



An
Bord
Pleanála

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

**Inspector's Report on
Recommended Opinion
312265-21**

Strategic Housing Development	336 BTR apartments and associated site works.
Location	Former Avid Technology International Site, Carmanhall Road, Sandyford Industrial Estate, Dublin 18.
Planning Authority	Dun Laoghaire Rathdown County Council.
Prospective Applicant	Atlas GP Ltd.
Date of Consultation Meeting	27 th April 2022
Date of Site Inspection	31. 03. 2022
Inspector	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 centrally within Sandyford, at the junction of Carmanhall Road and Blackthorn Road, with frontages to both roads, and is immediately opposite the junction of Blackthorn Road and Burton Hall Road to the east. The site is visible for some distance along Burton Hall Road and from various vantage points in the surrounding area. This area is currently undergoing transformation from low rise industrial, employment and office use to higher density residential and mixed-use developments. The Stillorgan and Sandyford Luas stops are within c. 450 m of the site (to the north and northeast respectively). Several bus routes also run along Blackthorn Road and Burton Hall Road. The site has a stated total area of 1.03 ha and falls gradually from south to north. It is above the level of Carmanhall Road and Blackthorn Road. It was previously occupied by a 2-storey warehouse / production building with ancillary offices (c. 3,890 sq.m.) 'Avid Technology International' (now demolished), and a large area of associated surface car parking. The site is currently unused and is bounded by temporary hoardings along the SE and NE boundaries, together with concrete block walls along the NW and SW boundaries.
- 2.1.2. The immediate surroundings of the site reflect the ongoing changing nature of Sandyford and includes a single storey commercial building and the 6 storey office building (6 storey, 'Nova Atria', occupied by 'Facebook') on Carmanhall Road to the

north; low profile vacant commercial buildings to the northwest (hereafter referred to as the 'Tack Packaging' site) fronting onto Ravens Rock Road; a newly refurbished 6 storey office complex to the southwest (now known as 'Three Rock Plaza') on Blackthorn Road; and 2-3 storey office and light industrial buildings on the opposite (eastern) side of Blackthorn Road

3.0 Proposed Strategic Housing Development

3.1.1. The proposed development consists of:

Table 1	Key Statistics
Site Area	1.29 ha (whole planning report refers to Avid site only of 0.73 ha)
No. Of Units 554 BTR Units on Avid Site & Tack Site combined <ul style="list-style-type: none"> • 336 on Avid • 218 on Tack Packaging site 	Combined Sites - 554 <ul style="list-style-type: none"> - studio 126 (23%) - 1 bed 277 (50%) - 2 bed 145 (26%) - 3 bed 6 (1%) Avid Site - 336 <ul style="list-style-type: none"> - studio 77 (23%) - 1 bed 175 (52%) - 2 bed 78 (23%) - 3 bed 6 (1%)
Density	Stated 460 u/ph, however, it is 429 u / ha for both sites
Non residential uses	Creche (c.319 sq. m) not shown on plans

Height	4 - 16 storeys
Dual Aspect	34%
Public Open Space	None
Shared Amenity Space	801 sq. m in Block D and E
Communal OS	Stated as 1475 sq. m (c. 20% of site)
Car parking spaces	84 on Tack site & 108 on Avid site
Bicycle Parking spaces	400 on Tack site and 348 on Avid Site
Access	New access points via Blackthorn Road, Carmanhall Road opposite village shops and Ravens Rock Road.

Note: Mat Con for height and density.

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 (2020),
- The Planning System and Flood Risk Management (including associated Technical Appendices).
- Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities (2009).

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 2022 - 2028

The current zoning objective in the Dun Laoghaire - Rathdown County Development Plan 2022-2028 is Objective 'A2' - "To provide for the creation of sustainable residential neighbourhoods and preserve and protect residential amenity".

Sandyford Urban Framework Plan (SUFP) 2016 - 2022

SUFP 3 refers to height and states:

'It is Council Policy that building height in Sandyford Business District accords with the height limits indicated on Building Height Map 3.'

The Sandyford Urban Framework Plan 2016 sets out blanket heights for individual parcels of land within the Sandyford Business District including the subject site which has been designated as having a permitted/developed height limit of 6-8 storeys.

Specific Local Objective 113 applies to the subject site. It states:

'To facilitate the provision of community infrastructure at ground floor along the eastern outer edge of the Carmanhall residential neighbourhood along Blackthorn Road, to create active street frontage and to ensure the appropriate provision of social and community infrastructure to serve the needs of the resident and employee population.'

