



An  
Bord  
Pleanála

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

### **Inspector's Report on Recommended Opinion ABP-304036-19**

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**Strategic Housing Development**

130 residential units, childcare facility,  
east west street link connecting  
Skerries Road to the east with Palmer  
Avenue to the west, public open space  
and all site development works

**Location**

Lands at Skerries Road, Palmer Road  
and Palmer Avenue, Rush, Co. Dublin

**Planning Authority**

Fingal County Council

**Prospective Applicant**

The Skerries Road Partnership.

**Date of Consultation Meeting**

3<sup>rd</sup> May 2019

**Date of Site Inspection**

15<sup>th</sup> April 2019

**Inspector**

Erika Casey

## 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 subject lands with an area of c. 4.6ha are located to the north of Rush Town Centre. The lands are greenfield in nature and are vacant. The site has frontage to Palmer Avenue to the west, Skerries Road to the east and Palmer Road to the north. There is an attractive limestone cut stone wall along the Skerries Road boundary. This wall forms part of the original demesne walls of Kenure Park Estate, however, it is not a protected structure.

2.2 Palmer Avenue is a single lane access road with a cul de sac at its southern end. There is a pedestrian access to Kenure Park to the south. The Skerries Road provides the primary access from the site to Rush Town Centre. Palmer Road connects back to the Skerries Road to the east.

2.3 Development in the vicinity of the site is primarily low density and suburban in character. To the north and south are existing housing estates, Palmer Court, Ladycove and St. Maur's Park. Part of the western boundary abuts two large detached houses set in their own grounds. The Rush Nursing Home and a detached dwelling are located to the south east of the site. The nursing home is a large two storey building served by surface car parking.

2.4 The principal entrance to the development from the Skerries Road is flanked by a detached house to the north. Vehicular access to this dwelling is currently provided

through the subject site. This access is retained as part of the development proposal. A portion of land to the north of the site comprising internal roads and open space serving the Palmers Court development is indicated as being within the applicant's control.

2.5 Rush Village Centre is located approximately 950 metres to the south and accommodates a range of local facilities, services and amenities. The nearest train station which is served by the Dublin to Belfast train line, is located 4km from the site. There is a half hourly bus service to Dublin.

### 3.0 Proposed Strategic Housing Development

3.1 The proposed development comprises 130 residential units consisting of a mix of 2, 3 and 4 bed units. A schedule of the proposed accommodation is set out below.

#### Schedule of Accommodation

Type	Number	Beds	Unit Size	Private Open Space	Height
Type 1	28	2	85	60	2
Type 2	61	3	108.5	60	2
Type 3	14	3	107	60	2
Type 4	14	4	130	75	2
Type 5	5	4	132	75	2

<b>Type 6</b>	8	3	109	60	2
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3.2 The percentage mix of units is as follows:

### Housing Mix

<b>Unit Type</b>	<b>Number</b>	<b>Percentage</b>
<b>2 bed</b>	28	21.5
<b>3 bed</b>	83	63.8
<b>4 bed</b>	19	14.6

3.3 The development also provides for:

- Childcare facility: with a floor area of 400 sq. metres designed to accommodate 40 children with an external play space.
- East West Street: new link connecting Skerries Road to the east with Palmer Avenue to the west which will act as part of the wider east west link to be delivered through wider lands at this location.
- Landscaped public open space including play facilities.
- New boundary treatment.
- All site development works including ESB substation, road, footpaths, attenuation and site services.

3.4 The key development parameters are as follows:

### Key Development Parameters

Parameter	Site Proposal
Density	37.7 units per ha (calculated on a developable area of 3.4ha through the omission of the east west road, crèche site and POS 2 and POS 3)
Car Parking	249 spaces
Bicycle Parking	With each dwelling and 2 spaces to serve crèche
Part V	10% on Site Provision
Vehicular Access	Via Skerries Road and Palmer Avenue (2 entrances)
Application Site	4.6 ha
Open Space	0.625 ha. (10%)
Crèche	400 sq. metres
Plot Ratio	0.31
Site Coverage	16%

