



An  
Bord  
Pleanála

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

### **Inspector's Report on Recommended Opinion ABP-310772-21**

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<b>Strategic Housing Development</b>	120 no. apartments and associated site works.
<b>Location</b>	Glenamuck Road North, Carrickmines, Dublin 18.
<b>Planning Authority</b>	Dun Laoghaire Rathdown County Council.
<b>Prospective Applicant</b>	Moran Park Homebuilders Limited.
<b>Date of Consultation Meeting</b>	7 <sup>th</sup> October 2021
<b>Date of Site Inspection</b>	25 <sup>th</sup> August 2021
<b>Inspector</b>	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.0.7ha is located on the eastern side of Glenamuck Road North, south of Foxrock village. It is located to the east of Leopardstown race course, north of Carrickmines and west of Loughlinstown. Close to M50 (junction to the M50 is c.350m south west of site). The immediate area to the east of Glenamuck Road North is characterised by 2 storey houses on generous plots. On the western side of the Glenamuck Road North is Carrickmines Croquet & Lawn Tennis Club. This western side of Glenamuck Road North is characterised by traditional suburban housing estates.

The site is bounded to the north, east and south by 2 storey houses on large plots, these include 'Tullybeg' to the north, Chigwell House to the northeast, Stafford Lodge to the south and Cloverdale & Bridgefield (part of Brennanstown Vale) to the east. To the south is Carricáil where permission has been granted to the prospective applicant for apartments.

Carrickmines Luas Park & Ride & Luas Stop is c.130m to the south. Lands slope north to south towards the Luas. And the site is c. 90m from no. 63 bus route serving the QBC on N11.

Existing access is off Glenamuck Road North. The extension of the site boundary along Glenamuck Road North provides for proposals for access, egress and drainage proposals. The extension of the site boundary to the south and south east at 'Carricáil' and Brennanstown Vale provides for foul and surface water sewer, for which a wayleave is enclosed with the pre-application request. The additional lands along Glenamuck Road and south at Carricáil and Brennanstown Road provide for a site area of c.0.32 ha. Copies of 4 no. 'grant of easements' dated 2016 have been submitted with the pre-application request.

## 3.0 Proposed Strategic Housing Development

Development parameters:

Site Area	1.06ha (substantive development area of 0.74ha). Red line boundary includes proposals for access/services etc
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Proposal	120 Apartments in 3 no. Blocks 1 residential amenity building (135sq.m) at Pavilion level between Block A&B
Density	113uph based on site area of 1.06ha 162uph based on site area of 0.74ha
Height	4-7 storeys and 1 storey residential amenity block (on basis of Build Height Strategy & upward modifiers, anything above 6 storeys for this is DLR notes is a Material Contravention)
Dual Aspect	73% (88 units)
Open Space	Communal Open Space (1031sq.m) (13.9%)
Parking	Car (115) (ratio of 0.96) (CDP requires 169 however PA recommend ratio of 1 per unit, i.e 120 spaces) Bicycle (138) (CDP requires 140 and Apart. Guidelines require 278) Motorbike (6)
Access	Via existing entrance off Glenamuck Road North and includes a new signalised T-Junction. Access point to the south via Carricail for emergency vehicles and pedestrians only
Part V	Proposing to rent 13 units (5 no. 1 bed and 8 no. 2 bed) at ground floor level to persons with mobility restrictions.
Childcare	None proposed

#### Unit Mix:

Apartment Type	No.	% of total
1 bed	32	27%
2 bed	78	65%
3 bed	10	8%
Total	120	100%

## 4.0 Planning History

### Site:

**PA Ref. D16A/0260 (ABP PL.06D.247822)** refers to a May 2017 grant of permission for 42 units (36 apartments in 2 blocks and 6 houses). 3 storeys in height with set back 4<sup>th</sup> floor over basement. Included basement and surface parking and access via Glenamuck Road North.

**PA Ref. D114A/0649 (ABP PL.06D.244272)** refers to a 2015 decision to refuse permission for the construction of 17 no. dwellings, works to existing vehicular entrance and new boundary treatment to Glenamuck Road North.

### Carricáil:

**(In prospective applicant's ownership)**

**PA Ref. D18A/1187 (ABP PL.06D.304995)** refers to a November 2019 grant of permission for 30 no. residential units (22 no. duplex units and 8 no. apartments).

## 5.0 Policy Context

### 5.1. National

#### **Project Ireland 2040 - National Planning Framework**

The NPF addresses the issue of 'making stronger urban places' and sets out a range of objectives which it considers would support the creation of high quality urban places and increased residential densities in appropriate locations while improving quality of life and place.

