



An  
Bord  
Pleanála

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

**Inspector's Report on  
Recommended Opinion  
ABP-308536-20**

**Strategic Housing Development**

Demolition of secondary school extension to Bray Head House and other minor structures on site, construction of 182 no. apartments, creche and associated site works.

**Location**

Bray Head House (a protected structure), Putland Road, Bray, Co. Wicklow.

**Planning Authority**

Wicklow County Council

**Prospective Applicant**

Denver Valley Developments Ltd.

**Date of Consultation Meeting**

15/01/2020

**Date of Site Inspection**

08/01/2020

**Inspector**

Conor McGrath

## **Contents**

1.0 Introduction .....	3
2.0 Site Location and Description .....	3
3.0 Proposed Strategic Housing Development .....	4
4.0 Relevant Planning History .....	5
5.0 Section 247 Consultations with Planning Authority .....	6
6.0 Planning Policy .....	7
7.0 Submissions Received .....	12
8.0 Forming the Opinion .....	13
9.0 Conclusion and Recommendation .....	18
10.0 Recommended Opinion .....	19

## 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 comprises a stated area of 2ha, located to the south of Putland Road on the southeastern side of Bray. The site was formerly part of the Presentation College school campus and is occupied by a 2-storey over basement building known as Bray Head House, or sometimes *The Monastery*, which is a Protected Structure (Ref. B67). To the west and adjoining the house, is a two storey 1950's wing which extends to a three-storey element at its western end.
- 2.2. The house was once occupied by the Presentation Brothers and the adjoining 1950's wing accommodated the primary school, with the secondary school occupying elevated lands to the west. Upon closure of this primary school, the buildings were occupied by the North Wicklow Educate Together until 2020. The buildings are currently vacant. Bray Head House is in relatively poor condition and door and window opes have been blocked up. The original school entrance avenue from Putland Road, which is now closed, continues south through the lands to Newcourt Road.
- 2.3. To the rear / south of the extant buildings is an expansive former yard area. Structures originally associated the house and school on the southeastern side of the site have been demolished, on foot of a previous permission for a nursing home on the lands. The southwestern corner of the site includes a wooded area with a number of high-quality trees. The large tree to the front of Bray Head House is also a notable feature of the site. On the eastern side of the site, former tennis courts, lie at a lower level than the remainder of the lands.

- 2.4. An adjoining residential development to the east and south of the site, known as The Headlands, comprises approx. 139 no. houses, duplex and apartment units, constructed on lands that were formerly associated with the college, previously in agricultural use. This development has a separate vehicular and pedestrian access from Putland Road to the north. The extensive area of existing open space to the north of Bray Head House comprises part of the Headlands open space.

### 3.0 Proposed Strategic Housing Development

- 3.1. The proposed development involves the demolition of the 1950's school wing and any remaining outbuildings on the site, and the construction of 182 no. apartments in three blocks around the protected structure, as well as the refurbishment of Bray Head House to accommodate 9 no. apartments. The western apartment block, Block A, will accommodate a creche with capacity for 30 no. children. The proposed apartment blocks are to be finished in brick cladding with light-weight metal cladding to upper floors. The original entrance avenue will be reopened to serve the development, while a pedestrian and cycle connection through the lands between Putland Road to the north and Newcourt road to the south will be accommodated.
- 3.2. Key development parameters include:

Net Site Area	2 hectare / 5 Acres
Residential units	182 units 1-beds - 36 (19.8%) 2-beds -131 (72%) 3-beds - 15 (8.2 %)
Density	91 units per Ha
Cumulative GFA	18,016.25-sq.m.
Plot Ratio	0.90
Dual Aspect Units	112 / 61.5 %
Car parking spaces	174 (0.95 / unit) incl. visitor parking 149 @ basement 25 @ Surface

Bicycle parking spaces:	442  350 at basement level 1 per b'room plus creche staff 92 surface level visitor spaces
Public Open space	4,932-sq.m. / 24%
Communal Open Space	2,934-sq.m.

#### 4.0 Relevant Planning History

There have been many previous planning applications on these school lands, including the following:

**PA ref. 08/630086:** Permission granted for change of use of the Presentation Brothers residence (*The Monastery*) to school use and associated works. An appeal under PL39.232202 was withdrawn.

