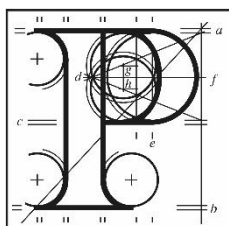


on



An  
Bord  
Pleanála

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

### **Inspector's Report on Recommended Opinion ABP-307157-20**

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**Strategic Housing Development**

153 no. residential units (53 no. houses, 100 no. apartments), childcare facility and associated site works.

**Location**

Blackglen Road, Sandyford, Dublin 18.

**Planning Authority**

Dun Laoghaire-Rathdown County Council

**Prospective Applicant**

Kitchli Limited

**Date of Consultation Meeting**

14<sup>th</sup> July 2020

**Date of Site Inspection**

27<sup>th</sup> May 2020

**Inspector**

Rachel Gleave O'Connor

## **1.0 Introduction**

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

## **2.0 Site Location and Description**

- 2.1. The site is located to the south of Blackglen Road and north east of Woodside Road. The area immediately surrounding the site is characterised by ribbon-type development, with a series of one-off, single or two storey houses, and a number of large detached dwelling houses. The character of Blackglen Road itself is overgrown and informal, lacking any pedestrian footpath or cycle path. The road bends to the west of the site, obstructing clear visibility along its stretch.
- 2.2. Dublin bus stops are positioned on both Blackglen Road and Woodside Road proximate to the site. A number of community amenities and facilities are located on Enniskerry Road and east of the site, including a primary school, community centre, library and shop. To the south east of the site the character of the area is more urban and includes apartment block development.
- 2.3. The site itself holds a large frontage onto Blackglen Road with a smaller frontage extent onto Woodside Road to the south. All other boundaries for the site are shared with the gardens of surrounding dwellinghouses.
- 2.4. The site appears undeveloped and overgrown with significant mature tree planting along some boundaries. The typography of the site is irregular with significant changes in levels across the site. A small stream / watercourse runs to the south-east of the site.

### 3.0 Proposed Strategic Housing Development

3.1. The proposed development involves 153 no. residential units as follows:

Unit Type	Number	Total
1 bed apartments	18	18
2 bed apartments	38	58
2 bed duplexes	20	
3 bed duplexes	24	47
3 bed houses	23	
4 bed houses	30	30

The development has a stated net residential density of c. 41.1 units/ha based on a development area of c. 3.72 ha. The development scheme comprises the following:

- 56 no. Apartments provided in 3 no. apartment blocks that range in height up to 4-storeys in height. The apartments provide a mix of one and two-bedroom units;
- 44 no. duplex units;
- 53 no. houses;
- A childcare facility measuring approximately 217sqm (GFA) at ground floor level of Apartment Block A that fronts onto Blackglen Road.
- Site works, including soft landscape open spaces (approximately 5,699sqm or 15% of the site area) and ancillary services and infrastructure provision to serve the proposed development, including the provision of a foul pumping station in the south-east corner of the site.

### 4.0 Planning History

4.1. Reg. Ref. D07A/1598 / ABP Ref. PL06D.227869: Permission refused by DLRCC and An Bord Pleanála for a residential development comprising a total of 180 units (142 apartments and 38 houses). Including 282 surface car parking spaces, a single storey creche (262sqm), new vehicular entrance on Blackglen Road, ESB substation

and switch room (22sqm) and all new walls and boundaries, landscaping, refuse stores, recycling centre, roads, footpaths, services on and underground, and for all other development on a site area of 3.693 hectares.

Reason: Having regard to the existing deficiency in the road network serving the area, in particular the lack of a continuous footpath along the Blackglen Road, between the site and Lamb's Cross and the period within which the constraints involved might reasonably be expected to cease, it is considered that the proposed development would be premature, would endanger public safety by reason of traffic hazard and would, therefore, be contrary to the proper planning and sustainable development of the area.

- 4.2. Reg. Ref. D07A/0425 (Appeal to ABP withdrawn): Permission refused by DLRCC for a residential development comprising a total of 224 units (130 apartments, 58 duplexes and 36 houses), with underground parking for 149 cars, 206 surface car parking spaces, a creche (254sqm), new vehicular entrance on Blackglen Road, ESB substation and switch room (22sqm) and all new walls and boundaries, landscaping, refuse stores, recycling centre, roads, footpaths, services on and underground, and for all other development on a site area of 3.693 hectares.
- 4.3. There were 5 reasons for refusal related to the proposed height and scale of the development, its location and other amenity considerations.

