



An
Bord
Pleanála

Inspector's Report 311151-21

Development	43 no. residential dwelling units (4 no. 1-bedroom, 33 no. 2-bedroom and 6 no. 3-bedroom units) in 3 no. apartment blocks.
Location	Grange Hill, Harold's Grange Road, Rathfarnham, Dublin 16.
Planning Authority	Dún Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D20A/0746
Applicant(s)	Deerfield Properties Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party v. Decision
Appellant(s)	Deerfield Properties Limited
Observer(s)	(1) John & Suzanne Hayes (2) Thomas McDonald (3) Pine Valley Residents Association, (4) Kevin & Fiona Foley

- (5) Paul Dowling & Helen Bennett
- (6) Peadar & Noreen Curran
- (7) Grange Hill Residents Association
- (8) Kevin & Jacquelyn McGuinness

Date of Site Inspection

20th May 2022

Inspector

Louise Treacy

1.0 Site Location and Description

- 1.1. The subject site has a stated area of 0.555 ha and is located on the southern side of Harold's Grange Road, Rathfarnham, Dublin 16. The site is located approx. 1 km south-west of junction 13 (Dundrum) of the M50 motorway and approx. 400 m south-east of the southern boundary of Marlay Park. The site is bounded by the M50 motorway to the south, Harold's Grange Road to the north, the "Grange Hill" residential estate to the east, and a detached, 2-storey dwelling known as "Ancrum" to the west.
- 1.2. The northern side of Harold's Grange Road is characterised by large, 2-storey detached dwellings, which are accessed from the public road via a segregated slip lane. The lands further to the north are characterised by established residential estates at Kingston and Pine Valley. The neighbouring lands to the east and west along Harold's Grange Road are primarily residential in nature, including a 3 - 4 storey apartment complex (Kingston Hall) which adjoins the eastern boundary of the Grange Hill estate. Some small-scale commercial premises are located further to the west of the site, proximate to the junction of Harold's Grange Road, Grange Road and Kellystown Road.
- 1.3. The site slopes from south to north from its boundary with the M50 towards Harold's Grange Road. It currently accommodates a vacant, single-storey dwelling, with the entire site being significantly overgrown and inaccessible at the time of the inspection. The rear portion of the site adjacent to the motorway is characterised by mature trees.
- 1.4. The adjoining Grange Hill estate is characterised by 19 no. 2-3 storey terraced dwellings and comprises phase 1 of the proposed development. The internal access road within this estate terminates at the eastern boundary of the subject site. A public footpath commences at the vehicular entrance to this estate and extends along its boundary with Harold's Grange Road before terminating at the shared boundary with the subject site. A footpath is also in place along the northern side of Harold's Grange Road, extending between the Kingston Green/Crescent estates to the north-east and the Pine Valley Park estate to the north-west. The footpath infrastructure along Harold's Grange Road is piecemeal, with no pedestrian crossings or dedicated cycle lanes provided.

2.0 Proposed Development

- 2.1. The proposed development consists of the construction of 43 no. residential dwelling units (4 no. 1-bedroom, 33 no. 2-bedroom and 6 no. 3-bedroom units) in 3 no. apartment blocks, Block A1, Block A2 and Block B as follows:
- Blocks A1 and A2 (3 storeys, c. 394.8 m² total floor area each) comprise 4 no. apartments each (2 no. 3-bedroom duplex units (115.6 m²) and 2 no. 1-bedroom apartments (54.2 m²) and,
 - Block B (5-storeys over undercroft car park (858 m²), c. 2,909 m² total floor area) comprising 33 no. 2-bedroom apartments (ranging in size from 70.15 m² to 88.60 m²) and 2 no. 3-bedroom apartments (100.49 m² and 101.65 m²).
- 2.2. Access is at the existing access at Harold's Grange Road (authorised pursuant to Reg. Ref. No. D11A/0191). The proposed development also consists of 52 no. car parking spaces comprising 31 no. surface car parking spaces including 2 no. disabled spaces and 21 no. undercroft car parking spaces, 106 no. bicycle parking spaces and 2 no. motorcycle parking spaces, bin stores, internal roads and footpaths, landscaping and boundary treatment works, site services and all ancillary and associated site development works.
- 2.3. Blocks A1 and A2 are proposed adjacent to the northern site boundary fronting onto Harold's Grange Road and generally reflect the building line of the existing dwellings to the east at Nos. 10 - 13 Grange Hill. Block B is located to the rear of Blocks A1 and A2 and has an L-shaped configuration. Nos. 25-28 Grange Hill front onto the eastern elevation of this block.
- 2.4. Vehicular access to the proposed development is via the existing Grange Hill estate, which forms Phase 1 of the proposed development. The proposed internal vehicular access routes extend in a generally east-west direction between blocks A1 and A2 and Block B at the northern end of the site and to the rear of Block B at the southern end of the site.
- 2.5. The proposed communal open space to serve the development and the existing Phase 1 development (Grange Hill) adjoins proposed Block B. A further pocket of communal open space is proposed adjacent to the southern site boundary on the opposite side of the internal access road. A new retaining wall is proposed within this

space, which will segregate the existing landscaped buffer to the M50 from the remainder of the site.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. Notification of the Decision to Refuse Planning Permission issued on 21st July 2021 for 2 no. reasons as follows:

(1) Having regard to the applicant's response to Item 1 of the Clarification of Further Information Request, and to the nature and layout of the proposed development, which would conflict significantly with and would preclude the delivery of extant permitted development (Reg. Ref. D11A/0191/ PL06D.239837), the proposed development would contravene materially a condition attached to an existing permission for development, in this instance being Condition 1 of Reg. Ref. D11A/0191/ PL06D.239837.

(2) Having regard to the lack of continuation between the existing and proposed footpath on Harold's Grange Road, the proposed development would endanger public safety by reason of traffic hazard, in particular for vulnerable users, and would be contrary to Section 8.2.4.1 'Traffic Management and Road Safety' of the Dún Laoghaire-Rathdown County Development Plan 2016-2022. The proposed development is therefore contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. **Planning Reports (8th December 2020, 5th May 2021 and 21st July 2021)**

3.2.2. Following their initial assessment of the planning application, Dún Laoghaire-Rathdown County Council's Planning Officer considered that **Further Information** was required in relation to the following items:

(1) Revised planning notices referring to the demolition of a habitable house on the site.

(2) Concerns regarding the overbearing impact of Block B on the adjoining property “Ancrum” and proposed apartment blocks A1 and A2, with the applicant to consider omitting apartment nos. 25, 26 & 27 so that the northern leg of Block B reads as 3-storeys over undercroft car parking with a set-back 3rd floor.

(3) A Daylight and Sunlight Impact Assessment of the proposed Block B on the internal accommodation of Nos. 25 to 27 Grange Hill.

(4) The requested Further Information of the Drainage Department (report of 18th November 2020 refers), which can be summarised as follows:

- (i) Recalculated site attenuation volume using correct discharge rates.
- (ii) A proposal that shows all hard surfaces as permeable surfaces.
- (iii) Demonstrate that the entire site is compliant with GDSDS requirements.
- (iv) Demonstrate that the proposed green roof complies with the Council’s Green Roof policy, including maintenance access arrangements and details of the proposed build-up.
- (v) A complete site investigation report and results.
- (vi) The provision of a penstock in the flow control device chamber, with no bypass door provided to the device.
- (vii) Fully dimensioned plans and sections of the attenuation storage system.
- (viii) The incorporation of additional SuDS measures.
- (ix) A stormwater audit.
- (x) Commentary on the proposed surface water drainage system in the event of blockage or partial blockage of the system.

(5) The requested Further Information of the Transportation Planning Department (report of 4th December 2020 refers), which can be summarised as follows:

- (i) A dimensioned drawing of the proposed development with the correct set-back line of the reservation for the Part 8 approved Blackglen Road / Harold’s Grange Road Improvement Scheme.

- (ii) Details of works proposed along the Harold's Grange Road site frontage to facilitate travel by cyclists and pedestrians, with the provision of a toucan crossing prior to commencement of construction recommended.
 - (iii) A detailed Quality Audit to demonstrate appropriate consideration has been given to the scheme's compliance with DMURS.
 - (iv) The proposed development internal roads and paths to extend up to the western site boundary with no ransom strips.
 - (v) Demonstrate that all proposed car parking spaces are accessible and meet standard dimension requirements for perpendicular and parallel parking spaces.
 - (vi) Demonstrate adequate provision of space for vehicles to minimise conflict with pedestrian routes for all access arrangements and all vehicle manoeuvres required for car parking, refuse collection, emergency vehicles and deliveries.
 - (vii) Detail the provision of adequate space for correctly designed car parking facilities for the proposed 106 no. cycle parking spaces.
 - (viii) Increased provision of car parking / car storage spaces, with a total of 66 no. parking spaces to serve the 43 no. apartments recommended.
 - (ix) Submission of a detailed Construction Management Plan.
- (6)** The requested Further Information of Parks and Landscape Services (report of 1st December 2020 refers), which can be summarised as follows:
- (i) A landscape design rationale with detailed landscape design and maintenance proposals.
 - (ii) Clarification of the area of open space to serve the proposed development.
 - (iii) Tree protection plan, updated arboricultural method statement and arborist's name and qualifications.
 - (iv) A drawing identifying the areas to be taken-in-charge (if relevant).
- (7)** Details of proposed public lighting within the development.
- (8)** A bat survey of the site.