**PA ref. 09/147      ABP ref. PL39.238144:** Permission granted in 2011 for an 88 –bed nursing home, of two to four-storeys with vehicular entrance from ‘The Headlands’, located to the south of and within the curtilage of *The Monastery*. The appropriate period of this permission was extended under PA ref. 16742, however, this permission was never implemented.

##### Adjoining lands:

**PA ref. 28/98      ABP ref. PL39.108989:** Permission granted for The Headlands residential development to the east of the subject site.

**PA ref 99/240:** Permission granted for modifications to apartment block no. 2 previously proposed under 28/98, PL39.108989.

**PA Ref. 00/85      ABP Ref. No. PL39.120813:** Permission refused in 2001 for revisions to The Headlands development to provide an additional six number duplex units. The refusal related to the location of the proposed units on an area designated as open space in the original permission, resulting in the loss of a transitional area between the permitted new development and the existing educational uses.

**PA Ref. 06/205:** Permission granted in 2006 for demolition of the existing three-storey secondary school building and swimming-pool to the west of the subject site, and construction of new school buildings, new access road to the school off the existing avenue and associated works.

**PA ref. 10/27 ABP ref. PL39.236905:** Permission granted for works additional to previously approved development (Planning. Ref. No. 06/205), including a new entrance and access road off Putland Road to the secondary school.

**PA ref. 19/737:** Further information was requested in respect of application by North Wicklow Educate Together Secondary School for temporary post primary school buildings and associated works to the south of the old Monastery residence (protected structure).

**PA ref. 20/1004:** Further information has been sought in respect of a current application for amendments to the existing school entrance from Newcourt Road and internal roads, which will include provision for a separate cycle and pedestrian link between Newcourt Road and Putland Road.

## **5.0 Section 247 Consultations with Planning Authority**

The planning authority submission refers to pre-application consultations undertaken on 9<sup>th</sup> June 2020, wherein the following matters were discussed:

- Policy provisions.
- Matters raised in previous planning application on the lands (19/737)
- Relationship with adjoining lands and clarity with regard to land ownership.
- Principle of development and suitability for this site.
- Access and permeability – Newcourt Road connection and links to Headlands.
- Protection of Trees.
- Archaeological Impacts.
- Treatment of protected structures.
- Residential amenities of existing adjoining and future residents.
- Building height and massing strategy.
- Childcare provision.
- Materials and finishes.

- Engineering, including road design and layout.
- Part V.
- Social Infrastructure Audit.

## 6.0 Planning Policy

### 6.1. National and Regional Planning Policy

#### 6.1.1. Project Ireland 2040 - National Planning Framework

National Strategic Outcome 1 is identified as Compact Growth, recognising 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.

Objective 3A seeks the delivery of at least 40% of all new housing in existing built-up areas of cities, towns and villages on infill and/or brownfield sites.

Objective 11 favours development within existing cities, towns and villages, subject to appropriate planning standards and achieving targeted growth.

Objective 13 provides that, in urban areas, planning and related standards will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.

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

#### 6.1.2. Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019)

Bray is a Key Town within the Dublin Metropolitan Area, which towns are described as large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.

The strategy is to provide for the sustainable, compact, sequential growth and urban regeneration in the town core of identified Key Towns by consolidating the built

footprint through a focus on regeneration and development of identified Key Town centre infill / brownfield sites.

Bray is located on the North-South development corridor. The DART Expansion Programme will support ongoing large-scale urban expansion.

RPO 4.3 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.

RPO 4.8 Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth targets of 30% of all new homes to be built within the existing built-up urban area.

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

The overarching aim is to ramp up delivery of housing across all tenures to meet their housing needs. This Plan sets ambitious targets to double the annual level of residential construction in the period to 2021. The plan identifies five pillars for activity. Pillar 3 relates to building more homes, where the key objective is defined as increasing the output of private housing to meet demand at affordable prices.

#### **6.2. S.28 Ministerial Guidelines**

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the Planning Authority, the following section 28 Ministerial Guidelines are considered to be relevant to the proposed development.

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, and the associated Urban Design Manual.
- Sustainable Urban Housing: Design Standards for New Apartments. Guidelines for Planning Authorities 2020
- Design Manual for Urban Roads and Streets (DMURS) 2013 - 2020.



