



An  
Bord  
Pleanála

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

**Inspector's Report on  
Recommended Opinion  
308723-20**

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<b>Strategic Housing Development</b>	172 residential units (89 no. houses; 83 no. apts); crèche, retail and associated site works
<b>Location</b>	Lands at Edmondstown (west of Kilmashogue Bridge and Coill Avon), Whitechurch Road, Rathfarnham, Dublin 16.
<b>Planning Authority</b>	South Dublin County Council Dun Laoghaire Rathdown County Council
<b>Prospective Applicant</b>	BCDK Holdings Ltd and Coill Avon Ltd
<b>Date of Consultation Meeting</b>	February 3 <sup>rd</sup> , 2021
<b>Date of Site Inspection</b>	January 24 <sup>th</sup> , 2021
<b>Inspector</b>	L. Dockery

## 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 and the documentation received from the prospective applicant, 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, which has a stated area of 7.12 hectares, consists of two green field sites that are located west of the Whitechurch Road and north of the M50. There are some existing derelict buildings on site and existing residential properties to the north of the site. The county boundary with Dun Laoghaire Rathdown administrative area, together with Marlay Park are located to the east of the site. Lands associated with Edmondstown Golf Club are located to the west of the site. The southern element of the site is currently under grass, in agricultural use. The Whitechurch stream, a tributary of the River Dodder runs along the eastern boundary of the site. The northern area of the site is heavily wooded to the roadside and a derelict bungalow is located on this area of the site while a derelict farmhouse and some outbuildings stand on the southern portion of the site. Both 35KV and 110 KV ESB lines traverse the site.

2.2 It is noted that part of the application site lies within Dun Laoghaire/Rathdown administrative area.

## 3.0 Proposed Strategic Housing Development

3.1 The proposed development comprises the construction of 172 residential units, together with retail units, crèche and café in a neighbourhood centre of 1186 square metres, two basement car parks, first section of a link street (438 linear metres),

upgrade works to College Road and Whitechurch Road, new signalised junction, upgrade existing access and all associated site works.

The following details are noted:

<b>Parameter</b>	<b>Site Proposal</b>
Application Site	7.12 ha (gross)/4.3 ha(net)
No. of Units	172 residential units (89 houses; 83 apartments)(110 units in S element, 62 units in N element)
Other Uses	Crèche- 274m <sup>2</sup> Cafe- 414m <sup>2</sup> 3 x retail units- 498m <sup>2</sup> The first section of a link street (approx. 438 linear metres) from the junction of Whitechurch Road and College Road Road Upgrade works
Density	40 units/ha (stated)
Height	3-7 storeys over lower level
Car Parking Bicycle Parking	283 spaces (97 N portion; 186 S portion)(1.44 space per house/1 space per apt/remainder for commercial) 145 (58 N portion; 87 S portion)
Vehicular Access	Whitechurch Road and proposed link road
Part V	10% provision

The breakdown of unit types is as follows:

	Studio	1 bed	2 bed	3 bed	4 bed	Total
Apartments	-	34	46	3	-	83
Houses	-	-	9	39	41	89
Total	-	34	55	42	41	172

3.2 The stated cumulative gross floor space of non-residential uses is 1186 square metres.

3.3 A Material Contravention Statement in relation to density in the context of H3 SLO1 has been submitted.

3.4 Letters of consent from both South Dublin County Council and Dun Laoghaire Rathdown County Council have been submitted with the documentation.

#### 4.0 **National and Local Planning Policy**

##### 4.1 National

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant Section 28 Ministerial Guidelines are:

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

- The Planning System and Flood Risk Management (including the associated ‘Technical Appendices’) (2009)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)
- Childcare Facilities, Guidelines for Planning Authorities (2001)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)

Other documents of note are:

- National Planning Framework, 2018
- Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019

## 4.2 Local

The South Dublin County Development Plan 2016-2022 and the Dun Laoghaire Rathdown County Development Plan 2016-2022 are the operative County Development Plans for the area.

### South Dublin County Development Plan 2016

Edmondstown is one of a number of areas designated as a ‘Consolidation Area within the Gateway’ within the operative CDP. Map 1.3 of the Core Strategy identifies the subject site as a ‘Housing Capacity Site’.

### Zoning:

‘Objective RES’ – ‘To protect and/or improve residential amenity’

Under the ‘RES’ zoning objective, residential use is permitted in principle. Childcare use, restaurant/café and ‘shop’ units, which based on their internal floor areas, would fall under a shop-neighbourhood use as per Schedule 5 of the CDP, would be open for consideration.

