

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

Inspector's Report on Recommended Opinion ABP-308186-20

Strategic Housing Development	233 no. apartments, creche and associated site works.	
Location	Junction of Ravens Rock Road and Carmanhall Road, Sandyford, Dublin 18.	
Planning Authority	Dun Laoghaire Rathdown County Council	
Prospective Applicant	Sandyford Environmental Construction Ltd.	
Date of Consultation Meeting	17 <sup>th</sup> December 2020	
Date of Site Inspection	11 <sup>th</sup> December 2020	

Inspector

Una O'Neill

## Contents

1.0 Introduction 4
2.0 Site Location and Description4
3.0 Proposed Strategic Housing Development5
4.0 Planning History6
5.0 Section 247 Consultation(s) with Planning Authority
6.0 National and Local Planning Policy7
7.0 Forming of the Opinion10
8.0 The Consultation Meeting13
9.0 Conclusion and Recommendation17
10.0 Recommended Opinion

### 1.0 Introduction

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

#### 2.0 Site Location and Description

- 2.1. The subject site, 0.56 ha in area, is located within the Sandyford Business District, Dublin 18, at the junction of Carmanhall Road and Ravens Rock Road. The site has frontage onto both the Ravens Rock Road to the west (89m) and Carmanhall Road to the north (61m). The site is bounded to the east by a vacant site, which has a permission for student accommodation (ref ABP-303467-19). The site to the south comprises a low rise commercial property. Sites on the opposite side of Carmanhall Road have been redeveloped as office blocks known as 'The Atrium' and 'The Chase', located on the east and west side respectively of the junction between Arkle Road and Carmanhall Road. The sites on the opposite side of Ravens Rock Road comprise two-storey commercial buildings developed as part of what was then the Sandyford Industrial Estate.
- 2.2. The surrounding area consists of low rise industrial, employment and office use. This area has been undergoing a transformation in recent years, particularly along the Luas line north of the site, with relatively new office accommodation developed on the sites on the northern side of Carmanhall Road, opposite the application site. New developments in the surrounding area include a mix of purpose-built office blocks, mixed-use developments (residential and commercial), and The Beacon Hospital. SHD applications (ABP 305940-19 & ABP 301428-18) have been granted for high density development on the outskirts of the business park, along Blackthorn Avenue.

2.3. The site comprises two vacant light industrial units with ancillary office accommodation and parking to the north and west, with an area of lawn along the northwestern boundary of the site. The boundaries to the adjoining streets are undefined, with a wide grass verge, street trees and public footpath. There is a level change of approx. 3m from the south to the north of the site.

## 3.0 **Proposed Strategic Housing Development**

3.1. The proposed development is for 233 build to rent residential units, a creche, shared amenity facilities, landscaping, underground parking and all site development works above and below ground on three blocks ranging from 6 to 14 storeys above a double basement.

Parameter	Site Proposal			
Site Area	0.56 ha			
No. of Residential Units	233 BTR units			
Other Uses	1 creche (340 sqm)			
Density	417 units per ha			
Building Heights	7 to 15 storeys			
Open Space	<ul> <li>0.09 ha / 902 sqm (17% site area) of communal space at ground level.</li> <li>2189 sqm (39% site area) at Podium, 7<sup>th</sup>, 8<sup>th</sup>, and 9<sup>th</sup> floor terraces.</li> </ul>			
Plot Ratio	3.65			
Parking	Double Basement - 123 car parking spaces [0.5 spaces per apartment]			

Table 1: Development Parameters

	460 bicycle parking		
Dual Aspect	47% (107 units)		
Vehicular Access	From Ravens Rock Road		

Table 2: Unit Mix

Unit Type	Studio	1 bed	2 bed	3 bed	Total
Apartments	31	125	66	11	233
% Total	13%	54%	28%	5%	100%

## 4.0 Planning History

**D05A/0566** – Permission granted for 182 apartments with retail unit and gym, in three blocks ranging in height from 10-14 storeys.

Adjoining Site to the East:

**ABP 303467** - Permission granted for a student accommodation development comprising 817 no. bed spaces and ancillary support facilities, 2 no. commercial units fronting Blackthorn Road (café/lounge and launderette), 57 no. car parking spaces and 586 no. bicycle parking spaces, service and emergency vehicular access from Blackthorn Road, and all ancillary works.

The permitted development comprises blocks ranging from 7 to 9 no. storeys, with a stated floor area of 25,459sq.m.