The SUFP notes "at strategically identified locations the SUFP allows for the design of buildings or elements to exceed the generally permitted building height by one or two storeys".

It further notes "it is essential that any building makes a positive contribution to the built form of the area. It is intended that building height shall therefore be determined by how it responds to its surrounding environment and be informed by; location; the function of the building in informing the streetscape; impact on open space and public realm (in particular shadow impact), impact on adjoining properties, views into the area and long distance views."

With regards to density and scale, SUFP 2 states

"It is Council policy to ensure that Sandyford Business District develops in an orderly manner in accordance with the increase in uses set out in the objectives of this Plan and the Density and plot ratio set out in Map 2".

The subject site is indicated as the location for maximum density in the district. The SUFP envisaged a density of 175 units per ha for the Avid Site and 150u/ha for the Tack Packaging site.

5.0 Planning History

PA Ref. D05A/0566 – Permission granted for 182 apartments with retail unit and gym, in three blocks ranging in height from 10-14 storeys

ABP-310104-21 Permission Refused (Aug 2021) for 428 no. Build to Rent apartments & childcare facility. Reasons for refusal related to, enclosed nature layout and height, communal open space inadequate, substandard level of residential amenity, material contravention for height and density.

ABP Ref. 303467-19: SHD Permission granted for 817-bedspace Student Accommodation

P.A. Ref. D16A/0158: Permission granted for a mixed use development of a 5 - 8 storey including 147 no. apartments.

SHD Pre App - Tack Packaging Site:

ABP-308186-20 Sandyford Environmental Construction Ltd. lodged a Pre-Application submission to ABP on 19/9/20 for: 233 build to rent residential units, a creche, shared amenity facilities, landscaping, underground parking and all site development works above and below ground on three blocks ranging from 6 to 14 storeys above a double basement.

On 22/12/20 The Board issued a Notice of Pre-Application Opinion highlighting the application required Further Consideration and Amendment concerning issues of 1) Development Strategy and 2) Residential Amenity.

PA Ref. D05A/0566 Permission granted for demolition of existing warehouse buildings and construction of a mixed use development comprising 182 no. apartments, 9 – 12 storeys.

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

None

7.0 **Submissions Received**

Irish Water (report dated 27th 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: The applicant has been advised that there is sufficient capacity in the Irish Water assets to facilitate the proposed development. The applicant can choose from one of the two options mentioned below to connect with the Irish Water network:

A connection is feasible to the 14" Asbestos main the North of the site. A bulk meter is to be installed on this connection.

A connection is feasible to the 6" Asbestos main to the East of the site. A control valve is to be placed on this main allowing for this connection to be set to closed during normal operations.

The applicant will be required to submit layout and designs within their redline boundary for validation by Irish Water. The applicant's layout and designs are to be submitted ahead of any SHD application.

Irish Water notes that the Confirmation of Feasibility to connect to the Irish Water infrastructure does not extend to the applicant's fire flow requirements. Irish Water cannot guarantee a flow rate to meet fire flow requirements and in order to

guarantee a flow to meet the Fire Authority requirements, the applicant should provide adequate fire storage capacity within the proposed development.

In respect of Wastewater:

The applicant has been advised that there is sufficient capacity in the Irish Water assets to facilitate the proposed development. The connection has to be made to the Arkle Road (MH: SO19264601) Network. A second connection option was proposed by the applicant to connect with other sewers adjacent to the site. This proposal is not feasible based on current constraints in the downstream network.

The applicant will be required to submit layout and designs within their redline boundary for validation by Irish Water. The applicant's layout and designs are to be submitted ahead of any SHD application.

Separate storm and foul water connection services have to be provided for the Development. The surface and storm water from the site must be only into an existing storm water network that does not discharge to an IW combined/foul sewer. The connection arrangement should be agreed with the Local Authority Drainage Division.

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, a Completed Application Form, Cover Letter, Planning Report, Statement of Consistency, Material Contravention Statement, Daylight and Sunlight Report, EIA Scoping Report, Appropriate Assessment Screening, Architectural Design Statement, Engineering Report, Preliminary Flood Risk Assessment, Architectural Drawings and Design Statement, Engineering Drawings, Engineering Assessment Report, Traffic and Transport Assessment, Preliminary Statement of Consistency on DMURS, Landscape Design Assessment, Photomontages, Energy Analysis, Utilities Report, Lighting Report, Draft BTR Agreement, Letter of Consent from DLRDCC and Part V Submission.