The site and wider area are subject to H3 SLO 1 of the operative South Dublin County Development Plan which states the following:

To facilitate the development of lands at Edmonstown (former Kilmashogue House) for the purpose of low-density residential development at a net density of not more than 12 dwellings per hectare, and to promote housing for older people (nursing home, independent and semi-independent) as a fully integrated part of such development with an increased density of not more than 20 dwellings per hectare to apply to independent and semi-independent housing for older people. All residential development, including housing for older people, shall be integrated within a sustainable residential neighbourhood that is served by shared public open space, community and local facilities. Permissible densities may be increased in accordance with the relevant ministerial guidelines where issues of accessibility have been fully resolved in an appropriate manner. Any future development should have regard to the boundaries with and the protection of the existing amenity and function of Edmondstown Golf Course.

H9 Objective 4 of the CDP: Residential Building Heights: To direct taller buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.

Variation 4 of the CDP which sought to respond to changes in National and Regional planning policy is noted.

#### Dun Laoghaire Rathdown County Development Plan 2016

The areas of land within the administrative area of DLRCoCo are located on land coloured white (unzoned). Marlay Park, located to the north of College Road is zoned 'Objective F' which seeks 'to preserve and provide for open space with ancillary active recreational amenities'.

The Wicklow Way right-of-way is located on College Road and connects on to Kilmashogue Lane to the south.

## 5.0 Planning History

### Southern Area of Site

#### SD06A/0826 (PL06S.221017)

Permission REFUSED for the demolition of one dwelling house and associated outbuildings and the construction of 42 dwelling houses; the construction of vehicular access to Whitechurch Road and internal access roads and footpath; the construction of approx 1,400 linear metres of 80mm foul water rising main along Whitechurch Road to serve the application site and an on-site subterranean pumping station; the realignment of the existing 450mm water main along the southern boundary and all other site development works required to facilitate the proposed development. There were six reasons for refusal which relates to (i) not satisfied, on the basis of the submissions made that the use of an on-site wastewater treatment system or a rising sewer and pumping station would provide an adequate and reliable means of disposing of the foul effluent which would be generated by the development. The proposed development, would, therefore, be prejudicial to public health, would give rise to a risk of water pollution (ii) road network in the area is not capable of safely accommodating the pedestrian and vehicular traffic which would be generated by the development due to the restricted width of the footpath and carriageway and the substandard horizontal alignment of the Whitechurch Road. The development would, therefore, give rise to traffic hazard and the obstruction of road users (iii) fail to provide a reasonable standard of residential amenity for its occupants (iv) by reason of its repetitive layout and the excessive scale and bulk of the proposed houses relative to the size of the plots on which they would stand, would fail to achieve an adequate standard of visual amenity and would have a negative impact on the character area (v) in the absence of a comprehensive approach for all the zoned lands at this location, the proposed development would be premature (vi) premature pending determination of road layout for the area.

A concurrent application was REFUSED by DLRCoCo under D06A/1405 for access to the above development. The reason for refusal related to the fact that the applicant failed to demonstrate that they had sufficient legal interest in the property or have obtained a letter of consent from the planning authority to carry out the development as proposed.

### Northern Area of Site

#### SD19A/0105

Permission REFUSED for construction of a residential development of 62 units, demolition of the existing house, Coill Avon, and all ancillary site works including alterations to the shared access and vehicular bridge to Coill Avon and Lynbrook on a site of 1.76 hectares (1.6 hectares application site and balance 0.16 hectares includes a section of the public road to facilitate connection to the public foul drainage system). **The reasons for refusal related to** (i) the proposed scheme does not adequately address the Specific Local Objective attached to the site...materially contravenes H3 SLO1...development is at variance with the objective as the density of 38.8 units/ha...has not adequately promoted an integrated approach to housing for older people...lacks integration (ii) layout and design contrary to urban design principles (iii) proposal fails to take account of existing green infrastructure on site (iv)insufficient drainage details (v) does not comply with DMURS

### Sites in Vicinity

#### SD03A/0725

Permission GRANTED for a driving range of 28 covered bays with an adjoining two-storey amenity building and all ancillary site works.

PC/PKS/01/19 Part 8 application - DLRCC Saint Thomas, Tibbradden Road, Tibbradden, Kilmashogue, Dublin 16

Approved by DLRCC 7th June 2019

The St Thomas Estate Part 8 application for use of the lands as a regional multi-use sports facility to include new pedestrian entrance and vehicular entrance, bicycle parking, carparking and coach parking.

