



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-304820-19

Strategic Housing Development

257 residential units, a new neighbourhood village centre providing c. 1,308 sq. m. of retail, medical centre (c. 225 sq. m.), community centre (c. 61 sq. m.) and crèche (c.481 sq. m.), a number of new public spaces, provision of link roads through the site from Enniskerry Road connecting to the proposed Glenamuck Link Distributor Road, car and cycle parking, all associated site development works, landscaping, boundary treatments and services provision.

Location

Former Wayside Celtic Football Club Sports Grounds and Adjoining Lands, Enniskerry Road & Glenamuck Road, Kiltiernan. Co. Dublin.

Planning Authority	Dun Laoghaire Rathdown County Council
Prospective Applicant	Ken Fennell as Receiver over Certain Assets of The Carrickmines Partnership
Date of Consultation Meeting	13 th of August 2019
Date of Site Inspection	9th August 2019
Inspector	Erika Casey

Introduction

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

The applicant previously submitted a consultation request under Section 5 (5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 for this landholding. The Opinion of the Board was issued on the 22nd of October 2018 – ABP Reference 302409-18. It is detailed by the applicant that the proposal did not progress to a SHD planning application due to legal issues. The current application relates to an alternative Phase 1 proposal with an amended red line boundary.

Site Location and Description

The site is located in Kiltiernan Village, Co. Dublin c. 15km to the south of Dublin City Centre. It comprises the former grounds of Wayside Celtic F.C. and is currently in use as playing fields. It has a stated area of 8.4 ha. It has frontages to the Enniskerry Road to the west and the Glenamuck Road to the north. There are adjoining lands to the immediate north, north east and south west as well as to the east of the proposed Glenamuck Link Distributor Road frontage that are also under the control of the applicant. The application form states that other lands at the site are in the ownership of Dun Laoghaire Rathdown County Council (DLRCC) and Cairn Homes. Letters of consent are provided.

The site slopes upwards from north west to south east. ESB lines traverse the eastern part of the site, adjacent to the route of the Glenamuck Link Distributor Road (GLDR). There is a tree belt including a hedgerow along a field boundary in the centre of the site and also several significant tree stands at the north-eastern corner at the boundary of Rockville House (a protected structure).

The site is served by the no.s 63 and 44 bus routes. The Ballyogan Wood Luas stop and the M50 are located c. 2 km from the site. The site is also within 2km of Stepside Village and c. 2km from the park development at Carrickmines.

The site is bound as follows:

- Glenamuck Road to the north. Permission has recently been granted for Part VIII works at the Glenamuck Road and Golden Ball junction.
- Adjoining site to the to the north west at the Golden Ball crossroads, outside the control of the applicant, which is currently occupied by a coal yard and the Kiltiernan Country Market. These lands are zoned for residential development.
- Rockville House protected structure, with associated gated lodge, outbuildings and grounds to the north east (RPS Ref: 1790), currently under development.
- Greenfield lands zoned for development to the east, south east and south west. The indicative route of the GLDR, which bisects adjoining lands under the applicant’s control is located to the east. This area is also traversed by a 220kv electricity line.
- Enniskerry Road to the west. Our Lady of the Wayside Church, a protected structure, is across the road from the site (RPS: 1802).

Proposed Strategic Housing Development

The proposed development involves 257 no. residential units as follows:

UNIT TYPE	NO. OF UNITS	%	GROSS FLOOR SPACE M ²
Houses			
3 bed	46	18%	8,273
4 bed	80	31%	6,005
Apartments			
1 bed	13	5%	756
2 bed	73	28.5%	6,336
3 bed	45	17.5%	5,522
TOTAL	257	100	26,892

3.2 The development has a stated net residential density of 45.5 units/ha, based on a net site area of 5.65 ha, excluding the area required for provision of surface water outfall through the Phase 2 portion of the landholding along Glenamuck Road and the third party lands; the link road through the site from the Enniskerry Road to the Glenamuck Link Distributor Road; the Village Green designated in the Kiltiernan LAP as a Civic Space; the Dingle Way designated a public walkway in the LAP; the area underneath the ESB powerlines and the landscape strip along the Enniskerry Road. The gross density is stated to be 31 units per ha.

3.3 The scheme also includes:

- A new neighbourhood village centre providing c. 1,308 sq. m. of retail floorspace within 3 units, including an anchor unit of 1,000 sq. m.
- A medical centre (c. 225 sq. metres).
- Community Centre (c. 67 sq. metres).
- Crèche (c.481 sq. metres).
- ESB substations of 32 sq. metres.
- New public spaces including Village Green and Dingle Way.
- Provision of link roads through the site from Enniskerry Road connecting to the proposed Glenamuck Link Distributor Road (GLDR).
- Car and cycle parking.
- Bin stores.
- All associated site development works, landscaping, boundary treatments and services provision.

3.4 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). However, the entire landholding is greater than the 10 ha threshold, including a Phase 2 application for adjoining lands that is to be progressed in the future. A sub-threshold EIAR is to be submitted, to address issues of cumulative impacts.

Planning History

Development Site

ABP/SHD/372/17/ABP 302409-18

- 4.1 Consultation request under Section (5) of the Planning and Development (Housing) and Residential Act 2016 for a Phase 1 development comprising 279 residential units (118 houses, 161 apartments/duplex) and a neighbourhood centre.

PL06D.236630/D09A/0471

- 4.2 Permission sought by the Carrickmines Partnership for a mixed use development on a site of c. 5.97 hectares, comprising 161 no. residential units, 4 no. retail units, 10 no. office units and 1 no. crèche. The residential element of the scheme comprised 88 no. houses, 35 no. apartment units and 38 no. duplex units. The commercial element comprised 4 no. retail units; 10 no. office units and a crèche. Access via 2 no. vehicular access points off Enniskerry Road and Glenamuck Road, also access to Rockville and to lands to the south-east of the site via proposed new internal access roads.
- 4.3 The application was refused by DLRCC for 4 no. reasons relating to (1) contravention of LAP objectives to retain tree lines and hedgerow at the site; inadequate development of the 'Dingle Way' and excessive tree removal; serious deficiency in usable recreational open space and substandard landscaping proposals (2) the design, finishes and the sense of place created by the development did not accord with the vision of Kiltiernan as set out in the LAP (3) the proposed masterplan submitted materially contravened the internal roads layout, access to adjoining lands and pedestrian cyclist connectivity as set out in the LAP and the Kiltiernan Neighbourhood Framework Plan, 2010 (4) no provision for childcare facilities, contrary to the LAP and to the Guidelines for Planning Authorities on Sustainable Residential Developments in Urban Areas, 2009. The Board refused for the following reason:

"Having regard to the existing features of the site, which include a substantial quantity of mature trees and hedgerow, and having regard to the layout indicated in the 2010 Kiltiernan Neighbourhood Framework Plan, which includes the retention of these trees, it is considered that the layout as proposed, including extensive removal

of viable trees and hedgerow to the east of Enniskerry Road and continuous car parking to the front of the residential units, would fail to have adequate regard to the framework plan, would seriously injure the amenities of the area and of future occupants and would, therefore, be contrary to the proper planning and sustainable development of the area.”