(9) A site plan drawing showing all communal areas (open space and roads) within the development and the existing Grange Hill estate (Phase 1 and 2) that are to be managed and maintained by a management company and those areas proposed to be taken in charge within Phase 1 and 2.

3.2.3. The applicant submitted a response to the Request for Further Information on 9th April 2021 which can be summarised as follows:

3.2.4. **Item No. 1:** The proposed development does not include the demolition of the habitable house referred to by the Planning Authority. This dwelling will be demolished under Planning Reg. Ref. D11A/0191.

3.2.5. **Item No. 2:** The northern leg of the originally proposed 4th floor in Block B has been omitted (unit no. 33). The footprint of the proposed 3rd floor plan has been reduced by omitting the end unit (no. 25) and reducing the floor area of unit nos. 26 and 27 at this level. The scale, height and mass of the northern leg of Block B has been reduced, with the total number of residential units reduced to 41 (33 no. units in Block B, with Blocks A1 and A2 unchanged).

3.2.6. **Item No. 3:** A Daylight Impact Assessment has been prepared by 3D Design Bureau which assesses the impact of the development on Nos. 25-28 Grange Hill. The assessment shows that 85% of the assessed windows (20 no.) will experience an imperceptible effect on VSC.

3.2.7. **Item No. 4:** A response to the requested Further Information of the Drainage Department was prepared by Pinnacle Consulting Engineers as summarised below.

(i) Revised Qbar and attenuation storage volume calculations have been submitted, resulting in a 20 m³ increase in the attenuation storage requirement (overall volume of 265 m³).

(ii) All parking bays will consist of permeable paving with a stone sub-base to incorporate attenuation storage. The access roads to the north and south of the apartment blocks will consist of porous asphalt surfacing.

(iii) The northern end of the site backs up into the tank from the hydrobrake manhole. This condition has been addressed by introducing a porous asphalt surface in conjunction with permeable paving.

(iv) The green roof now provides 100% coverage of all roof area to the apartment block. Details of interception storage and treatment storage have been provided.

(v) The surface water storage elements will be designed as tanked elements initially. Partial or full infiltration of these storage elements may be proposed at a later date, which could be agreed by way of planning condition.

(vi) A penstock will be installed in the hydrobrake manhole and will not include a bypass door. A silt trap will also be provided.

(vii) A drawing of the proposed Stormtech attenuation storage system has been provided.

(viii) The proposed SuDS measures for the development include Stormtech attenuation tank, permeable paving, porous asphalt, green/sedum roofs, flow control, rainwater harvesting, oil/petrol interceptor.

(ix) The applicant submits that the requirement for this item has been waived in discussions with the Drainage Department, assuming all other items of requested information have been provided.

(x) The applicant submits that the surface water drainage system operates entirely under the force of gravity. Details of the operation and maintenance of the system have been provided. A Flood Risk Assessment has also been undertaken which confirms that the site is located in Flood Zone C (Low Probability) and that the proposed development will not pose any flooding issues.

3.2.8. **Item No. 5:** A response to the requested Further Information of the Transportation Planning Department has been prepared by Pinnacle Consulting Engineers as summarised below.

(i) The applicant engaged with the Transportation Planning Department prior to the submission of the Further Information response. It is confirmed that the building line of the proposed development has been set back sufficiently to ensure that the proposed Blackglen Road/Harold's Grange Road Improvement Scheme can be built, and that the reservation required to do so remains in situ. A drawing has been provided to detail the proposed set back arrangements (Drawing No. P200501-PIN-XX-DR-0012).

(ii) It is confirmed that footpaths and cycle paths will be provided along the site frontage on lands under the applicant's control. The applicant understands that the Blackglen Road/Harold's Grange Road Improvement Scheme proposes a toucan crossing c. 150 m west of the proposed development and that alterations to this approved Part VIII scheme would not be permitted.

(iii) A Quality Audit has been provided.

(iv) A drawing has been provided to demonstrate that both proposed internal roads and paths extend up to the western site boundary to allow for connection to adjoining residential lands, with no ransom strips provided.

(v) It is confirmed that all proposed car parking spaces are accessible and meet standard dimension requirements for perpendicular and parallel parking spaces, including sufficient room within the space or adjoining carriageway to allow for vehicle turning and reverse manoeuvres.

(vi) It is confirmed that adequate space is provided for vehicles to minimise conflict with pedestrian routes and for all access arrangements and vehicle manoeuvres required for car parking, refuse collection, emergency vehicles and deliveries within, to and from the proposed development. All turning movements will occur within the carriage space, with no overswing onto verges or footpaths.

(vii) The submitted architectural drawings provide details of the proposed 106 no. cycle parking spaces, which have been designed to the requirements of the Planning Authority.

(viii) The submitted architectural drawings identify the designation of car parking spaces for the apartment units and for visitor/disabled/car sharing parking.

(ix) An Outline Construction Management Plan has been submitted.

3.2.9. **Item No. 6:** The internal road and open space at the rear of the site have been reconfigured, with the western section of the road relocated closer to the southern site boundary. The amendments will allow the open space to connect to the primary open space in the next phase of development on the adjoining 'Deerfield' site to the west and the open space is now consolidated into one single communal area. Play areas and seating areas for residents have also been introduced. The mature trees at the southern boundary will be retained and will add character to the overall

landscape plan. The proposed quantum of open space meets the required standards.

- 3.2.10. **Item No. 7:** An outdoor lighting report and accompanying drawing has been submitted.
- 3.2.11. **Item No. 8:** A bat survey was not undertaken given that bats were noted to be in hibernation. In the event planning permission is granted for the proposed development, the applicant requests that this matter be addressed by condition prior to the commencement of development.
- 3.2.12. **Item No. 9:** Drawing No. P-Site-12 identifies the roads, open spaces and areas which are to be taken-in-charge, including the lands within the applicant's control within the completed Phase 1 development (Grange Hill), within the subject site and the land reserved along the northern site boundary for the Blackglen Road/Harold's Grange Road Improvement Scheme. Pending the taking-in-charge of the overall scheme, a management company will be established to manage and maintain the development.
- 3.2.13. Following an assessment of the applicant's Further Information Response, the Planning Officer considered that **Clarification of Further Information** was required as summarised below:
- 3.2.14. **Item No. 1:** An issue has been brought into focus that Planning Reg. Ref. D11A/0191 has commenced but has not been completed, that the permission is still live, and that the applicant is seeking to rely on further aspects of D11A/0191 being implemented, while proposing a scheme that would be mutually inconsistent with D11A/0191. It would appear that an 'amending' application to D11A/0191 would be the only viable approach in this instance. To that end, the applicant is requested to:
- (a) Submit a revised 'red line' application site that incorporates lands covered by D11A/0191, with appropriate consents, as necessary.
 - (b) Submit revised public notices that describe the subject proposal as an amendment to D11A/0191.
- 3.2.15. **Item No. 2:** Submit revised plans and particulars to further reduce the visually overbearing effects of proposed Block B on Block A1.

- 3.2.16. **Item No. 3:** Submit revised plans, elevations and sections, which may include a reduced height and scale of Block B and/or repositioning or reconfiguration of the block to reduce the potential for detrimental impacts on the residential amenity of Nos. 25 and 26 Grange Hill in relation to daylight access, including a revised and updated daylight assessment.
- 3.2.17. **Item No. 4:** Submit a detailed, dimensioned drawing of the proposed development with the correct set-back from the road reservation for the Blackglen Road / Harold's Grange Road Improvement Scheme.
- 3.2.18. **Item No. 5:** Submit detailed drawings demonstrating how safe passage for pedestrians and cyclists along the Harold's Grange Road site frontage can be provide to / from the development ahead of the delivery of the Harold's Grange Road Part 8 scheme.
- 3.2.19. **Item No. 6:** Submit revised plans and particulars which fully address the encroachment of vehicles on any existing or proposed car parking spaces and a revised and updated swept path analysis.
- 3.2.20. **Item No. 7:** Submit revised plans and particulars indicating: (a) all car parking spaces to be omitted from public open space, (b) additional detail on the nature of the proposed retaining wall, to be located as far away as possible from retained trees, (c) additional details of how trees can be successfully retained.
- 3.2.21. **Item No. 8:** Submit a bat survey report.
- 3.2.22. The applicant submitted a response to the Request for Clarification of Further Information on 25th June 2021, which can be summarised as follows:
- 3.2.23. **Item No. 1 (a):** There is a degree of inter-dependence between the approved site layout under Reg. Ref. D11A/0191 for the provision of 67 no. dwellings on a 2.6 ha site and the current proposal to develop this 0.555 ha site within the overall development lands. Planning application Reg. Ref. D11A/0191 authorises the demolition of the bungalow and store located on the current application site. As such, the demolition of these structures was not included in the current planning application as it was envisaged that the demolition would be carried out pursuant to D11A/0191. The applicant does not have a legal interest in all the lands which formed part of planning application Reg. Ref. D11A/0191 and therefore cannot submit a planning application to vary the existing permission. Thus, the demolition of

the two structures on the site must be included in the current planning application, while the application site boundary remains as originally indicated.

