



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-307977-20

Strategic Housing Development	714 no. residential units (583 no. Build to Rent apartment, 131 no. Build to Sell apartments) and associated site works.
Location	Milltown Park, Sanford Road, Dublin 6.
Planning Authority	Dublin City Council South
Prospective Applicant	Sandford Living Limited
Date of Consultation Meeting	23/10/2020
Date of Site Inspection	16/10/2020
Inspector	Conor McGrath

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1.0 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.

2.0 Site Location and Description

- 2.1. The subject site is located at Milltown Park, southeast of Ranelagh Village, bounded by Sandford Road to the north and Milltown Road to the southeast. The lands, comprising 4.3 hectare, form part of a larger parcel of institutional lands. The site is bounded to the north and west by two-storey housing in Norwood Park and Cherryfield Avenue Lower respectively.
- 2.2. The roadside boundaries are generally comprised of high stone and render walls, which restrict views into the site. The eastern and northern edges of the site are comprised of mature trees and woodland. The western edge of the site is provided with lower level planting and trees. The southern part of the site is currently occupied by a number of structures, including the 18th C Milltown Park House and associated extensions of varying age and form, a Chapel Building (1860's) and Tabor House (1875). None of these properties are identified on the record of protected structures. There are a number of protected structures to the north and east of the site on Sandford Road and Clonskeagh Road.
- 2.3. The site is accessed via an existing entrance from Sandford Road. The remainder of these institutional lands to the south are accessed via a more recently constructed entrance on Milltown Road. Internal access between the subject site and these lands has been closed off.

3.0 Proposed Strategic Housing Development

3.1. The proposed development generally comprises the development of 714 no. residential units which are to be divided between 583 no. Build to Rent units and 131 no. Build to Sell units. The development involves the removal of existing structures on the site with the exception of the chapel building and Tabor House which are to be converted to amenity and residential uses respectively. The principle development parameters as described in the submitted documentation are set out below:

Gross Site Area:	4.3 Ha		
Total Residential units:	714	Build to Sell	131 (18%)
		Build to Rent	583 (82%)
Density:	166/Ha		
Site Coverage:	28%		
Part V:	74 Units (10%)		
Dual Aspect:	294 (41%)		
Car Parking Spaces:	363		
Bicycle Parking Spaces:	1,079		
Tenant Amenity Ratio:	1,671.5-sq.m. / 2.3 sqm		
Communal Open Space	5,221-sq.m.		
Public Open Space	13,349 (31%)		

Accommodation Mix	%
Studio	15%
1 Bed Apartment	37%
2 Bed Apartment	43%
3 Bed Apartment	5%

The development is provided in seven blocks across the site, including the retained Tabor House, with heights generally in the range of 5-8-storeys. The exception to this is block A1, located at adjacent the Miltown Road / Sandford Road / Eglinton Road junction, which rises to 13-storeys.

Block	No. of units	Height (Storeys)	(Height approx. m)
A1	103	5 - 7 & 13-storey	16.5 – 43m
A2	140	6 – 8	20 – 27m
B	90	2 - 7	17 – 23m
C	191	2 – 8	7.5 – 18.75m
D	40	3 - 5	10.5 – 17m
E	28 duplex apts	3	9m
F	98	5 - 7	17 – 23.5m
Tabor House	24	4	17.1m

A total of 1,671-sq.m. of communal internal amenity space is provided, comprising 934-sq.m. in the residential blocks and Tabor House and 737-sq.m. within the converted Chapel building. 5,221-sqm of communal open space is provided (including upper level terraces in Block A1 and B).

13,349 sqm of public open space (31% of the site area) is provided, comprising

- Area A (new public park) along the eastern portion of the site (9,273 sq m),
- Area B (green buffer) along the north of the site (3,040 sq m) and
- Area C a shared plaza area adjacent to both Areas A and B (1,036 sq m).

4.0 Planning History

PA ref. Reg. Ref. 3044/13 / ABP Ref. PL29S.242764 – ‘Temporary School Accommodation’. Subject to an extension of duration and further extension of duration.

PA ref. 4333/15: Permission granted for demolition of the existing boundary wall and sliding gate at the side entrance to Milltown Park on Milltown Road, and its replacement with a new boundary wall and set back entrance. This entrance provides access to the remaining Jesuit lands and is located to the south of the proposed entrance to the subject development.

