



Development

Demolition of all existing buildings including a habitable house and outbuildings and the construction of an infill development of 16 no. detached, semi-detached, terraced duplex dwellings and apartments with provision for 29 car parking spaces including all associated site development works necessary to facilitate the development.

Location:

Knocknagram House, Park Court, Glenageary, Co. Dublin.

Planning Authority

Dún Laoghaire Rathdown County Council.

Planning Authority Reg. Ref.

D18A/0967.

Applicants

Red Rock BPRKH Ltd.

Type of Application

Permission.

Planning Authority Decision

Grant with conditions.

Type of Appeal

Third Party.

Appellants

1. Bellvue, Glenageary & Rochestown
Residents Association.

Observers

None.

Date of Site Inspection

22nd May 2019.

Inspector

Dáire McDevitt.

1.0 Site Location and Description

1.1 The site is located c.700m south of Sallynoggin and 1.2 km west of the Glenageary DART Station. This site lies within an established residential area characterised by suburban semi-detached dwellings. It is accessed via Park Court housing estate to the west of the R118, access is via an internal road within the residential scheme. Knockagram House and numerous outbuildings/sheds/workshops at present occupy the site. The structures are all in a state of significant disrepair and detract from the area. The site is relatively flat with a stated area of c.0.4045 hectares and is bounded by a granite stone wall of varying heights.

1.2 The site is bounded on all sides by residential development in the form of standard two storey semi-detached suburban houses. The site is bounded to the east by the rear gardens of Park Road and to the south and west those of Glenageary Court. Access is via Park Road to the north, with the gable of No. 19 bounding facing the site and the rear garden of No. 20. There are a number of trees on the northern section of the site with the former rear garden of Knockagram House occupying the north western corner. The remainder of the site is hardcore.

2.0 Proposed Development

Permission is being sought for a residential scheme of 16 units, c.408sq.m of public open space with c.64sq.m communal area to the rear of the duplex units along the southern boundary.

External finishes include render, brick and stone, dark tiled roofs with metal standing seam cladding.

2.1 Housing type and mix:

- 3no. 5 bed 3 storey detached.
- 2no. 4 bed 3 storey detached.

- 2no. 3 bed 2 storey detached.
- 1no. 3 bed dormer bungalow.
- 8no. duplex/apartments:
 - 4no. 2 bed units.
 - 4 no. 3 bed units.

13 Units are proposed on the southern portion of the site and extend the full width of the site. 2no. detached houses are proposed to the northwest section of the site and 1 detached house to the north eastern portion.

2.2 Documentation included with the Application:

- Planning Report.
- Architectural Design Statement.
- Architectural Heritage Assessment.
- Appropriate Assessment Screening Report.
- Ecological Impact Assessment.
- Landscape Design Report and Landscape Performance Standards.
- Arborist Assessment.
- Landscape Plan,
- Tree Constraints Plan
- Tree Removal and Tree Protection Plan.
- Traffic Impact Report.
- Construction Traffic Management Plan.
- Engineering Services Report.

- Drawings/plans.

2.3 Further Information (7th January 2019)

This addressed concerns raised in relation to overlooking, contiguous elevations, mitigation measures, Traffic management, parking, drainage, storm water attenuation and a play strategy.

3.0 Planning Authority Decision

3.1 Decision

Grant Permission subject to 24 conditions.

3.2 Planning Authority Reports (30th November 2018 & 31st January 2019)

These form the basis of the Planning Authority's decision and the main issues raised relate to housing design, residential amenities and open space.

The case officer's reports focused on a comparison between the current proposal and that refused permission for 15 units in 2018. The Planning Authority was satisfied that the current proposal addressed the reasons for refusal of permission under PA. Ref. No. D18A/0437.

The assessment concluded that the principle of a residential infill development at this site was acceptable. Furthermore it was considered that a high quality and appropriately scaled new development at this site, in context with the existing surrounding built form, would add to the area.

3.2.1 Other Technical Reports

Conservation Division (21st November 2018). No objection to the demolition of the existing structures on site.

