



An
Coimisiún
Pleanála

Inspector's Report

PL-500439-DR-25

Development	Demolition of building and development of 24 houses with all associated site works.
Location	Dunluce, Glenamuck Road South, Carrickmines, Dublin 18, D18E3Y9
Planning Authority	Dun Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D25A/0725/WEB
Applicant(s)	Altitude Distribution Ltd.
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party Normal Planning Appeal
Appellant(s)	Altitude Distribution Ltd.
Observer(s)	None
Date of Site Inspection	4 th March 2026
Inspector	Suzanne Kehely

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1.0 Site Location and Description

- 1.1. The site of 0.586 hectares (net) is located on the southeastern side of Glenamuck Road South in the southern periphery of south Dublin urban development area. It is in an urban fringe type location where very low-density housing in a rural type of environment is being replaced with new dense development alongside greenfield development. Carrickmines Park is c 600m to the north. The site is c. 1km from Ballyogan Wood Luas Station. The site is south of the M50 ring route around Dublin. The interchange is c 500m east of the site.
- 1.2. The site is within the boundary of the Kiltarnan Glenamuck Local Area Plan area (2025). It is in the lower lying area where ground level is in the order of 83mOD with lands rising to the south, east and west as part of the Dublin Mountains foothill's location, with a local high point of 141mOD to the southwest.
- 1.3. There is an existing vehicular access to the site from the Glenamuck Road. The site features mature vegetation along the boundaries and notably, a wooded area is along the southern corner in addition to a row of mature trees along the boundary with the adjacent open space in the development to the south/east and are prominent in the streetscape. Dunluce House is large, detached dwelling (399 sq.m. floor area) of relatively recent construction. It is bound by a stream and mature hedgerow to the southwest in addition to mature planting along the site perimeter.
- 1.4. The site is serviced by a Bus route along the Glenamuck Road and a bus stop is located to the front of the site.
- 1.5. The sites on each side have been recently developed. The site to the north has 5 storey apartments, a mix of house types and office/retail uses, whereas the site to the south has three storey terraced housing.

2.0 Proposed Development

- 2.1. Permission is sought for the demolition of the 399sq.m. detached dwelling and the construction of a residential development with associated landscaping, engineering, and all site infrastructure works. In detail it comprises:

- Construction of 24 no. dwellings, consisting of 4 no. 2 bed units & 20 no. 3 bed units, comprised of 4 no. House Type A units, 13 no. House Type B1 units, 6 no. House Type B2 units & 1 no House Type B3 unit. The proposed dwellings are between 2 - 3 storey buildings, ranging in height from 9 metres to 11.5 metres.
- Provision of 41 surface car parking spaces, including visitor, accessible & EV charging spaces, 6 no. visitor bicycle parking spaces and 1 no. motorcycle space located around the site.
- Public open space areas of combined 1,005sqm or 17.1% of the site area;
- Creation of an upgraded vehicular & pedestrian/cyclist entrance to link to the R842 Glenamuck Road
- Infrastructure works to serve the proposed development include the internal road network, public lighting, site drainage works, hard and soft landscaping, boundary treatment, and all ancillary site services and development works above and below ground.

2.2. The application is appended with the following reports:

- Climate Change Impact Assessment Report. P116 sets out conclusions and recommendations. To conclude, the Proposed Development is considered to have met the criteria set out by the Taxonomy Regulation, in regard to being classed as an environmentally sustainable economic activity.
- Part V Proposal
- Planning Report by Foundation
- Architectural Drawings and Drawing Schedule by Darmody Architecture
- Housing Quality Assessment by Darmody Architecture
- Architectural Design Statement by Darmody Architecture
- Landscape Drawings and Drawing Schedule by Gannon & Associates
- Landscape Design Rationale by Gannon & Associates
- Civil and Roads Engineering Drawings and Drawing Schedule by CS Consulting
- Civils Design and Traffic / Transport Report by CS Consulting
- DMURS Compliance Statement by CS Consulting

- Ecological Impact Assessment by Malone O'Regan
- Environmental Impact Assessment Screening by Malone O'Regan
- Appropriate Assessment Screening- stage 1 by Malone O'Regan
- Arboricultural Impact Assessment by Charles McCorkell
- Construction Management Plan by Beldare Homes
- Construction and Demolition Waste Management Plan by Beldare Homes
- Operational Waste Management Plan by Beldare Homes
- Climate Action and Energy Statement by Beldare Homes
- Public Lighting Drawings & Report by Electric Skyline
- Archaeological Desktop Study by IAC Archaeology

2.3. The works relating to trees are set out in the Arboricultural Report and require the removal of 16 trees, 3 tree groups, 1 shrub group, and the partial removal of 1 tree group. Details of the proposed removals are specified within the Tree Work Schedule at the end of the report in Appendix A and are shown on the Tree Removals Plan at Appendix B. 32 trees are categorised as category B of which 3 are to be felled. These include the Monterey Pine, Scots Pine and a Douglas Fir. Only one is Category A is identified and is to be retained - metasequoia glyptostroboides (Dawn Redwood).

2.4. No recorded or previously unrecorded sites of archaeological potential were identified within the site.

2.5. Revised drawings submitted in Appeal documentation

- Car Parking: This has been revised from 2 spaces per dwelling to 1 space with two additional spaces – one of which is for disabled parking.
- Three storey houses (type A1) are proposed to be converted to two- storey.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. By order dated 13th November 2025, the planning authority issued notification of its decision to refuse permission subject to three reasons based on material contravention on density grounds and non-compliance with S.28 guidelines in respect of private open (based on SPPR 2) and car parking (based on SPPR3). The reasons are:

1) Having regard to the location of the proposed development, the residential zoning objective, the Dún Laoghaire–Rathdown County Development Plan 2022–2028, including Policy Objective PHP18 (Residential Density), Section 12.3.3.2 (Residential Density), and the Kiltiernan Glenamuck Local Area Plan (KGLAP), which seeks a higher residential density in the range of 50–80 units per hectare for lands at this location to reflect proximity to the Luas and alignment with sustainable transport and compact growth objectives, it is considered that the proposed density of approximately 41 units per hectare constitutes an unacceptably low density of development. This would represent an inefficient and unsustainable use of a fully serviced and accessible site, located within walking distance of high-capacity public transport, and would therefore materially contravene Policy Objective PHP18 and Section 12.3.3.2 of the County Development Plan, as well as the objectives of the Kiltiernan Glenamuck Local Area Plan. To permit the proposed development would set an undesirable precedent for similar low-density schemes and would be contrary to the proper planning and sustainable development of the area.

2) The proposed development is contrary to SPPR 2 of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) as it fails to provide the minimum private open space required for the potential occupancy of the units. House Type A1 illustrates only 30 sq. m of private amenity space and includes an office/study that could reasonably be converted to a bedroom, resulting in a three-bedroom dwelling requiring 40 sq. m under SPPR 2. Similarly, House Type B1 includes both an entertainment room and a living room, creating the potential for a four-bedroom dwelling requiring 50 sq. m private open space. This design approach is considered to be non-compliant with SPPR 2 by presenting units

as smaller while facilitating additional habitable rooms, resulting in 16 units that do not meet the required standards and rendering the proposal contrary to the proper planning and sustainable development of the area.

3) The proposed development is contrary to SPPR 3 of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) as the majority of units are provided with two car parking spaces, which exceeds the appropriate provision for a compact, sustainable settlement and undermines the objectives of promoting modal shift and reducing car dependency. This overprovision of parking is considered inconsistent with national policy and renders the proposal contrary to the proper planning and sustainable development of the area.

The applicant was advised that there are additional outstanding issues that would have to be addressed in the event of a future planning application.

3.2. Planning Authority Reports

3.2.1. Planning Report: The planning report sets out a detailed planning history with specific reference to permitted densities greater than 50 uph in the area. It cites the development plan policy in addition to the statutory guidelines. The core issue is excessively low-density having regard to PHP18 and KGLAP28 which provide for higher density and specifically 50-80uph for the area east of the Kiltiernan Glenamuck Link Road. It is noted to be 1km to the UAS and this distance is to be reduced by recent developments. The site is described as urban neighbourhood for the purposes of car parking which is considered excessive. Other issues relate to matters raised in the technical report and requiring further information. A justification for demolition is also noted to be lacking.