- Architectural Heritage Protection Guidelines for Planning Authorities (2011)
- Childcare Facilities – Guidelines for Planning Authorities.
- The Planning System and Flood Risk Management. Guidelines for Planning Authorities.
- Urban Development and Building Heights Guidelines for Planning Authorities (2018)

### 6.3. Local Planning Policy

#### 6.3.1. Wicklow County Development Plan 2016- 2022

Bray is designated as a Metropolitan Consolidation Town, defined as a Strong active urban place within the metropolitan area with strong transport links, whose population is targeted to increase from 29,339 in 2011 to 40,000 in 2028.

Chapter 4, Housing, promotes development on suitably zoned lands, generally in accordance with the sequential approach. It places a strong emphasis on infill opportunities and better use of underutilised lands.

Housing objectives include:

- HD5 ..... new residential development shall be expected to aim for the highest density indicated for the lands.
- HD13 Apartments generally will only be permitted within the designated centres in settlements (i.e. designated town, village or neighbourhood centres), on mixed use designated lands (that are suitable for residential uses as part of the mix component) or within 10 minutes walking distance of a train or light rail station.

Cycling and Walking Objective

- TR11: To facilitate the development of foot and cycleways off road (e.g. through open spaces, along established rights-of-way etc), in order to achieve the most direct route to the principal destination while ensuring that personal safety, particularly at night time, is of the utmost priority.

Parking Objectives:

- TR35 New / expanded developments shall be accompanied by appropriate car parking provision, with particular regard being taken of the potential to reduce

private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 7.1 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.

Table 7.1 requires the provision of 1-2 no. spaces per dwelling unit.

Cycle parking is required on the basis of 1 space per bedroom + 1 visitor space per 2 units.

Heritage objectives (Chapter 10) include:

- BH10: To positively consider proposals to improve, alter, extend or change the use of protected structures so as to render them viable for modern use....
- NH14 To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of amenity or the environmental, as set out in Schedule 10.08 and Map 10.08 A, B & C of this plan.

(Note: Map 10.08c identifies an existing TPO on the Grounds of Presentation College.)

- NH16: Development that requires the felling of mature trees of environmental and/or amenity value, even though they may not have a TPO in place, will be discouraged.
- NH17 To discourage the felling of mature trees to facilitate development and encourage tree surgery rather than felling where possible.
- NH18 To encourage the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native, and appropriate local characteristic species, in all new developments.

#### Appendix 1 – Development and Design Standards

With regard to the intensity of development, measures such as ‘units per hectare’ do not allow meaningful measurement of the quantum of development permissible on mixed-use sites and do not reflect the range in unit sizes that may be proposed.

Therefore, plot ratio will apply in such areas. Unless otherwise specified, maximum plot ratio standards are identified.

<b>Location</b>	<b>Maximum plot ratio</b>
<b>Commercial, housing or mixed use core town centre (zoned TC)</b>	2 (20,000-sq.m. / ha)
<b>Commercial, housing or mixed use edge of centre (zoned TC)</b>	1 (10,000-sq.m. / ha)
<b>Housing only edge of centre</b>	0.5 (5,000-sq.m. / ha)
<b>Housing only greenfield</b>	0.35 (3,500-sq.m. / ha)

In terms of unit size and format, the plan states that in ‘edge of centre’ or ‘out of centre’ new residential development, the quantum of apartments allowable will be regulated, as this dense format of development is more suited to urban core locations, where direct access to services is available. In this regard the maximum quantum of floor space that may be devoted to apartments in ‘edge-of-centre’ locations shall be 40% of the development and 20% in ‘out-of-centre’ locations.

Public open space will normally be required at a rate of 15% of the site area.

### 6.3.2. **Bray Municipal District Local Area Plan 2018 – 2024**

The site is zoned Objective R-HD New Residential – High Density: To protect, provide and improve residential amenities in a high-density format.

This objective is to facilitate the provision of high quality, high density residential developments with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.

#### Ch. 2 Vision and Development Strategy

The residential development strategy includes:

- To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher

residential densities at appropriate locations, subject to a high standard of design, layout and finish;

Chapter 3, Residential Development, notes the aim to focus new residential development into the existing built envelope. The subject lands at Presentation College have an identified yield of 75 no. units on 2.2 ha. Objectives include:

- R2 ..... new residential development shall be expected to aim for the highest density indicated for the lands. .... Lands zoned Residential – High Density will be expected to achieve a density of not less than 50 units / hectare.
- R4 To encourage in-fill housing developments, the use of under-utilised and vacant sites ..... and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.