Parks and Landscape Services (23rd November 2018). The layout is similar to that which was refused permission in 2018. The concerns remain the same, in

that the applicant has opted for the absolute minimum quantum of open space that is allowed. This results in sub-optimal, small open space that would be insufficient in size and scale to cater for the active and passive recreational needs of the projected residential population.

In addition the location of the stormwater attenuation tank completely within the small open spaces, places unacceptable constraints on potential new planting, a sufficient quantity and diversity of such is required to achieve an acceptable and sustainable standard of residential placemaking. The absence of adequate and appropriate (nature-based solutions) play opportunities is also unsatisfactory

Recommend that permission be refused on the lack of compliance with Section 8.2.8.1 (Landscape Design), 8.2.8.2 (public/communal space-Quantity), 8.2.8.3 (i), (ii), (iii) (public/communal space-Quality) and 8.2.8.5 (play).

Transportation Planning (27th November 2018 & 25th January 2019):

The TIA submitted was noted. Further information was requested relating to road layout, traffic management signage, visitor carparking, EVC points, road and footpaths to comply with the Council's TIC policy. The Further Information submission addressed the outstanding concerns of the Transportations Section. No objection subject to compliance with conditions.

Drainage Planning (2nd November 2018 and 15th January 2019): Further information was requested relating to surface water drainage. The Further Information submission addressed the outstanding concerns of the Transportations Section. No objection subject to compliance with conditions.

3.3 Prescribed Bodies

Irish Water (3rd November 2018). No objection.

3.4 Third Party Observations

The Planning Authority stated that 26 submissions were received. The main points of concerns raised are summarised as follows:

- The applicant has not overcome the previous reasons for refusal for 15 residential units on the site.
- Overbearing development due to the proposed height, scale, layout, orientation and proximity to site boundaries.
- Detrimental impact on the residential and visual amenities of adjoining residential properties.
- Drainage issues.
- Traffic and Transport Issues.
- Materially contravene the Development Plan.
- Devaluation of adjoining properties.
- Nuisance during construction.
- Light pollution from new street lights.

4.0 Planning History

Planning Authority Reference No. D18A/0437 refers to a 2018 decision to refuse permission for an infill development of 15 residential units for the following reasons:

1. *It is considered that the overall height, bulk and scale of the proposed development, when taken in conjunction with the limited separation distances adjoining site boundaries to the east, west and north of the site, in*

particular, would appear visually overbearing and intrusive as viewed from the adjoining sites. The proposed development would, therefore, be seriously injurious to the residential and visual amenity of the adjoining dwellings and, if permitted, would set an undesirable precedent for similar development on the vicinity. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. *It is considered that the proposed duplex/apartment development by virtue of its height, proximity to residential development on adjacent lands, to the south of the site and the extent of terraces to the proposed south (rear) at first floor level, would result in overlooking of the adjoining properties to the south. As a result the proposed development would seriously injure the residential amenities and depreciate the value of property in the vicinity and would, thereby, be contrary to the proper planning and sustainable development of the area.*

Applications of relevance in the area:

Planning Authority Reference No. D16A/0967 (An Bord Pleanála Reference No. PL.06D.248486 refers to a 2017 grant of permission for the construction of 5 houses and 14 apartments at 230 & 234 Glenageary Road Upper.

5.0 Policy & Context

5.1 Dun Laoghaire-Rathdown County Development Plan 2016-2022

The site is zoned under Land Use Objective 'A' with a stated objective '*to protect and/or improve residential amenity*'.

RES3: refers to the density requirements for the county.

Higher densities at a minimum of 50 units per hectare will be encouraged where a site is located within a 1km pedestrian catchment of a rail station, a priority QBC and/or 500 metres of a Bus Priority Route, and/or 1 km of a town or District Centre.

RES7: *It is the Council policy to encourage the establishment of sustainable communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the interim Housing Strategy.*

Chapter 8. Principles of Development:

Section 8.1.1.1. Urban Design Policy UD1 sets out that all development is of high quality design that assists in promoting a ‘sense of place’. The promotion of the guidance principles set out in the ‘Urban Design Manual - A Best Practice Guide’ (2009) and in the ‘Design Manual for Urban Roads and Streets’ (2013).

Section 8.2.3 Residential development.

Section 8.2.8.2 Public/Communal Open Space-Quantity

(i) Residential/Housing Developments.