3.2.2. Other Technical Reports

Transportation report :

- Accept that it is not expected to result in increase of more than 10% in total traffic flows at any adjoining road at peak hours due to minimal traffic forecast.
- Should be links to Drumkeen and Carrickmines Manor development to achieve permeability and should be subject of FI

- Some anomalies between landscape drawings and road layout drawings.
- Of note, the proposed 2 x 6m wide shared surface access roads, parallel to Glenamuck road south, within the development do not comply with DMURS which sets a limit of 4.8m.
- There is insufficient pedestrian space between the dwelling entrance and proposed shared surface. Section 12.4.8 Vehicular entrances and Hardstanding Areas, states that a minimum of 1.2m access path shall be provided for each dwelling. A ramped courtesy crossing should also be provided. These matters are considered to require further information.
- No detailed Quality Audit (Stage 1 Road Safety Audit, Access Audit, Cycle Audit and a Walking Audit) was included and should be subject of FI.
- In terms of car parking and accessibility, it is noted that the proposed entrance is approx. 1km from the Ballyogan Wood LUAS stop and that this distance will be reduced on completion of the north east quadrant of The Park. The LEYs development also provides a future route and across the Glenamuck distributor road.

Building Control:

- No objection subject to conditions

Environment Enforcement report:

- Not satisfied that proposals can be carried out in accordance with standard procedures. More details are required in regard to operational waste management - estimates of waste generated and adequate storage within the curtilage of the development.
- Conditions for construction management and construction demolition waste management are required in addition to public liaison and pest control.

Public lighting:

- No objection – lighting design has been approved

Parks and landscaping :

- Further information required – The report cites the EU nature Restoration Regulations Aug.2024 -must be no net loss in the total national area of urban green spaces or urban tree canopy cover. It is requested that every effort be made to preserve trees for removal, particularly T1, Monterey Pine which is dominant along Glenamuck Road, in addition to T3 and T4, by revising the site entrance details. A more southern access would preserve the sylvan setting. This is illustrated in a drawing on Page 16 of PA planning report.
- Open space: Regarding the POS, only 553 sq.m.is functional – the site frontage does not qualify as landscape buffer zone intended to retain mature tree specimens. A condition in lieu of public open space to address shortfall of 6% of 0.5858ha of the required POS of 878.7sq.m. is recommended.
- Conditions recommended in event of grant of permission in relation to tree protection, tree bond, implementation of arboriculture plan landscape plan, retention of both arboriculturist and landscape architect

Part V Housing report

- The compliance is noted - no objection subject to conditions

Drainage:

- Further details required in respect of discharge rate of Surface water and modelling data. The use of an attenuation tank is not considered to be in line with nature-based solutions development plan policy and such is encouraged/required through various landscaping measures
- Protection of the watercourse, site investigation details, stormwater audit details and a surcharge analysis of the surface water drainage system and blockage impacts – safe overland flow routes without and outside site for example are required.

3.3. **Prescribed Bodies**

Uisce Eireann: No report to planning authority but details submitted with application include Pre-connection enquiry response which states no objection in principle-connection available without infrastructure upgrade needed at time of enquiry.

3.4. Third Party Observations

None

4.0 Planning History

4.1.1. The subject site

An Bord Pleanála 304985: The site formed part of larger site of 3 detached houses namely 'Dunluce', 'Drumkeen' & 'Mulberry', Glenamuck Road, Carrickmines, Dublin 18 as part of a section 5 request pursuant to the Planning and Development (Housing) and Residential Tenancies Act 2016, for development of the entire site with 156 apartments with communal basement car parking. This proposal was submitted for consideration whereby it was concluded that further information was required in respect of car parking, flood risk due to the stream traversing the site, impact on trees and childcare provision.

An Bord Pleanála PL06D.226712/ Planning Authority Reference D07A/1294: Permission refused in May 2008 for a development comprising 73 no. apartments. Reasons for refusal related to excessive density, scale and layout, impact on adjoining residential amenity, traffic impact and prematurity.

4.1.2. Adjacent lands : at Rockville, Glenamuck Road South,

An Bord Pleanála 249144 / Planning Authority Reference D17A/0520– permission on appeal (7/2/2018) for demolition of existing dwelling and construction of 15 no. 3-storey houses, new access, connection to drainage and new boundary.

4.1.3. Lands in wider area in LAP to south of subject site:

ACB 323469/ Planning Authority Reference D25A/0435/WEB refusal of permission for housing at Rockville, Glenamuck Road South, Kilternan, Dublin 18. Described as Phase 3 of residential development to include 19 number houses, including 13 number two storey, three-bedroom houses, and six number three-storey, four-bedroom houses, 38 number car parking spaces. Resident cycle parking and bin storage areas are provided in-curtilage, and additional visitor cycle parking is provided in Sheffield stands. The proposed development includes private amenity space, consisting of private gardens, and public open space. The proposal includes vehicular access from the under construction Glenamuck Link Distributor

Road to the north, and a proposed alternative service route for the Large-Scale Residential Development (LRD) on the adjoining lands to the south of the subject site permitted under Register Reference: LRD24A/0597. The proposal includes all associated site and infrastructural works, including tie-ins to the GLDR infrastructure at the site entrance and alteration of the boundary wall currently being constructed as part of the GLDF

Stated Reason: Having regard to the Objective 'A' zoning of the subject site, and to the layout and design of the proposal including the quality of the public open space, the interaction with the Glenamuck Link Distributor Road (GLDR) and the future Kiltiernan Park- New Phase, it is considered that the proposed development fails to consider the context of the site or respond to the character of the surrounding area, would result in a negative visual impact on the streetscape, and would provide a poor level of residential amenity for future occupants in terms of the quality of open space. The proposed development would be contrary to Section 12.3.1.1 – Design Criteria and Objective PHP35: Healthy Placemaking in terms of layout and design, Section 12.8.5 Public Open Space– Quality and Section 12.8.5.1 - Design of the Dan Laoghaire-Rathdown County Development Plan 2022-2028 and Objective SDF11-2 of the Kiltiernan-Glenamuck Local Area Plan 2025 and would therefore, be contrary to the proper planning and sustainable development of the area

5.0 Policy Context

5.1. Project Ireland 2040- National Planning Framework (1st Rev Aril 2025)

- 5.1.1. Part of the vision of the NPF is for more compact and sustainable development involving a greater proportion of residential and mixed-use development within the existing built-up footprints of our cities and towns. This is achieved through managing growth by directing significant amounts of new housing into existing built-up areas of cities, towns and villages and doing this particularly through infill and brownfield sites while the rest of new homes will be targeted on greenfield edge of settlement areas. The NPF also sets out a number of National Strategic Outcomes which include Compact Growth and facilitating greater densities while delivering high quality design.

- Policy Objective 22: 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.
- Policy Objective 45: 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, increased building height and more compact forms of development.

5.2. **The Eastern and Midland Regional Assembly Regional Economic and Spatial Strategy 2019-2031**

5.2.1. This includes the following objectives:

- RPO 3.2 and RPO 3.3 seek to promote compact urban growth through development plan core strategies setting targets (at least 50% of new homes) within or contiguous to built-up areas and identifying regeneration areas (infill/brownfield) in line with ministerial housing guideline.
- RPO 4.3: Consolidation and Re-Intensification - 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.

5.2.2. Section 5.2 emphasises the vision for Dublin of consolidating Dublin City and suburbs which underlines the spatial vision. The guiding principles for this are contained in section 5.3. In particular the guiding principles for the MASP area include:

- Compact sustainable growth and accelerated housing delivery and
- Integrated Transport and Land-use to focus growth along existing and proposed high quality public transport corridors and nodes along the expanding public transport network (Bus Connect and Luas among others), while maintaining capacity of strategic transport networks

5.2.3. RPO 5.3 - Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular

focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.

5.3. Compact Settlement guidelines

5.3.1. It is Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments. This policy is aligned to NPF priorities for compact growth and with Housing for All priorities to provide a greater range of housing options.

5.3.2. Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs

City - Suburban/Urban Extension: Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development⁸. It is a policy and objective of these Guidelines that residential densities in the range **40 dph to 80 dph (net)** shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)

5.3.3. In calculating and defining net the guidelines state: The general rule of thumb is that the net site area would be between 65 to 80 percent (approx.) of the gross area but this will depend on the area of land involved and local circumstances.

5.3.4. In appendix B Table 1 includes local street and open pocket park and incidental open space as part of the net area whereas lands that cannot be developed due to environmental sensitivities are excluded This for example would I consider reasonable relate to the constraints presented by the LAP objective to protect trees along the boundary and the also the topographical constraints presented by the stream and hedgerow row both features being incorporated in open space and landscaping of the site.