**D16A/0158**: Planning permission granted for a mixed-use development comprising 147 no. apartments, creche facility, gymnasium, media suite and café fronting onto Blackthorn Road, undercroft carpark for 151 no. carparking spaces, 158 no. bicycle parking spaces, services and plant, new vehicular entrance and fire tender/cycle access from Blackthorn Road, landscaped courtyard, and all associated works.

The permitted development comprises blocks ranging from 5 to 8 storeys having a stated floor area of 16,167sq.m.

## 5.0 Section 247 Consultation(s) with Planning Authority

5.1. A consultation meeting under Section 247 of the Planning and Development Act 2000 (as amended) took place on the 16<sup>th</sup> November 2019 and 24<sup>th</sup> July 2020. The following issues were discussed: Density; Height; Parking Standards; Dual Aspect Ratio; Design of Buildings; Trees; and Vehicular access and parking

## 6.0 National and Local Planning Policy

#### 6.1. Project Ireland 2040 – National Planning Framework

The National Planning Framework includes a specific Chapter, No. 6, entitled 'People Homes and Communities'. It includes 12 objectives, including the following:

- Objective 27 which seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- Objective 33 which seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- Objective 35 which 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.

## 6.2. Eastern & Midlands Regional Assembly, Regional Spatial & Economic Strategy (EMRA-RSES).

- Dun Laoghaire Rathdown is located within the Dublin Metropolitan Area (DMA).
- Section 4.4 There is potential for the re-intensification of employment lands at Sandyford Business Park.

• Section 5.4- Upgrades to the green LUAS line will support development in Sandyford.

• Table 5.1- Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing. New emerging mixed-use centres at Sandyford.

#### 6.3. Section 28 Ministerial Guidelines

The following Section 28 Ministerial Guidelines are considered to be of particular relevance:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018).
- Urban Development and Building Heights Guidelines for Planning Authorities, (2018).
- Design Manual for Urban Roads and Streets.
- Childcare Facilities Guidelines for Planning Authorities.
- Architectural Heritage Protection Guidelines for Planning
   Authorities.

#### 6.4. Local Planning Policy

The **Dun Laoghaire Rathdown County Development Plan 2016-2022** is the operative county development plan for the area.

- Sandyford is a "secondary centre" in the development plan Core Strategy.
- Sandyford Business District is identified as a primary growth node from which a significant portion of the supply of residential units will derive up to 2022 and beyond.
- Zoned Objective 'A2'; to provide for the creation of sustainable residential neighbourhoods and preserve and protect residential amenity.
- It is a specific objective of the Development Plan to protect and preserve trees on the east side of the junction between Carmanhall Road and Ravens Rock Road.
- Appendix 15: Sandyford Urban Framework Plan
  - Land Use Zoning: Residential

 Application site is within Zone 5 Carmanhall Road Neighbourhood. The SUFP states 'This residential neighbourhood shall be contained by tall buildings at either end of Carmanhall Road where the building line along the southern side of Carmanhall Road shall be set back to provide a linear greenway. This linear greenway will widen into a substantial Civic Park located at the junction of Corrig Road and the north west of Carmanhall Road. It is envisaged that the Park together with the greenway will provide high amenity open space for both the local residents and employees alike.

- Residential Density: 150 units/ha.
- **Building Height**: 6 storey at the boundary with Ravens Rock Road; 8 storey for the remainder of the site.

• **Objective BH1:** It is an objective of the Council to ensure that Sandyford Business District is developed in accordance with height limits set out in Map 3 Building Height subject to the building making a positive contribution to the built form as set out above.

• **Objective BH2:** It is an objective of the Council to require applicants to include with their proposals an analysis of the impact of the height and positioning of buildings on: > Immediate and surrounding environment; > Adjoining structures; > Open spaces; > Public realm (including impact on streets, spaces, pedestrian and cycle routes, identified green routes, and with particular emphasis on shadow impact); > Views and Vistas; and > Impact on micro climates (such as wind funnels and overshadowing).

• **Objective PR1:** It is an objective of the Council to ensure the provision of a high quality, safe, attractive and functional public realm. This shall be achieved through the appropriate and planned use of space and structure, building interface, continuous street frontages and enclosure, hard and soft surfaces, high quality materials, textures, planting, street furniture, lighting and signage and by encouraging a positive relationship between the buildings and the surrounding environment.

• The building line along Carmanhall Road should be set back to protect the existing sylvan character and provide a buffer from the employment.

## 7.0 Forming of the Opinion

7.1. 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 submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

#### 7.2. Other Submissions

Irish Water – Confirmation of feasibility issued.

