



An  
Bord  
Pleanála

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

**Inspector's Report on  
Recommended Opinion  
312243-21**

<b>Strategic Housing Development</b>	168 no. residential units (69 no. houses, 99 no. apartments), creche and associated site works.
<b>Location</b>	Glenamuck Road South, Carrickmines Great, Dublin 18.
<b>Planning Authority</b>	Dun Laoghaire Rathdown County Council.
<b>Prospective Applicant</b>	Grafton Issuer DAC.
<b>Date of Consultation Meeting</b>	20 <sup>th</sup> April 2022
<b>Date of Site Inspection</b>	31. 03. 2022
<b>Inspector</b>	F. Fair

## **1.0 Introduction**

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

## **2.0 Site Location and Description**

- 2.1.1. The site is located in the Dublin Suburbs of Carrickmines and Glenamuck at a site south of the M50 Motorway junction for Carrickmines and Southeast of the Glenamuck Road. It is bound by Springfield Lane to the east, existing detached residential dwellings to the north, rear gardens of dwellings in Rockville Drive to the southwest and side gardens of dwellings in Cairnbrook Avenue to the west. There are no dwellings or structures on the subject site. Disused farm sheds stand on a section of land in the ownership of the applicant, located on Springfield Lane to the north of the subject site.
- 2.1.2. The site boundaries are mainly defined by overgrown and unmaintained hedgerows, interspersed with some trees. In the western part of the site there is an area of very dense vegetation comprising mostly mixed undergrowth, whin bushes and thistles.
- 2.1.3. Currently, access to the subject site is via a vehicular entrance at the northern boundary off Springfield Lane leading from Glenamuck Road. There are three gates providing access to the site. One gate is located at the existing disused farm outbuildings on Springfield Lane; a second gate is located about halfway along the eastern boundary and a third gate is located off a laneway extending south from Springfield Lane. On the western boundary in the neighbouring development there is

a vehicle turning head at the end of Cairnbrook Avenue. It is proposed that a new entrance will be created at this point to serve the site. The site appears to have been in continuous agricultural use and is currently used to graze horses.

- 2.1.4. The site slopes gently upwards from the north-western boundary adjacent to Cairnbrook, towards the laneway along the south-eastern boundary. The rise is approximately 9m from the lowest to the highest points located some 200 m apart. Across the centre of the site, the rise is approximately 6 m from west to east.

### 3.0 Proposed Strategic Housing Development

- 3.1.1. The proposed development consists of

Development Proposal	Site Statistics
No. of units	168 no. units
Unit breakdown	<p>Apartments – 99</p> <ul style="list-style-type: none"> <li>• 37 no. 1 bed</li> <li>• 35 no. 2 bed</li> <li>• 27 no. 3 bed</li> </ul> <p>Houses – 69</p> <ul style="list-style-type: none"> <li>• 11 No. 3 bed</li> <li>• 58 no. 4 bed</li> </ul>
Site area	3.065 ha
Site coverage	21%
Plot Ratio	1.65

Density	c. 55 units / per ha
Building Height	<ul style="list-style-type: none"> <li>• 2 – 3 storey houses</li> <li>• 2 no. 5 – 6 storey Apartments over basement</li> </ul>
Dual Aspect	51%
Public Open Space	7,500 sq. m
Communal Open Space	840 sq. m
	Totalling 24.5% of the site area
Creche	160 sq. m (c. 45 childcare spaces)
Car parking	243 no. spaces (66 basement and 177 surface)
Cycle Parking	125 for apartments – 20 visitor spaces at surface
Part V	32 no. units located in Block B01 (20%)

## 4.0 National and Local Planning Policy

### 4.1.1. National

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

Chapter 4 of the Framework addresses the issue of ‘making stronger urban places’ and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 4 sets out to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

The directly relevant National Policy Objectives as contained within the NPF include:  
National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

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

National Policy Objective 11: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

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

Objective 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 57 sets out to enhance water quality and resource management, this includes the requirement to ensure that flood risk management informs place making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. Relevant Section 28 Ministerial Guidelines:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual')
- Design Manual for Urban Roads and Streets (Interim Advice Note Covid -19, May 2020)
- Guidelines for Planning Authorities on Urban Development and Building Heights, 2018
- Sustainable Urban Housing: Design Standards for New Apartments (2018),
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities (2009).
- The Architectural Heritage Protection Guidelines for Planning Authorities (2011).