5.3.5. Private Open space:

- SPPR 2 - Minimum Private Open Space Standards for Houses It is a specific planning policy requirement of these Guidelines that proposals for new

houses meet the following minimum private open space standards: 1 bed house 20 sq.m 2 bed house 30 sq.m 3 bed house 40 sq.m 4 bed + house 50 sq.m A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves. . . . In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

5.3.6. Car parking: In order to meet the targets set out in the National Sustainable Mobility Policy 2022 and in the Climate Action Plan 2023 for reduced private car travel it will be necessary to apply a graduated approach to the management of car parking within new residential development.

- SPPR 3 - Car Parking It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling. (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the

maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking. This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

5.4. Development Plan

- 5.4.1. Zoning: Under this CDP, the site is zoned Objective A with the objective ‘to provide residential development and improve residential amenity while protecting the existing residential amenities.’
- 5.4.2. Housing: Relevant Chapters of the CDP for assessing housing at the subject site include Chapter 2 – Core Strategy, Chapter 4 – Neighbourhood-People, Homes and Place, Chapter 8 – Green Infrastructure and Biodiversity, Chapter 10 – Environmental and Flood Risk, Chapter 12 – Development Management, Chapter 13 – Land Use Zoning and Chapter 14 – Specific Local Objectives. • Policy Objective PHP18: Residential Density –
- 5.4.3. Car parking Table 12.5. Parking Zone 3 in T” Supplementary Map applies
- Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5)
- Proximity to public transport services and level of service and interchange available.
 - Walking and cycling accessibility/permeability and any improvement to same.
 - The need to safeguard investment in sustainable transport and encourage a modal shift.
 - Availability of car sharing and bike / e-bike sharing facilities.
 - Existing availability of parking and its potential for dual use.
 - Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).
 - The range of services available within the area.
 - Impact on traffic safety and the amenities of the area. Capacity of the surrounding road network.
 - Urban design, regeneration and civic benefits including street vibrancy.
- Bicycle Parking Table 12.8
- Houses: 1 per unit (long) and 1 per 5 units (short)

5.5. Kilternan Glenamuck LAP 2025

- Section 1.7.3 refers to the adjusted residential capacity. With the application of the revised density parameters per the compact settlement guidelines, there is an uplift in the residential capacity of Plan area from a stated 2,015 units in the core strategy to approximately 2,500 units (Note: this figure does not include potential infill/backland development associated with the with existing properties)
- Figure 2.4 Site Development Frameworks within the Kiltiernan-Glenamuck LAP delineates 11 sites with the area subject to specific objectives. The subject site does not fall within any of these the nearest is SDF10 Glenamuck East pertaining to land on the opposite side of the road. SDF8 related land to the east is at the periphery of the development area.
- Policy KGLAP 4 - Site Development Frameworks: It is policy that future development shall generally accord with the objectives set out in the site development framework section for each development site (see section 2.7). Planning applications shall include a consistency statement setting out how each of the objectives in the Site Development Framework will be delivered.
- Policy KGLAP28 – Overall Residential Density: It is policy to promote and support residential densities in line with Policy Objective PHP18 of the County Development Plan 2022 – 2028 (or any subsequent Plan) and the ‘Sustainable Residential Development and Compact Settlements Guidelines’, 2024. In this regard, residential density shall generally accord with site development frameworks in Chapter 2 or where density is not provided for in Chapter 2:
 - **Lands located to the east of the Kiltiernan - Glenamuck Link Road shall achieve a residential density of 50-80 dwellings per hectare.**
 - Lands to the west of the Kiltiernan Glenamuck Link Road shall achieve a residential density of 40-50 dwellings per hectare.
 - smaller infill sites that are not of sufficient scale will be assessed on a case-by-case basis. Such sites may define their own density (as agreed by the planning authority) in response to the scale and form of surrounding development.

- Movement: Promote permeability and connectivity between Kiltiernan Road and Glenamuck Road and • Provide linkages onto the north-south greenway, See Figure 7.2, Chapter 7.
- Tress: objective to protect and preserves trees and woodlands along the northeast and south east
- It is outside a flood zone
- The site is in an new residential community area in the core strategy.
- The entire KGLAP area is defined as a 'peripheral urban extension' per the definition of the table 3.1 Areas and Density ranges Dublin and Cork City and Suburbs' and 3.8 'Accessibility 'in the Guidelines for the following reasons:
- The majority of the Kiltiernan - Glenamuck Plan area is located within the Dublin City and Suburbs boundary and identified as a New Residential Community in the core strategy.
 - the Plan area largely consists of greenfield lands at the edge of existing built-up areas.
 - A large proportion of the Plan area is zoned for residential development.
 - None of the Plan area is currently: within a 1km walking distance of existing or planned high-capacity public transport (i.e. Luas stop or core bus corridor stop) within 500m - 1km walking distance of an existing or planned high frequency (10min peak hour frequency) or reasonably frequent (15min peak hour frequency) bus service.
- Having regard to the parameters of the Sustainable Residential and Compact Settlement guidelines 2020 the general density range applicable to the KG Lap is 40-80 dwellings per hectare (refer to chapters 2 and 4 for more specific density application within the plan area. This higher density range would therefore result in an uplift of residential capacity for the Plan area.
- Residential Mix: More 3 bed homes are needed to reflect the 3-person household size in the area. In order to facilitate the changing needs of families, it is considered appropriate that, when proposed as part of a new

residential development, that larger, 3-bed(+) apartment / duplex units are provided in accordance with Policy Objective PHP27 in the County Development Plan.

- Traffic and movement
 - Glenamuck Road is an existing permeability route along which a dedicated bus corridor is proposed with new link road to the north.
 - It is an objective to deliver a range of improvements to the safety and quality of the Active Travel environment on Glenamuck Road 'East', between the Kiltiernan-Glenamuck Link Road and the northern boundary of the Plan area. Key measures include:
- Car parking Objective CPM1 residential carparking shall accord with the requirements of the SPPR 3 car parking facilities as part of new development in line with the Sustainable Residential Development and Compact Settlements Guidelines.
- Policy KGLAP 40 – Modal Shift: It is Policy to provide an environment which supports moving people from the private car to more sustainable modes of transport. This can be done by way of further developing the network where a range of facilities and services are accessible in a short walking and cycling timeframe from homes or are accessible by high quality public transport located within a short walk from home.

5.6. Other guidelines

- Design Manual for Urban Roads and Streets (2013)

5.7. Natural Heritage Designations

5.7.1. The nearest sites are:

- Knocksink Wood SAC Site Code (000725) c. 4.25km south of site.
- Ballyman Glen SAC Site Code (000713) c. 4.5km south of site.
- South Dublin Bay SAC Site Code (00210) c.5.6km north of site.
- Wicklow Mountains SAC site Code (002122) c. 5.9km southwest of site.
- Rockabill to Dalkey Island SAC Site Code (003000) c.6km.

- South Dublin Bay and River Tolka SPA Site Code (004024) c.5.6km north of site.
- Wicklow Mountains SPA Site Code (004040) c. 5.9km southwest of site.
- Dalkey Islands SPA site Code (4172) C.6.6km northeast of site.

5.8. EIA Screening

- 5.8.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

6.0 Water Framework Directive

- 6.1.1. The site is in a suburban setting served by existing drainage and water supply infrastructure and to which connections are feasible without upgrading of the public network. The applicant has submitted the Uisce Eireann response to pre-connection query CDS no. CDS25004784 and confirms feasibility by Uisce Eireann without infrastructure upgrades.
- 6.1.2. There is an open ditch bounding the site that drains to a tributary of the Carrickmines Stream to the North. It was described as stagnant in the AA report but was clearly flowing in a northly direction into the culvert under the road at time of inspection. It is stated as not designated as part of the Drainage District or Arterial Drainage System.
- 6.1.3. The site is not a risk of flooding based on the submitted analysis. This flows into the Shangannagh River (EU Code: IE_EA_10S010600) to the east and ultimately into Killiney Bay a few kilometres downstream. Both the Shangannagh River and the Carrickmines Stream were assigned 'Good' ecological status and are currently 'not at risk' of not meeting their WFD objective under the latest data. The underlying

ground water body is Wicklow (EU Code: IE_EA_G_076) which is assigned a status of 'Good' but 'at risk' of not meeting WFD objectives. Hydrological connection is possible to the surface waterbodies through run-off and on-site drainage discharging to surface water and also by way of seepage into the groundwater during construction if poor construction management. With embedded Best Practice this is not likely, the proposal is relatively small scale and for a short duration up to 18 months and is in accordance with a range of Best Practice Standards for environmental management. Accordingly, the run-off is unlikely to pose any risk to water quality or at least any greater risk than may exist at present. While surface water calculations and SuDS details need to be clarified with the Drainage Division of the planning Authority and possibly amended, no substantive water quality deterioration concerns have been raised in the planning appeal. The pathway to surface waters, groundwater and the Irish sea is weak, and residual pollutants would be dissipated by virtue of distance and assimilative capacity in waters that have at least good status.