## **5.0 National and Local Planning Policy**

### **5.1. Section 28 Ministerial Guidelines**

- 5.1.1. Having considered the nature of the proposal, the receiving environment and 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) 2009
  - Design Standards for New Apartments Guidelines for Planning Authorities 2018
  - Design Manual for Urban Roads and Streets (DMURS) 2019

- The Planning System and Flood Risk Management (including the associated Technical Appendices) 2009
- Childcare Facilities Guidelines for Planning Authorities 2001
- Urban Development and Building Heights Guidelines for Planning Authorities 2018
- The Architectural Heritage Protection Guidelines for Planning Authorities

## 5.2. **National Planning Framework**

5.3. The NPF seeks to achieve compact urban growth by targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas and plans for growth of 490,000 to 500,000 people in the Eastern and Midlands Region.

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

5.5. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

5.6. Objective 35 seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

## 5.7. **Dun Laoghaire Rathdown County Development Plan 2016-2022**

5.7.1. Zoning: The site is zoned 'Objective A' – To protect and/or improve residential amenity. Lands to the south and west of the site are zoned 'Objective B' – To protect and improve rural amenity and to provide for the development of agriculture. Lands to the south and east are zoned 'Objective G' To protect and improve high amenity areas.

- 5.7.2. General: The Dun Laoghaire Rathdown County Development Plan 2016-2022 contains the planning policies applicable to the site. Section 1 outlines that the Council is required to deliver c.30,800 units over the period 2014 – 2022. It is stated that the Council in seeking to secure this objective with focus on three strands, namely: increasing the supply of housing; ensuring an appropriate mix, type and range of housing; and, promoting the development of balanced sustainable communities.
- 5.7.3. Housing policies set out in section 2.1.3 include policy RES3: Residential Density, which promotes higher residential densities in the interests of promoting more sustainable development whilst ensuring a balance between this and ensuring the reasonable protection of residential amenities and established character of areas; RES4: Existing Housing Stock and Densification, which encourages the densification of existing housing stock to retain population levels, and RES7: Overall Housing Mix, which encourages the provision of a wide variety of housing and apartment types.
- 5.7.4. Other policies which relate to sustainable land use and travel include ST2: Integration of Land Use and Transportation Policies, ST19: Travel Demand Management, ST23: Car Clubs and ST27: Traffic & Transport Assessment and Road Safety Audits.
- 5.7.5. Section 3.3.8 describes the need for investment and renewal in the centre of Blackrock, to be coordinated through the Local Area Plan.
- 5.7.6. Section 4.2 considers Open Space and Recreation including Policy OSR5: Public Open Space Standards.
- 5.7.7. Section 7.1.3 refers to Community Facilities including Policy SIC11: Childcare Facilities.
- 5.7.8. Section 8 refers to Principles of Development and contains the urban design policies and principles for development including public realm design, building heights strategy, and car and cycle parking. Policy UD2 requires Design Statements for all medium to large developments, and UD6 refers to Building Height Strategy.

## **6.0 Forming of the Opinion**

6.1. Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

### **6.2. Documentation Submitted**

6.2.1. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia, the following:

- Application Form for a Section 5 Pre-Application Consultation Request in respect of a Strategic Housing Development;
- Cover letter;
- Statement of Consistency / Planning Report;
- Part V housing proposals comprising letter and drawings;
- Archaeological Impact Assessment;
- Architectural Drawings and Schedule, Housing Quality Assessment and Architectural Design Statement;
- Arboricultural Assessment, Tree Survey Plan, Tree Retention Plan;
- Development Impact Plan;
- Landscape Concept Masterplan;
- Open Space Enlargement Plan and Section;
- Engineering Report, including 'Record of correspondence with Irish Water';
- Construction and Environmental Management Plan;
- Appropriate Assessment Screening Report;
- Ecological Impact Assessment;

- Flood Risk Assessment;
- Engineering drawings;
- Traffic & Transport Assessment; and
- DMURS Compliance Statement.