#### 4.1.2. **Regional Policy**

##### **Regional Spatial and Economic Strategy (RSES) for Eastern and Midland Assembly, 2019**

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region seeks inter alia to consolidate the Dublin Metropolitan Area by focusing at least 50% of all new homes within or contiguous to the existing built up areas of Dublin.

#### 4.1.3. **Local Policy**

##### **Dun Laoghaire Rathdown Development Plan 2016-2022**

The subject lands are zoned Objective 'A' in the Dun Laoghaire Rathdown County Development Plan and the objective is 'to protect and-or improve residential amenities.'

Located within a transitional zone area with adjoining lands to the east zoned 'B' with the objective 'to protect and improve rural amenity and to provide for the development of agriculture.'

### **New Dun Laoghaire Rathdown Development Plan 2022-2028**

The subject lands are zoned Objective A in the Dun Laoghaire Rathdown County Development Plan and the objective is 'to protect and-or improve residential amenities.'

There is an objective to protect trees and woodlands on the southern portion of the lands.

### **Kiltiernan Glenamuck Local Area Plan 2013 (as extended) to 2023**

The overall strategy for the LAP lands reflects that of the County Development Plan, based on the roads improvement objectives for the Glenamuck District Distributor Road (GDDR) and Glenamuck Local Distributor Road (GLDR) to bypass Kiltiernan village, facilitating the development of the village centre and a new civic node. There is a Section 49 Supplementary Development Contribution Scheme for the GDDR, which also includes a separate infrastructure project of Regional Surface Water Attenuation Ponds that are required to affect the SUDS drainage scheme for the new roads and the development lands within the LAP area.

The LAP also provides for some upgrading of the existing Glenamuck Road to provide pedestrian and cycle facilities and the upgrading of the Enniskerry Road to a traffic calmed street to function as part of the neighbourhood centre.

Section 2.2 of the plan sets out a broad framework and principles of development including objectives RE01-RE09 relating to residential development and which includes RE03 which seeks to facilitate the provision of appropriate densities and a mixture of dwelling types and tenures taking into account proximity to public

transport corridors, site topography, sites of archaeological interest/protected structures and natural features.

Section 10 of the LAP sets out the phasing requirements and details that up to 700 dwelling units can be accommodated on an existing upgraded road network, in advance of the GDDR scheme, as Phase 1. It is stated however, that the development of additional units in excess of these 700 dwelling units would, however, require the construction of the Glenamuck District Distributor Road Scheme roads. LAP section 10.6 sets out 13 criteria to be considered in the case of developments in advance of that scheme, with the following locations to be considered as part of Phase 1:

Phase 1(a) to comprise c. 350 dwelling units:

A. Glenamuck Road Upper / North Portion (c. 200 dwelling units). This area encompasses the lands designated as 'medium / higher density residential' at the northern section of Glenamuck Road.

B. Node at junction of Enniskerry and Glenamuck Roads (c. 150 dwelling units). This area includes the lands designated as 'medium density residential' to the east of Enniskerry Road. Any proposed developments must include the improvement of the Glenamuck Road.

In relation to surface water attenuation the following is noted:

"In advance of the construction of the Regional Surface Water Attenuation Ponds it will be necessary to incorporate stringent Sustainable Drainage Systems (SUDS) measures on each development site. In particular for all sites whose site plan area is greater than 0.5 hectares (ha) or where the number of residential units proposed exceeds twenty (20) or whose proposed commercial area exceeds 500 square metres it is proposed to require the preparation of Stormwater Impact Assessments and Stormwater Audits".