6.1.4. Having assessed the proposed development and considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration and having further considered the nature, scale and location of the project, I consider that the proposal can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

6.1.5. The reason for this conclusion is as follows:

- the scale and nature of both the former use and proposed residential development on a brownfield re-development in an urban serviced area, and
- the distance from the nearest water bodies and the lack of hydrological connections.

6.1.6. I therefore conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a

temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

7.0 The Appeal

7.1. Grounds of Appeal

The applicant has submitted a first party appeal against the decision to refuse permission. The appellant refutes the decision on the following basis:

- The development contributes to compact growth
- The proposed density of 40.9 units per hectare is entirely consistent with Sustainable Residential Development and Compact Settlement Guidelines 2024 in that the area is designated as a suburban area/urban Extension where an acceptable range is 40-80 units per hectare. This is based on
- Site constraints due to riparian corridor, trees and scale and character of surrounding development.
- The KGLAP acknowledges that until high-capacity public transport is improved a 40-80 /ha is acceptable across the LAP area.
- The issue of non-habitable rooms having the potential to be additional bedrooms with consequent higher private open space requirement is addressed by reducing the floor area by way of omitting floor level. Thereby house type A1 is a two bed and meets the 30sq.m. requirements. This could be addressed by condition.
- In respect of living rooms being used as bedroom, it is submitted that rooms are integral family living spaces and not surplus rooms – the omission of which would compromise the quality of space.
- In respect of car parking the appellant proposed to replace the original proposal of 2 spaces per dwelling to one pace (reducing spaces from 41 to 24) aligns with SPPR3 while increasing landscaped areas and enhancing SuDs and overall environmental quality and urban design outcomes.
- Overall, the scheme complies with national guidance, the county development plan and the LAP and will deliver high quality housing.

7.2. **Planning Authority Response**

In response to the appeal grounds which acknowledge the revised plans, the planning authority does not consider the modification to one of the house types by reduction to two storey or the reduction in car parking spaces to address the underlying issue of density which remains at 40.9iph and which does not fully optimise the potential of the site.

7.3. **Observations**

None

8.0 **Assessment**

8.1. **Issues**

8.1.1. Having examined the application details and all other documentation on file, the reports of the planning authority, and having inspected the site, and having regard to relevant national and local level policy and statutory guidance, I consider that the substantive issues in this appeal are related to:

- Density of Development
- Private Open Space
- Car parking and Site Layout

8.2. **Density**

8.2.1. The planning authority considers the overall density of 41 units per hectare to be too low primarily by reference to the Kiltiernan-Glenamuck Local Area Plan (KGLAP) for the area in which the site is located. The planning authority has taken the position that a density range of 50-80 units per hectare which is stated to specifically apply to lands east of the Glenamuck Link Road in the KGLAP applies to the subject site.

8.2.2. The applicant makes the case that there is both policy basis and site character basis for consideration of a lower density by taking account of, on the one hand, the provisions in the KGLAP for 40-80 units per hectare as an overall default density range and as is also guided in the Sustainable Residential Development and Compact Settlement Guidelines (CSGs) for such suburban areas and, on the other

hand, having regard to both the site constraints and site context, particularly in terms of limited public transport accessibility and comparable lower densities in the area..

- 8.2.3. I note that the planning authority refers to the area as 'urban neighbourhood' and that based on this site characterisation and Table 3.1 of CSGs, this typically can accommodate a range of 50-250uph whereas in a Suburban/urban extension location, a density range of 40-80 uph generally applies but with densities up to 150uph at accessible locations. Ultimately the area is in a state of transition as it densifies and for this particular site at this time, pending improvement of facilities, an urban extension classification seems, I consider, more consistent with the approach of the KGLAP than 'urban neighbourhood'.
- 8.2.4. The applicant relies on the minimum limit of this 40-80dph range in the CSGs but these guidelines provide for refinement and state the decision maker(s) will need to determine the appropriate density range(s) for the area as is required as stated in Policy and Objective 3.1 which states: It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate. I consider the planning authority has adhered to this in its plan-led approach in the KGLAP which was adopted in July 2025 and has been informed by the parameters and guidance in the CSGs whereby it defines density specific ranges within the LAP area relative to its accessibility, both existing and planned.
- 8.2.5. The KGLAP is quite specific in defining character areas and in stating development parameters for a list of 11 sites of which the site is not a part. While in a broader context a general range of 40-80 uph is stated having regard to accessibility limitation issues, it specifically states that all other lands to the east of the Kiltiernan – Glenamuck Link Road can accommodate a higher density. The appellant refers to considerations such as proximity /accessibility to Public Transport and services and character, amenity and natural environment as justification for lower density. I consider all these site context issues have been accounted for. The density is, for example, based on a net site area and even discounting additional buffer areas alongside the mature boundary trees of say an additional 500sq.m., the density remains below 50uph.

- 8.2.6. In reaching its decision on what is too low a density in this case, the planning authority has I note, in addition to its KGLAP also been informed by its Transportation Planning Division and the more recent pattern of development in keeping with its density objectives. I note the Transportation Planning report confirms that the main entrance is approx. 1km walking distance from Ballyogan Wood LUAS via the Glenamuck Road South and Ballyogan Road and significantly, that this distance will be reduced on development of the north-east quadrant of the Park in Carrickmines when the associated parkland and Greenway are completed and available to the public and as required by specific local objective no.82 of the CDP. It is also pointed out that there is another proposed route through The Leys development and across the Glenamuck District Distributor Road and proposed link at The Park. Furthermore, in addition to the bus service fronting the site, the site is also 250m from bus stops on the Glenamuck District Distributor Road which will have greater frequency of service. While I note that there are no planned bus corridors such as Bus Connects or Orbital Routes in the National Transport Authority's, Greater Dublin Area Transport Strategy 2022-2042, I accept that this is evidence of planned and likely improved access to the LUAS and also improved public bus transport service within 500m and that this supports the qualification of the site location as being 'accessible' by reference to Table 3.8 of the CSGs in the short term and it is not strictly a peripheral location within the meaning of CSGs I also note the considerations in section 3.4.1 which states 'The approach to refining density should be informed by the capacity and wider network accessibility of public transport services at a node or interchange (number of options, capacity and peak hour frequency) and the journey time to significant destinations (e.g. city centre or significant employment location). In view of this accessibility in terms of public transport and also to an employment centre in Carrickmines, I consider this context contributes to justification of an exceedance of the minimum density range limit of 40dph for urban extension areas. I refer also to my comments under my assessment of 'car parking'.
- 8.2.7. At a broader level, the site location is also identified in the County Development Plan as part of a new residential community in the Core strategy and the site is strategically placed in terms of increasingly improved access to upgraded public transport and achieving feasibility of same in this emerging consolidated area.

8.2.8. In terms of the argument that the building typology context supports a lower density and layout as proposed, I note that in overall terms, the approach in the development plan is to provide for increased capacity of lands as set out in the KGLAP area. The increase is in the order of 25% (increasing from approximately 2000 to 2500 units) and the pattern of both 4 storey apartments and more recent 3 storey houses permit for an increase in height. The development parameters (in SDF10) for land with extensive frontage across the road include a height range of 2-4 storeys and even 5 storeys in places in addition to requiring permeability through lands which provides access to an employment centre and facilities in the adjacent Carrickmines area to the north. I further note the reference in the planning authority report to following permitted densities: The Leys - 56uph, Greenan -127uph, Cairnlea -108uph and a site at Carrickmines Great -52uph. I furthermore concur with the views that the site configuration, boundaries and interface with adjacent site can accommodate an increase of density over that proposed and can I consider reasonably accommodate at least 3 storey housing or possibly more while still assimilating with the surrounding environs. Furthermore, the site is relatively low lying in the LAP environs where land rises to the south and west as part of the Dublin Mountain foothills and does not have the constraints of more elevated or removed sites.

8.2.9. I therefore consider this density range of 50-80 uph is reasonable and in accordance with the overall approach to densification as reflected in the policy approach to Residential Density stated in Dun Laoghaire Rathdown County Development Plan 2022-2028 (CDP), Policy Objective PHP18 wherein 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

8.2.10. In terms of overall design approach, density could be increased by reduced car parking but the revised layout in the appeal documentation does not provide for this.

I do not consider the density and layout as proposed which provides for 2 car parking spaces fronting 18 of the 24 houses or with reduced parking by intermittent landscaping in a front garden type arrangement in lieu of some spaces, while also compromising on the respective private open space/rear gardens, meets with a priority aim to deliver sustainable and compact urbanisation in an area classified as being within a 'city and suburban area or a metropolitan town and served by existing or proposed high-capacity public transport' as set out in section 3.3 of the CSG.