In the Vicinity

D17A/0793 and D18A/0566 - Adjacent site to the North East (Rockville House)

- 4.4 D17A/0793 related to a 2.22 ha site to the north east, fronting onto the Glenamuck Road, immediately adjoining the subject site. The site comprised Rockville House, a protected structure, and the associated gate lodge and other structures and adjoining lands. Permission sought by Frederick Jackson for demolition of existing agricultural outbuilding, retention of Rockville House and gate lodge as 2 no. separate dwellings, also retention of an associated walled garden as public open space; 49 no. dwellings consisting of 37 no. detached, semi-detached and terraced 2/3 storey houses and 12 no. apartments in 1 no. 4 storey apartment block; new vehicular access from Glenamuck Road South and retention and re-use of existing vehicular access to Rockville House and gate lodge for pedestrian and cyclist use; upgrades to Glenamuck Road including new footpath, resurfacing of the carriageway and public lighting. Described as the first phase of development on the residential zoned lands at Rockville House. Permission granted subject to conditions, none of which required any substantial amendments to the proposed scheme.
- 4.5 D18A/0566. Permission granted to Goodrock Project Management Ltd. for 6 no. 4 bed dwellings on a site to the immediate south of D17A/0793, to be accessed from the permitted local road within D17A/0793.

ABP-300731-18 - Site to the Northwest at Glenamuck Road

- 4.6 Relating to a 4.5 ha site on the northern side of the Glenamuck Road, opposite the subject site. Permission sought by Declan Taite and Anne O’ Dwyer, Joint Statutory Receivers to Certain Assets of Michael Doran and Martin Doran for 141 no. residential units (98 no. houses and 43 no. apartments / duplexes), crèche and link access road between Enniskerry Road and Glenamuck Road.
- 4.7 The Board refused permission on 26th April 2018 for the following 4 reasons:

1. *Kiltiernan has been designated as a 'Future Development Area' in the Core Strategy set out in the Dun Laoghaire Rathdown County Development Plan 2016-2022. Furthermore, the County Development Plan includes a specific objective for a proposed quality bus/bus priority route running along the Glenamuck Road to the east of the site. In addition, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) indicate that residential densities within existing or planned public transport corridors should be a minimum of 50 units per hectare, but with a provision that minimum net densities can be specified in Local Area Plans. In this regard, the Kiltiernan Glenamuck Local Area Plan 2013 specifies that minimum net densities of 40 – 45 units per hectare should apply to the subject site and adjoining lands. The site of the proposed development is on serviceable lands, within the development boundary of Kiltiernan, in an area earmarked for residential development with access to existing and planned public transport. Having regard to the proposed density of development, it is considered that the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to Dublin City and to the established social and community services in the immediate vicinity, and would not conform to the minimum densities required in the Local Area Plan and the Guidelines. Furthermore, it is considered that the proposed development does not provide for an appropriate mix of dwelling types, being predominantly semi-detached housing, to comply with the overall provisions set out in the County Development Plan. The proposed development would, therefore, be contrary to the provisions of the County Development Plan, Local Area Plan and to these Ministerial Guidelines, and would be contrary to the proper planning and sustainable development of the area.*
2. *The Board is not satisfied, on the basis of the documentation submitted with the application, both in the drawings and accompanying report, that the information received is appropriately referenced, sufficiently detailed and supported by site specific investigations, in order to facilitate a comprehensive examination of the storm water proposals for the proposed development. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

3. *The proposed layout would result in a substandard level of pedestrian/cycle connection, particularly to the lands to the east / north-east of the application site. This lack of connectivity would be contrary to the principles espoused by the Design Manual for Road and Streets (2013) and the Urban Design Manual, a companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) which includes 'Connections' as one of the 12 criteria for the design of residential development. The proposed development would fail to provide for the necessary integration and permeability between different sections of the overall development area as set out in the Local Area Plan, and would be contrary to national policy guidance, and would, therefore, be contrary to the proper planning and sustainable development of the area.*
4. *Having regard to the location and height of the proposed houses, crèche/duplex block and apartments in close proximity to the adjoining residential property to the north (Shaldon Lodge), it is considered that the proposed development would seriously injure the residential amenities of this residential dwelling, by reason of its overbearing impact and by reason of overlooking, particularly from the terraces and balconies in the proposed development's most proximate duplex unit and apartments. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

Planning Authority Reference D18A/0940/ABP PL06S.303324

- 4.8 Permission refused by Dun Laoghaire Rathdown County Council for Phase 2B residential development on a site located to the south east of Phase 1 residential development permitted under Reg. Ref. D17A/0793 at Rockville House, Glenamuck Road South. The development relates to a 4 storey apartment block comprising 57 residential units. Reasons for refusal related to prematurity pending the determination of the PA of the GLDR; under provision of a childcare facility; having regard to the car dominated layout of the development, the provision of open space within the restriction corridor of the 220 Kv electricity line and the lack of own door units, it was considered the development would fail to provide an adequate sense of place. The application was appealed to the Board and was refused on the 7th of May 2019.

4.9 The reason for refusal stated:

“Having regard to the Dun Laoghaire-Rathdown County Development Plan 2016-2022 and the Kiltiernan Glenamuck Local Area Plan 2013, and to the objective to provide a Glenamuck Link Distributor Road, it is considered that the proposed development would be premature pending the determination by the planning authority of the road layout for the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

An Bord Pleanála Reference 303978-19 – Lands to the north of Glenamuck Road

- 4.10 Permission granted by the Board in June 2019 for a development comprising 30 no. houses and 173 no. apartments, a crèche with a floor area of 480 sq. metres, a retail unit with a floor area of c. 83.5 sq. metres, a social/amenity facility with a floor area of c. 299.4 sq. metres with all associated site works at Glenamuck Road South.