5.0 Section 247 Consultation(s) with Planning Authority

The prospective applicant's documentation outlines 2 no. s.247 pre-application consultations meetings with Dublin City Council on 22nd January 2020 and 24th June 2020. These generally reflect the record of the meetings submitted by the planning authority. The principle matters raised in these discussions are identified as follows:

- Preparation of a masterplan for the wider institutional lands.
- Permeability to adjoining institutional lands.
- Treatment of existing buildings and relationship with retained structures.
- Design and layout of open space.
- Protection of existing trees and clarity of the extent of tree loss.
- Internal residential amenity in terms of daylighting and provision of balconies.
- Ecological impacts, including the requirement for bat surveys.
- Separation from adjoining residential properties.
- Building height and massing – justification for proposed 13-storey block.
- Treatment of roadside boundary walls.
- Roads and car parking layout, including justification for Sandford Road entrance and development of a parking strategy.
- Mix of units through the scheme and high proportion of single-aspect units.
- Public access to the lands.

6.0 Relevant Planning Policy

6.1. National and Regional Policy

6.1.1. **National Planning Framework 2018-2040**

National Strategic Outcome 1, Compact Growth, recognises the need to deliver a greater proportion of residential development within existing built-up areas. Activating these strategic areas and achieving effective density and consolidation, rather than sprawl of urban development, is a top priority.

National Policy Objective 2A identifies a target of half of future population growth occurring in the cities or their suburbs. Objective 3A directs delivery of at least 40% of all new housing to existing built-up areas on infill and/or brownfield sites.

Objective 3b seeks to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprint.

Objective 13 is that, in urban areas, planning and related standards including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.

6.1.2. **Regional Spatial and Economic Strategy for the Eastern and Midland Region**

RPO 4.3 seeks to “support the consolidation and re-intensification of infill / brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

Section 5.3 identifies guiding principles for development of the metropolitan area, which include:

Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.

6.1.3. **Rebuilding Ireland – Action Plan for Housing and Homelessness 2016**

Pillar 4: Improve the Rental Sector. The key objective is to address obstacles to greater private rented sector delivery and improving the supply of units at affordable rents. Key actions include encouraging the “build to rent” sector.

6.2. **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:

- Urban Development and Building Heights, Guidelines for Planning Authorities
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);

6.3. **Dublin City Development Plan 2016 – 2022**

The subject lands and adjoining lands to the south are zoned Z15: To protect and provide for institutional and community uses.

These lands are described as playing an important role in the achievement of a more compact city in that they contribute to the creation of vibrant neighbourhoods and a sustainable well-connected city through the provision of such infrastructure as schools, hospitals and open space.

With any development proposal on these lands, consideration should be given to their potential to contribute to the development of a strategic green network and to the delivery of housing in the city. In addition, development at the perimeter of the site adjacent to existing residential development shall have regard to the prevailing height of existing residential development and to standards in Section 16.10 (standards for residential accommodation) in relation to aspect, natural lighting,

sunlight, layout and private open space, and in Section 14.7 in relation to the avoidance of abrupt transitions of scale between zonings.

Where there is an existing institutional and/or community use, any proposed development for 'open for consideration' uses on part of the landholding, shall be required to demonstrate

- how the proposal accords and assists in securing the aims of the zoning objective;
- how it secures the retention of the main institutional and community uses on the lands, including space for any necessary expansion of such uses;
- how it secures the retention of existing functional open space e.g. playing fields;
- the manner in which the nature and scale of the proposal integrates with the surrounding lands.

A masterplan may assist in demonstrating how the requirements of this paragraph may be satisfied.

In considering whether there is no longer a need for the existing institutional use and a material contravention or variation to the development plan is proposed, the planning authority shall consult with the owner/ operator of the existing institutional and community uses and any relevant statutory provider. A masterplan is required in these circumstances.

The masterplan, which may necessitate a variation, shall set out a clear vision for the lands, to provide for the identification of 25% of the lands for open space and/or community. The masterplan must incorporate landscape features which retain the essential open character of the lands zoned Z15. It must also ensure that the space will be provided in a manner designed to facilitate potential for future public use and protect existing sporting and recreational facilities which are available predominantly for community use.

The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network.

Adjoining lands to the north and northeast are zoned Z2, To protect and / or improve the amenities of residential conservation area.

Residential conservation areas are noted to have extensive groupings of buildings and associated open spaces with an attractive quality of architectural design and scale. The overall quality of the area in design and layout terms is such that it requires special care in dealing with development proposals which affect structures in such areas. The general objective for such areas is to protect them from unsuitable new developments or works that would have a negative impact on the amenity or architectural quality of the area.

There are a number of protected Structures on adjoining sites to the north and east of the site.

Policy SC13, promotes sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, are appropriate to their context, and which are supported by a full range of community infrastructure.