8.2.11. Accordingly, I do not consider the proposal constitutes a sufficient level of intensification of this planned accessible location. I consider the provisions of section 3.4.2 of the CSG on which the appellant relies cannot reasonably override the detailed and recent density ranges in the KGLAP as a baseline for assessment. I concur with the planning authority in its assessment that permission for the proposed density of almost 41 units would be unacceptably low at this location within the Glenamuck East area. I say this having regard to its proximity to services and improving accessibility and concur with the planning authority that the development does not fully optimise the potential of the site and permission would I consider be contrary to the strategic objective of achieving compact settlements in their alignment with the national policy objectives of prioritising the provision of new homes at locations that support sustainable development.

8.2.12. Given the site characteristics and specific density requirements for the site as set out in the KGLAP which have taken account the guidance in the CSGs, I concur that permission would constitute a material contravention of the development plan. Having regard to the provisions of section 37(2)(b), I am of the opinion that there is no substantive basis to support the case that a material contravention is warranted on the basis of strategic national importance, conflicting development plan objectives or national policy such as reflected in the Compact Settlement Guidelines and the National Planning Framework (as revised) or the pattern of development.

8.2.13. I therefore consider that the planning authority reason for refusal relating to density should be substantially upheld. I consider this to be the overriding substantive issue.

8.3. **Private Open space**

8.3.1. The second reason for refusal is based on inadequate private open space which is determined by the planning authority to be contrary to the SPPR 2 of the CSGs. The

planning authority has reviewed the floor plans and taken the position that the proposed 2-bedroom houses are in effect 3-bedroom houses and most of the 3-bedroom houses are in effect 4-bedroom houses and has applied the standards accordingly. This is disputed by the applicant who has taken a design approach of providing more generous living accommodation by having additional living room areas on the upper levels of the three storey dwellings. While more recent statutory guidance is focussed on floor areas for apartments, house size is more flexible and standards in terms of habitable space are referred to in the County Development Plan by reference to 'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). (See S.12.3.4.2 of the CDP). I have collated the following table which summarises the proposed house sizes and associated private open space relative to minimum standards in the CDP and the more recent CSGs with a footnote for context summarising the minimum gross floor areas for a range of typical house types.

Table: Private Open Space provision

Proposed House Type*	Proposed	CDP/LAP	CSGs
House type A – 2 bed (113 sq.m.) 3 storey – Plus 'office' 12.6 sq.m on top 2nd floor included as living area.	4 no. mid terrace unit 30sq.m.	<u>Min. in Table</u> <u>12.10</u> •48 sq.m (2bed) •60 sq.m (3 bed)	<u>Table 5.1 /PPR2</u> •30 sq.m.(2bed) •40 sq.m.(3 bed)
House type B1 3 bed 155.4 sq.m. Plus 1st floor living/ent. room 18.6sq.m. Ground floor living agg. 35.1sqm.	10 no. units 43 sq.m.	•60 sq.m (3 bed) •75 sq.m. (4 bed or more)	•40 sq.m.(3 bed) •50 sq.m.(4 bed)
House Type B2 123sq.m 3 bed (5P) Office 3.9sq.m.	24.5sq.m. roof terrace + 15.8sq.m gd. terrace	•60 sq.m.(3 bed)	•40 sq.m.(3 bed)

House Type B3 155.1sq.m. 3 bed (6P) Plus 1st floor living room 17.6sq.m. Ground floor living agg. 38.6sqm.	End terrace 65 sq.m.	• 60 sq.m. (3 bed) • 75 sq.m. (4 bed or more)	• 40 sq.m.(3 bed) • 50 sq.m.(4 bed)
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*In the Quality Housing for Sustainable Communities Guidelines, two/three storey house sizes based on bedroom numbers have the following target gross floor areas:

- 4 bed (7 persons)/3 storey – 120 sq.m.
- 3 bed (6 persons)/3 storey – 110 sq.m.
- 3 bed (5 persons)/3 storey – 102 sq.m.
- 2 bed (4 persons)/2 storey – 80 sq.m.

8.4. While on the face of it, a two bed only requires 30 sq.m. of private open space, the proposed dwelling A1 type is 113 sq.m. over three floors whereas a two bed minimum area in the 2007 housing standards is typically 80sq.m. over two floors. Given the additional living accommodation proposed at upper level and layout, I consider an upper floor level could be easily converted to provide 3 bedrooms and still comply with 3 bed minimum areas of 102-110sq.m.. Similarity in the case of the B1 and B3 house types of 155sq.m. with 3 bedrooms and additional living accommodation at first floor level, these could reasonably be converted to four-bedroom houses and comfortably exceed the minimum floor area for such a house type. I therefore consider the approach by the planning authority to assess two bed houses as three beds and three bed houses as four beds, to be proportionate and reasonable having regard to the dwelling layouts over 3 floors, adaptability and amenity for future occupants and by reference to house sizes in Housing for Sustainable Communities guidelines (2007).

8.5. In terms of compliance with the development plan, I note the private open space as proposed is considerably below the development plan standards as contained in Table 12.10 of the CDP and as required in section 12.8.3.3 wherein all houses are required to provide an area of good quality private open space behind the front building line. The CDP provides for relaxation for innovative design. While there is no objection in principle to generously spaced accommodation and three storey development, it should not compromise density which I consider is the overriding

consideration. In a layout that does not meet with the density level of the KGLAP and provides potentially generous car parking/'front garden' type space while failing to meet with the minimum private open space standards in the Compact Settlement Guidelines for the size of dwellings proposed, it is difficult to consider such a breach in standards to be acceptable. I do not consider the proposal could be described as 'an exceptionally well-designed scheme providing an otherwise very high-quality living environment that is in close proximity to existing public open space' so that the CDP standards would be relaxed to the level proposed.

8.6. I note the applicant has sought to remedy the shortfall in open space by reducing the floor area by way of removing a floor level in house Type A. as the planning has pointed out in tis response, this does not address the underlying issue of density. I would also comment that while this improves the ratio of private space, I do not consider two storey housing with even less occupancy potential to be appropriate in an area where it is an objective to achieve higher densities and would therefore constitute an inefficient use of serviced land. It would also be out of keeping with the more recent pattern of three storey and higher development as part of the urbanisation of the area. A better approach would be, I consider, to realign the terraces and increase garden depths by reducing the setback from the carriageway and replace perpendicular parking with parallel parking. On balance, in terms of housing layout and urban design, I do not consider the proposal, as revised to comply with the aims of Policy KGLAP 1 which aims to promote a high standard of urban design throughout Kitiernan - Glenamuck in accordance with the relevant policies set out in the County Development Plan, Section 28 Guidelines and other relevant guidance documents including: The Compact Settlement Guidelines (2024), and the Design Manual for Urban Roads and Streets (2013).

8.7. Car Parking

8.7.1. The planning authority has determined that the provision of car parking in the order of 2 spaces for the majority of dwellings and amounting to 41 spaces for 24 houses is contrary to the specific planning policy SPPR3 of the Compact Settlement Guidelines. The planning authority has effectively applied the criteria in SPPR 3 (i) which states as a specific planning policy requirement of these Guidelines that: In

city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.

- 8.7.2. I note the KGLAP, in objective CMP1 requires that the car parking shall accord with these CSGs requirements in SPPR3 'as is applicable'. The applicant makes the case that the site is not adequately serviced by public transport and therefore qualifies as a peripheral location where a maximum rate of 2 spaces may be provided as per SPPR 3. The dispute in this case centres on the degree of accessibility of the site to high quality public transport and determining whether or not the site is an urban neighbourhood or urban extension area in applying Table 3.8 accessibility criteria of the CSGs. The planning authority, in its report, refers to the area as 'urban neighbourhood' and for such areas a maximum of 1 space is to be provided.
- 8.7.3. This 'urban neighbourhood' standard is a departure from the Car Parking Map of the CDP, which predates the CSGs. I refer to T2 Supplementary Map in which the subject site is located in Car Parking Zone 3 and is in close proximity to Zone 2 where both zones permit standard car parking of 2 spaces per house, although the policy does provide for a case by case approach such as having regard to a range of criteria as I have cited in the policy section and which includes consideration of accessibility and safeguarding investment in public transport infrastructure.
- 8.7.4. In support of the applicant, I note that it is stated in section 1.7.2 of the KGLAP that none of the plan area is currently within 1km of high-capacity public transport such as the Luas or core bus corridor or within 500m-1km of a planned high frequency service. This has informed the density range of 40-80uph, for example, although refined to 50uph for the environs of the site.
- 8.7.5. However, in support of the planning authority case for reduced car parking, the site is strategically placed in the KGLAP in that it fronts the Glenamuck Road which is a planned Dedicated Bus Corridor and, in terms of local services, it is adjacent to neighbourhood centre lands and employment lands as indicated in Figure 2.2 Indicative Urban Design Strategy Map 2025. Transport improvements are also set out in figure 5.1. Objective A7 refers to Glenamuck Road and Objective PT1 seeks to

improve bus services such as increasing frequency of services. While the applicant dismisses this as aspirational, the Transportation Planning Division has identified improved accessibility to the LUAS service to which I have referred in my assessment of density issues. As I have stated, the area is transitioning from a peripheral location to a denser urban area as evidenced by the emerging pattern of denser development as referenced in the case history of recent densities in the planning authority assessment and as evident in the reinforcement of streetscapes and local services that are within walking distance. This densification is in line with the aim of the Compact Settlement Guidelines and aligned to the regional policies and national policy objective of consolidating urban centres and providing 50% of additional housing in such areas while integrating with sustainable transportation and modal shift from car-based travel.