An Bord Pleanála reference PL06D.303945 and PL06D. 304174

- 4.11 A Part 10 application for the Glenamuck District Distributor Road Scheme (GDDRS) is currently before the Board – application reference PL06D.303945. A Compulsory Purchase Order for the acquisition of the necessary land to construct the GDRS is also before the Board – PL06D. 304174. Both are due for decision and confirmation on the 18th September 2019. The GDRS will provide for:

- The construction of the Glenamuck District Distributor Road (GDDR) connecting the existing R117 Enniskerry Road with the Glenamuck Road East/Golf Lane Roundabout (c. 890m of four lane dual carriageway and c. 660 metres of two lane single carriageway road.)
- The construction of the Glenamuck Link Distributor Road (GLDR) (c. 1,800m of two lane single carriageway road) connecting the new District Distributor Road (GDDR) to the R117 south of Kiltiernan, including junctions with Glenamuck Road, Ballycorus Road and Barnaslingan Lane.
- Associated site development and landscaping works.

National and Local Planning Policy

Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant 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’, as updated March 2018.
- ‘Design Manual for Urban Roads and Streets’.
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’).
- ‘Childcare Facilities Guidelines for Planning Authorities’.
- ‘Urban Development and Building Heights – Guidelines for Planning Authorities’, 2018.

Dun Laoghaire Rathdown County Development Plan 2016-2022

Kiltiernan is designated as a ‘future development area’ in the Core Strategy as outlined in Figure 1.1 of the Plan (Core Strategy Map) and is within the Metropolitan Area of the county. Development Plan section 1.3.4.2 sets out the basis for the Kiltiernan – Glenamuck LAP. It is anticipated that the plan area will ultimately accommodate c. 2,500-3,000 residential units, a neighbourhood centre, two tranches of public open space and a large employment node adjacent to the established mixed-use development at The Park, Carrickmines. The key elements of the overall planning framework for the area includes the proposal to provide a bypass road of the Village Core of Kiltiernan, the implementation of a Neighbourhood Framework Plan to consolidate the Village Core, the graduation of residential densities from higher densities adjacent to the Luas line to lower densities further removed from this main public transport artery and the implementation of a centrally located major public open space / school site.

The northern section of the development site is zoned 'Objective A' in the development plan, *'to protect and/or improve residential amenity'*. Residential development is 'permitted in principle' under this zoning objective while childcare service is 'open for consideration'. The lands at the Enniskerry Road frontage on the western side of the site are zoned 'Objective NC', *'To protect, provide for and-or improve mixed-use neighbourhood centre facilities'*. The uses 'community facility', 'childcare service', 'Doctor / Dentist', 'Health Centre / Healthcare Facility', 'Residential', 'Open space', 'Shop specialist', 'Shop neighbourhood', 'Shop District' are all permitted in principle.

There is a proposed quality bus / bus priority route running along the Glenamuck Road and the Enniskerry Road. In addition, there are six year road upgrade proposals on the Enniskerry and Glenamuck Roads. The site is subject to Specific Local Objective (SLO) 40 *'To implement and develop the lands at Kiltiernan / Glenamuck in accordance with the Kiltiernan / Glenamuck Local Area Plan'*. There are two protected structures in the vicinity of the site, i.e. Rockville Lodge (RPS: 1790) to the immediate north east and Our Lady of the Wayside Church (RPS: 1802) on the western side of the Enniskerry Road.

Kiltiernan Glenamuck LAP 2013 – 2023

The overall strategy for the LAP lands reflects that of the County Development Plan, based on the roads improvement objectives for the Glenamuck District Distributor Road (GDDR) and the Glenamuck Link Distributor Road (GLDR) to bypass Kiltiernan Village, facilitating the development of the village centre and a new civic node. The LAP also provides for some upgrading of the existing Glenamuck Road to provide pedestrian and cycle facilities and the upgrading of the Enniskerry Road to a traffic calmed street to function as part of the neighbourhood centre. There is a Section 49 Supplementary Development Contribution Scheme for the GDDR, which also includes as a separate infrastructure project of Regional Surface Water Attenuation Ponds that are required to effect the SUDS drainage scheme for the new roads and the development lands within the LAP area.

The LAP also provides for some upgrading of the existing Glenamuck Road to provide pedestrian and cycle facilities and the upgrading of the Enniskerry Road to a traffic calmed street to function as part of the neighbourhood centre. Section 2.2 of the plan

sets out a broad framework and principles of development including objectives RE01-RE09 relating to residential development and which includes RE03 which seeks to facilitate the provision of appropriate densities and a mixture of dwelling types and tenures taking into account proximity to public transport corridors, site topography, sites of archaeological interest/protected structures and natural features.

Section 10 of the LAP sets out the phasing requirements and details that up to 700 dwelling units can be accommodated on an existing upgraded road network, in advance of the GDDR scheme, as Phase 1. LAP section 10.6 sets out 13 criteria to be considered in the case of developments in advance of that scheme, with the following locations to be considered as part of Phase 1:

Phase 1(a) to comprise c. 350 dwelling units:

- A. Glenamuck Road Upper / North Portion (c. 200 dwelling units). Lands designated as 'medium / higher density residential' at the northern section of Glenamuck Road.
- B. Node at junction of Enniskerry and Glenamuck Roads (c. 150 dwelling units). This area includes the lands designated as 'medium density residential' to the east of Enniskerry Road. Any proposed developments must include the improvement of the Glenamuck Road.

In relation to surface water attenuation the following is noted:

"In advance of the construction of the Regional Surface Water Attenuation Ponds it will be necessary to incorporate stringent Sustainable Drainage Systems (SUDS) measures on each development site. In particular for all sites whose site plan area is greater than 0.5 hectares (ha) or where the number of residential units proposed exceeds twenty (20) or whose proposed commercial area exceeds 500 square metres it is proposed to require the preparation of Stormwater Impact Assessments and Stormwater Audits."

Phase 1(b) to comprise c. 350 dwelling units:

- C. Concentrated at village core / along Enniskerry Road. Including lands zoned as 'neighbourhood centre' and 'residential' along the Enniskerry Road. Development is dependent on delivery of a traffic calming scheme and must include the improvement of the Enniskerry Road through the 'village core'.