Chapter 4 defines Mid-rise buildings as up to 50m and taller buildings as being above 50m. Policy SC16, recognises the low-rise nature of the city, and the potential and need for taller buildings in a limited number of locations.

Chapter 5 sets out policies for quality housing.

QH6 encourages attractive mixed-use sustainable neighbourhoods containing a variety of housing types and tenures.

QH7 promotes sustainable urban densities throughout the city, having regard to the need for high standards of urban design and architecture and integration with the character of the surrounding area.

QH8 promotes the development of vacant or under-utilised infill sites and higher density proposals which respect the design and character of the area.

QH17 supports the provision of purpose-built, managed high-quality private rented accommodation with a long-term horizon.

Section 16.7.1 notes that a co-ordinated approach shall be taken to the potential positioning of higher building forms across the city to create clusters, where appropriate, and prevent visual clutter or negative disruption of the city skyline.

Section 16.7.2 indicates that the site is located within an area identified as Low-Rise Rest of City, where a 16m limit on building height applies.

Section 16.10 identifies Standards for Residential Accommodation.

An indicative site coverage of 50% is identified for Z15 lands.

7.0 Submissions Received

7.1. The submission from Irish Water confirms that they have issued a Confirmation of Feasibility for connections to the Irish Water networks in respect of the subject development.

8.0 Forming the Opinion

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 submission and the discussions which took place during the tripartite consultation meeting.

8.1. Documentation Submitted

8.1.1 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 includes the following:

- Planning Application Form and associated fee.
- Architectural drawings.
- Engineering drawings.

- Arborist drawings.
- Landscape drawings.
- Planning Report
- Statement of Consistency
- Material Contravention Statement
- Environmental Report
- Sandford Road SHD Masterplan + Architectural Design Statement (+ Appendices including Appendix B – North Facing and Dual Aspect Units)
- Infrastructure Design Report
- Site Specific Flood Risk Assessment
- Mobility Management Plan
- Preliminary Construction Management Plan
- DMURS Design Statement
- Basement Impact Assessment
- Traffic and Transport Assessment
- Parking Strategy
- Aerials, CGIs and Verified Views
- Daylight and Sunlight Assessment Report
- Screening for Appropriate Assessment
- Environmental Impact Assessment Report - Biodiversity
- Arboricultural Assessment, Arboricultural Impact and Tree Protection Strategy Report
- Landscape Design Statement
- Operational Waste Management Plan for Proposed Residential Development
- Telecommunications Report
- Townscape and Visual Impact Assessment Preliminary Report
- Lighting Report
- Energy & Sustainability Report
- Pedestrian Wind Comfort Study
- Archaeological Impact Assessment
- Draft EIAR Architectural and Cultural Heritage Chapter
- Childcare Demand Assessment

- Social Infrastructure Audit.

8.1.2 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 relevant guidelines issued by the Minister under section 28 of the Act of 2000. Section 5(6) requires that where the proposed development would materially contravene the development plan or local area plan, as the case may be, other than in relation to the zoning of the land, then the statement provided for the purposes of subsection (5)(b)(i) shall indicate why, in the prospective applicant's opinion, permission should nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

8.1.3 Statements required under S.5(5) and 5(6) above have been submitted in this regard and I have considered all of the documentation submitted by the prospective applicant, relating to this case.

8.2. The Material Contravention Statement

8.2.1 The statement refers specifically to contravention of the building height provisions of the Dublin City Development Plan 2016-2022, specifically the maximum height of 16m specified for this area under section 16.7.2 of the plan. The statement identifies exceedance of the development plan provisions in respect of each of the proposed blocks (A – F), including Tabor House which is to be converted to residential use.

- Section 3.0 of the Statement notes the provisions S.37(2)(b) of the Act and makes the following points in respect of S.27(2)(b)(i) and (iii)
 - The development is classified as a 'Strategic' Housing Development, and thus it can be considered to be of strategic importance.
 - The heights proposed in the current development are appropriate having regard to National Policy, in particular the objective Urban Development and Building Heights Guidelines, for increased building heights and overall density of development.