Chapter 9 Built and Natural Heritage

- AH1 To ensure the protection of all structures (or parts of structures) contained in the Record of Protected Structures.
- AH2 To positively consider proposals to improve, alter, extend or change the use of protected structures so as to render them viable for modern use, subject to consultation with suitably qualified Conservation Architects and / or other relevant experts, suitable design, materials and construction methods.....

Green Infrastructure Map GI1, identifies a Tree Preservation Order on the subject lands. Green Infrastructure objectives include:

- GI4 To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, where considered to be viable, safe and in line with sound arboricultural management, in the interest of amenity or the environmental, .....

## **7.0 Submissions Received**

- 7.1. Irish Water confirm that a Confirmation of Feasibility was issued for connection to Irish Water networks. An existing 150mm sewer traverses the site and the applicant is required to engage with Irish Water in respect of a feasibility assessment for any

sewer diversion. Irish Water will require the applicant to provide a contribution toward the costs of upgrade works required to increase the capacity in the water network. Any consents required will be the responsibility of the applicant to obtain.

## **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**

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, inter alia:

- Pre-Application Consultation Request Form and Fee
- Planning Report
- Statements of consistency
- Architectural Drawings
- Architectural Design Statement
- Landscape Design Report and Drawings
- Arboricultural Assessment
- Ecological Impact Assessment
- AA Screening Report
- EIA Screening Report
- Construction Environmental Management Plan
- Engineering Services Report
- Site Specific Flood Risk Assessment
- Demolition Justification and Outline Strategy
- Construction and Demolition Waste Management Plan
- Construction Management Plan

- Climate Change Assessment
- DMURS Design Statement
- Traffic & Transport Assessment
- Irish Water Confirmation of Feasibility
- Conservation Report
- Archaeological Assessment
- Social Infrastructure Audit
- Environmental Analysis
- Daylight/Sunlight Analysis
- Public Lighting Plan and Drawing
- Details of Part V Proposal
- CGIs and Verified Views
- Site Survey Drawings

In accordance with section 5(5)(b) of the Act of 2016, the documentation includes 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.

## **8.2. Planning Authority Submission**

A submission from Wicklow County Council was received by An Bord Pleanála on the 23rd day of November 2020 in accordance with Section 6(4)(b) of the 2016 Act. The submission includes a statement of the planning authority's opinion, details of pre-planning meetings and copies of internal reports prepared in respect of the proposed development. The report containing the opinion of the planning authority makes the following points:

- The proposed high density apartment development is acceptable in principle.
- The site can be characterised as an Intermediate Urban Location. Justification is required demonstrating that the site is suitable wholly for apartments.
- The mix of dwellings, and the overall design approach, is acceptable.

- The retention of the original house is welcome. There is no objection in principle to the demolition of the 1950's extension.
- Sub-division of the original house into apartments should retain the original plan and principle historic spaces and features thereof.
- Replacement window design should be sympathetic to the protected structure.
- These apartments are served by limited private open space.
- The removal of trees along the entrance avenue is contrary to the development plan objective for their protection and requires further consideration.
- Enhanced permeability is important for this high-density scheme with reduced parking provision. The development should facilitate a link between Putland Road and Newcourt Road.
- Improvements to the Putland Road entrance are welcome.
- The scheme is suitable for reduced parking provision subject to a submission of a parking demand report.
- The design and layout of proposed forecourt parking should be reviewed.
- Clarity with regard to the extent and location of cycle parking is required.
- The proposed creche does not appear to have sufficient capacity for this scheme.
- Boundary treatments should be informed by conservation expertise.
- Surface water drainage should be in accordance with relevant standards.
- Further archaeological assessments and investigations should be undertaken prior to lodgement of any application.
- A full and complete bat survey should be submitted with any application.
- Compliance with the storage provisions of the 2018 Apartment Guidelines should be demonstrated.
- The overshadowing impacts on Headlands properties require consideration.

The submission is accompanied by copies of internal reports from the following departments:

- Housing and Corporate Estates: The prospective applicant has made proposals to meet Part V requirements. There is a need for 1,2 & 3-bed units in Bray. Indicative costs have not been submitted.