8.7.6. Accordingly, while I have some reservations about classifying the area presently as 'urban neighbourhood' in the context of SPPR 3, I consider the approach to reducing car parking with the provision in the order of 1 space per dwelling at this location to be reasonable.

8.7.7. The applicant in the appeal drawings complies with this. I consider however that the amount of parking in this case is a secondary issue to urban design and site layout. The layout as presented in both the initial and revised plans submitted with the appeal has a dominant private type car parking arrangement in a manner that is, I consider, contrary to the Design Manual for Urban Roads and Streets (2013). Perpendicular car parking in both layouts is provided and aligned with the front of most of the individual house frontages, whereas grouping of parking spaces is recommended with intervening landscaping. The applicant response of simply replacing a perpendicular space with landscaping in front of each house, in effect provides for a suburban front garden type layout rather than a communal approach which could have the benefit of enhanced communal or public open space, enhanced tree protection of mature trees, (I refer to the concerns of felling a significant tree in the Parks and Landscaping Division Report,) while possibly increasing the rear garden depths or increasing housing footprint/units. For example, the perpendicular parking could be replaced by grouped parallel parking and thereby allow a shift in building line and create a more urban streetscape. I refer for example to figure 4.76 on page 118 of the Design Manual for Urban Roads and

Streets which illustrates the layout of a local street with parallel and perpendicular parking. The parallel space with footpath and defensible spaces requires a depth of 5.4-6.5m from the carriageway whereas the perpendicular space requires 7.8-8.8m in addition to buffer overhang spaces (0.3m).

- 8.7.8. I further note that DMURS sets a minimum width of 4.8m for a shared a local street with a shared surface, whereas a standard carriage width is 5-5.5m. The submitted layout varies in the various submitted layout drawings and it is difficult to fully ascertain the detail. The general layout shows a 6m wide road as a shared surface for the two cul-de-sac roads. I have looked at the layout and considered the possibility of conditioning revisions, but I consider this to have too many uncertainties having regard to the planning authority concerns in the various technical reports and moreover this does not address the density issue. There are detailed alignment issues of the road and pedestrian areas as highlighted by the Transportation Division in addition to the need for safety audits and the possibility of relocating the entrance to enhance protection of key trees in the local landscape. Other concerns relate to drainage and the need to revisit SuDS and enhance nature-based drainage in landscaping. All such issues need to inform a review of the overall design approach.

9.0 AA Screening

- 9.1.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Knocksink Wood SAC (Site Code 000725), Ballyman Glen SAC (Site Code 000713), South Dublin Bay SAC (Site Code 00210), Wicklow Mountains SAC (Site Code 002122), Rockabill to Dalkey Island SAC (Site Code 003000), South Dublin Bay and River Tolka SPA (Site Code 004024), Wicklow Mountains SPA (Site Code 00404), Dalkey Islands SPA (Site Code 004172) or any other European sites in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

- 9.1.2. This determination is based on:

- The absence of any ecological pathway from the development site to the nearest European Sites
- Scale nature of the development site and location of the development in a fully developed and serviced urban area
- Location-distance from nearest European sites

10.0 Recommendation

10.1. I recommend that the decision of the planning authority to refuse permission be upheld and that permission be refused based on the following reason and considerations.

11.0 Reasons and Considerations

1) Having regard to the location of the proposed development, the residential zoning objective and Policy Objective PHP18 (Residential Density) which seeks a higher residential density in the Dún Laoghaire–Rathdown County Development Plan 2022–2028, together with the provisions of the Kiltiernan Glenamuck Local Area Plan, 2025 including policy KGLAP28, which seeks to promote and support residential densities in line with Policy Objective PHP18 and states ‘Lands located to the east of the Kiltiernan - Glenamuck Link Road shall achieve a residential density of 50-80 dwellings per hectare ‘ at this location to reflect its accessibility and which is considered to be consistent with the sustainable transport and compact growth objectives of the National Planning Framework, it is considered that the proposed density of approximately 41 units per hectare constitutes an excessively low density of development for such land. It is therefore considered that the proposed development would materially contravene Policy Objective PHP18 which states it is objective ‘to promote compact urban growth’ and ‘encourage higher densities’ and policy KGLAP28 and would by itself and the precedence it would set for serviced and accessible lands, serve to militate against these policies objectives and undermine the provision of compact settlements and the safeguarding of investment in public transport infrastructure. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

- 2) Notwithstanding, the revised house type submitted with the appeal documentation, it is considered that the proposed provision of 43sq.m. of private open space for 3 storey dwellings of 155 square metres with 4 habitable rooms on the upper levels and which could reasonably be converted to provide additional bedroom accommodation than stated, fails to provide the minimum private open space required for the occupancy of such units. The proposed development is therefore contrary to SPPR 2 of the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) in its provision of private amenity space and would be therefore contrary to the proper planning and sustainable development of the area.
- 3) Having regard to car parking provision and layout as proposed in revised drawings submitted with the appeal documentation which is noted to reduce car parking spaces from 41 to 24 and incorporates landscaping in place of every space removed, it is considered that the intervening space between the terraced façades and carriageways is comparable to the provision of front gardens and is suburban in nature. Accordingly it is considered that the proposed development fails to adequately consider the urban context of the site or respond to the denser character and more recent pattern of development of the surrounding area and is contrary to guidance in the Design Manual for Urban Streets (2013) as advocated in KGLAP1 and other urban design policies and objectives in the Kilternan Glenamuck Local Area Plan (2025) and would therefore be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Suzanne Kehely

1st April 2026

Appendix 1 - Form 1- EIA Pre-Screening

An Bord Pleanála	PL-500439-DR-25		
Case Reference			
Proposed Development Summary	Demolition of dwelling and development of 24 houses with all associated site works on a site of c. 0.6hectares.		
Development Address	Dunluce, Glenamuck Road South, Carrickmines, Dublin 18, D18E3Y9		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	X
		No	
2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?			
Yes	X	Class 10(b)(i) 'Construction of more than 500 dwellings units' Class 10(b)(iv) 'urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere	Proceed to Q3.
No			
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?			
Yes			EIA Mandatory EIAR required
No	X		Proceed to Q4
4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
Yes	X	24 dwellings is significantly below the 500-dwelling threshold. As a 0.6hectare urban site surrounded by development, the scale of the development is significantly below the threshold of 10 hectares for built up areas.	Preliminary examination required (Form 2)

5. Has Schedule 7A information been submitted?		
Yes		Screening Determination required
No	X	Screening determination remains as above (Q1 to Q4)

Inspector: _____ **Date:** _____

Appendix 2 - EIA Preliminary Examination – Form 2

<p>An Bord Pleanála Case Reference</p>	<p>PL-500439-DR-25</p>
<p>Proposed Development</p>	<p>Demolition of dwelling and development of 24 houses with all associated site works on a site of c. 0.6hectares. 12-18 month construction phase in accordance with outline Construction Environmental Management Plan to be updated prior to commencement. C532 Control of Water Pollution from Construction Sites. Guidance for consultants and contractors and C811 Environmental Good Practice on Site. No basement works</p>
<p>Development Address</p>	<p>Dunluce, Glenamuck Road South, Carrickmines, Dublin 18, D18E3Y9</p>
<p>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations. This preliminary examination should be read with, and in the light of, the rest of the Inspector’s Report attached herewith.</p>	
<p>Characteristics of proposed development (In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p>	<p>The proposed development involves demolition of a house and outbuildings/sheds and construction of 24 no. dwelling units, and all associated site works. The size of the development is not exceptional in the suburban densifying context. The development would not result in the production of significant waste, emissions, or pollutants. It is within the development area and is serviced.</p> <p>The demolition and production of waste is to be managed by a CEMP and Construction and Demolition Waste management plan. Any construction impacts would be local and temporary in nature, and the implementation of a standard Construction Management Plan with specialist input and monitoring will satisfactorily address potential impacts.</p>

