



An
Bord
Pleanála

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

Inspector's Report on Recommended Opinion ABP-309698-21

Strategic Housing Development

172 Build to Rent Apartments, 8 no. commercial units and associated site works.

Location

Junction of Sallynoggin Road Lower and Glenageary Avenue, Glenageary, Co. Dublin.

Planning Authority

Dun Laoghaire Rathdown County Council.

Prospective Applicant

Red Rock Glenageary limited.

Date of Consultation Meeting

14th May 2021.

Date of Site Inspection

26th April 2021.

Inspector

Daire McDevitt.

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1.0 Introduction

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

2.0 Site Location and Description

The site, with a stated area of c.0.61 hectares, is located on lands adjoining the junction of Sallynoggin Road Lower and Glenageary Avenue. Glenageary DART station is c.1.3km from the site. The area is characterised by single and two storey houses. An existing neighbourhood centre is located to the north.

The site forms part of a larger parcel of lands which was the subject of an application for a supermarket, retirement home complex and medical centre. The supermarket, Lidl is constructed, the site which is the subject of this application refers to the portion of lands where the retirement home and medical centre are located under an extant permission (PL.06D.244904.)

It is bounded to the north and east by Glenageary Avenue, which serves as access to An Post sorting office and a row of 2 storey houses. To the north of this road is a small piece of open space and the main Glenageary roundabout. It is bounded to the south by Lidl, some surface carparking and access road. Facing the site along Sallynoggin Road Lower are a row of modest cottages/houses. The site boundaries on the north, west and eastern sides consist of a c.1m high unrendered block wall. The southern boundary is open. An informal path is noticeable that cuts thorough the site linking Lidl to Glenageary Avenue.

3.0 Proposed Strategic Housing Development

Development parameters:

Site Area	0.6109ha
Proposal	172 BTR in 4 no. Blocks & 8 Commercial Units (622sq.m)
Density	282uph
Height	7 to 10 storeys over partial basement. Block A1 (6 storeys). A2 (6 storeys), B1(7 storeys) & B2 (10 storeys)
Dual Aspect	72% (123 units)
Internal Amenities/Facilities	Internal Amenity Space: 1051sq.m (Sch. of Accommodation refers to 417sq.m BTR Amenity)
Open Space	Roof Garden Space: 1001sq.m Public Open Space: 3069sq.m
Parking & Access	123 (car) and 350 (bicycle) New access off Glenageary Avenue
Part V	0

Unit Mix:

	Block A1	Block A2	Block B1	Block B2	Total	% of total
Studio	2	-----	-----	14	16	10
1 Bed	22	8	-----	32	62	36
2 Bed	11	9	19	38	77	44
3 Bed		5	12	-----	17	10
total	35	22	31	84	172	100%

4.0 Planning History

The site which is the subject of this consultation is part of a larger holding which has extensive planning history. The relevant site applies to the area which includes Block A and Block B referred to below. The supermarket (Block C) has been built and is operational (Lidl):

PA Reg. Ref. D14A/0865/E refers to an EOD. This is the second Extension of Duration permission. This included Condition No. 2 “The duration of permission is extended until 14/01/2026. The works shall therefore be completed by 14th January 2026”

PA Reg. Ref. D14A/0865 (ABP Ref. PL.06D.244904) refers to a grant of permission for a mixed use development of c.10616sq.m gfa including: Block A part 4/part5 storey c. 7154sq.m 141 no. bedroom retirement home complex (pharmacy and café/restaurant), Block B a c.551sq.m 3 storey medical centre and Block C a c.2714sq.m supermarket (1225 nett retail sales area) representing a 3 storey equivalent.

Older planning history include decision to refuse permission under PA Reg. Ref. D14A/0113, D9A/0214 (ABP PL.06D.235804), D05A/1632 (ABP PI.06D.218244).

Block C:

PA Reg. Re. D17A/0148 refers to retention permission and relates to the portion of the site containing Block C (Lidl).