- 3.2.24. **Item No. 1 (b):** Revised public notices have been provided which reference the demolition of the existing bungalow and store on the site. Planning drawings of these structures have been provided and the planning application fee has been revised accordingly.
- 3.2.25. **Item No. 2:** Block B has been reduced in height and scale and repositioned further south by 2.25 m to increase the separation distance to Block A1. The fourth floor of the block has been omitted and the total number of apartments has been further reduced by 2 no. units (31 no. in total).
- 3.2.26. **Item No. 3:** A revised Daylight Impact Assessment Report has been prepared by 3D Design Bureau which assesses the impact of the amended development on Nos. 25-28 Grange Hill. The assessment shows that 90% of the assessed windows (20 no.) will experience an imperceptible level of effect on VSC. A “not significant” effect will arise to window 26a (No. 26 Grange Hill), with a slight effect arising on window 25a (No. 25 Grange Hill). A secondary study confirms that the projecting element above both ground floor windows is a contributing factor to the perceptible impact on daylight. Having regard to the substantial level of compliance with the daylight requirements at Nos. 25-28 Grange Hill, the existing projecting window elements, and the dual aspect ground floor plan, it is considered that the impact on windows 25a and 26a would not seriously injure the residential amenity of these two properties.
- 3.2.27. **Item No. 4:** A detailed drawing of the set back from the Blackglenn Road / Harold’s Grange Road Improvement Scheme has been submitted as prepared by Pinnacle Consulting Engineers.
- 3.2.28. **Item No. 5:** Pending the construction of the Harold’s Grange Road Part 8 Scheme, pedestrians and cyclists will be directed to the Grange Hill access, which has an uncontrolled pedestrian crossing at the entrance. If deemed appropriate, the Planning Authority can attach a planning condition for the construction of a similar uncontrolled crossing for the passage of pedestrians and cyclists along the Harold’s Grange Road site frontage, ahead of the delivery of the Part 8 scheme.

- 3.2.29. **Item No. 6:** The vehicle tracking has been updated to show no encroachment in the parking spaces.
- 3.2.30. **Item No. 7 (a):** It is proposed to omit 3 no. car parking spaces to ensure the retention of mature trees along the southern site boundary. It is proposed to retain the 6 no. spaces to the south of the public open space/southwest boundary, resulting in a total of 53 no. spaces serving 39 no. apartments (44 no. general spaces, 2 no. disabled spaces and 7 no. visitor spaces).
- 3.2.31. **Item No. 7 (b):** Details of the proposed retaining wall are set out in a fee quote for same as prepared by Geoman Ltd.
- 3.2.32. **Item No. 7 (c):** An Arboricultural Impact Assessment incorporating a Tree Protection Strategy has been submitted.
- 3.2.33. **Item No. 8:** A bat assessment has been submitted. The assessment concludes that there are low levels of bat activity on the site, with some commuting activity and low levels of feeding recorded. The house and outbuildings are not currently used as roosts and no derogation licence is required. Appropriate mitigation measures are identified.
- 3.2.34. In assessing the Clarification of Further Information response, Dún Laoghaire-Rathdown County Council's Planning Officer considered that the applicant had not adequately responded item no. 1. The Planning Officer considered that permitting a separate application on part of the original parent permission development site, where the new permission would provide for a changed layout that would conflict with the permitted development and inhibit its delivery on lands outside the applicant's control, would be contrary to the proper planning and sustainable development of the area. It was also noted that the existing permission could be progressed in principle before its expiration in June 2022.
- 3.2.35. The absence of adequate/safe pedestrian and cycle facilities to/from the site was also considered unacceptable. As such, it was considered that the proposed development would endanger public safety by reason of traffic hazard or obstruction of road users, and it was considered that planning permission should be refused on that basis.

3.2.36. **Other Technical Reports**

3.2.37. **Transportation Planning (4th December 2020, 5th May 2021, 20th July 2021)**

3.2.38. Further information initially requested in relation to 9 no. items as set out in Section 3.2.2 of this report. Following the applicant's Further Information submission, it was recommended that planning permission be refused for the proposed development based on: (1) the delivery of a footpath along the frontage of the development as previously conditioned under the parent permission is not under the applicant's control, and (2) the development is reliant on the delivery of the Harold's Grange Road Part 8 scheme for the proposed continuous footpath.

3.2.39. Following the applicant's Clarification of Further Information submission, this Department continued to recommend that planning permission be refused for the proposed development based on the endangerment of public safety by reason of traffic hazard or obstruction of road users.

3.2.40. In the event planning permission is granted, suitable planning conditions are identified, including the payment of a special development contribution in respect of traffic calming measures to be implemented on Harold's Grange Road.

3.2.41. **Parks and Landscape Services (1st December 2020, 4th May 2021, 13th July 2021):** Further information initially recommended in relation to 4 no. items as summarised in section 3.2.2 of this report. Appropriate planning conditions also identified in the event planning permission was granted for the proposed development.

3.2.42. Following the applicant's Further Information submission, it was recommended that planning permission be refused for the proposed development based on concerns relating to the impact on retained trees and the absence of a contiguous, coherent open space between Grange Hill and the proposed development.

3.2.43. Parks and Landscape Services continued to recommend that planning permission be refused for the proposed development following the applicant's Clarification of Further Information submission. Planning conditions identified in the event permission is granted for the proposed development.

- 3.2.44. **Drainage Planning (18th November 2020, 23rd April 2021, 8th July 2021):** Further information initially requested in relation to 10 no. items as summarised in section 3.2.2 of this report.
- 3.2.45. Following the applicant's Further Information and Clarification of Further Information submissions, no objections arose to the proposed development subject to conditions.
- 3.2.46. **Municipal Services – Public Lighting (30th April 2021):** No objection subject to conditions.
- 3.2.47. **Housing Department (30th October 2020):** Recommends that a Part V condition be attached in the event planning permission is granted for the proposed development.

3.3. Prescribed Bodies

- 3.4. Irish Water:** No objection to the proposed development subject to conditions.

3.5. Third Party Observations

- 3.5.1. Submissions were made on the application by: (1) Grange Hill Residents Association, 15 Grange Hill, Dublin 18, (2) Conor McDonald, (3) Jessica Hurley, Three Rock Grove, 6 Harold's Grange Road, Rathfarnham, Dublin 16, (4) David Reilly, (5) John & Orla Nathan, 64 Pine Valley Park, Rathfarnham, Dublin 16, (6) Carol Morgan, 123 Pine Valley Avenue, Rathfarnham, Dublin 16, (7) Eoin O'Flaherty, 12 Pine Valley Way, Dublin 16, (8) James Johnston, 14 Pine Valley Grove, Rathfarnham, Dublin 16, (9) Paul Dowling and Helen Bennett, 281 Harold's Grange Road, Dublin 16, (10) Suzanne Behan, 275 Harold's Grange Road, Rathfarnham, Dublin 16, (11) Ger Gormley, 14 Harold's Grange Road, Rathfarnham, Dublin 16, (12) Jane Nolan and James Johnston, 14 Pine Valley Grove, Rathfarnham, Dublin 16, (13) Peadar Curran, 1 Harold's Grange Road, Dublin 18, (14) Pine Valley Residents Association, 60 Pine Valley Park, Rathfarnham, Dublin 16, (15) Geoff Herbert, 4 Pine Valley Park, Rathfarnham, Dublin 16, (16) Pat Marchant, 276 Harold's Grange Road, Dublin 16, (17) Kevin Foley, Pine Valley Estate, 283 Harold's Grange Road, Dublin 16, (18) Pdraig Murphy, 282 Harold's Grange Road, Dublin 16, (19) Ronan O'Leary, 10 Harold's Grange Road, Dublin 16, (20) Pat McGovern, 25 Pine Valley Park, Dublin 16, (21) Pauline Fitzgerald, 60 Pine Valley Park, Dublin 16, (22) Austen Corcoran, 96 Pine Valley Avenue, Rathfarnham, Dublin 16, (23) Kevin & Jacquelyn McGuinness, 277 Harold's Grange Road, Dublin 16, (24) Stewart Paul, 35 Pine Valley Avenue, Dublin 16, (25) John M. O'Donoghue, 4 The

Hideaways, Glenbeigh, Co. Kerry, (26) Grainne Moran, 104 Pine Valley Avenue, Rathfarnham, Dublin 16, (27) Fiona O'Donoghue, 51 Pine Valley Park, Rathfarnham, Dublin 16, (28) Sean Beirne, 48 Pine Valley Park, Dublin 16, (29) Ian O'Rourke, 9 Grange Road, Dublin 16, (30) Linde Lunney, 73 Pine Valley Avenue, Dublin 16, (31) David O'Donoghue, 51 Pine Valley Park, Rathfarnham, Dublin 16.