3.5 Access to the site will be via a new signalised junction at Skerries Road and will include the removal of a portion of the existing stone wall. The junction will also include the local access road to Rush North Beach and will provide for signal controlled pedestrian crossing points. Access will also be provided via a new priority junction at Palmer Avenue. As part of the development, Palmer Avenue will be upgraded along the western boundary of the development site to provide a carriageway width of 5.5m. A 1.8m wide raised footpath will be provided along the eastern side of Palmer Avenue, as well as a 1.8m wide cycle track which will facilitate the future implementation of the proposed cycle route between the Skerries Road and Rush Main Street. The additional lands required for these improvements will be taken within the development site.

3.6 249 car parking spaces will be provided on the basis of 2 spaces per dwelling to serve the 3 and 4 bed units and 1 space per unit for the 2 bed houses. 11 visitor spaces to be provided and 6 spaces to the serve the crèche plus 3 set down spaces.

## 4.0 Planning History

### Subject Site

4.1 There is no recent planning history relating to the subject site.

### In the Vicinity

4.2 There are a number of historic permissions relating to the housing development to the north of the site – applications references F01A/0272, F03A/0827, F01A/0221 and F00A/0682 refer.

4.3 There are have also been a number of applications granted on lands to the south west of the site including F15A/0294 (infrastructural site development works), F16A/0221 (129 dwellings) and F16A/0024 (4 apartments and 30 dwellings).

### Planning Authority Reference F18A/0681

4.4 There is a current application for a new housing development comprising 6 no. terraced 3 storey 3 bed dwellings on a site to the immediate north of the site. Further Information was requested by the Planning Authority on this application and decision is pending.

## 5.0 National and Local Planning Policy

### 5.1 National Policy

#### Project Ireland 2040 - National Planning Framework

5.1.1 Chapter 4 of the Framework addresses the topic of ‘making stronger urban places’ and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 13 provides that in urban areas, planning and

related standards, including in particular building height and car parking, will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

## **Section 28 Ministerial Guidelines**

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

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').
- Design Manual for Urban Roads and Streets.
- Childcare Facilities – Guidelines for Planning Authorities.
- Urban Development and Building Heights 2018.

## **5.2 Regional Policy**

### **Planning Guidelines for the Greater Dublin Area**

5.2.1 The lands are located in the Hinterland Area of the Greater Dublin Area. Under the settlement strategy, Rush is identified as a moderate growth town. It is stated in the guidelines:

*“It is critical that in the future Moderate Growth Towns in the hinterland area develop in a self sufficient manner in the longer term and that continued basis for growth is that they do not become dormitory towns.”*

### **Western and Midlands Regional Assembly – Draft Regional Spatial and Economic Strategy 2019-2031**

5.2.2 Under the draft strategy, Rush is located in the 'Hinterland Area'. This area is described as including the peri-urban areas in the commuter catchment around Dublin, which covers much of the Region extending into parts of the Midlands, into Louth to the north and beyond the region south into Wexford.

5.2.3 Regarding the Hinterland area, the RSES provides for:

- *Compact and sustainable growth of towns with 30% of all growth to develop within the existing built up areas.*
- *Above national average growth rates to continue, in a more sustainable rate.*
- *Consolidation and improvement in the services and sustainability of those areas that have experienced significant population growth.*
- *Focus on High Value assets and amenities to be protected and their use enhanced for all the region.*

5.2.4 Objective **RP0 4.3 (consolidation and re-intensification)** states:

*“Support the consolidation and intensification of infill/brownfield sites to provide high density and people intensive uses with the existing built up areas of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

### 5.3 Local Planning Policy

#### **Fingal County Development Plan 2017-2023**

5.3.1 The site is zoned ‘RA’ Residential Area which seeks ‘to provide for new residential communities subject to the necessary social and physical infrastructure’. The vision for this zoning is:

*“Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenure in order to meet household needs and to promote balanced communities.”*

5.3.2 The site is located within the Rush Development Boundary. It is identified as being located within a ‘Highly Sensitive Landscape’. There is an objective for a road proposal through the site and an indicative cycle/pedestrian route to the west of the site along Palmer Avenue.