5.0 Policy Context

5.1. National

Project Ireland 2040 - National Planning Framework (2018)

The NPF sets out the Governments’ high level strategic vision for shaping the future growth and development of the country

National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Planning Objective 13: In urban areas, planning and related standards, including, in particular, height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

Chapter No. 6, entitled 'People Homes and Communities'. It includes 12 objectives (Objectives 26 to 37) among which Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. Objective 35 seeks to increase densities in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Section 28 Ministerial Guidelines.

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

- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual: A Best Practice Guide (2009)
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)

- Design Manual for Urban Roads and Streets (2013) (updated May 2020)
- The Planning System and Flood Risk Management (including the associated ‘Technical Appendices’) (2009)
- Childcare Facilities – Guidelines for Planning Authorities.
- Retail Planning Guidelines for Planning Authorities (2012)

5.2 Regional

Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

Under the RSES a Dublin Metropolitan Area Strategic Plan (MASP) has been prepared to manage the sustainable and compact growth of Dublin. The aim of the Dublin Metropolitan Area Strategic Plan is to deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin’s sustainable growth.

5.3 Local

Dun Laoghaire Rathdown County Development Plan 2016-2022

The site is zoned Objective ‘NC’ which seeks *‘to protect, provide for and/or improve mixed use neighbourhood centre facilities’*. Residential is ‘permitted in principle’.

Shop is ‘permitted in principle’

Site falls within the boundary of the proposed Sallynoggin Local Area Plan area.

On lands to the south: SLO 30 *to prepare a LAP for Sallynoggin.*

To the north of the site: SLO 160 *to facilitate, support and enhance the development of the area, both roundabouts at Killiney Shopping Centre (Graduate Roundabout) and at Glenageary, to be retained, to ensure proper traffic management of the area.*

Section 2.1.3.4 Existing Housing Stock Densification: “Encourage densification of the existing suburbs in order to help retain population levels - by ‘infill housing. Infill housing in existing suburbs should respect or complement the established dwelling

type in terms of materials used, roof type, etc. In older residential suburbs, infill will be encouraged while still protecting the character of these areas.”

Policy RES 3: It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development.

Where a site is located within 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and/or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities of 50 units per hectare will be encouraged.

RES7 refers to overall housing mix (type and tenure) within the county.

RES 8 refers to the provision of social housing.

The Planning Authority also noted Chapter 3 and relevant policies and objectives pertaining to retail. In particular RET6 (Neighbourhood centres), Section 3.2.2.6 and table 3.2.1 (retail hierarchy).

Relevant Development Management Standards include inter alia

Section 8.1.1.1. Urban Design Policy UD1 sets out that all development is of high quality design that assists in promoting a ‘sense of place’. The promotion of the guidance principles set out in the ‘Urban Design Manual - A Best Practice Guide’ (2009) and in the ‘Design Manual for Urban Roads and Streets’ (2013).

Section 8.2.3.3 refers to **apartment developments** and standards required in relation to (i) design, (ii) dual aspect, (iii) mix of units, (iv) separation between blocks), (v) internal storage, (vi) penthouse development, (vii) minimum floor areas, (viii) public, private and communal open space standards and (ix) play facilities.

Section 8.2.4 Sustainable Travel and Transport

Section 8.2.8 Open Space and Recreation

Appendix 9. Building Height Strategy

6.0 Section 247 Consultation(s) with Planning Authority

It is stated by the prospective applicant that a pre-application consultation meeting took place with the Planning Authority on 4th November 2020.

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

7.2 Documentation submitted

7.2.1 The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017.

The information inter alia included: Completed Application Form, Pre-Planning Statement & Statement of Consistency, Architectural drawings and submission, CGIs, Glenageary Gate-Design Statement, Screening Report for Appropriate Assessment, Ecological Impact Statement, Acoustic Design Statement, Building Life Cycle Report, Sustainability & Energy Statement, Traffic & Transportation Assessment, Flood Risk Assessment, Infrastructure Design Report & Engineering drawings, Landscape Masterplan & Landscape Design Statement.

7.2.2 Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. These statements have been submitted, as required.

7.2.3 I have reviewed and considered all of the documents and drawings submitted.

7.3 Planning Authority Submission

7.3.1 In compliance with section 6(4)(b) of the Act of 2016 the planning authority for the area in which the proposed development is located, 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 9th April 2021.

The report included planning history, issues relating to the proposal and issues that may be considered by An Bord Pleanála.