#### 7.3. Documentation Submitted

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, a Completed Application Form, Cover Letter, Planning Report, Statement of Consistency, Material Contravention Statement, Daylight and Sunlight Report, EIA Screening Report, Bat Report, Appropriate Assessment Screening, Engineering Report, Flood Risk Assessment, Architectural Drawings and Design Statement, Engineering Drawings, Traffic and Transport Assessment, Landscape Plan, Arboricultural Assessment, Tree Survey and Constraints, and Part V Submission.

#### 7.4. Applicant's Statement of Consistency

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.

#### 7.5. Applicant's Material Contravention Statement

Material contravention statement submitted which addresses density and building height.

#### 7.6. Planning Authority Submission

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 submitted a note of the S.247 meeting, the planning authority opinion, along with interdepartmental reports and the relevant planning applications in the area. These were received by An Bord Pleanála on the 14<sup>th</sup> October 2020. The issues raised are summarised below:

• Concerns raised in relation to the scale/quantum of development, which is substantially greater than what is envisaged in the in the Sandyford Urban Framework Plan (SUFP) and would result in a deficient standard of residential amenity for future residents of the development.

- The following matters require further consideration on the part of the applicant:
  - Density and Quantum of Development
  - Site Layout
  - Building Height
  - Standard of Accommodation
  - Public / Communal Open Space
  - Public Realm
  - Access, Car and Bicycle Parking
  - Surface Water Drainage and Flood Risk

• Map 2 of the SUFP provides for a residential density of 150 dwellings per hectare on the subject site. The proposed development has a density of 416 dwellings per hectare. This would amount to circa 146 no. dwellings more than what the SUFP provides for (assuming SUFP provides for circa 87 no. dwellings based on a gross site area of 0.58ha as measured by the Drawing Office).

• There are no meaningful public open spaces within the Sandyford Business District. Lack of public open space and community facilities in the area for the scale of development proposed. 0.8 ha town/civic park to be provided under SUFP, 300m northwest of the site.
 This proposed park will be one of few in the wider Sandyford area and its delivery is essential to the quality of life of local residents and workers. No funding under URDF to develop it in the past – new bid by DLR to get funding.

• 0.8 ha park too small to cater for population proposed – designed for SUFP pop of c. 4546 persons.

• It is considered that a material departure from the SUFP residential density limits, as proposed, would result in a seriously deficient standard of community infrastructure, and public open space specifically.

• Layout and loss of trees to southwest - whilst the planning authority acknowledges that the redevelopment of this site will require the removal of some mature trees, there is scope to retain mature trees of value in the southwestern corner of the site which contribute to the public realm. The applicant should reconsider the site strategy in this regard.

• Building height – contrary to SUFP, which is based on thought out urban design rationale; further consideration of overall legibility of the district and location of existing and permitted landmark/tower buildings; consider implications if dev to west and south were to same scale.

• Development potential of sites to east and south – consider sunlight/daylight to east; proximity of façade to south.

• Standard of accommodation – number of north facing units. While not within 45 degrees of due north, windows are recessed and flanked by walls that would obstruct sunlight; ADF of 0.4% in some instances; scale of overshadowing of podium open space, which likely arises due to height.

• Public footpaths along Carmanhall Road and Ravens Rock Road - SUFP to deliver a high-quality public realm. The minimum 1.8m wide footpath as per DMURS is considered inadequate given high footfall.

• Access - involves the removal of a group of trees of value, including a semimature street tree; Car parking insufficient – want 1:1 parking ratio.

• Surface water drainage and flood risk - more information required.

## 8.0 The Consultation Meeting

8.1. A Section 5 Consultation meeting took place remotely via Microsoft Teams on the 17<sup>th</sup> December 2020, commencing at 10.00 am. Representatives of the prospective applicant, the planning authority and An Bord Pleanála participated in the meeting. An agenda was issued by An Bord Pleanála prior to the meeting.

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. Planning Policy Context SUFP
- Development Strategy layout and public realm, scale and design of blocks, open space
- 3. Residential Amenity sunlight/daylight, dual aspect apartments, residential support facilities and amenities, communal open space
- 4. Transportation
- 5. Water Services
- 6. Any Other Matters

#### 8.2. Planning Policy Context, SUFP

In relation to the Planning Policy Context for the area, ABP representatives sought further elaboration/discussion/consideration in relation to the following issues:

- Greater reasoning and justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2016-2022 and the Sandyford Urban Framework Plan including (inter alia) issues of compliance with density and height strategy.
- Greater rationale required in terms of height strategy adopted note the SUFP states 'this residential neighbourhood shall be contained by tall buildings at either end of Carmanhall Road'. The SUFP sets out a height strategy for this area. The documentation needs to assess the implications of the proposal on the adopted development strategy for the area, visual impact and issue of legibility.