Phase 1(b) to comprise c. 350 dwelling units: C. Concentrated at village core / along Enniskerry Road. Including lands zoned as 'neighbourhood centre' and 'residential'



along the Enniskerry Road. Development is dependent on delivery of a traffic calming scheme and must include the improvement of the Enniskerry Road through the 'village core'. The site is within Phase 1(a) B and Phase 1(b) (c) as per the LAP phasing map. The 13 planning criteria to be used in the assessment of planning applications up to 700 dwellings are as follows:

1. Conformity with the Kiltiernan / Glenamuck Local Area Plan, 2013-2019, and which promote and facilitate the achievement of its vision and objectives.
2. Demonstration of a high level of architectural quality and urban design and are sympathetic to the special character of Kiltiernan / Glenamuck.
3. Achievement of local road / footpath improvement and traffic management measures.
4. Consolidation of the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines.
5. Consolidation of Kiltiernan village.
6. Planned within the context of an overall outline Master Plan for individual and affiliated land holdings (in order to prevent piecemeal development).
7. Compatibility with later phases of development.
8. Facilitation of the orderly development of adjoining property/land holdings.
9. Proximity to the Luas Line B1 and within the catchment area for the Section 49 Supplementary Development Contribution Scheme for Luas Line B1.
10. Availability of environmental services. Specifically, the Council will monitor and have regard to capacity at the Shanganagh Wastewater Treatment Works to ensure that wastewater from any proposed development in the LAP area can be accommodated in accordance with the Wastewater Discharge License for the Works.
11. Incorporation of acceptable Sustainable Drainage System (SUDS) measures on each development site.

12. Likelihood of early construction.

13. Provision of an appropriate level of active and passive open space and community facilities. Specifically, the Council, in conjunction with the Department of Education and Skills, will have regard to the capacity of local schools to accommodate development, in accordance with the “Code of Practice on the Provision of Schools and the Planning System”.

The development site is within **LAP land parcel 31A of the LAP**. It is suitable for Medium / Higher density residential development such as apartments, duplexes, terraces, detached. The site is constrained by access which is off a private roadway, overhead powerline and archaeology site

### **Enniskerry Road / Glenamuck Road Part VIII Scheme**

The Part VIII scheme relates to the Enniskerry Road / Glenamuck Road (Golden Ball) junction. It extends as far as the entrance to Rockville on the Glenamuck Road. The scheme involves the following:

- Widening of both sides of the Glenamuck Road to allow for the provision of left and right turning lanes, cycle lanes and footpath approaching the Golden Ball junction. Also removal of a ‘pinch point’ at Cromlech Close.
- General upgrading of the Golden Ball junction to provide improved pedestrian and cycle facilities. Cycle lane/tracks on Glenamuck Road.
- Provision of a new right turning lane on the Enniskerry Road at the southern approach to the Golden Ball junction with a new frontage to the Kiltiernan Country Market at the eastern side of the road.
- Improved pedestrian crossings incorporated within signalised junctions including new crossings on the northern and western sides of Enniskerry Road.
- Upgraded public lighting.
- Attenuation pond to the east of Glenamuck Road.

Part VIII approval was granted at a meeting of Dun Laoghaire Rathdown County Council on 11th September 2017.

**Reg. Ref. PC/IC/01/17** Consent issued in 2017 for a Part VII Scheme for upgrade works at the Glenamuck Road.

**As noted under Section 4 above, An Bord Pleanála Reference PL06D.303945 and PL06D. 304174.** Part 10 application for the Glenamuck District Distributor Road Scheme (GDDRS) and a Compulsory Purchase Order for the acquisition of the necessary land to construct the GDRS was granted by the Board in December 2019

## 5.0 Planning History

- 5.1.1. The subject site is located within the area identified as “Phase 1(a) - A; Glenamuck Road upper/north portion”. It is stated that this area could accommodate up to 200 dwelling units in advance of the delivery of the Distributor Road Scheme.
- 5.1.2. A review of the Planning Authority’s on-line planning application data indicates that a total of 146 units (11 units under Reg. Ref.: D14A/0766 + 28 units under Reg. Ref.: D14A/0765 & PL06D.244520 + 31 units under Reg. Ref.: D15A/0443 + 15 units under Reg. Ref.: D17A/0520 + 61 units under Reg. Ref. D21A/0110 & ABP Ref.: 310089-21) –have been permitted in Phase 1(a)-A since the adoption of the LAP.

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

It is stated in the CE report that a pre-application consultation took place with the planning authority on the 13<sup>th</sup> December 2021. The minutes of the meeting are attached to the file.