	<p>Operational waste will be managed by an Operational Waste Management Plan.</p> <p>The site is not at risk of flooding.</p> <p>There are no SEVESO/COMAH sites in the vicinity of this location.</p> <p>The site coverage represents a moderate intensification of building footprint and does not involve the use of substantial natural resources by itself to give rise to significant risk of pollution or nuisance. The development, in overall terms, by virtue of its type and scale, does not pose a risk of major accident and/or disaster, or is it vulnerable to climate change. Subject to compliance with the Conditions recommended by the Environment Division of the planning authority, the proposal presents no likely risks to human health. Localised adverse impact on residential amenity for future occupants, tree felling, urban design and car parking issues are addressed in the planning assessment within the scope of planning considerations.</p>
<p>Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>While boundary trees are subject of objective to protect, the site is not located within a designated protection area for a natural landscape, habitat or any species.</p> <p>Based on archaeological desk survey and walkover, there are no recorded monuments in the proposed development area - the nearest being 265m southeast, (Cross DU026-018) as part of rich archaeological area in the wider context e.g. Carrickmines Castle and the Pale ditch. Potential findings can be addressed by pre-development assessment.</p> <p>The development will subject to conditions, has capacity to implement a range of natural drainage systems which will control surface water run-off.</p>

	<p>The site is served by a local urban road network and is about 1km from the LUAS nearest stop and a bus service passes the site. Vehicular traffic impact on carrying capacity of the local road network is likely to be negligible.</p> <p><u>Surface Water:</u> Impacts on water quality will be mitigated by standard good practice construction stage measures and the operational surface water drainage system.</p> <p><u>Foul drainage:</u> The proposal is reliant on connection to the foul sewer network.</p>	
<p>Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>The proposed development does not involve a significant change in the local landscape in terms of terrain or building form. The main impact is from loss of mature trees which is informed by an Arboricultural assessment. The Parks and Landscaping Division of the PA have raised concerns about loss of road frontage trees which could be saved by relocation of entrance, and this is a matter that can be addressed by design modification. It will otherwise not be visually incongruous in the wider context. Construction works will be temporary and subject to monitoring.</p> <p>Accordingly, having regard to the nature of the proposed development, its location relative to sensitive habitats/features, likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.</p>	
Conclusion		
Likelihood of Significant Effects	Conclusion in respect of EIA	Yes or No
There is no real likelihood of significant effects on the environment.	EIA is not required.	Yes

There is significant and realistic doubt regarding the likelihood of significant effects on the environment.	Schedule 7A Information required to enable a Screening Determination to be carried out.	No
There is a real likelihood of significant effects on the environment.	EIAR required.	No

Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)

Appendix 3 – Appropriate Assessment Screening

Screening for Appropriate Assessment

Test for likely significant effects

Step 1: Description of the project and local site characteristics

Case file PL500439-DR-25

Brief description of project

Demolition of dwelling and development of 24 houses with all associated site works on a site of c. 0.6hectares. 12-18 month construction phase in accordance with outline Construction Environmental Management Plan to be updated prior to commencement. C532 Control of Water Pollution from Construction Sites. Guidance for consultants and contractors and C811 Environmental Good Practice on Site. No basement works

Brief description of development site characteristics and potential impact mechanisms

The site is a serviced and zoned urban site in the Dublin Mountain foothills and is set back just under 5km from the coastal waters of Killiney Bay. It relates to domestic garden lands of a large single dwelling adjoined by recently developed medium to high density housing in line with the Local Area Plan. It drains naturally to the Carrickmines Stream to the north via a culvert under the Glenamuck Road

The site has an open ditch/drain on the southwestern boundary that joins the Carrickmines stream via a tributary and in this way is indirectly connected to the Shangannagh River that discharges to the Coastal waters. The site is bound by mature trees and hedgerow which and some trees are to be partly felled and retained as informed by an Arboricultural Assessment and potentially subject to some amendments by the Parks and Landscape Division. The AA screening provides a habitat survey of the site.

The site is not located within or directly adjacent to any Natura 2000 sites (SAC or SPA). The nearest sites are:

	<ul style="list-style-type: none"> • Knocksink Wood SAC Site Code (000725) c. 4.25km south of site. • Ballyman Glen SAC Site Code (000713) c. 4.5km south of site. • South Dublin Bay SAC Site Code (00210) c.5.6km north of site. • Wicklow Mountains SAC site Code (002122) c. 5.9km southwest of site . • Rockabill to Dalkey Island SAC Site Code (003000) c.6km. • South Dublin Bay and River Tolka SPA Site Code (004024) c.5.6km north of site. • Wicklow Mountains SPA Site Code (004040) c. 5.9km southwest of site. • Dalkey Islands SPA site Code (4172) C.6.6km northeast of site.
Screening report	<p>Y prepared by Malone O'Regan Environmental Consultants</p> <p>This report identifies 13 sites in Table 4-1 page 4 and concludes that the proposed development alone or in-combination will not have any direct or indirect significant effects on any European sites in light of their conservation objectives and best scientific knowledge and not reasonable scientific doubt existing in relation to the conclusion. No mitigation is required to achieve this. Stage 2 AA is not considered necessary.</p>
Other reports	<p>The engineering Report also contains detailed measures for surface water drainage. Standard waste management is provided for with a Construction waste management Plan and an operational waste management plan. Tree removal is proposed.</p> <p>The Planning authority report concluded that Appropriate Assessment can be screened out.</p>
Natura Impact Statement	N

Relevant submissions	Technical Reports by applicant: AA Screening , Arboricultural Assessment, engineering services report.			
Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests Link to conservation objectives (see NPWS)	Distance from proposed development	Ecological connections	Consider further in screening Y/N
<ul style="list-style-type: none"> Knocksink Wood SAC 	<ul style="list-style-type: none"> Petrifying springs Old sessile oak woods with Ilex and Blechnum Alluvial forests 	4.25km south	Part of Glencullen catchment - No direct connection –	N
<ul style="list-style-type: none"> Wicklow Mountains SPA 	<ul style="list-style-type: none"> Merlin Peregrine 	5.9km SW of site	intervening urban area adjoining site and expansive greenfield woodland and upland area in wider context	N
<ul style="list-style-type: none"> Wicklow Mountains SAC 	<ul style="list-style-type: none"> Oligotrophic waters containing very few minerals of sandy plains Natural dystrophic lakes and ponds [3160] 	c. 5.9km SW of site	No direct connection	N

	<ul style="list-style-type: none"> • Northern Atlantic wet heaths with <i>Erica tetralix</i>] • European dry heaths • Alpine and Boreal heaths • Calaminarian grasslands of the <i>Violetalia calaminariae</i> • Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • Blanket bogs (* if active bog) • Siliceous scree of the montane to snow levels • Calcareous rocky slopes with chasmophytic vegetation • Siliceous rocky slopes with chasmophytic vegetation • Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> • <i>Lutra lutra</i> (Otter) 			
<ul style="list-style-type: none"> • Ballyman Glen SAC 	<ul style="list-style-type: none"> • Petrifying springs with tufa formation • Alkaline fens 	c. 4.5km south	No direct connection	N

<ul style="list-style-type: none"> • South Dublin Bay SAC Site Code (00210) c.5.6km north of site. 	<ul style="list-style-type: none"> • Mudflats and sandflats not covered by seawater at low tide • Annual vegetation of drift lines • Salicornia and other annuals colonising mud and sand • Embryonic shifting dunes 	c.5.6km north of site.	Due to coastal water and separation distance no direct connection	N
<ul style="list-style-type: none"> • South Dublin Bay and River Tolka SPA 	<ul style="list-style-type: none"> • Light-bellied Brent Goose • Oystercatcher • Ringed Plover • Grey Plover • Knot • Sanderling • Dunlin • Bar-tailed Godwit • Redshank • Black-headed Gull • Roseate Tern • Common Tern • Arctic Tern • Wetland and Waterbirds 		Due to coastal water and separation distance no direct connection	N
<ul style="list-style-type: none"> • Rockabill to Dalkey Island SAC 	<ul style="list-style-type: none"> • Reefs • Phocoena phocoena (Harbour Porpoise) 	c.6km north east	No direct connection	N
<ul style="list-style-type: none"> • Dalkey Islands SPA. 	<ul style="list-style-type: none"> • Roseate Tern • Common Tern • Arctic Tern 	c.6.6km northeast		

Commentary

As the site is not located within or adjoining any European Sites, and there are no direct pathways between the site and the European site network, the proposed development would not result in any direct effects such as habitat loss on any European site.