#### D16A/ 0955

Permission GRANTED at Tibbradden Road, Kilmashogue, Dublin 16 for Stillorgan RFC for the construction of a new rugby club facility- work commenced Oct 2020.

### 6.0 **Section 247 Consultation(s) with Planning Authority**

6.1 It is stated by the prospective applicant that one pre-application consultation took place with both South Dublin County Council and Dun Laoghaire Rathdown County Council on 23rd July 2020 and 9th Nov 2020.

### 7.0 **Submissions Received**

#### Irish Water

Confirmation of Feasibility issued for this site. Notes an increase in units for the proposed development and confirm based on existing capacity within the Irish Water network it is expected that this increase can be facilitated at connection agreement.

#### Water:

New connection to the existing network is feasible without upgrade. Please note, there is an existing 450mm watermain running through the development site, Irish Water request the following to be completed prior to the applicant progressing to application stage:

- The applicant is required to survey the site to determine the exact location of the infrastructure. Any trial investigations shall be carried out with the agreement and

in the presence of an Irish Water/South Dublin County Council Inspector. These surveys and trial investigations need to be completed ahead of SHD application.

- The applicant must engage with Irish Waters diversion section in regard to an assessment of diversion(s) feasibility. The outcome of this feasibility assessment must be agreed with IW ahead of progressing to SHD application to ensure adequate protection of existing assets and to ensure appropriate separation distances can be achieved as per IW standards codes and practices

#### Wastewater:

There is no Irish Water infrastructure adjacent to the site. In order to complete the proposed connection at the Premises, the Irish Water network will have to be extended in such a way that prioritises gravity solution where possible. It will be necessary to carry out further detailed study and investigations to confirm feasibility of the extension. The applicant must engage with Irish Water in respect of a high-level solution design ahead of progressing to SHD application.

## **8.0 Forming of 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 submissions and the discussions which took place during the tripartite consultation meeting. I shall provide brief detail on each of these elements hereunder.

### **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 included, inter alia, completed application form, a completed pre-connection enquiry feedback form from Irish Water, architectural drawings, Material Contravention Statement, Planning Report; letters of consent; Social Infrastructure Audit, Landscape Design Report; Outline Construction

Management Plan; Architectural Design Statement; Appropriate Assessment Screening Report; Operational Waste Management Plan; Bat Survey; Traffic Assessment Report; engineering drawings; Engineering Services Report, EIA Screening Report and Site Specific Flood Risk Assessment.

8.1.2. I have considered all of the documentation submitted by the prospective applicant, relating to this case.

## 8.2 Planning Authority Submission

8.2.1 In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, South Dublin County Council and Dun Laoghaire Rathdown County Council, submitted a note of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 17<sup>th</sup> December 2020 and 16<sup>th</sup> December 2020 respectively.

8.2.2 The 'opinion' of South Dublin County Council included the following matters: summary of key issues arising, description of site and surroundings, proposal, local policy context, zoning, pre-planning, planning history, internal consultations, zoning, density, building height, tenure and unit mix, Part V, social infrastructure, design, layout and visual amenity, residential amenity, standard of accommodation, access and parking, masterplan, traffic and transport, landscaping including ecology and bats, drainage and water supply, archaeology, screening for AA, screening for EIA and conclusion. The appendices contain details on relevant planning history, internal reports and section 247 consultations. The following points are noted:

- The PA considers that the proposed development would not accord with proper planning and sustainable development in its current form. Of particular concern are the issues of density and accessibility. The proposal is considered not to be in accordance with H3 SLO 1 of the South Dublin County Development Plan 2016 – 2022. Of particular concern is the proposed density, which would be contrary to the SLO in the absence of deliverable accessibility improvements and unsustainable in this location due to the existing poor transport links, substandard infrastructure for sustainable modes and poor accessibility. The density proposed would be unsustainable owing to car dependency and would not accord with proper planning and sustainable development. It is the view of

the Planning Authority that the subject location is not suitable for the density proposed without issues of accessibility being fully resolved and demonstrated as deliverable first.