The site is within Phase 1(a) B as per the LAP phasing map.

5.3.4 The 13 planning criteria to be used in the assessment of planning applications up to 700 dwellings are as follows:

- 1. Conformity with the Kiltiernan / Glenamuck Local Area Plan, 2013-2019, and which promote and facilitate the achievement of its vision and objectives.*
- 2. Demonstration of a high level of architectural quality and urban design and are sympathetic to the special character of Kiltiernan / Glenamuck.*
- 3. Achievement of local road / footpath improvement and traffic management measures.*
- 4. Consolidation of the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines.*
- 5. Consolidation of Kiltiernan Village.*
- 6. Planned within the context of an overall outline Master Plan for individual and affiliated land holdings (in order to prevent piecemeal development).*
- 7. Compatibility with later phases of development.*
- 8. Facilitation of the orderly development of adjoining property/land holdings.*
- 9. Proximity to the Luas Line B1 and within the catchment area for the Section 49 Supplementary Development Contribution Scheme for Luas Line B1.*
- 10. Availability of environmental services. Specifically, the Council will monitor and have regard to capacity at the Shanganagh Wastewater Treatment Works to ensure that wastewater from any proposed development in the LAP area can be accommodated in accordance with the Wastewater Discharge License for the Works.*
- 11. Incorporation of acceptable Sustainable Drainage System (SUDS) measures on each development site.*
- 12. Likelihood of early construction.*
- 13. Provision of an appropriate level of active and passive open space and community facilities. Specifically, the Council, in conjunction with the Department of Education and Skills, will have regard to the capacity of local schools to*

accommodate development, in accordance with the “Code of Practice on the Provision of Schools and the Planning System”.

5.3.5 The Transportation Department (on foot of the conclusions of the Part 8 Council Enniskerry Road/Glenamuck Road Junction Upgrade Part 8 Environmental Report Volume 1 (May 2017)) have stated that the number of units that can be accommodated within Phase 1 has been increased from 700 units up to 1,050 units.

5.3.6 The LAP map indicates the development site as land parcel 20a at the northern part of the site fronting the Glenamuck Road and parcel 22 at the Enniskerry Road frontage. The following objectives for land parcel 20a are noted:

- Objective A residential development – apartments, duplex, terrace / courtyard units. Neighbourhood uses to be located within the NC zoning.
- LAP Table 4.1 indicates that land parcels 20a and 20b have a combined net area of 10 ha, to be developed as medium density residential, i.e. 40-45 units/ha, a total of 400-450 units for both sites.
- LAP section 7.1.2 states that the open space to be provided in conjunction with land parcel no. 20a (and land parcels 5a and 2) will require to be provided in a manner that facilitates the objective to provide a green way link connecting the future amenity facility being developed at the former landfill site to the primary neighbourhood centre. LAP section 7.1.4 states that extensive tree planting should be undertaken along the western side of the GLDR abutting land parcels no. 20a and 26a to provide a green screen for the Kiltiernan village core.
- Building height of 2-4 storeys with 4 storey elements at locations on road frontages, adjacent to NC.
- Development abutting the NC zoning objective to complement design.
- To incorporate an element of granite.
- Development to have regard for the protected structure ‘Rockville’ and its associated curtilage.

- Importance of pedestrian and cycle permeability between lands to the east through 20a to the NC use to the east and then across Enniskerry Road to the education and other community uses to the west.
- Land parcel 20a is within Phase B as set out above.

5.3.7 The following objectives for parcel 22 are noted:

- LAP Section 2.2.2. Land parcel no. 22 is to function as the only Neighbourhood Centre / primary centre / civic core for the LAP area.
- Integrated design for neighbourhood centre. Could include residential (1/3), commercial/office (1/3) and retail. Office use to include doctors and dentists. Could potentially include community facilities, e.g. a post office, a cultural facility. To include an anchor retail facility, must be appropriately integrated into the development. Local facilities, i.e. not businesses that 'attract' outside business.
- To be focussed on a new civic space that will become the heart of Kiltiernan village, which includes an appropriate water feature, sculpture or the like in the central civic space. Potential for accommodating an open air/partially covered market in the central plaza area – Kiltiernan Country Market. Importance of permeability through plaza area from north-east to south-west. Accommodation for community meeting facilities to be provided at the neighbourhood centre, also provision for a MUGA facility.
- Objective NC01:
“To provide of an appropriate mix of residential/commercial/ retail/ community services development in the new neighbourhood centres to ensure a high quality and attractive civic environment, a sense of both place and vitality, and which optimises access to public transport corridors.”
 Objectives NC02, NC03 and NC04 also apply.
 - Residential density of 40-45 units/ha.
 - Height 2-4 storeys.

- Building materials to incorporate an element of granite. Architectural style can be contemporary but including ‘vernacular’ elements. No ‘themed’ development.
- Needs to include recycling facilities.
- Parking facilities to be undergrounded or peripheral and/or placed to the ‘rear’.
- Land parcel no. 22 is within Phase C as set out above, to include the village core and dependent on the delivery of traffic calming along the Enniskerry Road.

5.3.8 The LAP map also indicates an avenue of trees along the western side of the GLDR, close to the development site. There is a restriction corridor associated with the 220 Kv route across the site.

5.3.9 LAP objective RE03 provides:

“To facilitate the provision of appropriate residential densities and a mixture of dwelling units, types and tenures taking into account proximity to public transport corridors, site topography, sites of archaeological interest / protected structures and natural features.”

5.3.10 LAP Table 4.1 provides for a total of 2,600 – 3,000 new residential units. Land Parcel 20a and 20b is allocated 400 – 450 units at a density of 40-45 units / ha. There is no allocation of residential units for land parcel 22. LAP section 4.8 sets out design guidance for residential development. The LAP Building Heights Map indicates 2-4 storeys for the entire development site. The LAP envisages 3 bands of residential density, i.e. a band of higher density proximate to the Luas catchment (45-55 units/ha), a medium density band further from the Luas catchment but close to the village core (40-45 units/ha) and the lowest density band west of Enniskerry Road and south of Ballychorus Road (35-40 units/ha). LAP objective 4.3 requires 20% of all dwelling units in new developments to be provided as social / affordable units.