Open Space: For all developments with a residential component - 5+ units – the requirement of 15sq.m-20sq.m of Open Space per person shall apply based on the number of residential/housing units [...] in instances where exceptionally high quality of open space is provided on site and such schemes may be subject to financial contributions as set out under Section 8.2.8.2 (iii).

(ii) Separation distances:

A minimum standard of 22 metres separation between directly opposing rear first floor windows should usually be observed, normally resulting in a minimum rear garden depth of 11 metres. However, where sufficient alternative private open space (e.g. to the side) is available, this may be reduced to 7 metres for single storey dwellings – subject to the maintenance of privacy and protection of adjoining residential amenities.

5.2 Guidelines

Project Ireland 2040 - National Planning Framework The recently published National Planning Framework includes a specific Chapter, No. 6, entitled 'People Homes and Communities'. It includes 12 objectives among which **Objective 27** seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages. **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.

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:

- **Design Manual for Urban Roads and Streets (DMURS).**
- **Sustainable Urban Residential Development Guidelines (DoEHLG 2009)** and its companion, the **Urban Design Manual - A Best Practice Guide (DoEHLG 2009).**
- **Quality Housing for Sustainable Communities (DoEHLG 2007).**

5.3 Natural Heritage Designations

The nearest designated sites are:

- Rockabill and Dalkey Island SAC (site code 003000) c. 3.1km to the east.
- South Dublin Bay SAC (site code 000210) c. 2.8km to the north.

- South Dublin Bay & River Tolka Estuary SPA (site code 004024) c. 2.8km to the north.
- Dalkey Islands SPA. (site code 004172) c. 3.3km to the east.

5.4 EIA Screening

Having regard to nature of the development comprising of demolition of existing house and outbuildings and construction of 16 residential units, in a serviced urban area, 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.

6.0 The Appeal

6.1 Grounds of Appeal

A third party appeal has been received from Bellvue, Glenageary & Rochestown Residents Association (a list is included of the relevant residents). The grounds of appeal can be summarised as follows:

Principle of Development

- The proposed development contravenes section 8.2.3.4(vii) for infill sites.
- Materially contravenes the land use zoning attached to the site which seeks to protect and/improve residential amenity.
- The current application more or less mirror a previous application for 15 residential units on the site that was refused permission under PA Ref. No. D18A/0437.
- The application has not overcome the previous reason for refusal which related to the overall height, bulk and scale of the development and its proximity to site boundaries was deemed to be visually overbearing and

intrusive when viewed from the adjoining site, would result in overlooking and be injurious to the residential and visual amenities of the adjoining residential properties.

Design & Layout

- Three storey units are unacceptable, they have an over bearing impact on adjoining properties
- Overlooking of adjoining properties from the terraces of unit type D
- Overshadowing of adjoining properties due to the height, scale and proximity of the development to site boundaries.
- Devaluation of adjoining properties.

Traffic

- Traffic hazard due to a significant increase in traffic on cul-de-sac.

Other

- Nuisance during construction arising from noise, traffic, etc.
- Inaccuracies in the plans submitted.

6.2 Planning Authority Response

The Planning Authority refers the Board to the original Planner's Report on file. It is considered that the grounds of appeal do not raise any new matter which, in the opinion of the planning authority, would justify a change of attitude to the proposed development.

6.3 Applicant's Response to the Appeal

This is mainly in the form of a rebuttal, points of note include:

- The current application does not mirror that refused permission in 2018. The scheme has been redesigned to address the planning authority's reasons for refusal.
- It is not possible to overlook the adjoining rear gardens from the terraces at first floor level due to the relative site levels in combination with the height of the boundary along the southern elevation.
- Overlooking and overshadowing is not an issue due to the set back and relationship of the proposed development with adjoining residential properties.
- The Area Planner and Transportation Department were satisfied that the proposed development would be acceptable in terms of impact on the exiting road network in the vicinity. Furthermore Traffic was not raised as a concern under the previous application (D148A/0437).
- The proposed open space, including the play area for children would be available to local residents, both existing and future, as it will be taken in charge by the Council.
- Conditions are attached that deal with hours of construction and impacts associated with the construction phase.
- 2 visitor carparking spaces, one of which is a disabled space, are provided.
- The stone boundary wall will be retained.