- The Planning Authority in general welcome the comprehensive redevelopment of this underutilised site, which occupies a prominent location on the approach to Sallynoggin from Dun Laoghaire and surrounding areas. The Planning Authority considers that the location of this site has significant potential in terms of creating its own character, having regard to its location and also to the site size of over 0.6ha. Furthermore the overall configuration of the site, and noting its relationship to adjoining sites and existing streetscapes, would lend itself to a high quality, well considered scheme which takes account of its immediate surroundings and wider environs.
- However, the Planning Authority has significant concerns with regard to the proposed quanta of land uses, height, density, scale and massing of the proposed development within its context as well as significant concerns regarding the impact of the proposed development on the visual and residential amenities of the surrounding area. It is considered that the proposal by reason of its overall height, density, scale, massing would constitute overdevelopment of the site.

The Planning Authority highlighted the following items that require further consideration:

Land Use Zoning

- Concern that the re-development of this prominent site on NC zoned lands, which comprises primarily of residential development does not adequately achieve the land use zoning objective of the site.

- Regard should be had to section 3.2.2.6 and policy RET6 (Neighbourhood centres) of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and table 3.2.1 relating to the Retail Hierarchy.
- The potential impact of the proposed development on the existing neighbourhood centre uses should also be considered in advance of an application.

Height:

- The Planning Authority agree that the principle of providing a higher density of development on this site, and some greater height, including noting the location of the site and existing immediately surrounding commercial buildings and land uses, it is considered that a case may be put forward for additional height, which may exceed the height limits set out under the current County Development Plan. This is subject to criteria contained within the Building Height Guidelines. However, the Planning Authority has fundamental concerns regarding the height, density and scale of the proposal and the associated visual impacts of the proposal when viewed from the surroundings and the potential impact of the proposal on the amenities of future residents, and on the surrounding amenities and streetscapes, and the residential amenity of the properties to the west/northwest in particular. The proposal in its current form is significantly at odds with the character of the surrounding area in terms of building heights, density and massing.
- The Planning Authority is not satisfied that the proposal can meet each of the development management criteria contained within the Building Height Guidelines. Absence of daylight/shadowing reports, etc and additional photomontages required (no leaf scenario and showing and identifying the surrounding buildings and feature/roads).

Visual Impact:

- The Planning Authority has significant concerns associated with the visual impact of the proposal when viewed from the immediate and wider surroundings, including as viewed from Glenageary Roundabout, the residential properties to the west/northwest, and also particularly evident within the southern portion of the site where the setback is significantly

reduced form that boundary. At a minimum, a reduction in height should be provided across the blocks of the proposal, so the scale and density of the buildings are significantly reduced from that boundary.

Materials/finishes:

- While the Planning Authority is satisfied that the palette of materials and finishes is generally considered acceptable, the massing and height of the proposals could be broken up to greater degree through the use of a wider variety/mix of materials/colours.

Residential support facilities/amenities:

- Further clarity required regarding the range and provision of resident support amenities as it is unclear. Reference to SPPR 7(b).
- More detail required regarding uses and location.

Standard of Accommodation:

- There is some concern regarding the restively small size of some of the proposed commercial units, the number of residential units on the ground floor in the NC zoning and the interface between the ground floor units, and the proposal to the adjacent sites, including hard landscaped area and the parking, services/deliveries etc area adjoining the subject site. It is considered that these concerns, and any details of the proposed uses/occupiers of the proposed commercial units, and any impact on the retail/commercial function, and existing uses in the NC zoning require examination.
- Concern regard to the size of some of the studio units and inconsistencies in the apartment sizes stated.

Residential Amenities:

- Concerns relating to overlooking where separation distances of 22m are not achieved between blocks within the proposed scheme.
- Access to daylight/sunlight.
- Need to comply with SPPR7 (Build to Rent).

Childcare:

- Childcare Assessment and details of childcare facility, if proposed.

Parking:

- Noting the significant concerns of the Planning Authority with regard to the height, scale and massing of the proposals, and also the Transportation Planning recommendations indicating a material shortfall in the proposed provision of car parking, and notwithstanding the subject well-served location (in terms of shops and similar), it is considered that the provision of off-street (basement) car parking be increased.