## 7.0 Submissions Received

Irish Water (report dated 19<sup>th</sup> January 2022)

Irish Water has assessed the proposal and confirms a Confirmation of Feasibility has been issued to the applicant advising that connection(s) are feasible subject to the following contingencies:

In respect of Water:

There is sufficient capacity in the existing Water Treatment Plant to facilitate the proposed development.

In respect of Wastewater:

There is sufficient capacity in the existing Wastewater Treatment Plant to facilitate the proposed development. In addition to the above, it is noted that the proposed connections are to be via private land.

As such, the applicant has been advised that, in order to obtain Design Acceptance from IW, the applicant is required to provide evidence of consent from all third party landowners. A wayleave in favour of Irish Water will be required to be provided by the applicant, in order for the works to be carried out in the third party lands

## **8.0 Forming of Opinion**

Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submissions and the discussions which took place during the tripartite consultation meeting. I shall provide brief detail on each of these elements hereunder.

## **9.0 Documentation Submitted**

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and

Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information included, inter alia,

- Planning Report and Statement of Consistency
- Statement of Material Contravention
- Architectural Design Statement
- Flood Risk Assessment
- DMURS Statement of consistency
- Preliminary Construction Management Plan
- Traffic and Transport Assessment
- Landscape design Statement
- Arboricultural Report and Drawings
- Appropriate Assessment Screening Report
- Ecological Impact Assessment
- EIA Screening Statement
- Archaeological Assessment

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

## 10.0 **Planning Authority Submission**

In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Dun Laoghaire Rathdown County Council, submitted a copy of their section 247 consultation with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on the 4<sup>th</sup> February 2022.

The Planning Authority has identified a number of considerations which may have a bearing on the Board's decision as to whether the proposal constitutes a reasonable basis for an application. Summarised as follows:

- Principle is acceptable
- Prematurity due to limited **road capacity, traffic congestion and safety** (transportation dept recommend Refusal)
- Concern with regard to **Height and Massing** negative impact to existing visual and residential amenities and B zoned lands
- Impact on 'B' zoned lands – **transitional zone**
- Inconsistent with CDP and LAP for Permissible Heights.
- **Scale and massing further CGI required**
- **Permeable routes and Pedestrian flow queried** within the scheme - connections to public roads and adjoining developments.
- Degree of permeability to the creche building
- **Discrepancies in plans and drawings** submitted (OS calculations, heights and elevation of dwellings)
- Details of taking in charge
- Query BTR Scheme
- Drainage – deficient detail and inconsistencies
- IW – Third party consent required for wastewater connections

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

## 11.0 Consultation Meeting

A Section 5 Consultation meeting took place via teams on the 24<sup>th</sup> March 2022, commencing at 10.00 am. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

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

1. Compliance with specific objectives of the Kiltiernan LAP 2013 - 2023 for Land Parcel 31A.

- Phasing
- Height & Massing
- Daylight, Sunlight, Overshadowing Assessment.
- Visual Impact

2. Transportation and deliverability of connectivity and the GDDRS

3. AOB

11.1.1. In respect of compliance with specific policies of the Kiltiernan LAP 2013 - 2023, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further justification of the proposal with respect to compliance with specific objectives of the Kiltiernan LAP 2013 - 2023 for Land Parcel 31A.
- Further justification for the phasing of development given that the LAP outlines that provision for the development of up to 700 no. housing units can be accommodated on an upgraded road network in advance of construction of the GDDRS and that the development of additional units in excess of these 700 dwelling units would require the construction of the Glenamuck District Distributor Road Scheme (GDDRS).
- Further consideration and dialogue regarding the timeframe for commencement and delivery of the GDDRS and certainty around its delivery.
- The Local Area Plan nominates the site as being suitable for 2-4 storey development. Proposal is for development up to 5 & 6 storeys high apartment

buildings. Further justification in light of the PA comments that the height and massing is appropriate at this transitional area.

- Further justification in terms of visual impact, more detailed cross sections, CGI's and visuals are required, at application stage, which include long range more distant views.
- Further justification and consideration of the proposal in terms of daylight and sunlight incl. shadow assessment, for proposed apartments, private, communal and public open space areas, and neighbouring properties.
- Further consideration that all material contravention matter are identified, justified and advertised accordingly.