- In respect of the National Planning Framework, the statement notes that the proposed scheme contributes towards compact growth in Dublin. The range of heights is appropriate to this location in accordance with NPF emphasis on developing high quality accommodation by increasing building heights in existing urban areas.
- It is argued that height limitation of 16 No. metres is contrary to SPPR 1 of the Urban Development and Building Heights Guidelines. The site has the capacity to accommodate increased height and will not have an undue negative impact on its receiving environment.
- It is argued that the development accords with the broad principles identified in para 3.1 of the Guidelines for considering proposals for buildings taller building.
- In respect of SPPR 3, the statement addresses the criteria identified in the Guidelines:
 - At the scale of the relevant city / town:
 - At the scale of district/ neighbourhood/ street
 - At the scale of the site/building.
- The site meets the criteria for a central and / or accessible urban located as defined in the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2018
- The development is stated to accord with Regional Policy Objective RPO 4.3 with regard to the consolidation and intensification of urban areas.

8.3. Planning Authority Submission

In accordance with section 6(4)(b) of the 2016 Act a submission from Dublin City Council was received by An Bord Pleanála on 15/09/2020. The submission contains the Opinion of the planning authority on the proposed development, a copy of S.247 pre-application meeting records, copies of internal technical reports and details of relevant planning applications.

In general terms the PA opinion notes the following points:

- The site is suitable for higher density development.
- The design approach in terms of setting, massing and stepping of height is appropriate, with the exception of Block A1.

- The scale and design of buildings can be successfully accommodated on the site.
- Separation distances are sufficient to address overshadowing and overbearing impacts on Cherryfield Avenue and Norwood Avenue.
- The development would be subject to a requirement for 50% dual aspect units given the location and scale of the site.

The planning authority identify issues to be addressed at application stage;

1. There are concerns regarding the visual impact of the proposal due to the height and scale of the proposed 13 storey element of the proposal. While it this part of the site can accommodate additional height, it is considered that the applicant has not demonstrated a compelling urban design argument for the 13 storey “landmark” building which will be a significant alteration to the skyline of the area. The applicant is therefore requested to reconsider the overall height of this element of the development and to demonstrate / justify the suitability of the site to accommodate proposed height particularly in the context of the adjoining residential development.
2. Further details are required to demonstrate that the proposal will respect and not have a detrimental impact on the residential amenities of properties in Cherryfield Avenue Lower and Norwood Park by way of overlooking from proposed balcony and terraced areas. .
3. The planning authority have concerns regarding the number of studios and 1 bed units, the portion of dual aspect units and the provision of private amenity space. Further justification of the documents as they relate to the requirements of the Apartment Guidelines (2018), SPPR8(ii) in relation to private amenity space and SPPR 4 and Section 3.18 in relation to the dual aspect and north facing units, should be provided.
4. It is considered that on-site childcare facilities be provided as part of any application.
5. The applicant is requested to clarify the number of trees to be removed to and consider amendments to the building layout and attenuation system to maximise tree retention. In addition the quantity of compensatory tree planting shall be stated in the tree survey/landscape report.

6. It is recommended that public open space should be in a maximum of 2 units of space to maximise retention of the existing tree belts. The proposed location of Block A1 in public open space is undesirable while the proposed 'Central Plaza' is primarily vehicular and not suitable as public open space. Suitable buffer private/communal open space or boundaries should also be provided between the private building facades and public open space.
7. Address issues raised in the Transportation Planning Division report, including issues relating to
 - A review of the Sanford Road vehicular entrance should be carried out and vehicular access requirements clearly demonstrated.
 - Review of interaction with public roads.
 - Review of internal roads layout.
 - A review of pedestrian and cyclist desire lines within the development
 - A review of the surface car parking layout within the Forecourt and Plaza areas.
 - Clarification in respect to the proposed car parking provision.
 - Provision of adequate bicycle parking.
8. Review surface water drainage details and submission of a revised flood risk assessment

The opinion concludes that on balance however, on the basis of the information received, it is considered that the development as proposed is consistent with the relevant provisions of the City Development Plan 2016-2022.

The opinion is accompanied by copies of internal reports from the following sections:

- Transportation Planning Division
- Drainage Division
- Housing Department
- Parks, Bio-diversity and Landscape Services.

I have reviewed and considered all of the documentation submitted by the planning authority relating to this case.

8.4. The Consultation Meeting

A Section 5 Consultation meeting took place via Microsoft Teams on the 23/10/2020. 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. I refer to the record of this meeting record.

8.3.2. The main topics raised for discussion at the tripartite meeting were as follows:

- Compliance with Z15 Zoning Objective
- Development Strategy – height and layout
- Tree loss / retention
- Access and parking, including access for pedestrians and cyclists
- Residential amenity – housing mix, daylighting, aspect, childcare
- AOB

In relation to compliance with Z15 Zoning Objective, An Bord Pleanála sought further elaboration/discussion/consideration on the following:

- Future institutional requirements for these lands.
- Compliance with the specific requirement for 25% of the lands to be provided as public open space, and the nature and layout of such space within the proposed development.
- The function and treatment of the proposed plaza area off Sandford Road as public open space.
- The extent of public interaction with and access to the lands.