Landownership:

- Having regard to the proposed layouts, and noting also the recommendations of Transportation Planning report, a full planning application should include Red and Blue boundary lines, indicating respectively the proposed works including any works outside the ownership of the applicants (and any required consents/permissions) and the land ownership of the applicant.
- Clarification of description of roads, works, etc in drawings submitted.

Other:

- Landscaping proposal and Landscape Statement.
- Address issues raised by Drainage Division (lack of details/discrepancies in information)
- Address issues raised by Transportation Planning (parking, works outside redline boundary, etc)
- Address issues raised by Housing Department (Part V).
- Address issues raised by Waste Management section.

7.4 Other submissions

Irish Water (12th April 2021)

Irish Water has assessed and has issued a Confirmation of Feasibility for connection(s) to the Irish Water network(s) subject to the following:

Water:

The Development should be supplied from the existing 250 mm DI main in Sallynoggin Road. A bulk meter should be installed along the connection main.

Wastewater:

The wastewater connection point should be at the existing 300 mm ID sewer in Glenageary Avenue. Separate storm water connection services must be provided for this Development. The storm water from this site must be discharged only into the existing storm water network in Sallynoggin Road that does not discharge to an Irish Water combined / foul sewer. The connection arrangement should be agreed with the Local Authority Drainage Division.

Planning Observations:

All development is to be carried out in compliance with Irish Waters Standards Codes and Practices and that design layouts for the development proposal have been submitted to Irish Water and that a Statement of Design Acceptance has been issued to the applicant by Irish Water ahead of any SHD Application.

Irish Water does not permit build over of its assets and the separation distances as per Irish Waters Standards Codes and Practices which must be achieved. Where any proposals by the applicant to build over or divert existing water or wastewater services the applicant is required to submit details to Irish Water for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Irish Water ahead of any SHD Application to the board.

8.0 The Consultation Meeting

- 8.1 A Section 5 Consultation meeting took place online via Microsoft Teams on the 14th May 2021, commencing at 10.09 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.

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. Compliance with local planning policy- Land Use Zoning 'NC'.
2. Development Strategy, including inter alia density, building height and scale, layout, architectural response to the site context and interface with adjoining uses.
3. Residential Amenities.
4. Childcare.
5. Part V.
6. Issues raised by Transportation Planning Section. With particular reference to SLO-160, parking provision and extent of works proposed outside site boundaries.
7. Issues raised by Drainage Division.
8. Any Other Business.

In relation to **Compliance with local planning policy- Land Use Zoning 'NC'** , ABP representatives sought further elaboration/discussion/consideration of:

- Issues raised by the Planning Authority.

In relation to **Development Strategy**, ABP representatives sought further elaboration/discussion/consideration of:

- Justification/rationale for density.
- Justification/rationale for height strategy.
- Justification/rationale for scale and massing
- Architectural response to the site context
- Interface with adjoining uses.
- Potential impact on development potential of adjoining lands.
- Issues raised by the Planning Authority.

In relation to **Residential Amenities** ABP representatives sought further elaboration/discussion/consideration of:

- Clarification of proposed communal facilities and amenities. Including the size, what is proposed, location, access and management arrangements.
- Standard of residential amenities within proposed units, communal area and public spaces (ie access to daylight/sunlight/overshadowing).
- Issues raised by the Planning Authority.

In relation to **childcare** ABP representatives sought further elaboration/discussion/consideration of:

- Clarification if a childcare is proposed, if not justification/rationale for approach.

In relation to **Part V** ABP representatives sought further elaboration/discussion/consideration of:

- Clarification of Part V provision.

In relation to **issues raised by Transportation Planning Section** ABP representatives sought further elaboration/discussion/consideration of:

- Compliance with SLO-160 and implications for the proposal.
- Justification/rationale for parking provision
- Clarification regarding extent of works proposed outside site boundaries.
- Clarification relating to parking for commercial units.
- Car park Strategy and Management Plan.

In relation to **issues raised by Drainage Division** ABP representatives sought further elaboration/discussion/consideration of:

- Requirement to address discrepancies and ensure all documentation is complete and correlates.