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. The planning authority's 'opinion' included the following matters:

- The subject site is in an area zoned 'A' where the objective is 'To protect and or improve residential amenity.' The residential and childcare uses proposed are consistent with the zoning objective for the site.
- Currently there exists a serious deficiency in the road network serving the area, in particular the lack of a continuous footpath along Blackglen Road, between the site and Lamb's Cross. The development is considered premature pending the construction of the Roads Improvement Scheme on grounds of public safety by reason of traffic hazard, in particular for vulnerable users. Thus, the proposed development is not considered to be in accordance with the proper planning and sustainable development of the area. It is considered that the reason for refusal for D07A/1598 still stands as the underlying circumstances still remain.
- The subject development at the proposed density does not make an adequate and sustainable use of the finite land resource and would be contrary to the



requirements of Policy RES3 of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and not in accordance with the proper planning and sustainable development to the area.

- The proposed layout does not lead to a readily apparent street hierarchy and a distinct sense of place. Long straight sections of road should be avoided as a design solution to limit speed within the development.
- The challenges presented by the site's topography coupled with the requirements of part M of the Building Regulations are acknowledged. However it is considered that the applicant should be requested to review the proposed layout to achieve a more efficient and sustainable use of the land.
- The proposed heights across the site are considered acceptable in principle.
- 3 no. north facing single aspect units are located in Block C.
- The proposal for car parking is considered acceptable given the site's suburban location and distance to the nearest high-quality public transport corridor.
- Concern regarding the significant location of surface water attenuation areas within the public open amenity spaces, as this might affect the usability of large parts of those areas.
- The Drainage Planning Section query the attenuation storage provided and a requirement to increase its volume, which may further impact the quantum of usable open space available.
- Further plans, drawings and details are required both with regards to surface water and the flood risk assessment.

#### **6.4. Irish Water**

##### **6.4.1. The submission from Irish Water (dated 18<sup>th</sup> June 2020) states the following:**

A Confirmation of Feasibility was issued in 2016 for this development. Based on the evaluation carried out by Irish Water at that time the development was deemed feasible subject to necessary upgrade works to service this development. Due to the length of time that has passed since the issuing the confirmation of feasibility being issued and the level of development that has occurred within this catchment in the intervening period, Irish Water is no longer confident of the available capacity to

cater for this development and in that regard, the board is advised that the Irish Water requires the applicant to reengage in order to reassess the feasibility of connection for this development.

## **6.5. Consultation Meeting**

6.5.1. A section 5 Consultation meeting took place via a video conference on the 14<sup>th</sup> July 2020. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

6.5.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

1. Road Improvement Scheme – Blackglen Road;
2. Density;
3. Design, site layout and street arrangement;
4. Part V housing;
5. Quality of proposed units (outlook, layout of duplex units, communal amenity space);
6. Impact upon amenity of existing residents (separation distances);
7. Cycle storage;
8. Drainage;
9. Any Other Matters.

6.5.3. In relation to the Road Improvement Scheme – Blackglen Road, ABP representatives sought further elaboration / discussion on:

- The previous reason for refusal related to prematurity pending the Road Improvement Scheme on Blackglen Road. Currently unsafe for pedestrians / cyclists.
- Can safe pedestrian and cyclist access / egress to the site be demonstrated.

Further ABP comments:

- The application needs to provide certainty regarding the timeframe and delivery of the Blackglen Road Improvement Scheme
- Documents should show safe pedestrian and cycle access to the site.
- There is no certainty regarding delivery of the Road Improvement Scheme at this time and therefore safe pedestrian and cycle access is not yet possible.

6.5.4. In relation to density, ABP representatives sought further elaboration / discussion on:

- Proposed density of 41.1 hectares. Query the appropriateness of this density level in light of national policy and the sites location.

- The context of previous proposals for the site demonstrating higher density levels was noted.

Further ABP comments:

- The application should show that the density level is optimised and ensure the most efficient use of land.
- Previous proposals for the site had higher density levels and were not refused by the board on the basis of density. Since that time, national policies have changed to promote higher densities in the appropriate locations.
- Explain why density has been reduced from the previous application on the site.
- The justification of density should be informed by the location, the proposed site is a short cycle to the Luas.

6.5.5. In relation to design, site layout and street arrangement, ABP representatives sought further elaboration / discussion on:

- Note that the design and street arrangement is largely unchanged from the 2007 scheme.
- How has the design been influenced by more recent planning policy and guidance, including DMURS, particularly in relation to street arrangement and hierarchy.
- Where are the home zones and cycle routes referenced in the documents.

Further ABP comments:

- In accordance with DMURS the number of cul-de-sacs should be limited.
- If future connections are to be shown, there should be some consideration of likely need.
- The number of future connections currently shown appears speculative.
- The application should explain the likely future development of surrounding lands that connections are shown to.
- Ensure DMURS compliance at design stage.
- Explain if the topography of the site is dictating the layout and design.