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 25st January 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:

- There was no S147 meeting held.
- PA Report Assesses Avid Site, only.
- Poor standard of residential amenity
- Quantum of development (density / population puts existing and planned supporting infrastructure under additional strain.
- Separation distances between blocks, overlooking, opposing windows.
- Active frontages on ground floor units – own door units required.

- Density of 450 u / ha far out weighs the proposed density of 175 u / ha as per the SUFP for the Avid Site
- Residential amenity and OS
- No POS
- Issues with Unit Mix (75% studios/ 1 bed)
- Dual Aspect should be 50% - Inverted windows on corners to balconies not appropriate as dual aspect.
- Justification of the pedestrian over bridge linking the two sites and podium level communal open space.
- 86% ADF compliance rate is substandard for this site. All rooms should be assessed.
- Impact upon sunlight / daylight of surrounding properties.
- Car parking ratio of 0.32:1 too low.
- Surface water drainage issues
- Transportation issues (access points tie in with Sandyford cycle improvements scheme, cycle access and way finding, cycle stands) RSA, Access Audit, Cycle Audit and Walking Audit required

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 27th April 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. Inconsistency in Site Area.

2. Previous Reasons for Refusal (SHD 310104-21) refused in Aug 2021

- Communal open space
- Resident support facilities
- Residential amenity (sunlight and daylight)
- Prejudicial to potential of adjoining sites

3. Compliance with provision of the Dun Laoghaire-Rathdown County Development Plan 2016-2022, including the Sandyford Urban Framework Plan.

- Specific Local Objective 113
- Quantum of development
- Height and density
- Public Open Space

4. Supporting Infrastructure (Transportation and Water Services)

5. AOB

11.1.1. In respect of inconsistencies in site area An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further elaboration and clarity in any application submitted regarding the red line boundary of the site and that the Avid site and the Tack Packaging site represent two separate standalone proposals, which while taking cognisance to one another, can be carried out and executed independently of one another.
- Further clarity that the subject proposal, solely, relates to the Avid site.
- Further clarity that the design statement relates to the Avid site and that the Masterplan for the wider area is a separate standalone document.

11.1.2. In respect of reasons for refusal SHD 310104-21 refused in Aug 2021, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further justification of how the subject proposal overcomes the previous reasons for refusal.
 - Enclosed nature of the site
 - Substandard level of residential amenity
 - Material contravention for height and massing
- Further consideration and/or justification of the documents as they relate to future residential amenity, having particular regard to the following:
 - impacts on adjoining structures
 - overlooking,
 - relationship of open space and public realm
 - views and vistas
 - daylight and sunlight incl. shadow assessment
 - placemaking and wayfinding
 - creation of neighbourhoods
- Further justification with respect to permeability of the block for pedestrians and movement strategy within and around the blocks, including consideration of interface with and passive surveillance of paths along the eastern and southern boundary, and legibility of the pedestrian entrances to the development.
- Further consideration and justification of the quantum and quality of communal open space including the availability of sunlight and daylight to the courtyard, roof gardens, and the functionality of the spaces.

- The further consideration of dual aspect units having regard to the requirements of the Sustainable Urban Housing Design Standards for New Apartments (2020), SPPR 4.
- Further justification required in terms of residential amenity, consideration of outlook, and access to daylight/sunlight within the apartments, in light of the PA CE report. An up dated Sunlight / Daylight Analysis and overshadowing analysis is required to be submitted with any application.
- An updated Wind and Microclimate Analysis (including details of any proposed mitigation measures); and an Inward Noise Assessment.

11.1.3. In respect of compliance with relevant statutory CDP, SUFP and SLO 113, An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further justification and consideration that specific objective SLO 113 has been addressed. In particular, to address provision of community infrastructure at ground floor along the eastern outer edge of the Carmanhall residential neighbourhood along Blackthorn Road, to create active street frontage and to ensure the appropriate provision of social and community infrastructure to serve the needs of the resident and employee population. Noted that a creche is not included on plans submitted for Avid Site.
- Further consideration that the visual impact assessment has regard to the site context, in particular, having regard to concerns expressed in respect of scale and massing.
- Further justification of the quantum of development in light of specific policies set out in the SUFP.
- Further detail and consideration of access to community and social infrastructure, open space and amenities, in the wider area.

