-303694-19' 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

7.1. 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.

7.2. 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 section 28 Ministerial Guidelines, and local policy, via the statutory development 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:

Height, scale and quantum of development

Accessibility, Permeability, Interaction with the Public Realm, Roads and Cycle Layouts.

details of which are set out in the Recommended Opinion below.

7.3. 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.

7.4. 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

8.1. 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 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.

8.2. 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.

8.3. 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:

- 1) Further consideration of the documents as they relate to the building height and quantum of development in the context of the Stillorgan Local Area Plan 2018-2024, the Building Height Strategy set out as Appendix 9 of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and the Urban Development and Building Heights Guidelines for Planning Authorities. The

further consideration of this issue may require an amendment to the documents and/or design proposals submitted. If the proposed heights are to be maintained at application stage then further justification of the height strategy should be submitted at application stage.

- 2) Further consideration / justification of the documents as they relate to accessibility, permeability, interaction with the public realm, roads and cycle layouts in the proposed development. This consideration and justification should have regard to, inter alia, the guidance provided in the Stillorgan Village Area Movement Framework Plan; the objectives of the Stillorgan Local Area Plan 2018-2024, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and associated Urban Design Manual and DMURS. The further consideration of this issue may require amendments to the documents and/or design proposals submitted.

8.4. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A site layout plan and relevant documentation indicating pedestrian and cycle connections and demonstrating how consistency with the Stillorgan Village Area Movement Framework Plan and compliance with the Stillorgan Local Area Plan 2018-2024 and DMURS is to be achieved. This should be accompanied by a planning report which addresses the issues of consistency with the above national and local policies and objectives and justifies if the development deviates from said policies and objectives.
2. Car parking rationale and details of parking management.
3. Landscape and Visual Impact Assessment with photomontages and 3D modelling, to include consideration of cumulative impacts including the adjacent

development permitted under ABP-300520-18 and indicative proposals for the adjoining lands owned by Dun Laoghaire Rathdown County Council.

4. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, to include consideration of the frontages of the scheme to Lower Kilmacud Road, Old Dublin Road and St. Laurence Park. Additional cross sections, CGIs and visualisations should be included in this regard.
 5. Details of proposed works to the public realm at Lower Kilmacud Road, Old Dublin Road and St. Laurence's Park, to include consent from relevant landowners where necessary.
 6. A daylight / sunlight study to include consideration of (i) daylight levels at open spaces within the proposed scheme and (ii) shadow impacts on St. Laurence Park and the adjoining lands owned by Dun Laoghaire Rathdown County Council.
 7. Additional drainage details having regard to the report of the Drainage Division of the planning authority, as contained in Appendix B of the Chief Executive Report dated 7th March 2019.
 8. Retail Impact Assessment.
- 8.5. Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:
1. Irish Water
 2. Transport Infrastructure Ireland
 3. National Transport Authority

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.

Sarah Moran

Senior Planning Inspector

10th April 2019