Table 4.1 of the framework sets growth targets for Dublin City and Suburbs, proposing a 20-25% growth in population to 2040. In achieving this, it places a great emphasis on compact growth requiring a concentration of development within the existing built-up area, including increased densities and higher building format than hitherto provided for. Brownfield sites, in particular, are identified as suitable in this context.

The directly relevant National Policy Objectives as contained within the NPF include:

- National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- National Policy Objective 3b: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

- National Policy Objective 11: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- National Policy Objective 13: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. 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.
- National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- National Policy Objective 35: Increase residential density 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 S.28 Ministerial Guidelines are:

- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’) (2009).
- ‘Urban Development and Building Height, Guidelines for Planning Authorities’. 2018
- ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ (2020).
- ‘Design Manual for Urban Roads and Streets’ (DMURS) (2013). Interim Advice Note- Covid 19 (May 2020).
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’).
- ‘Childcare Facilities – Guidelines for Planning Authorities’.

## **5.2 Regional**

### **Eastern and Midland Regional Assembly - Regional Spatial and Economic Strategy 2019-2031 (EMRA-RSES)**

The RSES provides a development framework for the region through the provision of a Spatial Strategy, Economic Strategy, Metropolitan Area Strategic Plan (MASP), Investment Framework and Climate Action Strategy.

The Dublin MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area, which seeks to manage the sustainable and compact growth of the Dublin Metropolitan Area.

The strategy for the sequential development of the metropolitan area is focussed on the achievement of ambitious compact development targets of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and 30% in other settlements, the MASP identifies strategic residential, employment and regeneration development opportunities on the corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects as set out in the NDP.

Strategic development corridors are identified including the City Centre within the M50; North-South Corridor (DART expansion); North-West Corridor (Maynooth/Dunbooyne line and DART expansion); Southwest Corridor (Kildare Line, DART expansion and Luas red line); and Metrolink – LUAS Corridor (Metrolink, LUAS greenline upgrades).

**RPO 5.3:** Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.

**RPO 5.4:** Future development of strategic residential development areas within the Dublin Metropolitan Area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.

**RPO 5.5:** Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

### 5.3 Local

#### **Dún Laoghaire-Rathdown County Development Plan 2016-2022**

The Dun Laoghaire Rathdown Development Plan 2016 – 2022 is the operative development plan.

The site is zoned ‘A’ with an objective ‘to protect and / or improve residential amenity’.

**Chapter 2** Sustainable Communities Strategy, includes inter alia policies which seek to increase housing supply and density (RES3), ensure an appropriate mix, type and

range of housing (RES7) and promote the development of balanced sustainable communities.

**Chapter 8 Policy UD6 Building Height:** “It is council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County”.

The **Building Height Strategy** is contained in Appendix 9. The site is located within a ‘residual urban area’ where a maximum of 3-4 storeys may be permitted. In certain circumstances upward modifiers can be applied to allow for an additional 1-2 storeys, including in situations where the site is larger enough (i.e. >0.5ha) to set its own context.

Other relevant sections include inter alia:

**Chapter 22** - Sustainable Travel and Transportation.

**Policy UD1:** Urban Design Principles - all development is of high quality design that assists in promoting a ‘sense of place’.

**Policy UD3** Public Realm Design

**Chapter 6 Built Heritage**

**Development Management standards of note (but not limited to):**

**Section 8.2.3.5** Residential Development- General Requirements.

**Section 8.2.3.1** Quality Residential Design

**Section 8.2.3.2** Quantitative Standards.

**Section 8.2.3.3-** Apartment Development

**Section 8.2.4** – Sustainable Travel and Transport

**Section 8.2.4.5-** Parking provision in excess of the maximum standards set out for non-residential land uses in Table 8.2.4 shall only be permitted in exceptional circumstances as described below.

Reduced parking or car –free parking will be allowed in areas with high public transport accessibility.

**Table 8.2.3:** Residential Land Use - Car Parking Standards

**Section 8.2.8** – Open Space and Recreation

**Section 8.2.11** Archaeological and Architectural Heritage (including ACAs)

**Section 8.2.11.2** Architectural Heritage – Protected Structures.

**I draw attention to the draft Dun Laoghaire Rathdown County Development Plan 2022-2028 which is due to be adopted in March 2022 and the requirement to comply with same, if applicable.**