5.3.11 LAP chapter 5 includes the following movement and transportation objectives in addition to those mentioned above:

- The existing Enniskerry Road and Glenamuck Road are to be the main public transport routes for the area with a new bus gate where the Enniskerry Road

joins with the extended GLDR. Only public transport vehicles, cyclists and pedestrians are to be allowed access to and from Kiltiernan Village from the Enniskerry Road at the bus gate. All other vehicles will not be allowed to make this movement. Another bus gate at the junction of the Glenamuck Road and the GLDR, to the east of the development site.

- Traffic improvements proposed for the portion of (traffic calmed) Enniskerry Road aligned through the Kiltiernan Village Core, from The Church of Ireland Parish site to the north to the Enniskerry/Ballybetagh Road junction to include provisions for cyclists and pedestrians. Upgrading of the section of Enniskerry Road that traverses the Kiltiernan civic node, to take the form of setting back developments to create widened pavements to encourage 'lively streets', the upgrading of footpaths and the installation of traffic calming measures including surface treatment of the roadway at selected pedestrian crossing points. In order to further discourage through traffic via this section of road, other further positive measures including restrictions may be required to achieve this objective.
- Indicative Green Way Link linking the future amenity facility on the remediated Ballyogan landfill site via the Wayside Celtic recreation facility to the primary Neighbourhood Centre east of Enniskerry Road to incorporate a walkway / cycleway, i.e. traversing the development site between Enniskerry Road and the GLDR route.
- Parking provision for the Primary Neighbourhood Centre shall preferably be underground.

5.4 Kiltiernan Neighbourhood Framework Plan

5.4.1 This is incorporated as an appendix of the current LAP. The framework plan sets out masterplan provisions with regard to block structure, use mix, architectural style and materials. The following points are noted in relation to the site and its immediate surroundings:

- Central crossroads node at the neighbourhood centre / village green / civic plaza.

- Community centre at the Enniskerry Road frontage, to the immediate north of the neighbourhood centre. Also stone wall and 'green edge' with trees at this location.
- Residential development of detached dwellings at the Glenamuck Road frontage. Courtyard terraced houses and apartments on the eastern side of the site. Courtyard and terraced houses at the Enniskerry Road side of the site and to the east (rear) of the neighbourhood centre. Retail, office/commercial, community services and residential buildings at the neighbourhood centre.
- Public open space / village green at the Enniskerry Road frontage, similar to The Crescent at Tyrrellspass or Sandymount.
- Maintain the scale and height of existing development along Enniskerry Road. Direct higher and denser development away from the road edge, deeper into the zoned development lands.
- Network of pedestrian and cycle connections between the Enniskerry Road and the GLDR, also secondary vehicular routes.
- 'Dingle Way' pedestrian / cycle route between the Enniskerry Road and the GLDR. As many trees as possible to be retained along the route.

5.5 Enniskerry Road / Glenamuck Road Part VIII Scheme

5.5.1 The Part VIII scheme relates to the Enniskerry Road / Glenamuck Road (Golden Ball) junction. It extends to the entrance to Rockville on the Glenamuck Road, including the development site frontage and for c. 100m on either side of the junction on the Enniskerry Road. The scheme involves the following:

- Widening of both sides of the Glenamuck Road to allow for the provision of left and right turning lanes, cycle lanes and footpath approaching the Golden Ball junction. Also removal of a 'pinch pint' at Cromlech Close.
- The existing grassed site slope at the development site frontage to the Glenamuck Road will be retained.
- General upgrading of the Golden Ball junction to provide improved pedestrian and cycle facilities.

- Provision of a new right turning lane on the Enniskerry Road at the southern approach to the Golden Ball junction with a new frontage to the Kiltiernan Country Market at the eastern side of the road.
- Improved pedestrian crossings incorporated within signalised junction including new crossings on the northern and western sides of Enniskerry Road.
- Upgraded public lighting.
- The scheme does not include any works to the Enniskerry Road frontage of the development site.

Part VIII approval was granted at a meeting of Dun Laoghaire Rathdown County Council on 11th September 2017.

Forming of the Opinion

6.1 Introduction

6.1.1 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; Planning and Environmental Report; Statement of Consistency; Area Schedule; Accommodation Schedule; Parking Schedule; Residential Quality Audit; Design Statement; Site Layout Plan; Details of Proposed House Types, Floor Plans, Elevations and Sections; Apartment Block Floor Plans, Elevations and Sections; Duplex Units Floor Plans, Elevations and Sections; Neighbourhood Centre Plans; Phasing Plan; Masterplan; Public Open Space Diagram; Taking in Charge Layout; Character Areas; Previous Scheme; Roads

Details; Foul and Surface Water Drainage Details; Site Specific Flood Risk Assessment; Drainage and Water Infrastructure Engineering Report; Transport Statement and DMURS Statement; Landscaping Masterplan and Associated Drawings including Rationale Booklet; Tree Survey/Constraints Plan; Ecological Impact Assessment; AA screening Report; Bat Assessment; Badger Assessment; Archaeology Assessment Report; Part V proposals; Letters of Consent from Relevant Landowners.

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 the 26th of July 2019. The Planning Authority's 'opinion' included the following matters.

PA Comment on Principle of Development

- Having regard to the development plan core strategy, the zoning of the lands and the provisions of the Kiltiernan LAP, the proposed development is acceptable in principle.
- The Planning Authority welcomes the proposed retail units, medical centre and crèche use of lands within parcel 22 and emphasises that this node will be the only neighbourhood centre within the Kiltiernan / Glenamuck area. The proposed retail and commercial uses relate to the provision of local services to

the population of Kiltiernan. The development is in accordance with the definition of a neighbourhood centre in the Retail Planning Guidelines.

- The scale of the retail units (anchor store of 1,000 sq. m., and retail units of 102 sq. m. and 206 sq. m.) is welcome and appropriate with regard to development plan policies RET 3 Retail Hierarchy, RET 6 Neighbourhood Centre and RET 7 Convenience Shops. The anchor store aligns with the LAP provisions for land parcel 22.
- The crèche is welcome. It will support the vitality and viability of the neighbourhood centre. The applicant should consider if the crèche is of sufficient scale to serve future phases of development. State that it is the opinion of the PA that a larger childcare facility would be preferable. No childcare demand analysis has been provided.
- Applicant requested to address the issue of primary school capacity in the area.
- Medical centre smaller than a typical primary care centre.
- The provision of further retail or commercial space would be welcomed by the planning authority having regard to (i) the scale of residential development envisaged in the LAP and (ii) the LAP provisions for land parcel 22 and (iii) the related provisions of the Framework Plan. The applicant is requested to provide a breakdown of floorspace within the portion of lands zoned NC to enable the PA to assess whether the balance of uses aligns with the proportions envisaged in the LAP.
- The PA consider that the proposed community centre (67 sq. m.) is not sufficiently sized to serve the proposed population and the location is not optimal.
- Refers to LAP provisions on robustness, i.e. the possible conversion of residential units adjacent to the village green to retail / commercial units if the need arises. Also provisions around adaptability in the Urban Design Manual with the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' and 2018 Apartment Guidelines.