3.5.2. The issues which are raised can be summarised as follows: (1) excessive development density and height, (2) non-compliance with apartment design standards, including storage requirements, (3) insufficient car parking, no EV charging points and overspill parking likely in adjoining neighbourhoods, (4) poor public transport, (5) inadequate open space and no provision for children's play, (6) poor quality footpaths and lack of cycle lanes and pedestrian crossings on Harold's Grange Road, (7) traffic impacts, (8) no community infrastructure, (9) impact on mountain views, (10) overlooking between the apartment blocks and of neighbouring residential properties, (11) piecemeal development, (12) planning documents unavailable on Planning Authority's website, (13) inadequate separation distances between the proposed apartment blocks, (14) overshadowing, with no shadow analysis submitted, (15) inadequate surface water drainage information, (16) no information regarding public lighting, construction management, areas to be taken in charge and operational waste management, (17) failure to complete planning reg. ref. D11A/0191, (18) site incorrectly categorised as an "intermediate urban location", (19) inadequate sightlines at site entrance, (20) safety concerns for Phase 1 residents due to increased traffic and use of sole vehicular access to the site, (21) existing open space in Phase 1 development is poorly designed and unsafe, (22) overbearing impacts, (23) non-compliance with 'A' land-use zoning objective, (24) negative impact on local property values, (25) noise and air pollution impacts from adjoining motorway, (26) negative impact on established character of the area, (27) no building lifecycle report submitted.

3.5.3. A further 8 no. observations were made on the applicant's Clarification of Further Information submission by: (1) Michael Berkery, 68 Pine Valley Park, Rathfarnham, Dublin 16, (2) Pine Valley Residents Association, 60 Pine Valley Park, Rathfarnham, Dublin 16, (3) Paul Dowling & Helen Bennett, 281 Harold's Grange Road, Rathfarnham, Dublin 16, (4) Hughes Planning & Development Consultants on behalf of Grange Hill Residents Association, 15 Grange Hill, Dublin 18, (5) Kevin &

Jacquelin McGuinness, 277 Harold's Grange Road, Rathfarnham, Dublin 16, (6) Kevin & Fiona Foley, 283 Pine Valley Estate, Harold's Grange Road, Rathfarnham, Dublin 16, (7) John & Orla Nathan, and (8) John & Suzanne Hayes, 275 Harold's Grange Road, Rathfarnham, Dublin 16.

- 3.5.4. The new issues which are raised can be summarised as follows: (1) proximity of Blocks A1 and A2 to busy road, (2) Blocks A1 and A2 will restrict the widening of Harold's Grange Road, (3) masterplan proposals will not be developed, (4) construction traffic management plan contains unreasonable assumptions, (4) lands to be taken-in-charge require clarification, (5) unacceptable daylight impact on Nos. 25 and 26 Grange Hill, (6) controlled pedestrian crossing required on Harold's Grange Road, (7) development is premature pending the upgrading of Harold's Grange Road, (8) phase 1 visitor spaces being inappropriately reallocated to serve the proposed development, (9) lighting report does not consider impacts on neighbouring property at Ancrum.

4.0 Planning History

- 4.1.1. **Planning Authority Reg. Ref. D11A/0191; ABP Ref. PL.06D.239837:** Planning permission granted by An Bord Pleanála on 20th July 2012 for the demolition of 2 no. 2-storey dwellings, 3 no. single-storey dwellings and 4 no. stables and outbuildings on lands known as Deerfield, Ancrum and Grange Hill and the construction of 71 no. residential dwellings, 152 no. surface car parking spaces, 83 no. bicycle spaces, 1 no. ESB substation, and landscaping, boundary treatments and all associated site development works and services on a site of 2.6 ha.
- 4.1.2. The first phase of the permitted development has been implemented on the adjoining site to the east - Grange Hill residential estate.

Relevant Planning History

- 4.1.3. **Planning Authority Reg. Ref. D14A/0502:** Planning permission granted on 4th November 2014 for alterations to development permitted under Reg. Ref. D11A/0191; ABP Ref. PL.06D.239837 comprising a change of house type at site Nos. 23 & 24 and subsequent minor alterations to footpaths and car parking spaces and the shifting of house site Nos. 18-24 to the east by 2.8 m.

Planning Authority Reg. Ref. PC/IC/01/15: Planning permission granted in 2015 for the Blackglan Road/Harold's Grange Road Improvement Part 8 Scheme.

5.0 Policy and Context

5.1. Dún Laoghaire-Rathdown County Development Plan 2022-2028

- 5.1.1. The Dún Laoghaire-Rathdown County Development Plan 2016-2022 was in force at the time this planning application was lodged. The 2022-2028 county development plan has been adopted in the interim and is the relevant local statutory planning policy document for the purposes of assessing this appeal case.

5.2. Land Use Zoning

- 5.2.1. The site is subject to land use zoning 'A' which has the objective "to provide residential development and improve residential amenity while protecting the existing residential amenities". Residential development is permitted in principle under this zoning objective.

5.3. Residential Development

- 5.3.1. **Policy Objective PHP18 (Residential Density):** It is a policy objective to: increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill / brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12; Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.
- 5.3.2. **Policy Objective PHP20: Protection of Existing Residential Amenity** – It is a policy objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.
- 5.3.3. **Policy Objective PHP27: Housing Mix** – It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the

County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future regional HNDA.

- 5.3.4. **Policy Objective PHP42: Building Design & Height** – It is a policy objective to encourage high quality design of all new development; ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).
- 5.3.5. **Policy Objective PHP44: Design Statements** – It is a Policy Objective that, all medium-to-large scale and complex planning applications (30+ residential units) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual – A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and / or space within the scheme.

5.4. Quantitative Standards for Residential Development

- 5.4.1. **Habitable Rooms:** Shall comply with appropriate national guidelines/standards in operation at the date of application (see section 5.6 below).
- 5.4.2. **Residential Density:** As a general principle, the objective is to optimise the density of development in response to type of site, location and accessibility to public transport.
- 5.4.3. **Separation Between Blocks:** All proposals for residential development, particularly apartment developments and those over 3 storeys high, shall provide for acceptable separation distances between blocks. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height.
- 5.4.4. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Where minimum separation distances are not met, a daylight availability analysis will be required.

5.5. Transport

- 5.5.1. To provide for pedestrians and cyclists as part of the development management process, all new development will be required to maximise permeability and connectivity for pedestrians and cyclists and to create direct links to adjacent roads

and public transport networks in accordance with the provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), 'Sustainable Urban Housing: Design Standards for Apartments' (2018) and the 'Design Manual for Urban Roads and Streets' (DMURS, 2019).

- 5.5.2. Harold's Grange Road which borders the northern site boundary is subject to a 6-year road upgrade objective to be delivered by the Local Authority as confirmed with reference to table 5.3 of the plan. This project was granted planning permission in 2015 but has not yet commenced.

5.6. Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)

- 5.6.1. The key development standards for apartment units in the context of this application are summarised below:
- 5.6.2. **Overall floor area:** 1-bedroom unit - 45 m²; 2-bedroom/3-person unit - 63 m²; 2-bedroom/4-person unit – 73 m²; 3-bedroom unit – 90 m². The majority of the units in a scheme of more than 10 apartments shall exceed the minimum floor area standards by 10%.
- 5.6.3. **Unit Mix:** Max. 50% 1-bedroom units, with no requirement for 3-bedroom units. No more than 10% of the total number of units in any private residential development may comprise 2-bedroom / 3-person apartments.
- 5.6.4. **Storage space:** 1-bedroom unit - 3 m²; 2-bedroom/3-person unit – 5 m²; 2-bedroom/4-person unit – 6 m²; 3-bedroom unit – 9 m². As a general rule, no individual storage room should exceed 3.5 m². Storage for bulky items should also be provided outside individual apartment units.
- 5.6.5. **Dual Aspect Ratio:** Minimum 50% dual aspect units; where single aspect apartments are provided, the number of south facing units should be maximised, with east and west facing units also acceptable.
- 5.6.6. **Floor to Ceiling Height:** Min. of 2.4 m required, but 2.7 m encouraged.
- 5.6.7. **Lift and Stair Cores;** Max. of 12 apartments per floor per core.
- 5.6.8. **Private amenity space:** 1-bedroom unit - 5 m²; 2-bedroom/3-person unit – 6 m²; 2-bedroom/4-person unit – 7 m²; 3-bedroom unit – 9 m². Gardens or patios/terraces shall be provided for ground floor units and balconies for upper levels. Balconies

should have a minimum depth of 1.5m in one usable length and should adjoin and have a functional relationship with the main living areas.