- Documentation needs to clearly set out what amenities/community/social infrastructure is available in the area which would support the proposed development of 233 apartments at density of 417 units per hectare.
- There is a notable absence of public open space in the area. Documentation should demonstrate what exists and what is proposed for the area.
- Material Contravention Statement should address all aspects of the development plan and SUFP, which are being potentially materially contravened.

# 8.3. Development Strategy - layout and public realm, scale and design of blocks, open space

In relation to development strategy, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Layout and Public Realm pedestrian movement around and between the blocks needs to be more clearly indicated on the plans, in particular where ramps and steps are proposed, to highlight permeability across the block and safe pedestrian routes/connections.
- Additional details required in relation to how the proposed pedestrian path on the 'green street' interfaces with the ramp to the basement car park along the southern boundary and potential for conflict with cars/desirability of this route for pedestrians. Consideration of interface and passive surveillance of path along the eastern boundary and legibility of the pedestrian entrance to the podium level from this path to support permeability across the block.
- Interaction of the buildings with the public realm along Carmanhall Road and Ravens Rock Road – more detail required in relation to 'linear greenway' required under the SUFP and footpath improvements required along Ravens Rock Road to support this development. Consideration of a privacy strip to units facing Ravens Rock Road and to the units at the corner of Block C with Ravens Rock Road; consideration of the interface of apartments in block C which have main habitable windows immediately along the boundary with the car park access.

- Further detail and consideration of public realm works required, which are in the ownership of the planning authority and would require inclusion in the red line boundary and a letter of consent.
- Clarity in relation to whether Block C residents can access the communal open space at podium level from that level.
- Clarity in relation to whether the public pathway to the west of Block C connects into the balcony connection between the shared amenity room in Block C and the shared amenity room in Block B. Are the upper level shared amenity areas accessible from the podium level?
- Scale and Design of Blocks further consideration of impact of the bulk, scale and massing of the proposed development on the adjoining sites and vice versa.
- Open Space indicate clearly on the plan the calculation of open space areas, what is included and what is excluded. Note that the play area for the childcare facility is not indicated on the plan and should not be included in the communal area calculation. The quantum and quality of the communal open space, including detailed designs, required for communal open space at podium level and above on the 7<sup>th</sup>, 8<sup>th</sup> and 9<sup>th</sup> floors - demonstrate amenity value of upper level spaces, functionality, wind impact, etc.
- Trees more detailed arboricultural assessment required.

## 8.4. Residential Amenity – sunlight/daylight, dual aspect apartments, residential support facilities and amenities, communal open space

In relation to the Residential Amenity, ABP representatives sought further elaboration/discussion/consideration in relation to:

• <u>Sunlight/daylight</u> – impact on proposed apartments and impact on the courtyard and roof terraces. Level of sunlight in central podium raised as a concern. Note some apartments do not meet ADF values.

• <u>Dual aspect apartments</u> – Plans should clearly indicate all the units considered to be dual aspect. Submission in relation to the primarily north facing units requires further justification in terms of residential amenity, and consideration of outlook and access to daylight/sunlight.

• <u>Residential support facilities and amenities</u> – documentation needs to be clear on what facilities are being provided, the quantum of facilities, and justification for the scale of facilities being provided for the projected population. Plans need to be clear on quantum of functioning/usable shared amenity spaces and accessibility of these spaces.

• Residential amenity of apartments along basement access ramp.

 Own door access to ground floor studios from Ravens Rock Road – 2 bed apartment has a window to second bedroom at a lower ground level – clarify access to sunlight/daylight and outlook from this room. The studio apartments have mezzanines of 24sqm to 35sqm at the upper level – clarify use of this level.

- Clarify design rationale for mezzanine level to the childcare facility.
- Identify bin storage areas proximate to cores.
- Identify play area for the childcare facility and how it interfaces with the proposed podium level open space and playground.

#### 8.5. Transportation

In relation to Transportation, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Quantum of car parking.
- Accessibility of cycle parking spaces. Provision for cycle parking in the public realm.
- Loading bay on Ravens Rock Road and impact on the public realm
- PA proposals for a cyclepath.

#### 8.6. Water Services

In relation to the Water Services, ABP representatives sought further elaboration/discussion/consideration in relation to:

- Further detail required in relation to surface water drainage proposal.
- Flood risk assessment in relation to blockages and potential for surcharging.
- Further detail in relation to blue roof proposals.