## **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 19<sup>th</sup> April 2021.



## **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: Strategic Housing Development - Pre-Planning Application Form, Planning Report (including pre-planning correspondence), Statement of Consistency, Environmental Impact Assessment Screening Report, Material Contravention Statement, Community Infrastructure Statement, Architectural Drawings and Drawing Register, Design Statement, Schedule of Accommodation, Part V Allocation (Proposals, Costings, Correspondence with Planning Authority), ESRI Red Line Boundary File, Landscape Architecture Drawings & Drawing Register, Landscape Rationale, Engineering Drawings & Drawing Register, Engineering Assessment Report (including Confirmation of Feasibility from Irish Water as Appendix D), Flood Risk Assessment, Traffic & Transport Assessment, Car Parking Strategy and Mobility Management Plan, DMURS Statement of Consistency, Construction Management Plan, Appropriate Assessment Screening Report, Ecological Impact Assessment, Electrical Drawings, Outdoor Lighting Report, Sustainability Report/Energy Statement, Photomontages/CGIs, Daylight and Sunlight Assessments, Technical Note - Operational Waste Management Plan, Technical Note - Construction and Demolition Waste Management Plan, Wind Desktop Study and Preliminary CFD Study, Assessment of the Visual impact on the Built Environment, Arboricultural Assessment and Wayleave Details.

7.2.2 In addition, 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 A Material Contravention Statement was submitted with reference to Building Heights, Residential Density and Residential Mix.

7.2.4 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 4<sup>th</sup> August 2021.

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

The Planning Authority has highlighted the following issues:

- The residential density is stated to be c.113uph. This figure is based on the sated site area of 1.06ha. Where the density based on the substantive development area of 0.74ha, the density would be c.162uph. The Planning Authority has previously used the substantive development area for the purposes of density calculation on other SHD (reference to Shaldon Grange, Kilternan). The applicant is requested to adopt a similar approach to this scheme.
- The Planning Authority agrees that the site is suitable for an increase in height above the adjoining 1 to 2 storey built form. The Planning Authority considers that 6 storeys is sufficient to maintain the existing and future resident's amenity and taking into account the immediate site context and future development potential of the adjoining sites. A reduction in height by 1 storey would also ensure a density (if the substantive development area is used as the recommended) is more in keeping with the immediate area.
- The applicant should consider setting the buildings further back from the adjoining sites' boundaries and adding more visual interest to the blocks. This is considered particularly important given the scheme will be setting a new built context for the area.
- The applicant should provide a detailed breakdown of the scheme/apartment's compliance with the Apartment Guidelines that demonstrated that the scheme meets the qualitative and quantitative standards for a residential development. The applicant should also consider a revised mix of units for the scheme more in keeping with the Development Plan standards on this, or if not submit an explanation as to why the proposed mix has been chosen.
- The Planning Authority notes that the development falls short of the recommended provision of open space by c.2000sq.m. With regards to the 10% default minimum outlined in the Development Plan, using the site area of 1.06ha the landscaping area appears to represent 9.7% ( a large amount of which is podium open space), not 13.94%. Further consideration required regarding how carparking by Block C can be minimised visually.
- A creche should be provided on site.

- An additional 5 no. car parking spaces should be provided and bicycle parking in accordance with local/national standards.
- Significant further details area required in relation to the proposed signalised T-junction at Glenamuck Road North.
- Address issues raised in the Transportation Planning Report, the Drainage planning Report and the Parks & Landscape Services Report attached to the Opinion.
- Address Irish Water matters.

## 7.4 Other submissions

### Irish Water (9<sup>th</sup> August 2021)

Irish Water reviewed the plans and particulars submitted for this Strategic Housing Development and confirmed that a Confirmation of Feasibility has been issued to the applicant advising that connection(s) are feasible subject to the following contingencies:

#### **In respect of Wastewater:**

The connection to the Irish Water network(s) may be through third party infrastructure and/or lands. The applicant will be required to obtain and provide the following ahead of any connection agreement: a) The customer has permission to connect to the third-party infrastructure/land. b) Any third-party infrastructure has sufficient capacity to cater for the additional load. c) Any third-party infrastructure is of sufficient integrity to take the connection and the additional load. d) Identify and procure transfer to Irish Water of arterial infrastructure within the third party infrastructure. e) Demonstrate that the arterial infrastructure is in compliance with requirements of Irish Water Code of Practice and Standard Details and in adequate condition and capacity to cater for the additional load from the Development.

Storm water from the site cannot be discharged to the Irish Water network. Proposed basement car park should be designed such that surface water from the site and/or surrounding areas cannot flow down to the car park.

#### **Planning Observations;**

Connection(s) to the public network are subject to a Connection Agreement with Irish Water. All development is to be carried out in compliance with Irish Waters Standards Codes and Practices and that design layouts for the development proposal, within the redline boundary 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. In order to ensure appropriate and access to existing infrastructure(s) the applicants are required to engage with Irish Water Diversions to agree to assess feasibility of any potential build over/diversion(s) which may be

required, separation distances, appropriate wayleaves and or access ahead of any SHD application.