- 5.6.9. **Communal amenity space:** 1-bedroom unit - 5 m²; 2-bedroom/3-person unit – 6 m²; 2-bedroom/4-person unit – 7 m²; 3-bedroom unit – 9 m².
- 5.6.10. The recreational needs of children must be considered as part of communal amenity space. Small play spaces (85 – 100 m²) catering for children up to the age of 6 to be provided in a scheme with 25 or more units of 2 or more bedrooms.
- 5.6.11. Private and communal amenity space may adjoin each other, but there should be a clear distinction, with an appropriate boundary treatment and/or a 'privacy strip' between the two. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year.
- 5.6.12. **Public open space:** No requirement identified under the Guidelines.
- 5.6.13. **Bicycle parking:** 1 cycle storage space per bedroom, with visitor parking required at a rate of 1 space per 2 residential units.
- 5.6.14. **Car parking:** As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.
- 5.6.15. Provision shall be made for the **storage and collection of waste** materials in apartment schemes. Refuse facilities shall be accessible to each apartment stair/ lift core and designed for the projected level of waste generation and types and quantities of receptacles required.

5.7. Urban Development and Building Heights Guidelines for Planning Authorities (2018)

- 5.7.1. The Guidelines confirm that in suburban/edge locations, development should include an effective mix of 2, 3 and 4 storey developments which integrate well with existing and historical neighbourhoods. Developments of 4-storeys or more in height can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets.

5.8. National Planning Framework (NPF)

- 5.8.1. The NPF sets out objectives which aim to secure more compact and sustainable growth patterns in urban areas in the period to 2040.
- 5.8.2. **National Policy Objective 3b** seeks to deliver at least 50% of all new homes targeted in the five cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

5.9. Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region

- 5.9.1. The purpose of the RSES is to support the implementation of the NPF by providing a long-term strategic planning and economic framework for the development of the region to 2031, including the promotion of compact growth and urban regeneration and sustainable settlement patterns.
- 5.9.2. **RPO 4.3:** Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

5.10. Natural Heritage Designations

- 5.11. None.

5.12. EIA Screening

- 5.12.1. An Environmental Impact Assessment Screening report was not submitted with the application. Class (10)(b) of Schedule 5, Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:
- Construction of more than 500 dwelling units,
 - Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

- 5.12.2. It is proposed to construct 39 no. dwelling houses which is significantly below the 500-unit threshold noted above. The site has an area of 0.555 ha and is well below the applicable threshold of 10 ha. The introduction of this residential scheme would have no adverse impact in environmental terms on surrounding land uses. The site has already been developed for residential purposes. The site is not designated for the protection of the landscape or of natural or cultural heritage and the proposed development is not like to have a significant effect on any European site. The proposed development would not give rise to waste, pollution or nuisances that differ from that arising from other housing in the neighbourhood. It would not give rise to a risk of major accidents or risks to human health. The proposed development would use the public water and drainage services of Irish Water and Dún Laoghaire-Rathdown County Council, upon which its effects would be marginal.
- 5.12.3. I have concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment, and that on preliminary examination, an environmental impact assessment report for the proposed development was not necessary in this case.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. A first-party appeal against the Planning Authority's decision to refuse permission for the proposed development has been lodged by Kieran O'Malley + Co. Ltd. on behalf of the applicant. The grounds of appeal can be summarised as follows:
- Development pursuant to Planning Authority Reg. Ref. D11A/0191 has ceased and will not resume. This is a stand-alone planning application and there is no reasonable basis for refusal reason no. 1 of the Planning Authority's decision.
 - The applicant has confirmed in writing that a footpath and cycle path will be provided along the site frontage within its control along Harold's Grange Road and an interim pedestrian crossing pending the Part 8 Road Improvement Scheme. The second refusal reason is not justified based on the development proposed and the planning history of the site.

- Refusal reason no. 1 is unreasonable as no further development will be carried out under the parent permission and the remaining lands within the overall site cannot be developed in isolation or without a fresh grant of planning permission.
- The Planning Authority was informed of the applicant's intentions regarding the development of lands within its control and were aware that the approved development under PA Reg. Ref. D11A/0191 would not be proceeding beyond the Phase 1 townhouses at Nos. 1-19 Grange Hill.
- The current application could not be submitted as an amendment to PA Reg. Ref. D11A/0191, as the applicant did not have the necessary legal interests in all the lands to make such an application. As the life of this permission expires in July 2022 and cannot be further extended, it made no practical sense to apply for an amendment to the permitted layout, where the life of any permission granted would be tied to the parent permission. Thus, the proposed development was lodged as a separate standalone application.
- No real conflict arises between the proposed development and the remaining permitted development on the original site layout, as no further development will be carried out on foot of the existing permission.
- Should An Bord Pleanála grant permission for the proposed development, two permissions for two different layouts would exist on the site for the remaining timeline of the original grant of permission (July 2022). However, the proposed and permitted site layouts are mutually exclusive as only one site layout can be implemented.
- The applicant is committed to constructing a 2 m wide pedestrian footpath and a cycle path across the application site frontage along the southern side of Harold's Grange Road and an interim pedestrian crossing.
- These interim proposals extend the existing footpath on the Phase 1 frontage westwards across the appeal site and connect to the network of footpaths on the north side of the road via the pedestrian crossing.

- These proposals would considerably improve pedestrian/cyclist access and safety at both development phases (i.e. existing Phase 1 at Grange Hill and the proposed development) pending the rollout of the Part 8 works.
- Should these proposals be deemed acceptable by the Board, the applicant would welcome a condition that requires the details of same to be submitted and agreed with the Planning Authority prior to the commencement of development on site.

6.2. Planning Authority Response

6.2.1. Valid response not received.

6.3. Observations

- 6.3.1. Observations have been made on the appeal by the following: (1) Kevin & Jacquelyn McGuinness, 277 Harold's Grange Road, Rathfarnham, Dublin 16, (2) Hughes Planning & Development Consultants on behalf of Grange Hill Residents Association, 15 Grange Hill, Dublin 18, (3) Peadar & Noreen Curran, Las Alturas, Harold's Grange Road, Dublin 18, (4) Paul Dowling & Helen Bennett, 281 Harold's Grange Road, Rathfarnham, Dublin 16, (5) John & Suzanne Hayes, 275 Harold's Grange Road, Rathfarnham, Dublin 16, (6) Thomas McDonald, 'Ancrum', Harold's Grange Road, Rathfarnham, Dublin 16, (7) Kevin & Fiona Foley, 283 Pine Valley Estate, Harold's Grange Road, Rathfarnham, Dublin 16, and (8) Pine Valley Residents Association, 60 Pine Valley Park, Rathfarnham, Dublin 16.
- 6.3.2. The points which have been raised in the observations reflect those raised at planning application stage (see section 3.5 of this report).
- 6.3.3. I note that the adjoining landowner to the west of the appeal site (site known as 'Ancrum') has confirmed that his land formed part of the parent permission on the subject site (Planning Authority Reg. Ref. D11A/0191) and will not be developed pursuant to this permission. The landowner also notes his support for the Masterplan which relates to the lands of the Phase 1 Grange Hill development, the current appeal site, the observer's land (Ancrum) and the neighbouring site to the west known as "Deerfield".

6.4. Further Responses

6.4.1. None.

7.0 Assessment

7.1.1. The proposed development as amended at Further Information and Clarification of Further Information stages includes a total of 39 no. apartment units as follows:

- **Block A1:** 2 no. 3-bedroom duplex apartments and 2 no. 1-bedroom apartments
- **Block A2:** 2 no. 3-bedroom duplex apartments and 2 no. 1-bedroom apartments
- **Block B:** 4 no. 1-bedroom apartments, 6 no. 2-bedroom/3-person apartments and 21 no. 2-bedroom/4-person apartments.

7.1.2. The amended development was readvertised to the public, and as such, forms the basis of my assessment. I am satisfied that the main issues for consideration in this case include:

- Principle of the Development / Planning History
- Pedestrian / Cyclist Infrastructure
- Development Scale and Layout
- Compliance with Development Management Standards
- Appropriate Assessment

7.2. Each of these issues is addressed in turn below.

7.3. Principle of the Development / Planning History

7.3.1. Refusal reason no. 1 of the Planning Authority's decision states, inter alia, that the nature and layout of the proposed development would conflict significantly with, and preclude the delivery of, extant permitted development (Planning Authority Reg. Ref. D11A/0191 / ABP Ref. PL06D.239837) and that the proposed development would contravene materially condition no. 1 attached to this permission.