5.3.3 Under the plan, Rush is identified as a Moderate Sustainable Growth Town. The plan states:

*“In the hinterland area, the towns of Lusk, Rush and Skerries rely on the provision of quality local services and also serve as commercial nodes for their immediate rural*



*environs as their location is more remote from higher order centres.....It will be important that Lusk, Rush and Skerries develop in a self sufficient manner in order to prevent them from becoming dormitory towns. A full range of services should be available to meet local needs and that of the surrounding rural areas in order to encourage smarter travel patterns and to provide for further growth.”*

5.3.4 Under the core strategy the plan indicates that Rush has approximately 58 hectares of land supply for new residential development with the capacity to accommodate c. 1,994 new homes.

5.3.5 Relevant objectives include:

**Objective SS20:**

*“Manage the development and growth of Lusk, Rush and Skerries in a planned manner limited to the capacity of local infrastructure to support new development”.*

**Objective PM39**

*“Ensure consolidated development in Fingal by facilitating residential development in exiting urban and village locations”.*

**Objective PM40**

*“Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents”.*

**Kenure LAP 2009 to 2015 (extended until 2019)**

5.3.6 The site is included in the Development Plan designation LAP 6A: Kenure LAP. This plan expired in February 2019. It is understood that it is not intended to prepare a new LAP.

## **6.0 Documentation Submitted**

6.1 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.

6.2 This information included, inter alia, Cover Letter, Letter of Consent, Application Form, Architectural Drawings, Schedule of Accommodation, Design Statement,

Landscape Masterplan, Statement of Consistency, Statement of Possible Effects on the Environment, Statement on Consultation, Engineering Drawings and Schedule, Engineering Services Report, Outline Construction Management Plan, Waste Management Plan, Flood Risk Assessment, Traffic Impact Assessment, DMURS Statement of Consistency, Natura Impact Assessment Screening, Ecological Impact Assessment, Archaeological Assessment, Correspondence from Conservation Architect, Energy Statement, Correspondence re: Part V, Irish Water Confirmation of Feasibility.

6.3 Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required. The applicant's case is summarised as follows:

- Access to the housing will be provided off the new east west street. This will encourage slower traffic movements and ensure the street is a central feature of the scheme and actively used.
- The east west street will connect via third party lands to the planned north west corridor which is to be delivered by others. This street is an important link street in the development of the wider area in Rush and will make an important contribution to releasing other land for development in the vicinity. The route will be 6m wide and include a 1.8m cycle track, 1.5m verge and 1.8m footpath.
- The large central open space will be directly surveilled by the development. A small pocket open space area provides a welcoming feature at the entrance on Skerries Road. There are also two other pockets of open space, one located to the north of the east west street and one addressing Palmer Ave. The dispersion of open space ensures the site maintains an open feel.
- The scheme has been designed with three distinct character areas which will create a sequence of spaces and routes in the scheme. The architectural approach includes a variety in ridge heights and minor variations in building lines to provide appropriate visual interest in the scheme. A variety of house types is also proposed.

- Considers that the development will provide an attractive, high quality and sustainable new residential development within the existing built up area of Rush that will integrate with the existing character of the area. The development incorporates design principles such as a high degree of permeability and connectivity to adjacent sites and the town centre and has been considered in the context of the principles set out in the Urban Design Manual.
- Notes that in the context of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Rush would be considered a large town where the guidelines indicate that development on outer suburban greenfield sites should not be less than 35 units per ha. The density is 37.7 units per ha. This has been calculated on the basis of a net site area of 3.444 hectares and excludes the crèche, east west link road and 2 primary open spaces. States that the site is located on the edge of a suburban town and the preferred typology is family homes which reflects the predominant character of the area. It is considered that apartments and townhouses are not viable at this location.
- All dwellings will meet or exceed the minimum standards for residential development. The principle design guidance of DMURS has been considered in the design. The development seeks to prioritise pedestrian and cyclists throughout.
- The provision of the crèche facility is in line with the guidance set out in the Guidelines for Planning Authorities on Childcare Facilities.
- Note that the principles of the now expired Kenure Rush LAP have been considered in the layout of the development, particularly in terms of connectivity and relationships with adjoining lands. The scheme also complies with the density targets identified in the LAP which ranged from 19 to 50 units per ha giving an average net residential density of 37 units per ha.
- Consider the development compliant with the zoning objective for the site and in accordance with relevant policies and objectives for residential development set out in the County Development Plan. With regard to objective PM38 of the plan which seeks to achieve an appropriate dwelling mix, size, type and tenure in all new residential development states that as Rush acts largely as a