Other issues raised include:

- Building Heights – concerns with the taller elements of the proposal over five storeys and compliance with SPPR 3 of the Building Height Guidelines
- Urban Design – Concerns with the proposed layouts and location of public open space. There are also concerns with the design approach taken with the taller buildings and their monolithic appearance
- Master planning – Concerns with the fragmented and piecemeal approach to the planning and delivery of the wider zoned lands
- Clarification on the proposed tenure is required
- Clarification on childcare demand is required and the number of one-bedroom units proposed.
- Clarification on number of north facing units required.
- Noise from the M50 – surveys should be taken at peak traffic times to give an accurate representation of the potential noise impact on future residents.
- Drainage and Water supply – the issues raised by the Water Services Section should be addressed.
- Parking and Access – the issues raised by the Roads Department should be addressed.
- Landscaping – the issues raised by the Public Realm Section should be addressed.
- Procedural Concern – proposal is across 2 sites and the northern site of 62 units may be outside the parameters of the SHD process

8.2.3 The 'opinion' of Dun Laoghaire Rathdown County Council included the following matters: internal reports; proposed development; planning history; context and site description; pre-planning consultations, policy context; principle of proposed development; road upgrades; transport; surface water drainage and flood risk;

AA/EIA screening and conclusion. S.247 meeting minutes have been appended to this report, together with relevant policies of operative CDP and internal reports.

A report concludes as follows:

- Proposed upgrade works on College Road and the junction of proposed link street with Whitechurch Road and College Road are welcome and in accordance with the broader policies and objectives of the CDP. However, PA has some concerns about the site's connectivity to the wider area when considering the available width on College Road and the ability to deliver a two-way cycle track. Further detailed required to ensure deliverability
- Upgrade works on College Road are highly important in order to connect the site to the wider area. Applicant should be required to substantially complete the work on College Road and have it available for use prior to first occupation of proposed residential development

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

### **8.3 Consultation Meeting**

8.3.1 A Section 5 Consultation meeting took place via Microsoft Teams due to Covid-19 restrictions on the 03<sup>rd</sup> day of February 2021, commencing at 10.00 am.

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.

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

- H3 SLO 1 of South Dublin County Development Plan 2016 and accessibility
- Development Strategy to include: planning history, masterplan, height, layout, open space and elevational treatment
- Residential Amenity
- Other Transportation Matters
- Drainage Matters
- Any other matters

8.3.3 In relation to H3 SLO 1 of South Dublin County Development Plan 2016 and accessibility, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:

- Planning history and previous refusals of permission pertaining to the site
- Locational context of site including its designation as 'Housing Capacity Site' within 'Consolidation Area' within South Dublin operative CDP 2016
- Matters of accessibility/density/car parking provision in context of Specific Local Objective H3 SLO1
- Further detail on PA solutions for appropriate development of the lands
- Proposed masterplan and desire to ensure that, in absence of redevelopment of overall land, proposal does not represent ad hoc, piecemeal development; future accessibility to remainder of lands and wider area

8.3.4 In relation to development strategy, An Bord Pleanála representatives sought further elaboration/discussion/consideration on the following:

- Height/form/massing/density of proposed development in the context of PA concerns; in the context of existing local and national policy; the existing/permitted pattern of development in the area and locational context
- Layout in the context of DMURS and Sustainable Residential Development in Urban Areas with associated Design Manual, given the location of the site within the Metropolitan area; its designation as a Housing Capacity Site and proximity to built-up areas; 12 criteria as set out in Urban Design Manual; creation of an urban edge along public road
- Open space provision and the desire to ensure that it is functional and usable, well supervised and not residual in nature;
- Relationship between proposed development and any possible future development on adjacent lands; public realm; landscaping

- Permeability/accessibility- both within the site and through to wider area; safety and surveillance
- Elevational treatment; proposed materials/finishes; quality of proposed development given its prominent location, together with the fact that proposal would set the benchmark for future developments within area; further refinement of elevational treatment required
- Phasing of proposed development

8.3.5 In relation to residential amenity, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Potential impacts on residential amenity of nearby residential properties in terms of overlooking, overshadowing, overbearing and noise
- Residential amenity of future occupants; compliance with Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018); noise impacts from M50; dual aspect units; internal daylight/sunlight

8.3.6 In relation to other transportation matters, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Car parking provision
- Other matters raised in South Dublin Roads Department Planning Report (dated 15/12/2020), as contained in Appendix 1 of PA Opinion and matters raised in Opinion of Dun Laoghaire Rathdown Roads Department Report (dated 30/11/2020), as contained in Appendix C of their Opinion
- Liaise with PA in relation to such matters, prior to lodging application

8.3.7 In relation to drainage matters, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Matters raised in Water Services Planning Report (dated 07/12/2020) as contained in Appendix 1 of PA Opinion
- Report of Irish Water to An Bord Pleanála, dated 16/12/2020

- Liaise with PA and IW in relation to such matters, prior to lodging of application

8.3.8 In relation to other matters, An Bord Pleanála sought further elaboration/discussion/consideration of the following:

- Consistency between drawings; additional CGIs/visualisations; taking in charge; ecology matters; Building Lifecycle Report

## 8.4 Conclusion and Recommendation

8.4.1 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.