- Welcomes the reference to the farm complex to the south as being capable of accommodating further retail/retail services development with pedestrian linkages.
- Proposed houses to Cell 2 overlooking the village square and green and the flank wall to the neighbourhood centre could be reconfigured to (i) remain between 9-12m in depth; (ii) be reconsidered in terms of internal layouts, structural engineering and elevations so that they could be converted into commercial / retail floorspace at ground level and a self-contained dwelling unit above. Note that the floor to ceiling heights at ground floor level are 3.5 metres.
- Applicant may wish to consider the use of a framed structural system to permit flexibility in this regard. Three storey structure may also be considered along this frontage overlooking the village green as part of the place making strategy, signalling the approach and entry into the village core.

PA Comment on Residential Density, Building Heights, Site Layout and Urban Design

- The Planning Authority agrees to applicant's calculation of net residential density. The development has a density of 45.5 units per ha which exceeds the LAP maxima by 0.5 units per ha. It is considered that this level of exceedance is acceptable.
- The proposed heights comply with the LAP maxima (2-4 storeys) for these land parcels.
- Generally satisfied with the site layout. Addresses the previous ABP refusal reason with regard to the retention of mature tree belts and hedgerows. Applicant to meet the requirements of the Parks and Landscape Report.
- Mix of unit types achieves a good balance.
- Village green compliant with the LAP and has the potential to offer opportunities for play and for occasional use as an outdoor market.
- Suggested changes to improve overall quality of the development and its compliance with the policy framework for the area:

- Omission of surface car parking at the village green. There is sufficient scope to provide car parking in the basement. Favour a reduction in the area of hardstanding.
- Welcome the provision of the stone faced boundary wall. Would welcome the provision of pedestrian gates at regular intervals.
- Consider a high order play areas should be provided in the village green and also age-friendly public seating.
- Enniskerry Road traffic calming and green edge. It is planned that traffic calming works will be carried out along the Enniskerry Road bookended by the existing primary schools. PA request the applicant provide cross sections of the Enniskerry Road to show the potential relationship between the prospective dwelling houses in cell 1 and cell 2 that front onto the Enniskerry Road and the road itself to ensure compliance with LAP objectives MTO 6 and 7. Concern that the dwellings are not sufficiently set back. Consider increasing separation distance between houses and public road and introduce internal path and planting.
- Concern regarding lack of passive surveillance over the Dingle Way from duplex blocks C, D and E. May wish to consider providing an additional retail/retail service unit opening onto the Dingle Way sited between the crèche and the anchor unit to provide a continuous building line.
- Changes to the design of the NC welcomed. Signage strategy should be considered. Consider that courtyard space in the NC should be open to allow permeability through the block. Clarity regarding the proposed plaza to rear of NC block required.

PA Comment on Housing Quality / Mix

- The proposed mix is overall consistent with development plan policy RES 7. No issues arise in relation to the mix of apartments with regard to SPPRs 1 and 2 of the 2018 Apartment Guidelines.
- Request that the Housing Quality Assessment includes the orientation of single aspect apartments.

- Private open spaces of houses and separation distances appear to meet development plan standards.

PA Comment on Linkages to Adjoining Sites

- Cross sections of future permeability routes should be submitted to show that these connections will work physically on the ground and that they are designed in. Permeability plan should be submitted showing universal access, permeability and desire lines through the site.
- Note that development shown on the overall masterplan shows that a link to Rockville has been considered and designed in. This is a welcome change.

PA Comment on Phasing

- The Part VIII consent at the junction of the Kiltiernan Road and Glenamuck Road concludes that an additional 350 residential units could be constructed in advance of the GDDR scheme. Some of the Part VIII works are within lands in the ownership of the applicant. The additional 350 units are distributed across the LAP phasing areas bringing the total quantum of interim housing units to 1,050.
- Details of the number of units proposed in each area do not appear to have been submitted. This should be submitted at application stage. The remaining housing capacity relating to LAP phasing areas 1B and C will be presented and justified at planning application stage, subject to the 13 LAP criteria. Note that there are a number of schemes at pre-planning stage and should they be lodged prior to the approval of the GDDR, any numbers in excess of 1,050 would be premature.
- In relation to phasing of the development, the PA consider that the provision of the village green and Dingle Way should form part of development phase 1. Concern regarding the delivery of the NC in phase 2 as it is the only NC to serve the anticipated population of 7,500 to 8,000 people. Also concerns regarding the inclusion of cells 1 and 2 along the Enniskerry Road in advance of the road design works for traffic calming.

PA Comment on Transport

- Concern in relation to the proposed vehicular route opposite Block E, which crosses the spine of open space and the Dingle Way. The PA consider that this should be omitted or replaced with a pedestrian/cycle pathway in order to avoid conflict between more vulnerable road and open space users and vehicles.
- Council are in negotiation with the Applicant in relation to the acquisition of the necessary lands in their ownership so that the Council can proceed with the Part 8 works. The extent of works to be carried out by the applicant at Enniskerry Road requires clarification. Dimensioned details of interface with existing Enniskerry Road and demonstration of adequate building line set back to allow for future Kiltiernan Village improvement at Enniskerry Road is recommended.
- Recommend that the link to the Glenamuck Road should be provided for within the first phase. This would provide an additional access point and would take pressure off the Glenamuck/Enniskerry Road junction and would also provide an important pedestrian and cycle link.
- The TIA should include an assessment of the fully built out development, to include links the Enniskerry Road, the link to the Glenamuck Road and the link to the GLDR. Note that this has implications for the indicative future junction with the GLDR in terms of whether it is a priority junction or a fully signalised junction.
- At planning application stage, the proposed development application phasing will need to be justified based on existing permissions and a level of capacity within the LAP phasing map areas in addition to assessment of achievement of LAP section 10.6 identified criteria 1 to 13. A condition should be imposed that housing units cannot be occupied until the Junction Upgrade Scheme has been fully implemented.
- The applicant shall demonstrate regard to section 3 of DMURS with respect to limiting use of cul de sacs. A Quality Audit should be submitted. Travel Plan required.