The proposed development provides a well-designed infill development providing a mixture of housing types and tenure in an established built up area with high quality public transport access and availability of employment opportunities in the vicinity. The development, therefore meets the explicit policies for compact urban development as set out in the national Planning

Framework, the (Draft Regional Spatial and Economic Strategy and the County Development Plan.

6.4 Observations

None.

7.0 Assessment

The main issues in this appeal are those raised in the grounds of appeal. The issue of appropriate assessment screening also needs to be addressed. The issues can be dealt with under the following headings:

- Principle of Development
- Design & Layout.
- Traffic.
- Other.
- Appropriate Assessment.

7.1 Principle of Development

7.1.1 The subject development comprises an infill residential scheme of 16 dwellings. The subject site is zoned objective A: *To Protect and/or Improve Residential Amenity*. Having regard to the zoning objective pertaining to the site and national guidance which promotes the consolidation of well serviced urban land, the principle of the development is acceptable at this location.

7.1.2 Policy RES 3 states that for new residential development, densities shall be 35 units per hectare. It notes however, that such density may not be appropriate in all instances but will serve as a general rule. It further details that within 1km of a Luas line, higher densities at a minimum of 50 units per hectare will be encouraged.

- 7.1.4 In considering the appropriateness of this density for the subject site, it is considered that regard must be had to the general character and prevailing pattern of development in the vicinity of the site. The site is well served by public transport but is c.1.2km from the nearest Dart station. Adjacent development comprises low density suburban housing. The Sustainable Residential Design in Urban Areas Guidelines note that in relation to suburban and infill sites in residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.
- 7.1.5 I note that the density targets set out under RES 3 are not explicit or rigid and it is clearly detailed that they will not be appropriate in all instances. Each application must be considered on its merits and on a case by case basis. I am satisfied that in this instance due to the context of the subject site and the character of adjacent development which is typically two storey dwellings, that the density of development is appropriate and will not undermine the policy objectives of the Development Plan. The design and layout of the development is considered to respond to the sites context, and whilst a higher density may be achievable, it would likely compromise the amenities of adjacent properties.
- 7.1.6 Policy RES3 sets out general recommendations and guidance regarding appropriate densities for different types of sites. The policy however, is not prescriptive in nature and specifically notes that such densities will be encouraged and may not be appropriate in all instances. The policy is aspirational and must be considered on a case by case basis, dependent on the circumstances and character of each site
- 7.1.7 I note that the proposal for 16 units results in a density of 39 units per hectare notwithstanding that the current proposal represents a slight increase in density from that refused in 2018. A density of 35 units per hectares is a minimum default density for the county. Densities of 50 units per hectares are

encouraged on sites within 1km pedestrian catchment of DART stations. The application site is c. 1.2km southwest of Gleanageary Dart Station and c. 200m from a bus stop along the R118. The case officers considered a density of 39 units per hectare acceptable at this location.

7.1.8 The proposal would entail the replacement of 1 dwellings (two storey) with 16 dwellings (3no. 3 bed 3 storey detached, 2no. 4 bed 3 storey detached), 2no. 3 bed 2 storey detached, 1no. 3 bed dormer bungalow and 8no. duplex. Under Section 8.2.3.3 of the CDP, advice on an appropriate mix of apartments is given. For schemes of under 30 apartments, assessment is to be made on a case-by-case basis. I consider that the mix that would be achieved by this proposal would be acceptable.

7.2 Design & Layout

7.2.1 The site is currently occupied by 'Knocknagrm House, a detached two storey unoccupied house in a state of significant disrepair. There are numerous outbuildings/sheds on site which are also in a state of significant disrepair. The proposal includes the demolition of Knocknagram House and ancillary outbuildings/sheds (total gfa of c, 2251.2sq.m) and the construction of 16 residential units (semi-detached, detached and duplex) with 29 surface parking spaces and c.438sq.m of public open space on a site with an overall area of c.0.4045 hectares.