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

8.4.3 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.

8.4.4 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.

## 9 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 requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

### 1. Principle of proposal:

Further consideration/justification of the documents as they relate to the principle of the proposed development in the context of the requirements of H3 SLO 1 of South Dublin County Development Plan 2016. The documentation submitted at application stage should demonstrate that the proposal is not premature pending determination of a road layout/increased accessibility for the area. The applicant should address why the proposed development could not be considered to be ad hoc, piecemeal, premature development in the absence of a comprehensive approach to the development of these residentially zoned lands. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

### 2. Height, Density, Car Parking and Layout

- (i) Further consideration and/or justification of the documents as they relate to the height and density strategy for the site. In this regard, the prospective

applicant should satisfy themselves that the design strategy for the site as it relates to height and density provides the optimal architectural solution for this site, in line with both local and national policy, and should submit a rationale/justification for the heights/setbacks and density proposed. CGIs, visualisations and cross sections, as necessary, including from strategic viewpoints along the M50, should be submitted which clearly show the relationship between the proposed development and existing/permitted development in the immediate and wider area and which illustrates the topography of the area.

- (ii) Further consideration/justification of the documents as they relate to the proposed car parking strategy. The prospective applicant should also satisfy themselves that the proposed car parking strategy provides the optimal solution for the site, given its locational context and should provide justification for extent of car parking proposed.
- (iii) Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above mentioned Guidelines and the Design Manual for Urban Roads and Streets. The matters of arrangement and hierarchy of streets; the creation of a defined urban edge along the proposed link road; connectivity with adjoining lands; provision of well supervised, quality, usable open space and the creation of character areas within a high quality scheme should be given further consideration.

This further consideration should be undertaken in an holistic manner, examining the entirety of the development site and should examine areas of the site where increased height and density may be appropriate, for example along the proposed link road and overlooking the areas of open space. The proposed development shall have regard to inter alia, national policy including the National Planning Framework; Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018) and Sustainable Urban Housing: Design Standards for New Apartments (December 2020), together with local planning policy, the site's context and locational attributes.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

### 3. Design and Materiality

Further consideration of the documents as they relate to the detailed design of the proposed development. The documentation submitted at application stage should demonstrate that the elevational treatments, external finishes, materials and detailing of the proposed buildings, together with the landscaping and surface/boundary treatments of the outdoor spaces would be of a sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. Details of the colour, tone and texture of materials and the modelling and profiling of the materials (including any cladding or framework system) on each block. Particular attention is required in the context of the strategic location and visibility of the site and to the long term management and maintenance of the proposed development. A Building Lifecycle Report, in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) should also be submitted in this regard.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

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:

1. A site layout plan which clearly identifies which areas are being included for the purposes of calculation of net and gross areas.
2. A report which address existing and future residential amenity and which includes matters such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts, together with proposals to address any such impacts, if necessary. A Daylight/Sunlight analysis, showing an acceptable level of

residential amenity for future occupiers and neighbours of the proposed development, should include details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties.

3. A housing quality assessment which provides specific information regarding the proposed apartments/duplex units and which demonstrates compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit
4. A site layout plan showing which, if any, areas are to be taken in charge by the planning authority
5. Construction and Demolition Waste Management Plan
6. Waste management details
7. Archaeological Impact Assessment
8. Childcare Demand Assessment
9. Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated in Appendix 1 of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.
10. Additional details in relation to transportation matters, having regard to the requirements of the Roads Department Planning Report as indicated in Appendix 1 of the Planning Authority's Opinion
11. Additional details and justification for the proposed development, having regard to the report of the Parks and Landscape Services Division of the Planning Authority as detailed in Appendix 1 of their Opinion.

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. Department of Culture, Heritage and the Gaeltacht
3. Transport Infrastructure Ireland
4. National Transport Authority
5. An Taisce-the National Trust for Ireland
6. Heritage Council
7. South Dublin County Childcare Committee
8. Inland Fisheries 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.

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Lorraine Dockery  
Senior Planning Inspector

22<sup>nd</sup> February 2021