- Further consideration/ justification should address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the density and height strategy in the development plan, issue of legibility, visual impact, and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018)

11.1.4. In respect of Infrastructure (transportation, movement, carparking and access and water infrastructure), An Bord Pleanála representatives sought further elaboration / discussion / consideration on the following:

- Further detail and consideration of works required to the public realm.
- 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 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.
- Clarity that issues raised by the IW report are addressed, in particular with regard to infrastructure on the site, sets backs or diversions and that a flow rate to meet fire flow requirements can be guaranteed.
- Consideration that each application stands on its own merits and that should issues or disagreements arise with respect to infrastructure deficits the Board precedent is to uphold the opinion of the planning authority, given their responsibility and authority on such matters.
- 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.

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

- Applicant advised to include all items of material contravention in their statement of material contravention and to advertise same accordingly.
- Further consideration of the proposal in terms of:
 - Inconsistencies in the information
 - Construction Management Plan,
 - Quality Audit
- 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.

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 applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan 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 **requires further consideration and amendment** in order to constitute a

reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

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

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

1. Development Strategy

(a) Further consideration/justification of the documents to clearly set out how the Avid site can be developed independently of the Tack Packaging site, given the linked nature of the overpass pedestrian walkway, communal open space and access to undercroft car parking also the requirement for a creche. Clear justification

that each scheme, which it is submitted are to comprise two separation planning applications can be deliver independently of one another, in particular, with respect of access, drainage and engineering technical matters, given the Masterplan for an overall scheme, the recent SHD pre application 308186-20 on the Tack Packaging site and land ownership.

(b) Further consideration/justification of the documents as they relate to the Dun Laoghaire Rathdown Development Plan 2022 - 2028, specifically Appendix 5 and the Sandyford Urban Framework Plan, in relation to the scale, height, and design of the proposed development and the potential impact on the adjoining sites and surrounding environs of Sandyford. The further consideration/ justification should clearly address the proposed design and massing, inter alia the visual impact, and relate specifically to the justification for any material contravention of the density and height strategy in the development plan, issue of legibility, visual impact and compliance with Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018). The further consideration of these issues may require an amendment of the documents and/or design proposal submitted.

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 Dun Laoghaire Rathdown County Development Plan

2022 – 2028 and Sandyford Urban Framework Plan 2022, in particular SLO 113, in respect of any application for permission under section 4 of the Act.

2. 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 UFP 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.
3. A detailed statement demonstrating further justification and clarity of the proposal with respect to red line boundary and what precisely is being proposed under any future application. Cognisance each application is dealt with on a case by case basis, therefore clarity is required to demonstrate how the Avid Site (the subject of this pre application) and proposals for the adjoining Tack Packaging site, which it is indicated while reliant upon one another will form two separate distinct applications can be carried out independently of one another.
4. A detailed statement and further CGI's, photomontages and visual impact assessment demonstrating how the proposed development ties in visually with the immediate context of the site and the wider Sandyford area given the site context and the scale and massing proposed relative to the surrounding environment.
5. Consider further the permeability of the blocks, pedestrian movement strategy between blocks, interface and access to podium level open space, clarity in relation to level changes, interface with proposed new streets, and potential conflict between pedestrians and vehicles using the basement access ramp/'street'.

6. Detail and justification of location and quantum of resident support facilities and resident services and amenities as defined by the Sustainable Urban Housing Design Standards for New Apartments Guidelines (2018) and accessibility/ease of access to those spaces by future residents.
7. Detailed quantum and design of open space proposals at all levels including consideration of issues related to wind micro-climate, design, and usability of spaces, in particular at the upper levels, and any implications of the green / blue roof design.
8. Further justification for omission of a childcare facility to serve the proposed development, in light of Childcare Facilities – Guidelines for Planning Authorities.
9. Detailed Arboricultural Assessment.
- 10.A Social and Community Audit
11. Provide further justification for the level of car and cycle parking proposed and detail the design of cycle parking spaces and secure storage areas. The justification should include an analysis of car and cycle parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.
12. 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.
- 13.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.

14. A response to matters raised within the PA Opinion submitted to ABP on the 25th January 2022.

15. 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.

16. As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application specifically as including 'Build to Rent' housing and a covenant/legal agreement is required at application stage.

17. A rationale or evidence based justification that the proposed resident support facilities and resident services and amenities are appropriate and accord with SPPR7 (b) of the Apartment Guidelines 2020.

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

19. Site Specific Construction and Demolition Waste Management Plan.

20. 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. Transport Infrastructure Ireland
3. National Transport Authority
4. 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.

Fiona Fair
Planning Inspector
16.05.2022