- **Water and Environmental Services:** The surface water system should ensure that any overflow from the attenuation tank is dealt with, without adverse effects within the development or on adjoining properties.
- **Transportation, Water and Emergency Services:** The report identifies revisions to the width of the access roads, the basement car park access and the road layout at the development entrance. Traffic analysis should consider the Putland Road / Vevay Road junction. A shortfall in parking provision is identified.

### **8.3. The Consultation Meeting**

A Section 5 Consultation meeting on the 15th January 2021, commencing at 10am, via Microsoft Teams. I refer to the record of the meeting in respect thereof.

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. Refer to the ABP record of the consultation meeting.

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

- Principle and density of development
- Trees management / protection
- Access and parking
- Residential Amenity and Open Space
- Drainage
- Visual Impacts
- AOB

In relation to the principle and density of development, An Bord Pleanála sought further discussion / consideration on the following:

- Consistency with the provisions of the County Development Plan with regard to the extent of apartment provision on the lands.



- Consistency with the provisions of the County Development Plan and Municipal District LAP with regard to the permissible intensity of development on the lands.

In relation to tree management / protection, An Bord Pleanála sought further elaboration and clarification with regard to the following:

- The status, and implications for the development, of any TPO relating to these lands.
- Rationale for removal of trees from the lands.
- The nature and value of mixed woodland area in the southeastern corner of the lands.

In relation to access and parking, An Bord Pleanála sought further elaboration and clarification with regard to the following:

- Implementation and management of the proposed pedestrian-cycle route through the lands between Putland Road and Newcourt Road.
- The nature and layout of surface car parking.
- Design and layout of the junction with Putland Road.

In relation to Residential Amenity and Open Space, An Bord Pleanála sought further elaboration and clarification with regard to the following:

- Relationship with open space of the adjoining development, the Headlands.
- Potential overlooking / residential amenity issues within Block B due to proximity of proposed apartment units.

In relation to Drainage, An Bord Pleanála sought further clarification / elaboration on the following:

- Surface water drainage proposals and point of discharge.

In relation to the visual impacts, An Bord Pleanála sought further discussion / consideration on the following:

- Nature of materials and finishes proposed for the site.
- Requirement for additional drawings and / or imagery with regard to the northern elevations of Blocks A and C and relationship with the protected structure.

In relation to Any Other Business, matters raised included;

- Consultation with the Wicklow County Childcare Committee.
- The completeness of the submitted Ecological Impact Assessment.
- The requirement for letters of consent in respect of works on public roads.

## 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 information and 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.

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, which 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

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 S.4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under S.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**

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:

- Minister for Housing, Local Government and Heritage
- The Heritage Council
- An Taisce – The National Trust for Ireland
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Water
- Wicklow County Council Childcare Committee

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 consideration and elaboration in the documentation as to how the development is consistent with the provisions of the County Development Plan and the Municipal District Local Area Plan with regard to the intensity of development and mix of housing types proposed on the site.
2. Further detail and elaboration with regard to the protection and management of trees on the site and the implications for the development of any Tree Preservation Order under section 205 of the 2000 Act relating to these lands, as identified in the development plan for the area.

Details should include a rationale for the removal of identified trees, i.e. whether due to condition or development impacts and any potential avoidance measures.

A detailed woodland management plan should be provided which should identify specific measure to ensure the long-term maintenance and protection of retained trees on the site. Responsibility for implementation of such plan should also be identified.

3. Further consideration and elaboration with regard to the private amenity space requirements of residents of proposed apartments in Bray Head House, having regard to the provisions of the *Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities*.
4. Further elaboration of the works described in section 2.2 of the Engineering Services Report, *Proposed Access Scenario*, to include evidence of any landowner consent required in respect thereof.
5. Further plans and drawings providing clarity with regard to the routing of the proposed surface water drainage system and the final points of discharge. The

relationship with existing drains and sewers on adjoining lands, including connections and direction of flow, should be clearly identified.

6. A report that specifically addresses the proposed materials and finishes to the scheme including specific detail of finishes, landscaped areas, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes which have regard to the context and setting of the development.
7. Additional detail and views of the northern elevations of Blocks A and C and their relationship with Bray Head House, including in particular views from the northwest and from the entrance avenue.
8. Regard should also be had to the matters raised in internal Planning Authority reports from the Water and Environmental Services section dated 04/11/2020 and the Transportation, Water and Emergency Services Section, dated 11/11/2020.

**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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Conor McGrath  
Planning Inspector

18/01/2020