#### 8.7. Any Other Matters

- Advised that there is no provision for further information at application stage, all details to be submitted at application stage; ensure consistency between documentation submitted by various consultants.
- A robust assessment is required in relation to SUFP and Development Plan.
- Requirement to gain consent from the Council for works within the public realm and inclusion within the red line boundary.

#### 9.0 Conclusion and Recommendation

- 9.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 9.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.
- 9.3. Having regard to all of the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 9.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

### 10.0 Recommended Opinion

- 10.1. 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.
- 10.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires **further consideration and amendment** to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.
  - 1. Development Strategy

Further consideration/justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2016-2022, specifically Appendix 15: Sandyford Urban Framework Plan, in relation to the scale, height, and design of the proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford. The further consideration/ justification should address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the density and height strategy in the development plan, issue of legibility, visual impact, and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

2. Residential Amenity

Further consideration and/or justification of the documents as they relate to future residential amenity, having particular regard to the following:

• Permeability of the block for pedestrians and movement strategy within and around the blocks, including consideration of interface with and passive

surveillance of paths along the eastern and southern boundary, and legibility of the pedestrian entrances to the development.

- The quantum and quality of communal open space including the availability of sunlight and daylight to the courtyard, roof gardens, and the functionality of the spaces, including the 'pocket park'.
- Sunlight and daylight within the apartments.
- The further consideration of dual aspect units having regard to the requirements of the Sustainable Urban Housing Design Standards for New Apartments (2018), SPPR 4. Further justification required in terms of residential amenity, consideration of outlook, and access to daylight/sunlight.
- Access to community and social infrastructure, open space and amenities, in the wider area.
- 10.3. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.
- 10.4. 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 arising from this notification:
  - Consider further the permeability of the blocks, pedestrian movement strategy between blocks, interface and access to podium level open space, clarity in relation to level changes, interface with proposed new streets, and potential conflict between pedestrians and vehicles using the basement access ramp/'street'.
  - Detail and justification of location and quantum of resident support facilities and resident services and amenities as defined by the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018) and accessibility/ease of access to those spaces by future residents.
  - Further detail and consideration of works required to the public realm, including the 'linear greenway' required under the SUFP along Carmanhall

Road and footpath network along Ravens Rock Road, including a letter of consent from the planning authority in relation to any areas in their ownership.

- 4. Further consideration of the interface of ground level apartments with Ravens Rock Rock and with the ramp to the basement car park.
- 5. Details of boundary treatment across the site.
- Detailed quantum and design of open space proposals at all levels including consideration of issues related to wind micro-climate, design, and usability of spaces, in particular at the upper levels, and any implications of the blue roof design.
- Identify provision of segregated play space for the proposed childcare facility, interface of such a facility with communal open space, and consideration of access to sunlight/daylight in the childcare facility.
- 8. Rationale in relation to the mezzanine levels proposed in the design of the apartments and childcare facility.
- 9. Detailed Arboricultural Assessment.
- 10. A Social and Community Audit
- 11. Provide further justification for the level of car and cycle parking proposed and detail the design of cycle parking spaces and secure storage areas. The justification should include an analysis of car and cycle parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.
- 12. Provide updated Sunlight and Daylight Analysis (based on a representative sample of units that includes assessment of worst-case scenarios); updated Wind and Microclimate Analysis (including details of any proposed mitigation measures); and an Inward Noise Assessment.
- 13. A Materials Strategy that details all materials proposed for buildings, open spaces, paved areas and boundaries. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials on each block. The documents should also have regard to the

durability of materials and the long-term management and maintenance of the proposed development.

- 14. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance of the various requirements of the 2018 Guidelines on Design Standards for New Apartments.
- 15. A Building Life Cycle Report that includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments.
- 16. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.
- 17. Information for the purposes of screening for EIA as set out in schedule 7A of the Planning and Development Regulations 2001 (as amended) where the application is not accompanied by a full EIAR. The information should be submitted as a standalone document and refer to the potential for cumulative effects in conjunction with other permitted and planned housing and road developments in the area.
- 18. A detailed Construction Environmental Management Plan.
- 19. 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.
- 20. Response to issues raised by the Transportation, Drainage Planning, and Parks Divisions of Dun Laoghaire Rathdown County Council, as per the reports submitted in Appendix C of the Planning Authority Report, received 15<sup>th</sup> September 2020.
- 21. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement

indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

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. The relevant 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. Una O'Neill Senior Planning Inspector

21<sup>st</sup> December 2020