7.3.2. In responding to the foregoing, the applicant's agent submits that the permitted development under the extant permission has ceased and will not resume. As such, it is considered that no conflict arises between the proposed development and the remaining permitted development. The applicant's agent notes that should planning

permission be granted in this instance, 2 no. permissions for 2 no. different site layouts would exist for the remaining timeline of the original grant of permission i.e. until July 2022. It is further noted that the proposed and permitted site layouts are mutually exclusive, as only one site layout can be implemented.

- 7.3.3. In considering the foregoing, I note that the lands to which Planning Authority Reg. Ref. D11A/0191 / ABP Ref. PL06D.239837 relates includes the current appeal site, the adjoining Grange Hill site to the east, the adjoining site to the west known as “Ancrum” and the adjoining site further west known as “Deerfield”. An extension to the duration of this permission was granted by Dún Laoghaire-Rathdown County Council to 18th July 2022 (Planning Authority Reg. Ref. D11A/0191 / E refers). The Grange Hill estate is the only part of the permitted development which has been completed. The permitted development on the appeal site has not commenced and the parent permission has now expired. I also note that the adjoining Ancrum site is no longer under the applicant’s control as illustrated on the submitted site location map.
- 7.3.4. Having regard to the foregoing, I do not consider that the granting of planning permission for the proposed development would materially contravene condition no. 1 of Planning Authority Reg. Ref. D11A/0191 / ABP Ref. PL06D.239837. The residential development of the site has already been deemed acceptable and the site remains zoned for residential purposes. As such, I am satisfied that the principle of the proposed development is acceptable at this location, subject to its compliance with all relevant national and local planning policies and standards.

7.4. Pedestrian / Cyclist Infrastructure

- 7.4.1. Refusal reason no. 2 of the Planning Authority’s decision relates to the lack of continuation between the existing / proposed footpath infrastructure on Harold’s Grange Road, on the basis of which, the proposed development would endanger public safety by reason of traffic hazard, particularly vulnerable users, and would be contrary to Section 8.2.4.1 “Traffic Management and Road Safety” of the county development plan 2016-2022.
- 7.4.2. The applicant’s agent submits that this refusal reason is not justified based on the nature of the development proposed and the site’s planning history. The applicant is committed to constructing a 2 m wide pedestrian footpath and cycle path across the

application site frontage on the southern side of Harold's Grange Road and an interim pedestrian crossing. It is submitted that these interim proposals will extend the existing footpath on the Phase 1 site (Grange Hill) westwards across the appeal site and connect to the network of footpaths on the north side of the road via the proposed pedestrian crossing. The proposed cycle path, footpath and uncontrolled pedestrian crossing are illustrated on Drawing No. P200501-PIN-XX-DR-D-0002-SI Rev. P01 which accompanies the appeal.

- 7.4.3. The applicant's agent submits that these proposals would considerably improve pedestrian / cyclist access and safety at both development phases, pending the roll out of the Part 8 works. Should these proposals be deemed acceptable to the Board, the applicant will accept a condition which requires the details of the works to be agreed prior to the commencement of development.
- 7.4.4. In considering the issue at hand, I note that planning permission has previously been granted for residential development on the subject site (Planning Authority Reg. Ref. D11A/0191 / ABP Ref. PL06D.239837 refers). In reviewing the Planning Inspector's report for this permission, I note that an earlier Part 8 Scheme to reconstruct and widen the public road between College Road and the Enniskerry Road, including the provision of pedestrian and cyclist facilities, had been approved in 2008. The occupation of the units which were permitted on the subject site was not restricted pending the completion of this scheme, which subsequently was not commenced.
- 7.4.5. Condition no. 13 of this permission required the developer to pay a special financial contribution under Section 48(2)(c) of the Planning and Development Act 2000 in respect of traffic calming measures north and east of the bend in the public road and for the provision of a proposed toucan crossing. The report of Dún Laoghaire-Rathdown County Council's Planning Officer of 5th May 2021 in relation to the current appeal case notes that this development contribution has not been paid in full.
- 7.4.6. The report of the Transportation Planning Department of 4th December 2020 in relation to the current appeal case notes that a Part 8 scheme for the Blackglen Road / Harold's Grange Road Improvement Scheme was most recently approved in June 2016. The scheme is to be carried out in 2 no. phases due to financial constraints, with Phase 1 comprising the Blackglen Road Improvement Scheme. The CPO for

Phase 1 was approved in 2019, but no definitive timeline has been identified to commence the construction of Phase 2 – Harold’s Grange Road. The Transportation Planning Department has recommended that planning permission be refused for the proposed development due to the endangerment of public safety due to the absence of adequate, safe pedestrian linkages to / from the proposed development.

- 7.4.7. In my opinion, it would be unreasonable to refuse planning permission for the proposed development based on the lack of continuous footpaths on Harold’s Grange Road. In reaching this conclusion I acknowledge that the existing pedestrian infrastructure on Harold’s Grange Road is piecemeal. However, I note two Part 8 schemes for upgrading works to the public road have been permitted, neither of which has been commenced to date.
- 7.4.8. In addition, I note that planning permission has previously been granted for residential development on the site and that the applicant is willing to provide pedestrian and cycle links across the Harold’s Grange Road frontage and a temporary pedestrian crossing across the public road pending the completion of the Part 8 works. In my opinion, this approach would be a reasonable compromise to enable the residential development of the site, pending the completion by the Local Authority of the upgrading works under the approved Part 8 scheme. Should An Bord Pleanála decide to grant planning permission for the proposed development, I consider that this matter, including the appropriate set-back to facilitate the Harold’s Grange Road improvement works, can be addressed by way of planning condition.
- 7.4.9. I also note that the Transportation Planning Department has made recommendations in relation to the undertaking of Road Safety and Quality Audits of the proposed development, and I consider that these matters can also be addressed by planning condition.

7.5. Development Scale and Layout

- 7.5.1. The third-party submissions raise concerns in relation to the development density and height, which are considered excessive. Concerns are also raised regarding overlooking between the proposed apartment blocks and neighbouring residential properties and in relation to overshadowing. It is also considered that the proposed development would have a negative impact on the established character of the area.

- 7.5.2. In considering the density and height of the proposed development, I note that the proposed building heights range from 3 storeys fronting onto Harold's Grange Road (Blocks A1 and A2) to 3 - 4 storeys over undercroft car parking to the rear of the site (Block B). While I acknowledge that the established dwellings on the northern side of Harold's Grange Road have building heights of 2-storeys, I note that the more recent residential developments to the east at Grange Hill and Kingston Hall have building heights of 3-4 storeys. As such, I consider that the proposed building heights would not be inappropriate or out of character with the established built form at this location, notwithstanding the level difference which occurs between the M50 motorway and Harold's Grange Road.
- 7.5.3. The proposed development has an equivalent residential density of 77 units / ha. The 2020 Apartment Design Guidelines note that in general terms, apartment developments are most appropriately located in urban areas. The Guidelines provide a broad description of proximity and accessibility considerations in identifying suitable locations for such developments within towns and cities, including peripheral and / or less accessible urban locations. The Guidelines note that such locations are generally suitable for limited, very small scale, higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (broadly <45 dwellings per hectare net) including sites in suburban development areas that do not meet proximity or accessibility criteria and sites in small towns or villages. The Guidelines identify that the range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors.
- 7.5.4. In interpreting the foregoing, I do not consider that the Guidelines identify an upper density limit value for apartment developments in suburban locations. In the event the Board disagrees with my assessment on this point, I note that the stated residential density of 45 dwellings per hectare is identified as a broad figure. Having visited the subject site, having regard to the pattern of development on the adjoining Grange Hill and Kingston Hall sites and national planning guidance which generally seeks to secure more compact and sustainable growth patterns in urban areas, I do not consider that the proposed development density would be inappropriate on this residentially zoned, urban site.

- 7.5.5. In considering the potential for overlooking impacts to arise on foot of the proposed development, I note that separation distances of between 22.476 m and 25.745 m arise between the southern elevation of Blocks A1 and A2 and the northern façade of Block B. Separation distances of between 21.145 m and 24.223 m arise between the eastern façade of Block B and the neighbouring development in the Grange Hill estate. In my opinion, these are acceptable separation distances in an urban context.
- 7.5.6. Separation distances of between 13.363 m and 18.124 m arise between the eastern elevation of proposed Block A1 and No. 10 Grange Hill. I note that the only fenestration which is proposed on the side / eastern elevation of Block A1 comprises small bathroom windows at each floor level. In my opinion, no undue overlooking would arise in this context.
- 7.5.7. The western elevation of Block B generally aligns with the eastern elevation of the neighbouring dwelling (Ancrum) to the west of the subject site. I note that limited fenestration is proposed on the western elevation of Block B facing this neighbouring property, including a centrally placed, small bathroom window and a corner bedroom window at 1st and 2nd floor levels. The 3rd floor of the block has been pulled back from the western site boundary, with a glass balustrade proposed around the patio space serving proposed apartment unit no. 25. In my opinion, having regard to the configuration of the fenestration on the western elevation of Block B and the setting back of the 3rd floor from the western site boundary, no undue overlooking of the neighbouring residential development to the west would arise on foot of the proposed development. I further note that the owner of this land has expressed his support in relation to the overall Masterplan proposals for the subject site and adjoining land, including the Ancrum site.
- 7.5.8. I also consider that no undue overlooking of the existing dwellings on the northern side of Harold's Grange Road would occur given that these dwellings are located on the opposite side of the public road. I am also satisfied that no undue overshadowing would occur within the development site or of any neighbouring dwellings having regard to the proposed building footprint and the separation distances arising.