6.5.6. In relation to Part V housing, ABP representatives sought further elaboration / discussion on:

- Part V housing located in block C to the south and rear of the site.
- Query the location of part V housing and whether it would be indistinguishable from private apartment blocks.
- The part V housing fronts onto a car parking area.

- Does the green space around the part V block act as an attenuation and drainage area.

Further ABP comments:

- The part V letter and statement of consistency contain conflicting part V figures.
- Concern that the quality of the open space for the part V housing is different than what is being provided for in other blocks.
- Outline the usability of the open space.
- Explain the discharge route across the site and whether this channels through the part V green space to the stream.
- The application should show that the part V housing is indistinguishable with all other blocks.

6.5.7. In relation to quality of proposed units, ABP representatives sought further elaboration / discussion on:

- The outlook from apartments with a window looking directly onto the balcony area for another apartment, repeated across floors and in all blocks.
- The adequacy of the design of duplex units to reduce disturbance between neighbours.
- Duplexes with the living space located over the top of a neighbouring units bedroom space.
- Duplexes with balconies located over the top of bedrooms for a neighbouring unit.

Further ABP comments:

- Ensure that documents describe adequate separation and prevention of overlooking between apartments.
- Documents should explain how the design and layout of duplexes will reduce potential disturbance.

6.5.8. In relation to impact upon the amenity of existing residents, ABP representatives sought further elaboration / discussion on:

- Separation distances to exiting neighbouring dwellings.
- Tree removal at the southern and eastern boundaries which appears to be outside the redline boundary for the site.

Further ABP comments:

- Show separation distances with the location of windows identified.
- Ensure that the tree survey is up to date and includes any trees within the site as well as to boundaries.

- The removal of trees outside of the redline boundary requires examination and consent from relevant landowners.

6.5.9. In relation to cycle storage, ABP representatives sought further elaboration / discussion on:

- Types of bicycle storage proposed.
- Query the location of bicycle storage and allocation to residents.
- The number and quality of block C bicycle spaces.

Further ABP comments:

- Provide a visual and written explanation of cycle storage.

6.5.10. In relation to drainage, ABP representatives sought further elaboration / discussion on:

- Any outstanding drainage issues.

Further ABP comments:

- Address discharge and attenuation matters raised.
- Outline and justify the drainage approach.

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

- The statement of consistency mentions that there is a stream within the site boundary, but the AA Screening and Ecological Report state the stream is outside of the site boundary.
- Location of the stream requires clarification and consideration is required of potential hydrological links to sensitive areas during construction.
- On page 11 of the statement of consistency the paragraph on flood risk is not completed.
- Page 43 of the statement of consistency should be checked in relation to the description of the 2007 scheme.

6.5.12. 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-307157-20' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

## 7.0 Conclusion and Recommendation

- 7.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 7.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines, and local policy, via the statutory development plan for the area.
- 7.3. Having regard to all of the above and to the preliminary nature of the submitted documentation, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the following elements – safe pedestrian and cycle access / egress to the site; residential density; detailed design; compliance with DMURS and Irish Water confirmation of feasibility - as 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.

## 8.0 Recommended Opinion

- 8.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 8.2. Following consideration of the issues raised during the consultation process and having regard to the opinion of the planning authority, and submissions received from statutory consultees referred to under Section 6(10) of the Act, 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 will need to be addressed in the documents submitted to which section 5 (5) of the Act of 2016 relates that could result in the constituting a reasonable basis for an application for strategic housing:

### Safe pedestrian and cycle access / egress to the site

The prospective applicant should satisfy themselves that the application is not premature in consideration of the Road Improvement Scheme and required works to Blackglan Road. Further consideration and justification is required pending delivery of the improvement works and how this relates to the construction timeframe of the proposed development.

### Residential Density

Further consideration and/or justification of documents as they relate to the proposed residential density having regard to the accessibility of the site to surrounding public transport options, including existing Luas connections and to the nearest bus stops/routes, by foot and cycle. Particular regard should be had to the criteria relating to appropriate residential density, as set out in Sustainable Residential Development in Urban Areas Guidelines (2009). Further consideration of this issue may require amendments to the documents and/or design proposals submitted.