## 8.0 The Consultation Meeting

8.1 A Section 5 Consultation meeting took place online via Microsoft Teams on the 7<sup>th</sup> October 2021, commencing at 10 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. Design Strategy (including inter alia, design, height, layout and open space provision).
2. Residential Amenities (existing and proposed).
3. Issues raised by DLR Transportation Planning Section.
4. Issues raised by DLR Drainage Division & Irish Water.
5. Any Other Business.

In relation to **Design Strategy (including inter alia, design, height, layout and open space provision) ABP** representatives sought further elaboration/discussion/consideration of:

- Clarify site area used for calculations relating to density and open space.
- Justification/rationale for design, materials/finishes.
- Justification/rationale for height strategy.
- Setback of blocks from site boundaries and potential impacts on development potential of adjoining lands.
- Open space provision and hierarchy (quality and quantum)
- Retaining walls.
- Issues raised by Planning Authority.

In relation to **Residential Amenities (existing and proposed) ABP** representatives sought further elaboration/discussion/consideration of:

- Residential standards and amenities of units and communal areas within the scheme.
- Daylight/sunlight/overshadowing assessment.
- Address any potential overlooking.
- Overbearance when viewed from adjoining residential properties.
- Justification/rationale for not providing a childcare facility.

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

- Access arrangements, t-junction and right turning lane.
- Rationale/ justification for the carparking strategy.

- Issues raised by the Planning Authority and DLR Transportation Planning Section.

In relation to **Issues raised by DLR Drainage Division & Irish Water** ABP representatives sought further elaboration/discussion/consideration of:

- Issues raised in the Irish Water submission.
- Clarify if Third party consent or other consents are required.

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/dovetail.
- Note timelines on the draft Dun Laoghaire Rathdown County Development Plan and if any application lodge may be affected by this.

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 310772' 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 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.

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 design strategy for the site in respect of:

- a) The interface with the lands to the south east and the development permitted under An Bord Pleanála Reference No. PL.06D.304995, the public realm at Glenamuck Road North and the interface with adjoining lands, 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 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 and additional CGIs/visualisations should be submitted with the application.
- b) A contextual layout plan which indicates the layout of adjoining developments, photomontages and cross sections at appropriate levels, including details of how the proposed development interfaces with contiguous uses/lands and adjoining roads.

- c) Detailed rationale/justification regarding the suitability of the proposed site to accommodate the proposed height, density and housing mix 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).
- d) In addition to the consideration of local statutory policy and 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.

The response should also include a report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details Particular attention is required in the context of the visibility of the site and to the long-term management and maintenance of the proposed development. A Building Life Cycle report shall also be submitted in accordance with section 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

The further consideration / justification should have regard to, inter alia, the guidance contained in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020, the Urban Development and Building Height Guidelines for Planning Authorities 2018; the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual; the Design Manual for Urban Roads and Streets 2013; and the Dun Laoghaire Rathdown Development Plan 2016-2022.

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

## **2. Traffic and Transportation**

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

- (a) Proposed works to the Glenamuck Road North and proposed traffic management measures.
- (b) Provide a justification for the level of car parking proposed. The justification should include an analysis of car parking demand taking account of the site's location and the level of connectivity (by all modes) to services and employment.

- (c) The Car Parking Strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended to be assigned and managed.
- (d) Pedestrian and cycle links to adjoining lands and connections to public transport routes and cycle/pedestrian infrastructure.
- (e) A response to the issues raised in the report of the Transportation Division of Dun Laoghaire Rathdown County Council, as contained in the Planning Authority's Opinion dated 4<sup>th</sup> August 2021.

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

### **3. Potential Impacts on Residential Amenities & adjoining lands**

Further consideration/justification of the documents as they relate to potential impacts on residential amenities of adjoining residential properties and impacts on adjacent lands 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 and 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 residential development (permitted or built).
- c) The development should be designed so as not to have a negative impact on any potential redevelopment of adjacent 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.



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.
2. Justification/rationale for approach to Childcare provision
3. A Landscape Impact Assessment and a Visual Impact Assessment including CGIs and details of proposed materials and finishes that would address the impact of the proposed development on Glenamuck Road North and when viewed from adjoining properties and neighbouring residential areas and roads, as well as the environment provided within the scheme. The assessment should include long views of the site from all approaches given the prominent location of the site due to the topography of the area.
4. Respond to issues raised in the Planning Authority Opinion received by An Bord Pleanála on the 4<sup>th</sup> August 2021.
5. Address issues raised in the Irish Water submission dated 9<sup>th</sup> August 2021.
6. An Ecological Impact Assessment.
7. A Tree survey, Tree Retention Plan, Tree Constraints and Arboricultural Assessment.
8. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.
9. 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.
10. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, , unless it is proposed to submit an EIAR at application stage.

Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland.
3. National Transport Authority.
4. 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.

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Dáire McDevitt,  
Senior Planning Inspector,  
12<sup>th</sup> October 2021