7.6. Compliance with Development Management Standards

- Unit Sizes

7.6.1. All the proposed unit sizes exceed the minimum requirements of the 2020 Apartment Guidelines. I am also satisfied that the majority of the units exceed the minimum floor area requirements by 10%.

- Unit Mix

7.6.2. The proposed development comprises 21% 1-bedroom units, 15% 2-bedroom / 3-person units, 54% 2-bedroom / 4-person units and 10% 3-bedroom / 5 person units. The 2020 Apartment Design Guidelines require that 2-person / 3-bedroom units may comprise no more than 10% of the units in a scheme. While I note that the proposed number of these units marginally exceeds the identified standard, I do not consider this to be a material issue. In my opinion, the proposed unit mix would be acceptable having regard to the infill nature of the scheme, in an area which is predominantly characterised by larger, family-sized dwelling houses. I also note that the 2-person / 3-bedroom unit at the 3rd floor, north-western corner of Block B has an overall floor area of 71.57 m², and as such is marginally below the required floor area for a 2-person / 4-bedroom unit (73 m²).

- Storage Space

7.6.3. The internal storage space of 4.83 m² which serves the 2-bedroom / 3-person units at each floor level of apartment Block B is marginally below the required standard of 5 m². However, given that the overall unit sizes exceed the minimum floor space requirements, I am satisfied that this is not a material issue. The storage space serving all other units exceeds the minimum requirements.

- Lift and Stair Cores

7.6.4. The proposed development complies with the maximum standard of 12 apartments per floor per core.

- Floor to Ceiling Height

7.6.5. The majority of the proposed apartment units have internal ceiling heights of 2.7 m, with all units exceeding the minimum requirement of 2.4 m.

- Dual Aspect Ratio

7.6.6. All the proposed apartment units are dual aspect, which exceeds the minimum Guideline requirement of 50%.

- Open Space

7.6.7. The proposed **private open space** for each apartment unit exceeds the minimum requirements. All balcony/terrace spaces exceed the minimum depth of 1.5 m and have a functional relationship with the main living space.

7.6.8. The primary **communal open space** serving the proposed development is arranged in an L-shaped configuration adjacent to the south-western site boundary and is enclosed by Block B and the southernmost internal access road. The grassed component of this space has a stated area of 774 m² and accommodates natural play elements and seating. A communal open space requirement of 259 m² arises for the proposed development based on the standards of the 2020 Apartment Guidelines and the unit mix. As such, the proposed communal open space significantly exceeds the minimum requirement.

7.6.9. The residents of the adjoining Grange Hill estate raised concerns regarding the quality of the open space provided within their Phase 1 development. The “Overall Proposed Site Plan – Open Spaces” drawing provided with the applicant’s Clarification of Further Information response confirms that the communal open space provided in this estate has an area of 1,765 m². Dún Laoghaire Rathdown County Council’s Planning Officer has confirmed that this space meets development plan requirements.

7.6.10. Given that the quantum of communal open space which is proposed on the current appeal site significantly exceeds the minimum requirements, I note that this communal open space will also be available for use by the residents of the Grange Hill estate, and as identified by Dún Laoghaire Rathdown County Council’s Planning Officer, will compensate for the limited recreational value of the amenity space in the existing estate.

7.6.11. I note that the Parks and Landscape Services Department of the Planning Authority has expressed concerns in relation to the retention of existing trees adjacent to the southern site boundary and the nature of the proposed retaining wall at this location.

Appropriate measures are identified to ensure trees are protected during site works. In my opinion, these matters can be addressed by planning condition.

- Car and Bicycle Parking

7.6.12. The 2020 Apartment Guidelines identify a benchmark of 1 no. car parking space per unit, with an element of visitor parking (e.g. 1 space for every 3 - 4 units) in relatively peripheral or less accessible urban locations. It is proposed to provide a total of 53 no. **car parking** spaces at undercroft and surface levels, comprising 44 no. general car parking spaces (1.1 space per unit), 2 no. universal access spaces and 7 no. visitor spaces. I consider the quantum of car parking to be acceptable having regard to national planning guidance.

7.6.13. It is proposed to provide 70 no. **bicycle parking** spaces across the site in an enclosed bin/bike store located between Blocks A1 and A2, at undercroft level of Block B and at surface level to the rear of Block B. Based on the bicycle parking standards of the 2020 Apartment Design Guidelines, a requirement for 74 resident cycle parking spaces and 20 visitor spaces arises in this instance. In my opinion, the shortfall of cycle parking spaces which arises would not justify a refusal of planning permission in this instance and I note that the Transportation Planning Department has not raised any objections in this regard. I note that this Department has recommended that 50% of the visitor parking spaces which are proposed to the rear of Block B shall be covered in accordance with the Planning Authority's standards. I consider this to be a reasonable requirement which can be addressed by planning condition.

- Waste Management

7.6.14. Separate bin stores are proposed to serve Block B and Blocks A1 and A2. Should the Board grant planning permission for the proposed development, I consider that the developer should agree an operational waste management plan with the Planning Authority prior to the commencement of development. This matter can be addressed by planning condition.

7.7. Appropriate Assessment

- Screening

7.7.1. I have reviewed the applicant's AA screening report, which concludes that an AA of the proposed development is not required. The subject site is not located within or directly adjacent to any European site, and as such, there is no potential for **direct impacts** to occur. The closest European sites to the appeal site include:

- Wicklow Mountains SPA (site code: 004040) located approx. 4 km to the south-west.
- Wicklow Mountains SAC (site code 002122) located approx. 3.7 km to the south-west.
- Rockabill to Dalkey Island SAC (site code: 003000) and Dalkey Islands SPA (site code: 004172) located approx. 11 km to the east.
- South Dublin Bay and River Tolka Estuary SPA (site code: 004024) and South Dublin Bay SAC (site code: 000210) located approx. 6 km to the north-east.

7.7.2. In considering the potential for **indirect impacts** to occur, I note that there is no hydrological connection between the subject site and the identified European sites and that it does not support any of the habitats or species which are qualifying interest for these European sites (see Appendix 1 of this report for details). Thus, there is no potential for indirect impacts, and as such, any potential **in-combination** impacts can be excluded.

7.7.3. In conclusion, in applying the source-pathway-receptor concept, and having regard to the nature and scale of the development, comprising a small residential scheme of 39 no. units on a brownfield site, the availability of public water and wastewater services to facilitate the development, and the separation distances arising to the nearest Natura 2000 sites, no appropriate assessment issues arise, and it is not considered that the proposed development would be likely to have a significant effect, individually or in combination with other plans or projects, on a European site.

8.0 Recommendation

8.1. I recommend that planning permission be granted for the proposed development.

9.0 Reasons and Considerations

9.1. Having regard to national planning policy which seeks to ensure more compact and sustainable development patterns in urban areas, the planning history of the site, under which residential development was previously deemed acceptable at this location, the pattern of residential development adjoining the site, and the nature and scale of the proposed development, and, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application as amended by the further plans and particulars submitted on the 9th day of April 2021 and the 25th day of June 2021, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid</p>

	<p>prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.</p> <p>Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.</p>
3.	<p>The developer shall pay to the planning authority a financial contribution as a special contribution under section 48(2)(c) of the Planning and Development Act 2000 in respect of a pedestrian crossing and any associated traffic calming measures which may be required on Harold's Grange Road. The amount of the contribution shall be agreed between the planning authority and the developer, or in default of such agreement, the matter shall be referred to An Bord Pleanála for determination. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be updated at the time of payment in accordance with changes in the Wholesale Price Index – Building and Construction (Capital Goods), published by the Central Statistics Office.</p> <p>Reason: It is considered reasonable that the developer should contribute towards the specific exceptional costs which are incurred by the planning authority which are not covered in the Development Contribution Scheme and which will benefit the proposed development.</p>
4.	<p>Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled with an agreement empowering</p>