suburban settlement of Dublin, the unit typology is considered entirely appropriate.

- The scheme is compliant with the standards set out in the County Plan regarding car parking, refuse storage and separation distances between dwellings. With regard to public open space, 10% open space is provided. Private open space requirements are met or exceeded. Facilities for children's play is provided.

## 7.0 Planning Authority Submission

7.1 A submission was received by An Bord Pleanála on the 18<sup>th</sup> April 2019 from Fingal County Council. The 'opinion' of the planning authority included, inter alia, the following:

- The development of the site for the uses proposed is acceptable in principle to the Planning Authority having regard to the role of the town in the core strategy of the Development Plan, its residential zoning and the ability of the site to assist in the consolidation of the town of Rush.
- The density proposed is considered acceptable taking into account the projected yield of residential land in Rush in the county core strategy and the positioning of the town in the settlement hierarchy of the County, the distance of the site from the town centre, the surrounding context and the nature of public transport in the vicinity.
- The east west link identified in the Development Plan is delivered in the site layout. The PA is supportive of the design of the street.
- There are concerns that the clustering of two bedroom units, which provide one parking space, could give rise to residents using the visitor parking spaces and that insufficient parking would then be available. The quantity of in curtilage parking spaces is at the lower end of what would be considered acceptable as the area is not well served by public transport.

- The location of the childcare facility is not considered appropriate owing to the proposed continuation of the link road in a westerly direction. The crèche, therefore, would be located on the corner of a T junction which is planned to become a 4 arm junction in the future, with likely increases in traffic flows. Insufficient drop off spaces have been provided and the number of staff car parking spaces exceeds the Development Plan standards. Parallel parking spaces or a one way circulatory system should be used to facilitate set down/drop off parking at the crèche.
- No drawings have been submitted to show new layout on Palmer Ave. Details of how a widened Palmer Avenue will tie in with Palmer Road to the north and with the existing road surfacing to the south should be clearly shown. Tighter corner radii should be incorporated at the access junctions at Palmer Ave and the signalised junction on the Skerries Road.
- Landscape Masterplan and Road Layout drawing should be consistent and show no grass verges obstructing access to in-curtilage parking spaces. Revised layout required to address the conflict at the proposed signal controlled junction on Skerries Road regarding the location of the bus stop. The developer shall agree in writing the timings/phasing of the signals at the proposed signal controlled junction with the Operations Department of Fingal Co. Co.
- Clarity required regarding the areas to be taken in charge particularly the set down parking spaces and staff car parking spaces at the crèche. Clarity also required regarding site access arrangements during the Construction Phase.
- The stone boundary wall along the Skerries Road adds character to the area and the PA consider it desirable to retain as much of the wall as possible. The entrance design should be re-examined to see if the extent of demolition of the wall can be reduced or if the road entrance can be redesigned to retain as much of the demesne wall as possible.
- Revised Flood Risk Assessment required to address potential flooding from the Kenure Stream.