11.1.2. In relation to, transportation and deliverability of connectivity and the GDDRS, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Acknowledge cross over of items for discussion on the agenda, phasing of the development in line with GDDRS was dealt with under the preceding item. However, further consideration and justification is required of permeable routes and pedestrian and cycle flow within the scheme and connections to public roads and adjoining developments.
- Further clarity that the vehicular access via Cairnbrook estate can be delivered and that consents, and relevant rights of way are in place.
- Further justification and consideration for location of the creche building and degree of permeability.
- Clarification that all items raised by drainage department in their report submitted to the Board are addressed, further meetings should be sought to resolve outstanding issues.
- Further clarity that issues raised by IW regarding third party consents required for wastewater connections are addressed.



- It is noted that an existing wayleave, waterlogged ground and a large number of trees are to be retained on site. Further consideration that drainage and landscaping plans and proposals are integrated, consistent and take account of one another.
- Further consideration of the proposal in respect to level of detail provided, particularly in relation to surface water drainage proposals and relating to site specific flood risk assessment and movement of overland flow rates.
- Consideration that there is no further information facility available to the Board, only in exceptional circumstances, therefore all information submitted needs to be clear and of a high quality and accurate to ensure that the Board can make an informed decision.

11.1.3. In regard to any other matters, An Bord Pleanála sought further elaboration / discussion / consideration of the following:

- Further consideration of the proposal in terms of:
  - Construction Management Plan,
  - Taking in Charge and
- Clarification that all items raised by the PA in their report submitted to the Board are addressed, further meetings should be sought to resolve outstanding issues.
- Further consideration that the SHD process does not allow for further information, only in exceptional circumstances, therefore all information submitted needs to be clear and of a high quality and accurate to ensure that the Board can make an informed decision.
- Consideration that any possible material contravention issues are advertised accordingly, and the application documentation should refer to the statutory Development Plan in place at the time the application is made.

- Consideration that an ecological impact assessment, AA Screening report and EIA screening report are required to accompany an application and consideration that all survey work is up to date.
- Consideration that consultation and engagement with the biodiversity section, ecology and parks and landscape services would be beneficial to address any issues arising.

## 12.0 Conclusion and Recommendation

- 12.1.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 12.1.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the section 28 Ministerial Guidelines and local policy via the statutory plans for the area.
- 12.1.3. Having regard to all of the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **constitutes a reasonable basis for an application for strategic housing development** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 12.1.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making

process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

### 13.0 Recommended Opinion

- 13.1.1. An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.
- 13.1.2. Following consideration of the issues raised during the consultation process and having regard to the opinion of the planning authority, **An Bord Pleanála is of the opinion that the documentation submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.**
- 13.1.3. Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:
1. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant zoning objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely

to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

2. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with specific objectives of the Kiltiernan LAP 2013 - 2023 for Land Parcel 31A. Such statement should have regard to the development plan and or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.
3. A detailed statement demonstrating how the phasing, unit mix and building height proposed is appropriate, given the statutory development plan and LAP in place at the time a decision is made.
4. A detailed statement demonstrating further justification and clarity of the proposal with respect to:
  - (i) access to the site via Cairnbook estate, pedestrian routes and flow and cycle connectivity and links to adjoining lands.
  - (ii) proposals to further increase the degree of permeability to the creche building.
5. A detailed Traffic Impact Assessment and Mobility Management Plan.
6. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory County Development Plan or LAP for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

7. Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.
8. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:
  - Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.
  - Impact to any neighbouring properties devoid of proposed and existing landscaping and trees.
9. Additional CGIs are required, as well as a Landscape and Visual Impact Assessment with photomontages, to include, long range and consideration of winter views from the surrounding areas.
10. An up to date Ecological Assessment and Biodiversity Report inclusive of a Bat Survey and wintering birds survey.
11. Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.
12. A response to matters raised within the PA Opinion submitted to ABP on the 4<sup>th</sup> February 2022.
13. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the

proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

14. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

15. Site Specific Construction and Demolition Waste Management Plan.

16. Details of public lighting.

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

1. Irish Water
2. Dun Laoghaire Rathdown County Childcare Committee

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the

Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Fiona Fair  
Planning Inspector  
21.03.2022