7.2.2 The current proposal is an attempt to overcome the previous reason for refusal under Planning Authority Reference No. D18A/0437. The main difference between the current proposal and that refused in 2018 is that the scheme has increased from 15 residential units to 16. The overall height, bulk and mass of the development is similarly to that previously refused permission. The revised proposal has resulted an increased setback from the site boundaries.

7.2.3 The appellants raised concerns that, while reduced in scale and footprint, the proposed development would detract from the residential amenities of

adjoining properties due to overbearing impact, overlooking and loss of light/overshadowing.

7.2.4 At the outset I consider it appropriate to acknowledge that the development would give rise to a change in the character of the area particularly when viewed from the rear of existing dwelling houses. The introduction of buildings constitutes a significant landscape and visual impact. The matter for the Board to determine is whether that impact would fall within the parameters set by the development plan and other standards.

7.2.5 Regarding overlooking and overbearing. I note that the potential for adverse consequences in this case is severely limited by both the ample size of the rear gardens of the adjoining houses and by the rear garden lengths in the scheme, the orientation of the proposed units and their relationship with the existing built environment. I note that the minimum separation achieved between the proposed houses and the original rear wall of existing houses is between 20m and 30m. With the exception of Unit 3 (house type C) a detached dormer house proposed on the north-eastern corner, which has a separation distance of c. 14m from rear elevation of No. 11 & 12 Park Road. The design of unit 3 eliminates overlooking. Overlooking of internal rooms of houses 21 to 24 Glenageary Court to the south from the terraces serving the duplex units along the southern boundary is not a concern as adequate setbacks are achieved. The grounds of appeal have raised specific concerns that No. 13-18 Glenageary Court to the west would be overlooked by the rear terraces of the duplex apartments and that the front facing balconies would overlook no. 1-10 Glenageary Court to the west. The corner of the terrace serving Type D (12/13) (the most westerly duplex) is setback c. 28m from the western boundary of the site and c. 47m from the rear elevation of No. 13 Glenageary Court. Overlooking is not a concern from the rear terraces or the front terrace serving these units. I consider that the separation is adequate and that, while the

character of the area will alter, no significant overlooking or overbearing will arise subject to appropriate boundary treatment.

7.2.6 I consider that taking into account the proposed height and setback of the upper floors of the duplex block from the houses at Glenageary Court along with the open space buffer and screening proposed within the scheme, would reasonably serve to ensure the building would not have an overbearing impact from the adjoining properties.

7.2.7 I am of the view that while there is a degree of overshadowing it is not of an extent that would detract from the residential amenities of adjoining properties and warrant a reason for refusal. The orientation and layout of the development would not lead to excessive overshadowing within the scheme or of adjoining properties. Consequently, I do not consider that the proposed development would lead to excessive overshadowing of the open space serving the proposed development, neighbouring properties.

7.2.8 However, I have a number of concerns in relation of the design of the overall layout of the proposed scheme. The quantum of surface parking proposed to cater for 16 residential units at this location raises concerns and I do not consider it to be the most efficient use for a fully serviced site within walking distance to public transport nodes. The site is a prime site for a cohesive residential redevelopment opportunity. I consider the proposed layout which is dominated carparking, access road and hard landscaping is not appropriate and would be a missed opportunity for the comprehensive and sustainable development of this site on zoned serviced lands.

7.2.9 The Council's Parks and Landscape Services noted that the current site layout is similar to that which was refused permission in 2018. The Section's concerns remain the same, in that the applicant has opted for the absolute minimum quantum of open space that is allowed. This results in sub-optimal, small open

space that would be insufficient in size and scale to cater for the active and passive recreational needs of the projected residential population.