- The drainage proposal should endeavour to incorporate a series of SUDS measures as opposed to a pipe network, attenuation basin etc. It is considered that this greenfield site is wholly suitable for using green infrastructure measures for drainage in place of the proposed attenuation underground tanking. Attenuation tanks are considered more problematic in terms of maintenance and provide little or no water quality or environmental benefits. Underground tanks and storage systems will not be accepted under public open space.
- The open space at the entrance to the estate from the Skerries Road has limited usability for children. It would be preferable if this area was reduced in size and the resulting area added to the larger areas of open space where it would be of more benefit to the wider community. Further consideration is required in relation to overlooking of the proposed POS 3 open space.
- In general, it is preferable that open space is not completely surrounded by roads, so that children can access the open space, where possible, without having to cross a road. Further consideration should be given to ascertain if this is achievable. Clarity required regarding the area of the playground and a facility of 520 sq. m. (min) is required.
- The layout/integration of the narrow strip of grass to the adjoining open space along St. Maur's Park is questionable. Two parallel roads with a narrow strip of open space between would appear to be unsustainable. ESB substation should be relocated.
- The dwellings within the proposal generally relate well with one another in terms of scale and design. Concern regarding unit 107 and that the dwelling may have an overbearing impact on the existing adjacent dwelling in Palmer's Court.
- A number of specific comments regarding the landscape proposals are raised including detail of boundary treatment, street trees etc. Tree survey required. Concern regarding preservation of existing Maritime Pine trees adjacent to the

Ladycove Estate. Details of public art should be provided.

## **Other Prescribed Bodies**

**Irish Water (09.04.2019):** Irish Water has issued a Confirmation of Feasibility for the development. The proposed development is a standard connection, requiring no network or treatment plant upgrades for water or wastewater by either the customer or Irish Water. No third party consents are required for these connection(s) to take place.

## **8.0 The Consultation Meeting**

8.1 A Section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 3<sup>rd</sup> May 2019, commencing at 10.30 AM. Representatives of the prospective applicant, the Planning Authority and An Bord Pleanála were in attendance. 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. Density: Having particular regard to the definition of net density set out in Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009.
2. Development Strategy for the site including:
  - Overall site layout, urban design and architectural approach particularly with regard to siting of crèche, design of central boulevard, car parking layout, treatment of urban edges and public realm, building height and housing mix/typology.
  - Landscaping proposals and open space provision, in particular connections to adjacent Palmer Court development.
3. Roads infrastructure, access and parking including wider pedestrian and cycle connections.
4. Childcare/ provision of crèche –scale, catchment, etc.

5. Surface Water Drainage and Flooding

6. Any other matters.

8.2 In relation to **Density** An Bord Pleanála sought further elaboration/discussion/consideration of the following: Density and compliance with the Residential Density Guidelines in the context of the definition of net density set out in Appendix A of the Guidelines and having regard to the character and location of this infill site on zoned serviced land in the hinterland area of the GDA.

8.3 In relation to the **Development Strategy** for the An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- The appropriateness of the overall layout, urban design and architectural approach and the need to create strong urban edges and appropriate public realm;
- The detailed design of the central boulevard including the treatment of parking layout and grass verge/cycle path.
- The proposed siting of the crèche facility.
- The need for greater height and density and better mix of housing types.
- The location and adequacy of open space provision in terms of providing sufficient recreational amenity and active passive surveillance. The need to create a better sense of enclosure around the public spaces.
- The proposed severance of the development from the existing open space area within the Palmer Court development which is within the applicant's control.
- The appropriateness of the housing mix and unit typology.

8.4 In relation to **Roads Infrastructure, Access and Parking**, An Bord Pleanála sought further elaboration/discussion/consideration of the following: works proposed to Palmer Avenue to facilitate future pedestrian and cyclist facilities and implementation of same; compliance of the scheme with DMURS; provision of car parking; access arrangements to the crèche; design of Skerries Road junction.

8.5 In relation to the **Crèche** facility, An Bord Pleanála sought further elaboration/discussion/consideration of the appropriateness of justification of its size having regard to the catchment demand.



- 8.6 In relation to **Surface Water Drainage and Flooding**, An Bord Pleanála sought further elaboration/discussion/consideration of the proposed surface water drainage measures and the adequacy of the Flood Risk Assessment.
- 8.7 In relation to any **Other Matters**, An Bord Pleanála sought further elaboration/discussion/consideration of the following: Land ownership/legal consent; unit mix and land use efficiency.
- 8.8 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 '303826' 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.