	<p>the local authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.</p> <p>Reason: To ensure the satisfactory completion of the development.</p>
5.	<p>Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may be referred by the planning authority or any other prospective party to the agreement to An Bord Pleanála for determination.</p> <p>Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.</p>
6.	<p>Details of the alignment/construction of proposed Blocks A1 and A2, including the ramp and stair access to each block, and the proposed footpath and cycle path adjoining the northern site boundary at Harold's Grange Road shall be agreed in writing with the Transportation Planning Department of the planning authority prior to the commencement of development.</p> <p>Reason: To facilitate future planned upgrade works to the public road.</p>
7.	<p>(a) The developer shall comply, at their own expense, with the submitted Quality Audit recommendations as accepted by the design team in the submitted Audit Feedback Forms for the development. The developer shall liaise with the planning authority, or any other required third party, as</p>

	<p>necessary to carry out the Road Safety Audit and Quality Audit recommendations and actions.</p> <p>(b) A final Stage 2 (detailed design) and post construction (Stage 3) independent Quality Audit (which shall include a Road Safety Audit, Access Audit, Walking Audit and a Cycle Audit), shall be carried out for the development in accordance with the Design Manual for Urban Roads and Streets (DMURS) guidance and TII standards. The Quality Audit team shall be approved by the planning authority (Transportation Planning Section) and all measures recommended by the Auditor shall be undertaken unless the planning authority approves any departure in writing. A feedback report shall also be submitted providing a response to each of the items.</p> <p>Reason: In the interest of traffic, pedestrian and cyclist safety.</p>
8.	<p>The internal road network serving the proposed development shall comply with the detailed standards of the planning authority for such road works.</p> <p>Reason: In the interest of amenity and of traffic and pedestrian safety.</p>
9.	<p>Proposals for an estate/street name, house numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house numbers, shall be provided in accordance with the agreed scheme. No advertisements/marketing signage relating to the name of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name.</p> <p>Reason: In the interest of urban legibility.</p>
10.	<p>All of the communal parking areas serving the residential units shall be provided with functional electric vehicle charging points. Details of how it is proposed to comply with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interest of sustainable transportation.</p>

11.	<p>A total of 50% of the visitor cycle parking spaces which are proposed to the rear of Block B shall be covered in accordance with the requirements of Dún Laoghaire-Rathdown County Council's Standards for Cycle Parking and Associated Cycling Facilities for New Developments (January, 2018).</p> <p>Reason: To ensure a satisfactory standard of development.</p>
12.	<p>Public lighting shall be provided in accordance with a scheme, which shall include lighting along pedestrian routes through open spaces, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Such lighting shall be provided prior to the making available for occupation of any house.</p> <p>Reason: In the interests of amenity and public safety.</p>
13.	<p>Details of the materials, colours and textures of all the external finishes to the proposed development, shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interest of visual amenity.</p>
14.	<p>Prior to the commencement of development, the developer shall submit a plan for the written agreement of the Planning Authority containing details of the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and the ongoing operation of these facilities.</p> <p>Reason: To provide for the appropriate management of waste in the interests of protecting the environment.</p>
15.	<p>The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.</p> <p>Reason: In the interests of public safety and residential amenity.</p>

16.	<p>The management and maintenance of the proposed development following its completion shall be the responsibility of a legally constituted management company, or by the local authority in the event of the development being taken in charge. Detailed proposals in this regard shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: To ensure the satisfactory completion and maintenance of this development.</p>
17.	<p>The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This scheme shall include the following:</p> <p>(a) A plan to scale of not less than 1:500 showing –</p> <p>(i) The species, variety, number, size and locations of all proposed trees and shrubs.</p> <p>(ii) Details of screen planting.</p> <p>(iii) Details of roadside/street planting.</p> <p>(iv) Hard landscaping works, specifying surfacing materials, furniture, and finished levels.</p> <p>(b) Specifications for mounding, levelling, cultivation and other operations associated with plant and grass establishment</p> <p>(c) A timescale for implementation.</p> <p>All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, or until the development is taken in charge by the local authority, whichever is the sooner, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p>Reason: In the interest of residential and visual amenity.</p>

18.	<p>(a) An accurate tree survey of the site, which shall be carried out by an arborist or landscape architect, shall be submitted to the planning authority prior to commencement of development. The survey shall show the location of each tree on the site, together with the species, height, girth, crown spread and condition of each tree, distinguishing between those which it is proposed to be felled and those which it is proposed to be retained.</p> <p>(b) Measures for the protection of those trees which it is proposed to be retained shall be submitted to, and agreed in writing with, the planning authority before any trees are felled.</p> <p>(c) Details of the proposed retaining wall adjoining the landscaped buffer at the southern site boundary shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development.</p> <p>Reason: To facilitate the identification and subsequent protection of trees to be retained on the site, in the interest of visual amenity.</p>
19.	<p>No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission.</p> <p>Reason: To protect the visual amenities of the area.</p>
20.	<p>Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.</p> <p>Reason: In the interest of public health.</p>
21.	<p>Prior to commencement of development, the developer shall enter into water and/or waste-water connection agreement(s) with Irish Water.</p> <p>Reason: In the interest of public health.</p>
22.	<p>Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public</p>

	<p>holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.</p> <p>Reason: In order to safeguard the residential amenities of property in the vicinity.</p>
--	--

Louise Treacy
Planning Inspector
29th July 2022

Appendix 1: Natura 200 Sites – Qualifying Interests & Conservation Objectives

Wicklow Mountains SPA (site code: 004040)	
Qualifying Interests	Merlin (<i>Falco columbarius</i>) [A098] Peregrine (<i>Falco peregrinus</i>) [A103]
Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

Wicklow Mountains SAC (site code 002122)	
Qualifying Interests	Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] Natural dystrophic lakes and ponds [3160] Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Alpine and Boreal heaths [4060] Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130] Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230] Blanket bogs (* if active bog) [7130] Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] Calcareous rocky slopes with chasmophytic vegetation [8210] Siliceous rocky slopes with chasmophytic vegetation [8220] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] <i>Lutra lutra</i> (Otter) [1355]

<p>Conservation Objective(s)</p>	<ul style="list-style-type: none"> - To maintain the favourable conservation condition of Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>) [3110] - To maintain the favourable conservation condition of Natural dystrophic lakes and ponds [3160] - To restore the favourable conservation condition of Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] - To restore the favourable conservation condition of European dry heaths [4030] - To restore the favourable conservation condition of Alpine and Boreal heaths [4060] - To maintain the favourable conservation condition of Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130] - To restore the favourable conservation condition of Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas [6230] - To restore the favourable conservation condition of Blanket bogs [7130] - To restore the favourable conservation condition of Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110] - To restore the favourable conservation condition of Calcareous rocky slopes with chasmophytic vegetation [8210] - To restore the favourable conservation condition of Siliceous rocky slopes with chasmophytic vegetation [8220] - To restore the favourable conservation condition of Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles in Wicklow Mountains SAC [91A0]
---	--

	- To maintain the favourable conservation condition of Otter [1355]
--	---

Rockabill to Dalkey Island SAC (site code: 003000)	
Qualifying Interests	Reefs [1170] Phocoena phocoena (Harbour Porpoise) [1351]
Conservation Objective(s)	- To maintain the favourable conservation condition of Reefs [1170] - To maintain the favourable conservation condition of Harbour porpoise [1351]

Dalkey Islands SPA (site code: 004172)	
Qualifying Interests	Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194]
Conservation Objective(s)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.

South Dublin Bay and River Tolka Estuary SPA (site code: 004024)	
Qualifying Interests	Light-bellied Brent Goose (Branta bernicla hrota) [A046] Oystercatcher (Haematopus ostralegus) [A130] Ringed Plover (Charadrius hiaticula) [A137] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157]

	<p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Wetland and Waterbirds [A999]</p>
<p>Conservation Objective(s)</p>	<p>To maintain the favourable conservation condition of Light-bellied Brent Goose [A046]</p> <p>To maintain the favourable conservation condition of Oystercatcher [A130]</p> <p>To maintain the favourable conservation condition of Ringed Plover [A137]</p> <p>To maintain the favourable conservation condition of Knot [A143]</p> <p>To maintain the favourable conservation condition of Sanderling [A144]</p> <p>To maintain the favourable conservation condition of Dunlin [A149]</p> <p>To maintain the favourable conservation condition of Bar-tailed Godwit [A157]</p> <p>To maintain the favourable conservation condition of Redshank [A162]</p> <p>To maintain the favourable conservation condition of Black-headed Gull [A179]</p> <p>To maintain the favourable conservation condition of Roseate Tern [A192]</p> <p>To maintain the favourable conservation condition of Common Tern [A193]</p>

	<p>To maintain the favourable conservation condition of Arctic Tern [A194]</p> <p>To maintain the favourable conservation condition of the wetland habitat in South Dublin Bay and River Tolka Estuary SPA as a resource for the regularly occurring migratory waterbirds that utilise it [A999]</p>
--	--

South Dublin Bay SAC (site code: 000210)	
---	--

Qualifying Interests	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Embryonic shifting dunes [2110]</p>
Conservation Objective(s)	<p>To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide [1140]</p>