Applying the source-pathway-receptor model in determining possible indirect impacts and effects of the proposed development, sources of potential impact are considered to include:

- Release of hydrocarbons, solvents, cementitious materials during construction to surface water and groundwater.
- Deterioration of water quality by overloading of foul water drainage system and release of effluent into the Irish Sea during the operational phase.
- Elevated noise and dust levels during demolition and construction

Where an ecological pathway exists, indirect impacts could negatively alter the quality of the existing environment, negatively affecting qualifying interest species and habitats that are dependent on high water quality, that require maintenance of natural vegetation composition and for mobile species, unimpeded access. It is also possible to be within a flight range of ex-site QI bird species but the surrounding urban environment and intervening open fields, uplands woodlands remove the likelihood of this primarily domestic garden being significant for these qualifying species.

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

Given the separation distance and intervening urban area, it is reasonable to conclude that the subject site is not suitable for ex-situ bird species and being a residential house and garden and therefore given the removed suburban locations no disturbance of species is likely to arise.

The open drain to the southwest is vulnerable to pollution and overloading however proposal incorporates construction management measures (CEMP) and SuDS measures form an integral part of the site layout and landscaping. Ultimately, the site is connected to an existing drainage infrastructure in this urban serviced area.

I note and that the nearest Site (Knocksinna Woods) is in a removed woodland area in the Glencullen Stream catchment – a separate catchment to Carrickmines Stream to which the site is connected. It is similarly hydrologically remote from the other nearest SAC sites.

Other hydrological connections to coastal waters (and European Sites within these waters) are very removed and due to dissipation and volumes, no effects are likely alone or cumulatively. In this regard I note the extensive list of developments in the vicinity of the site that have been screened out from the need for stage 2 appropriate assessment, The Engineering Services Report sets out how surface water can be attenuated with SuDS measures and filtered on site which would be in line with standard measures and this will be discharged into an existing surface water drainage network and standard measures such as petrol interceptors will be in place. There will therefore be only a moderate increase in the quantity of surface water discharged. No material adverse change to surface water run-off is likely to arise nor, due to dilution factor, will downstream waters be contaminated. No significant increase in foul water will arise and, in this regard, UE has confirmed availability of connections to foul sewer network. Discharges from the site to the licensed Bray Shanganagh Wastewater Treatment Plant will be negligible. There is no potential for contamination of coastal waters arising directly or indirectly from the development site. Accordingly significant effects can be ruled out.

Accordingly, in respect the above listed sites, aside from the coastal waters there is no direct hydrological connectivity between these European sites and the development site. The development site is located in a developed serviced urban area remote from coastal waters. It can be concluded that there are no significant hydrological or ecological connectivity pathways between the European Sites and the development site.

AA Screening matrix

Site name	Possibility of significant effects (alone) in view of the conservation	objectives of the site*
Qualifying interests		
As above	Impacts	Effects
	None	None
Likelihood of significant effects from proposed development (alone):	No	No

	<p>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</p> <p>No</p>
<p>Step 4 Could proposed development result in likely significant effects on a European site?</p>	<p>No</p>
<p>I conclude that the proposed development (alone) would not result in likely significant effects on Knocksink Wood SAC (Site Code 000725), Ballyman Glen SAC (Site Code 000713), South Dublin Bay SAC (Site Code 00210), Wicklow Mountains SAC (Site Code 002122), Rockabill to Dalkey Island SAC (Site Code 003000), South Dublin Bay and River Tolka SPA (Site Code 004024), Wicklow Mountains SPA (Site Code 00404), Dalkey Islands SPA (Site Code 004172) or any other European sites. The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project. No mitigation measures are required to come to these conclusions.</p>	

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on Knocksink Wood SAC (Site Code 000725), Ballyman Glen SAC (Site Code 000713), South Dublin Bay SAC (Site Code 00210), Wicklow Mountains SAC (Site Code 002122), Rockabill to Dalkey Island SAC (Site Code 003000), South Dublin Bay and River Tolka SPA (Site Code 004024), Wicklow Mountains SPA (Site Code 00404), Dalkey Islands SPA (Site Code 004172) or any other European sites in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The absence of any ecological pathway from the development site to the nearest European Sites.
- Scale nature of the development site and location of the development in a fully developed and serviced urban area.
- Location-distance from nearest European sites.

Appendix 4

WFD IMPACT ASSESSMENT STAGE 1: SCREENING

Step 1: Nature of the Project, the Site and Locality

An Bord Pleanála ref.	PL-500439-DR-25	Address	Dunluce, Glenamuck Road South, Carrickmines, Dublin 18, D18E3Y9
Description of project		Demolition of building and development of 24 houses with all associated site works on a site of c. 0.6hectares. 12-18 month construction in accordance with outline Construction Environmental Management Plan to be updated prior to commencement. C532 Control of Water Pollution from Construction Sites. Guidance for consultants and contractors and C811 Environmental Good Practice on Site. No basement works	
Brief site description, relevant to WFD Screening		The site has a single house in a serviced and increasingly urban area. An open drain/ditch flows north along the southwestern boundary and flows into a culvert under the road. It has mature tree/hedge boundaries. The site is in flood risk Zone C and has low risk of flooding. Details provided in both the Engineering Services report (with infrastructure maps) and the AA Screening Report and also topographical survey drawings.	
Proposed surface water details		Propose surface water system to control and regulate run-off discharging to existing storm water network. Propose to incorporate an attenuation system and SuDs (Tree pits, permeable paving, 'stormtech' attenuation tank, soft landscaping and petrol interceptor) as part of the development. This would attenuate the surface runoff. Further details required by Drainage Division of PA. Open ditch with buffer is to be retained.	

Water supply	Public Water Mains on Glenamuck Road. Feasibility of connection confirmed by Uisce Eireann					
Proposed wastewater treatment system & available capacity, other issues	To foul sewer on Glenamuck Road . Feasibility of connection confirmed by Uisce Eireann					
Other matters	Site not at risk of flooding. Drainage Division require further details for surface water attenuation and SuDS.					
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective	Identified pressures on that water body	Pathway linkage to water feature
Groundwater	Underlying site	Wicklow (IE_EA_G_076)	Good	At risk	Anthropogenic Pressures -Within the wider Avoca/Varty area impacted by Agricultural run-off, forestry and historical industry	Yes – percolation as site is underlain by GWB
River	c. 125m to north of site	Tributary to Carrickmines	Good	Not at risk	-	Connected by drain /ditch

		Stream_010					
River	c. 4km downstream of Carrickmines Stream -nearest site	Shanganagh_010	Good	Not at risk	-		Indirectly hydrologically connected via Carrickmines Stream.
Coastal	c. 5km downstream of Carickmines Stream	Southwestern Irish Sea-Killiney Bay (HA10)	High	Not at risk	-		Indirectly hydrologically connected to Coastal waterbody via rivers
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact	Screening Stage Mitigation Measure	Residual Risk (yes/no) Detail	Determination to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' /'uncertain' Stage2.

1.	<u>Surface water run-off</u>	Carrickmines Stream_010	Existing surface water drainage system via the stormwater drain	Siltation, hydrocarbon spillages, siltation, ph concrete	SuDs and natural drainage to limit run-off and treat. Standard construction practice	No	Screened Out
2.	<u>Earthworks and seepage to Ground water</u>	Wicklow (IE_EA_G_07 6	The pathway is through soil. No basement works - so unlikely	hydrocarbon spillages	No groundwater to be encountered. Construction Env. Management Plan	No	Screened Out
OPERATIONAL PHASE							
1	<u>Surface water run-off</u>	Carrickmines Stream_010	Existing surface water drainage via foul sewer which discharges to a water body	Siltation, hydrocarbon spillages, siltation, ph concrete	Standard maintenance. SUDS/nature-based measures proposed to address surface water run-off before discharging to network.	No	Screened Out

	<u>Connection to foul sewer</u>		Via the WWTP which discharges to this surface water		WWTP to comply within its discharge license.	No	Screened out
2	<u>Run-off and seepage to Ground water</u>	Wicklow (IE_EA_G_07 6	The pathway is through soil, fissured granite if unfiltered .	Hydrocarbon spillages	No basement works. SUDS/nature-based measures which incorporate pollution mitigation/petrol interceptor.	No	Screened Out
DECOMMISSIONING PHASE							
N/A							