## 9.0 **Conclusion and Recommendation**

- 9.1 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.
- 9.2 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 s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.
- 9.3 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: density; housing mix and typology; overall layout, particularly in relation to treatment of public realm and urban edges; design of central east west street; layout of open space to provide for appropriate connections and wider pedestrian and cyclist connections which are set out in the Recommended Opinion below.
- 9.4 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.

9.5 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.

## 10.0 Recommended Opinion

10.1 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.

10.2 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.

10.3 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:

## **Density**

- 10.4 Further consideration of documents as they relate to density and compliance with the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) in the context of the definition of net density as set out in Appendix A of the Guidelines. Particular regard should be had to the need to develop the site at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage having regard to the character and location of this infill site on zoned serviced land in the hinterland area of the GDA and given its proximity to established social and community services in the area. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

## **Architectural Approach and Overall Layout**

- 10.5 Further consideration of documents as they relate to the development strategy for the site, in particular the architectural approach and overall layout of the proposed development in relation to:

- The overall design approach to the site to ensure that:
  - the development appropriately responds to the sites context including that the need to create strong urban edges and an appropriate public realm having regard to the extent of road frontages abutting the site;
  - that an appropriate range of housing typologies and mix is provided, a high quality living environment created and that a development of sufficient scale and height is promoted;
  - that the central boulevard is appropriately designed to ensure no conflict between pedestrians, parking and vehicular movements;
  - that the crèche is appropriately located having regard to appropriate parking and set down arrangements.
- The configuration of the layout particularly as it relates to the creation of a hierarchy of high quality, functional and amenable public open spaces with maximum surveillance, appropriate enclosure, children's play, amenity and pedestrian connectivity should be given further consideration. Particular regard should be had to ensure that the open space is appropriately connected, particularly in relation to adjacent developments.

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

### **Roads Infrastructure, Access and Parking**

10.6 Further consideration of documents as they relate to road infrastructure and parking particularly in relation to:

- The extent of works to be undertaken to Palmers Avenue including provision of footpaths, cycle paths, public lighting and future tie in works with existing and proposed road infrastructure.
- The design of the junction with the Skerries Road having regard to the conservation importance of the existing boundary wall.
- Access, parking and set down arrangements for the crèche.
- Compliance with DMURS particularly with regard to off street parking and street enclosure.
- The provision of adequate cycle parking including visitor cycle parking.

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

### **Surface Water Drainage and Flooding**

10.7 Further consideration of documents as they relate to surface water drainage and flooding particularly in relation to:

- The proposed measures to incorporate SuDS such as swales, integrated tree pits, bio retention areas etc.
- The requirement to consider potential flood risk associated with the Kenure Stream.

10.8 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 detailed report outlining the proposed works to be undertaken to Palmers Avenue in terms of pedestrian and cycle facilities, public lighting and any road upgrade works necessary to facilitate the development and provide for

appropriate connections to the wider area. The report should also detail who is going to undertake the works required and the timelines involved relative to the construction and completion of the proposed development. Details of areas to be taken in charge should be detailed.

2. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, landscaped areas, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long term management and maintenance of the proposed development.
  3. Photomontages/CGI's to include views of the development when viewed from within the scheme along the central boulevard and externally from Palmers Road, Palmers Avenue, Skerries Road and St. Maur's Park.
  4. A report prepared by a suitably qualified and competent person demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets.
  5. Landscaping proposals including and overall landscape masterplan for the development site including detail of tree planting, quantity, type and location of all proposed hard and soft landscaping including details of play equipment, public lighting, pedestrian and vehicular entrances and boundary treatments. The landscape plan should specifically detail how material from the demesne wall will be salvaged and re-used in the landscaping proposals.
  6. Childcare demand analysis and the likely demand for childcare places resulting from the proposed development.
- 10.9 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. Transport Infrastructure Ireland
2. National Transport Authority
3. Minister for Culture, Heritage and the Gaeltacht
4. Heritage Council
5. An Taisce — the National Trust for Ireland
6. Irish Water
7. Fingal County Childcare Committee

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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**Erika Casey**  
**Senior Planning Inspector**

**17th May 2019**