- 7.2.10 I consider that proposed development of 16 residential units does not provide any meaningful opportunity for children's play and for recreation. The proposed development makes provision for a communal area of c. 64sq.m to the rear of the duplex along the southern boundary and a larger section of c.408 sq.m adjoining the entrance to the scheme bounded by the access road. I consider that the proposal would be deficit in terms of quality open space.
- 7.2.11 Having regard to the nature of the development, given the imbalance of carparking and road surfaces proposed, I consider that the proposal fails to provide a high quality residential environment for future residents. In my opinion, the development in its current form provides for the underutilisation of a serviced suburban site suitable for the provision of a high quality residential development.
- 7.2.12 On balance I consider that the proposed development results in a poor design concept that is substandard in its form and layout; fails to provide high quality usable open spaces; fails to establish a sense of place; would result in a substandard form of development lacking in variety and distinctiveness, all of which would lead to conditions injurious to the residential amenities of future occupants. Furthermore, the layout of the proposed scheme, being dominated by roads, is contrary to the provisions of the Design Manual for Urban Roads and Streets, issued by the Department of the Environment, Community and Local Government and the Department of Transport, Tourism and Sport in 2013. It is considered that the proposed development would, therefore, seriously injure the residential amenities of future occupants and would be contrary to the proper planning and sustainable development of the area

7.3 Traffic

- 7.3.1 The appellants highlighted concerns that the scale and density of the development would result in excessive traffic movements onto a cul de sac within an existing residential estate which would give rise to safety concerns.
- 7.3.2 The site is located on lands zoned for residential use as set out in the Dun Laoghaire Rathdown County Development Plan 2016-2022. The impact of the land uses zonings and permitted densities on public infrastructure is taken into consideration during the Development Plan process. I am satisfied the proposal would not constitute a traffic hazard due to increase traffic movements.
- 7.3.3 The proposed development is for a modest housing scheme. Having regard to the limited extent of traffic generally associated with and generated by this scale of development, I am satisfied that no material adverse impacts to the surrounding road network are likely to occur.
- 7.3.4 Section 8.2.4.9 (i) in the County Development Plan set out the required dimensions for vehicular entrances and Section 8.2.4.5 refers to the car parking standards. The proposed development complies with the Development Plan standards as set out in table 8.2.3.

7.4 Other

- 7.4.1 I consider that the drawings submitted with the application are sufficient for the purposes of assessment of the appeal by the Board. I note the discrepancy in labelling of elevations. The application was deemed valid by the planning authority. The grounds of appeal highlight that the appellants are aware of the correct labelling and what elevations area referred to. I have taken all of this information into account and am satisfied that there are no substantial omissions in the available information.

7.5 Appropriate Assessment

- 7.5.1 The applicant has submitted an Appropriate Assessment Screening Report. This concluded that the European designated sites found to be within the

potential zone of influence of the proposed development are deemed not be at risk of likely significant effects from construction or operation of the proposed development.

7.5.2 The nearest European Sites are *Rockabill and Dalkey Island SAC* (site code 003000), *South Dublin Bay SAC* (site code 000210), *South Dublin Bay & River Tolka Estuary SPA* (site code 004024) c. 2.8km to the north and *Dalkey Islands SPA*. (site code 004172).

7.5.3 The site is a serviced urban site, which neither lies in or near a Natura 2000 site. The nearest such sites are at a considerable distance and there are no direct connections between them and the development site. Having regard to nature and scale of the proposed development, the nature of the receiving environment and the distance to the nearest European sites, 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.

8.0 Recommendation

I recommend that planning permission should be refused for the following reasons and considerations.

9.0 Reasons and Considerations

1. The “Urban Design Manual – a Best Practice Guide” issued by the Department of the Environment, Heritage and Local Government in 2009, to accompany the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas includes key criteria such as context, connections, inclusivity, variety and distinctiveness. It is considered that the proposed development results in a poor design concept that is substandard in its form and layout; fails to provide high quality usable open spaces; fails to

establish a sense of place; would result in a substandard form of development lacking in variety and distinctiveness, all of which would lead to conditions injurious to the residential amenities of future occupants. Furthermore, the layout of the proposed scheme, being dominated by roads, is contrary to the provisions of the Design Manual for Urban Roads and Streets, issued by the Department of the Environment, Community and Local Government and the Department of Transport, Tourism and Sport in 2013. It is considered that the proposed development would, therefore, seriously injure the residential amenities of future occupants and would be contrary to the proper planning and sustainable development of the area.

2. The proposed development, by reason of its inadequate qualitative and quantitative provision of communal open space, would conflict with the provisions of the current Development Plan for the area and with the minimum standards recommended in the "Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities" published by the Department of the Environment, Heritage and Local Government in December, 2009. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Dáire McDevitt

Planning Inspector

28th June 2019