- Details of an accessible continuous pedestrian route along the Glenamuck Road and Enniskerry Road frontages are requested.
- Details of cycle parking areas requested.
- Car parking to be in accordance with DLRCC standards. Details of car parking designation requested.
- Details of vehicular entrances to the Glenamuck Road and Enniskerry Road to meet specific requirements.
- Applicant to demonstrate that the development meets 'taking in charge' requirements. The drawing should ensure facilitation of rights of way and all potential future permeability connections to adjoining development sites compatible with an agreed Masterplan. Full details demonstrating how the potential for feasible fully accessible road links and accessible permeability links to adjoining land can be facilitated by the development.
- Also to meet other requirements of the Transport Dept. including lighting plan and construction management plan.

PA Comment on Drainage and Flood Risk

- The Drainage Planning Section has concerns about attenuation storage and that it is insufficient to accommodate future phases of development. It will need to be demonstrated how the required attenuation storage can be accommodated if it is intended to locate the storage within this site for future development.
- Applicant required to resubmit Microdrainage results using Cv values of 1.0 and site specific or local data, where available.
- Proposed surface water outfall through a lengthy connection through third party lands to a watercourse. Applicant will need to prove that this is technically feasible, also submit a draft wayleave agreement in favour of DLRCC for any section of surface water infrastructure located in lands not taken in charge or in the applicant's ownership.

- Applicant shall identify the section of the Microdrainage report that shows where the outflow values from the upstream catchments are inputted into the downstream attenuation storage volume calculations.
- Applicant to review camber of carriageway adjacent to permeable paving to allow it to drain to the permeable paving. Supporting standard details of all proposed SuDS measures to be submitted.
- Landscape drawings should be compatible with landscape drawings. Green roofs to be in accordance with Council policy.
- Utilities clash check required. Stormwater Audit required for application.
- In terms of flood risk assessment, overland flows to be reassessed to avoid routes through lands not in their ownership.

PA comment on Trees and Open Space

- Details of the classification and quantification of open spaces should be submitted at application stage.
- Open space provision to housing cells 3, 4 and 5 should be improved.
- Arboricultural Impact Assessment required.

PA Comment on Other Matters

- Notes that the applicant is capable of meeting Part V requirements.
- Applicant to address issues raised in the Waste Management report.
- Applicant to submit a Letter of Consent to carry out works on lands outside of their ownership.
- The description of development should include the proposed removal of a telecommunications mast at the site.

6.4 Prescribed Bodies

Irish Water (29.07.2019)

- IW confirms that subject to a compliant water and wastewater layout and a valid connection agreement being put in place between Irish Water and the

developer, the proposed connections to the Irish Water networks can be facilitated.

6.5 Consultation Meeting

6.5.1 A section 5 Consultation meeting took place at the offices of An Bord Pleanála on the 13th of August 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 advanced and contained the following issues:

1. Residential 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. Compliance with provisions of Kiltiernan Glenamuck Local Area Plan 2013-2023; phasing of development and future development of landholding.
3. Development strategy including housing mix; neighbourhood centre; siting and disposition of duplex units; connections and permeability to adjacent lands; public realm and passive surveillance; landscape strategy.
4. Roads and transportation issues; Part VIII works and interface with Enniskerry Road; roads layout; pedestrian and cycle connections; car and cycle parking provision.
5. Crèche and school capacity.
6. Drainage and flood risk
7. Any other matters.

6.5.3 In relation to **Density**, An Bord Pleanála sought further elaboration/discussion/consideration of the following: the calculation of density in the context of the definition of net density set out in Appendix A of the Guidelines and having regard to drawing reference PL07 submitted by the applicant and recent SHD decisions in the vicinity.

6.5.4 In relation to **Compliance with provisions of Kiltiernan Glenamuck Local Area Plan 2013-2023**; An Bord Pleanála sought further elaboration/discussion/consideration regarding:

- Phasing of the development, particularly with regard to the delivery of the Neighbourhood Centre, Dingle Way, Village Green and road connection northwards to the Glenamuck Road.
- Timescale for the future development of the remaining landholding.
- Quantum of development in the context of the phasing provisions of the LAP.

6.5.5 In relation to **Development Strategy** An Bord Pleanála sought further elaboration/discussion/consideration regarding

- Housing mix and in particular, the percentage of 1 bed units.
- Siting and disposition of duplex units along access road connecting the Enniskerry Road to the GLDR and the need to avoid gables and provide for a more appropriate urban edge and passive surveillance.
- The need to consider further the treatment of corner units (particularly house types C1 and D1) and provision of appropriate double fronted units.
- Connections and permeability to adjacent lands and the need to provide meaningful connectivity and avoid potential for ransom strips.
- Permeability within the development.
- Robustness and adaptability of housing units having regard to the comments from DLRCC.
- Landscape strategy and in particular treatment of village square and extent of surface car parking and sculpture feature. Provision of children's play. Functionality of the plaza to the rear of the NC.
- Scale of neighbourhood centre and nature, scale, function and management of community facility. Future phases of commercial development.

6.5.6 In relation to **Roads and Transportation** issues; An Bord Pleanála sought further elaboration/discussion/consideration regarding:

- Part VIII works and timescale for implementation of same. Appropriate phasing conditions.
- Interface between the development and the Enniskerry Road and the need to ensure an adequate building line set back to allow for the future Kiltiernan Village improvements at Enniskerry Road. Provision of a continuous pedestrian route and cycle path along the Enniskerry Road frontage.
- TIA and the need to include an assessment of the fully built out development including further details of the proposed junction arrangement with the GLDR.
- Roads layout; pedestrian and cycle connections;
- Car and cycle parking provision.
- Deliveries to the NC.
- Site access and implementation of through route to the Glenamuck Road.
- Integration of the Dingle Way with the GLDR, public plaza and internal roads.

6.5.7 In relation to **Crèche and School** capacity ABP representatives sought further elaboration/discussion/consideration regarding:

- The scale of the crèche facility in the context of future phases of development.
- The residual capacity for schools in the vicinity to accommodate future population.