### Detailed Design

The prospective applicant should provide further justification and/or detail in relation to the detailed design of the proposed apartments, houses and duplexes. In particular, the prospective applicant should provide further justification and/or detail in relation to the floor layout of duplexes and overlooking between apartment units, as well as elevational design, that in the case of houses and duplexes replicates the previous 2007 application. Design should be informed by recent planning guidance and the Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual') (2009). Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

### Compliance with DMURS

The prospective applicant should provide further justification and/or detail in relation to compliance with DMURS, in particular the prioritisation of safe walking and cycling routes both within and around the development, the treatment and nature of the proposed 'Homezones' and the number of cul-de-sacs within the site. Further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

### Irish Water Confirmation of Feasibility

Article 297 of the Planning and Development (Strategic Housing Development) Regulations 2017 sets out the requirements relating to applications and in (2)(d) that an application shall be accompanied by evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant network or networks have capacity to service the development. Irish Water have confirmed to the Board that it requires the applicant to reengage in order to reassess the feasibility of connection for the development.

Pursuant to article 285(5)(b)(i) and (ii) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that the following specific information should be submitted with any application for permission:

1. An up to date tree survey to be provided, to include trees outside of the boundary but proximate to the proposed construction works. Any trees identified for



removal should be within the site. If trees are identified for removal outside the redline boundary, consent of the landowner should be demonstrated. Tree protection measures should be explained in detail.

2. A plan showing separation distances between the development and to existing dwellings should also be included, annotating key distances to boundaries, buildings and windows.
3. The application submission should demonstrate that the quality of Part V Housing to be included as part of the development is indistinguishable from comparable private housing within the scheme. Details should be provided of the usability and quality of the external amenity area proposed as part of the Part V Housing, with particular regard to the attenuation and drainage function of such areas and how this will impact the quality and usability of the space. North facing single aspect units should also be avoided in Part V Housing to ensure a commensurate level of quality when compared to the private housing apartments proposed.
4. Additional details and/or revised proposals in relation to site services, having regard to the report of the Drainage Planning Section of the Planning Authority. Additional detail and/or revised proposals in relation to the SuDS, attenuation measures and drainage calculations; Further consultation is also required with Irish Water to confirm the feasibility of connection to the network.
5. The Design Statement should include consideration of the comments provided by the Planning Authority Heritage Officer and how the design responds to the derelict cottage outside of the site boundary with historic associations with Padraic Colum and Countess Marchievicz.
6. Overshadowing and daylight/sunlight analysis of potential impact on adjoining residential dwellings and areas. Daylight/Sunlight analysis, should also be submitted showing an acceptable level of residential amenity for future occupiers of the proposed development; within the proposed residential units, in private and shared open space, and in public areas within the development. The methodology should follow BRE Guidelines and analysis is expected of each floor, until achievement of BRE target levels can be demonstrated to all units on a

floor. For example, if all units do not meet target levels on the ground floor, units on the first floor will require assessment, until it can be shown that all units on a floor achieve target levels and a reasonable assumption can be reached in relation to units above.

7. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated, only windows with a true dual aspect will be considered as contributing to meeting the minimum quantum required. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines and point 3 above.
8. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.
9. A plan of the proposed open and communal spaces clearly delineating public, semi-private and private spaces should be provided, as well as a detailed breakdown of the total area of same.
10. Additional CGIs are required, as well as a Landscape and Visual Impact Assessment with photomontages, to include, consideration of visual impacts on the surrounding areas.
11. A building life cycle report shall be submitted in accordance with section 6.3 of the 'Sustainable Urban housing: Design Standards for New Apartments (2018)'. The report should have regard to the long term management and maintenance of the proposed development.
12. A plan identifying the location of cycle storage and corresponding units to be allocated spaces, with annotation to explain the cycle storage provision.
13. Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development.
14. Traffic and Transport Impact Analysis, to be prepared in consultation with Dun Laoghaire Rathdown County Council.

15. Waste Management Details.
16. Site Specific Construction and Demolition Waste Management Plan.
17. Road Safety Audit and Quality Audit.
18. AA Screening Report.

8.3. 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. Minister for Culture, Heritage and the Gaeltacht (Built Heritage and Nature Conservation)
2. The Heritage Council
3. An Taisce – The National Trust for Ireland
4. Irish Water
5. Inland Fisheries Ireland
6. Waterways Ireland
7. Transport Infrastructure Ireland
8. National Transport Authority
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.

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Rachel Gleave O'Connor

Planning Inspector

5 August 2020