In relation to **any other business** ABP representatives sought further elaboration/discussion/consideration of:

- ABP highlighted to the requirement to address all technical issues prior to lodging an application as no recourse to further information under SHD.
- Address any material contraventions if they arise.
- Ensure all documentation correlates.

The prospective applicant and the planning authority were given the opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 309698' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

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

Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that

the documentation submitted with the consultation request under section 5(5) of the Act requires **further consideration and amendment in order to constitute a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

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

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

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. Development Strategy

Further consideration and/or justification of the documents as they relate to the development strategy for the site in respect of the proposed density, height, scale and massing of the proposal, having regard to its locational context.

- a) Justification/rationale for the proposed residential density and height with regard to the provisions of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).
- b) In addition to the consideration of other national policy and guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome for the subject lands.
- c) The interface with existing uses (Lidl and An Post Sorting Office) the interface with the public realm at Sallynoggin Road Lower and Glenageary Avenue as they relate to the design and layout of the proposed development and the desire to ensure that the proposal provides a high quality, positive intervention at this prominent location. Particular regard should also be had to creating suitable visual relief in the treatment of elevations and interface with adjacent lands. An architectural report, urban design statement, visual impact assessment and additional CGIs/visualisations should be submitted with the application, together with a report that specifically addresses proposed materials and finishes to the scheme.
- d) Furthermore, the layout should address the creation of vibrant, amenable and high-quality communal and public open spaces within the development. Permeability through the site and connectivity.

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

2. Potential Impacts on Residential Amenities & adjoining lands

Further consideration/justification of the documents as they relate to potential impacts on residential amenities of adjacent residential properties, impacts on adjacent lands and impact within the proposed scheme to include:

- a) Daylight, Sunlight and Overshadowing analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development,

which includes details on the standards achieved within individual rooms within the development, in communal open spaces and in public areas within the development. The impact on adjoining lands, residential properties and uses should also form part of the assessment.

- b) Further consideration of the details and mitigation proposed, to ensure that the proposed development has been designed to avoid direct overlooking of adjacent residential properties and units within the scheme. The response should include a report that addresses issues of residential amenity (both of adjoining developments and future occupants), specifically with regards to overlooking, visual dominance and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining uses.
- c) The development should be designed so as not to have a negative impact on any potential redevelopment of adjoining lands.
- d) Consideration of the impact on the development/redevelopment potential of adjoining lands, having regard to, inter alia, the limited separation distances proposed between the development and site boundaries.

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

3. Traffic and Transportation

Further consideration and/or justification of the documents as they relate to:

- a) Justification/rationale for the Carparking Provision associated with the proposed Build to Rent Apartments.
- b) The provision of safe pedestrian and cycle access and to the safe provision of accessible cycle parking.
- c) Details of landownership and clarification of works proposed outside the site boundary outlined in red. And relevant third party consents where required.
- d) A Carparking Strategy and Mobility Management Plan.
- e) A response to issues raised by Transportation Planning contained in the Planning Authority's Opinion received by An Bord Pleanála on the 9th April 2012.

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

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

1. A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2020 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the

proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.

2. Clarification of the number of units and type of units proposed within the scheme which are proposed as Build to Rent and compliance with the Sustainable Urban Housing: Design Standards for New Apartments 2020, specifically the guidance on Build to Rent Development and SPPR7 and SPPR8 in particular. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation, operation and management of the scheme.

The response should also include a Report that addresses the quantum and quality of services, facilities and amenities proposed having regard to the future needs of the occupants of the proposed development. And a Site Specific Management Plan which includes details on management of the communal areas, public space, residential amenity and apartments.

3. Landscape proposals.
4. Justification/rationale for approach to Childcare provision.
5. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
6. Respond to issues raised by the Drainage Division contained in the Planning Authority's Opinion received by An Bord Pleanála on the 9th April 2021.
7. Respond to issues raised in the Planning Authority Opinion received by An Bord Pleanála on the 9th April 2021.
8. Where the prospective 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. The Minister for Housing, Local Government and Heritage
3. The Heritage Council
4. An Taisce
5. 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.

Dáire McDevitt

Planning Inspector,

20th May 2021