6.5.8 In relation to **Drainage and Flood Risk**, ABP representatives sought further elaboration/discussion/consideration regarding:

- Outfall over third party lands.
- Adequacy of attenuation measures.
- Technical issues raised by DLRCC.

6.5.9 In relation to **Any Other Matters**, ABP representatives sought further elaboration/discussion/consideration regarding:

- EIA
- Material Contravention

- Building Life Cycle Report
- Letters of consent
- Blue line boundary

6.5.10 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-304820-19' 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.

Conclusion and Recommendation

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

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

7.3 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 of development
- permeability and connections
- design and layout of residential development
- phasing of development

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

- 7.4 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.
- 7.5 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.

Recommended Opinion

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

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

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could

result in them constituting a reasonable basis for an application for strategic housing development:

Density

- 8.4 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 site on zoned serviced land in the metropolitan area of the GDA, its proximity to existing and proposed social and community services and the fact that it is located on a planned transport corridor. Detail should also be provided regarding the overall density to be achieved on the land holding as a whole. 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.

Permeability and Connections

- 8.5 Further consideration of the documentation relating to the co-ordination of the proposed development with the development of the adjoining lands in accordance with the provisions of the Kiltiernan Local Area Plan. The submitted documentation should demonstrate that proper connections for movements by pedestrians, cyclists and vehicles would be provided between the proposed development and future development on other lands both in the control of the applicant and other parties and should specify the type, location and levels of the proposed connections. The documentation should include a plan showing that area of the proposed development that would be taken in charge by the Planning Authority that would include links to adjoining lands extending to the site's boundaries without any intervening strips. The submitted documentation should give an account of consultations on the matter with other landowners and the planning authority with a view to ensuring that such connections are consistently shown on the documentation submitted with any relevant applications. In this regard, it would be beneficial if an

overall masterplan for the lands in question could be submitted that has been agreed with adjoining landowners in the interests of providing for a comprehensive urban development strategy which is cognisant of the adjoining third party lands and provides a local planning framework to deal with inter alia, movement, permeability and public realm. 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

8.6 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 disposition of the duplex units fronting the internal access road connecting the Enniskerry Road to the GLDR to ensure a more coherent streetscape with improved passive surveillance.
- The proposed housing mix having regard to the high percentage of 3 and 4 bed units.
- The treatment of corner units and the need to provide more appropriate double fronted house types in order to improve the public realm and passive surveillance.
- The scale and location of the proposed community centre.
- Landscape strategy and in particular treatment of village square and extent of surface car parking. The provision of adequate children's play throughout the development. Design and functionality of the plaza to the rear of the neighbourhood centre.
- Interface of the development with the Enniskerry Road and the need to ensure sufficient separation is provided between the houses and the public road and that the building line is sufficiently set back to allow for future road improvement works.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

Phasing

- 8.7 Detailed phasing proposals, to include the consideration of the delivery of the link road northwards to the Glenamuck Road within the first phase of development. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to the design and layout of the proposed development.
- 8.7 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. Rationale for the design and layout of the proposed Neighbourhood Centre and the Enniskerry Road frontage of the development, with regard to the provisions of the Kiltiernan Neighbourhood Framework Plan, to include a breakdown of the proposed land uses within the Neighbourhood Centre and the community facility as provided for under the Kiltiernan Glenamuck LAP. Clear rationale should be set out regarding the nature, scale, function and management of community facility. Detail should also be provided regarding future phases of commercial development and potential quantum of commercial development proposed in the context of the LAP objectives. Design options to be submitted indicating how residential units adjacent to village square are designed to facilitate future adaptability and conversion to commercial use.
 2. Detailed surface water drainage proposals to include (i) stringent SUDS measures in advance of the development of the Regional Surface Water Attenuation Ponds as provided for under the Kiltiernan Glenamuck Local Area Plan 2013-2021; (ii) a Stormwater Impact Assessment; (iii) outline proposals that demonstrate that the surface water drainage system for the site can be adapted for adjacent future additional development lands in the applicant's ownership; (iv) legal agreement regarding the surface water outfall through land outside the site boundary; (v) rationale for the locations of swales.
 3. Landscape and Visual Impact Assessment with photomontages and 3D modelling.

4. Detailed cross sections, including (i) relationship with the indicative route of the Glenamuck Link Distributor Road and (iv) cross sections of the Enniskerry Road frontage to include the Neighbourhood Centre. All cross sections to indicate proposed ground levels, roads, public open spaces and building heights. Cross sections of future permeability routes should also be submitted to show that these connections will work physically on the ground and that they are designed appropriately in accordance with universal access and desire lines through the site. Where connections are proposed these should be provided to the boundaries of the site.
5. Landscaping proposals to include (i) Arboricultural Impact Assessment and details of measures to protect trees and hedgerows to be retained at the site; (ii) particular consideration of trees at the boundary with Rockville House; (iii) proposed landscaping at the Dingle Way and as per the LAP objective to provide trees at the indicative route of the Glenamuck Link Distributor Road; (iv) rationale for proposed public open space provision, to include an open space hierarchy and detailed layouts for the public open spaces at the Neighbourhood Centre with regard to the provisions of the Kiltiernan Neighbourhood Framework Plan; (v) clear strategy for the provision of appropriate children's play throughout the development, including the village green.
6. Assessment of the residual capacity of schools in the area.
7. Details of car and cycle parking provision, to include areas designated for parking or drop off purposes associated with the Neighbourhood Centre and childcare facility. Service and delivery arrangements for the Neighbourhood Centre.
8. Archaeological Impact Assessment
9. 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. Clarity to be provided regarding how the development complies with Policy BF04 of the Kiltiernan LAP which seeks to incorporate granite and granite features into the design of residential and commercial buildings.

10. A Building Life Cycle Report in respect of the proposed apartments as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities (2018).
11. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018. This should include details of the orientation of single aspect units.
12. Traffic Impact Assessment to include a full assessment of the entire masterplan area including links to the Enniskerry Road, the link to the Glenamuck Road and the link to the Glenamuck Link Distributor Road. Clarity to be provide regarding future vehicular junction with the GLDR and the integration of the Dingle Way with the GLDR.
13. 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.

8.8 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
4. Department of Culture, Heritage and the Gaeltacht
5. An Taisce-the National Trust for Ireland
6. The Heritage Council
7. Failte Ireland
8. An Comhairle Ealaíonn
9. Dun Laoghaire Rathdown County Council 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.

Erika Casey

Senior Planning Inspector

27th August 2019