In relation to the Development Strategy – height and layout, An Bord Pleanála sought further elaboration/discussion/consideration on the following:

- The design rationale and evolution of the design process, particularly for block A1, including reference to alternatives considered.
- The contravention of the 16m limit specified in development plan.

In relation to the Tree loss / retention, An Bord Pleanála sought further elaboration/discussion/consideration on the following:

- The woodland character of the site and future management of such areas.
- The need for clarity with regard to the number of trees to be removed, the condition of such trees and the rationale for their removal.
- Potential for amendments to maximise tree retention.

In relation to Access and Parking, including access for pedestrians and cyclists, An Bord Pleanála sought further elaboration/discussion/consideration on the following:

- Clarity on the requirement for vehicular access from Sandford Road.
- The vehicular and parking function of the proposed Plaza vis a vis its role as open space.
- The provision of secure bicycle parking.

In relation to Residential amenity – housing mix, daylighting, aspect, childcare, An Bord Pleanála sought further elaboration/discussion/consideration on the following:

- Clarity on the treatment of BTR versus BTS in terms of residential amenity standards.
- Clarity on the description and identification of dual aspect apartments and compliance with Guideline requirements.
- Clarity with regard to internal daylighting assessments.
- The presentation of the results of daylight and sunlight analysis.
- The provision of childcare facilities within the development.

In relation to Any Other Business, An Bord Pleanála referred the prospective applicants to the issues identified in the planning authority opinion on the proposed development.

9.0 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 submissions including the documentation submitted by the prospective applicants, the submission of Irish Water, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, including section 28 Ministerial Guidelines and local policy via the statutory plan for the area.

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: **constitutes a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.**

10.0 Recommended Opinion

The Board 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 **would constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**

Furthermore, 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. Further elaboration, including a map to an appropriate scale, of land uses across the entire Z15 land use zoning at Milltown Park.
2. Further elaboration of how the proposed extent and layout of public open space meets the specific requirements of the Z15 land use zoning objective. This shall consider the treatment of the proposed Public Plaza and access road from Sandford Road as public open space, as well as measures to improve public access to, and interaction with, the proposed public open space.
3. Further consideration and/or justification of the documents as they relate to the height and design strategy. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site as it relates to height provides the optimal architectural solution for this location within the city and should submit a rationale/justification for the heights, focussing in particular on Block A1. Such justification shall include details of alternative studies or design approaches considered.
4. Further consideration and/or elaboration of the documents as they relate to the treatment of existing trees and woodland on the site to include maps and drawings providing clarity with regard to:
 - Trees to be retained and trees to be removed.
 - The condition of such trees, and
 - The rationale for removal – i.e. whether due to condition or development impacts.
 - The nature and extent of compensatory planting to be provided.

Further consideration should be given to alternative development layouts to minimise the loss of trees.

5. Further consideration and/or justification of the documents as they relate to the requirement for vehicular access from Sandford Road to the site and to the proposed Plaza area, having regard to the impact of such access on adjoining roads and on the function of identified public open spaces within the site.
6. i) Further elaboration and / or justification of the documents as they relate to the proposed extent, allocation and management of car parking within the site.
ii) Further consideration of the extent of bicycle parking provision within the development, in the context of the provisions of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.
7. Further elaboration of measures to avoid overlooking and loss of privacy due to overlooking of existing adjoining residential properties, to include detailed section drawings illustrating their relationship with the proposed development.
8. Further elaboration and / or justification with regard to the design and layout of residential accommodation and compliance with the relevant standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, in respect of Build-to-Sell and Build-to-Rent residential development. Further elaboration of the documentation should be provided in particular, in respect compliance with SPPR4 in relation to dual aspect provision, SPPR7 in respect communal and recreational facilities and SPPR8 in respect of private amenity space.
9. Further justification and / or consideration of the provision of childcare facilities within the development having regard to the scale of development proposed and the level of childcare provision in the surrounding area.
10. Regard should also be had to the matters raised under item no. 8 of the planning authority Opinion in respect of Transportation and item no. 9 in respect of surface water drainage and flood risk.

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. National Transport Authority
3. Minister of Culture, Heritage and the Gaeltacht
4. An Taisce - the National Trust for Ireland
5. Heritage Council
6. An Comhairle Ealaíonn
7. Fáilte Ireland

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.

Conor McGrath
Planning Inspector

06/11/2020