

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

4 September 2019

Re: Strategic Housing Development Application to An Bord Pleanála

Demolition of existing buildings, construction of 406 no. residential dwellings (281 no. houses and 125 no. apartments/duplexes), childcare facility, 1 no. commercial unit, Public Park, provision of a School Site, and all associated site works. Newcastle South & Ballynakelly, Newcastle, Co. Dublin

ABP Reference: 303986-19

Dear Sir

This application is made to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 16 May 2019.

This correspondence identifies the following documentation and information submitted with this application:

1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001 to 2017, as amended; and,
2. The information is made pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 16 May 2019, as required under article 297(3) of the Planning and Development Regulations 2001 to 2017, as amended.

1 Article 297 and 298 Requirements

The documentation required under article 297 is identified below:

- **297(1)** – The planning application form is submitted herewith
- **297(2)(a)** – A letter of consent from Mazars is submitted herewith in respect of Folio DN135965F Plan No. 21. Similarly, a letter of consent from James and Louise Fitzgibbon is submitted herewith in respect of a small portion of the site comprising Folio DN7274. The balance of the lands are

controlled by the Applicant.

- **297(2)(b)** – A copy of the newspaper Notice published in the Irish Daily Star on 4 September 2019 is attached herewith.
- **297(2)(c)** – MOLA Drawing No. NCS18_MOLA_00_XX_DR_A_XX_0002 and NCS18_MOLA_00_XX_DR_A_XX_0003 at a scale of 1:1,000 and incorporating the requirements of parts (i) to (iv) is submitted herewith. [Note: MOLA Drawing No. NCS18_MOLA_00_XX_DR_A_XX_0001 provides an overall Site Layout Plan at scale of 1:2,500 for information purposes.
- **297(2)(d)** – Evidence from Irish Water that it is feasible to provide services is included in the DBFL Infrastructure Design Report as Appendix K.
- **297(2)(e)** – It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- **297(2)(f)** – A full Schedule of Drawings and Documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **297(2)(g)** – Details of compliance with Section 96 of the Planning and Development Act 2000 have been detailed in Section 3.6 of the Planning & Statement of Consistency Report submitted with the application. Details of Part V compliance including the location of units, layouts, calculations and methodology for calculating costs, have been subject to consultation with South Dublin County Council Housing Department. Confirmation of this continuous engagement is at Appendix A of the Planning & Statement of Consistency Report
- **297(2)(h)** – Units to be transferred to the Planning Authority have been identified on MOLA Drawing No. NCS_MA_01_XX_DR_A_PV_001100 submitted herewith.
- **297(2)(i)** – Letters of consent from Mazars, in respect of Folio DN135965F plan no. 21., and James and Louise Fitzgibbon, in respect of a small portion of the site comprising Folio DN7274, are submitted herewith together.
- **297(2)(j)** – The appropriate statutory fee of €59,080.24 being the fee payable, is attached herewith.
- **297(3)** – Section 2 below provides a statement of proposals to address the matters set out in the Board's Notice of Pre-Application Consultation Opinion dated 16 May 2019.
- **297(4) and 298(1)** – A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **298(2)** – This application does not propose any works to a Protected Structure or Proposed Protected Structure or to the exterior of a structure within an Architectural Conservation Area.

It is noted that the application is accompanied by an Environmental Impact Assessment Report and an Appropriate Assessment Screening Report (Stage 1).

2 Statement of Proposals to Address Issues Raised in the Board's Notice of Pre-Application Consultation Opinion

The Board's Opinion of 16 May 2019 identified the following:

1. **Issues to be addressed in the documents submitted with the application.** The Board's Notice stated that the documents submitted require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development, and identified those matters in its Notice. These issues have been comprehensively addressed in the drawings, documents and reports submitted with the application. Section 3 below provides a statement of the manner in which these matters have been addressed in the documentation submitted.
2. **Specific Additional Information to be submitted with the Application.** The documentation submitted with this application is listed in Section 1 above and on the separate Schedule of Documents. This information includes all of the specific items identified in the Opinion.
3. **Authorities to be notified of the making of the application.** Copies of the letters sent to these authorities notifying them of the application under section 8(1)(b) of the Act are submitted with this application.

3. The Board's Opinion – Issues Addressed in the Submitted Documentation

The Board's Opinion identifies matters to be addressed in the documents submitted with the application. These matters have been addressed in the documents submitted herewith. To assist the Board and any interested parties in assessing the application the following sections provide a summary of the proposed amendments seeking to address the matters raised in the Board's Opinion, an overview of the change and direction of where to obtain further detail is included for convenience.

3.1 Urban Design & Integration

Item 1 states:

'Further consideration is required in respect of the documentation relating to the achievement of an acceptable standard of urban design within the proposed development at its integration with existing, permitted and planned development on adjoining land in compliance with the provisions of DMURS, the development plan (including its zoning and roads objectives) and the local area plan (including its indicative layout). The documentation should illustrate how the proposed development would provide suitable street frontage along the main street through the site and along the eastern and southern side of the planned square around the area zoned as open space along the western side boundary, while providing a rectilinear layout of street with perpendicular junctions and omitting the doubling up of parallel carriageways; and showing how links would be provided to the streets in existing and permitted housing on neighbouring lands and how they could be provide to future residential development on the neighbouring lands zoned for such.'

3.2.1 Integration with Existing, Permitted & Planned Development

DBFL Consulting Engineers have provided a DMURS Compliance Statement to demonstrate that the proposed development layout aligns with the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS). The development strategy maximises connectivity between key local destinations through the provision of a high degree of permeability and legibility for all network users particularly for sustainable forms of travel such as walking and cycling.

The provision of linkages from adjacent land to the subject site have been facilitated by providing a road layout that aligns with existing, permitted and future development surrounding the site.

Figure 1 Proposed Linkages to Existing & Future Development Lands



(Extract from DBFL Dwg. No 170024-9020 Transportation Linkages Plan)

Street links have been provided to the ownership boundary with the development permitted under Reg. Ref. SD17A/0378 to the west of the subject site as shown on DBFL drawing number 170024-2001 & 2002. The proposed road design takes account of the alignment and level of the adjacent development although the final physical connection will be delivered subject to agreement with the

adjoining landowner and South Dublin County Council. These linkages will provide improved permeability to the future development and St. Finian's School.

The proposed east / west link street has been designed to align with the SDCC Development Plan and Newcastle LAP for the future continuation of the link street through third party lands. Please refer to MOLA Drawing Nos. NCS18_MOLA_00_XX_DR_A_XX_0801 and NCS18_MOLA_00_XX_DR_A_XX_0800 which provide an overlay of the proposed development with the SDCC Development Plan zoning map and the Newcastle LAP Overall Framework, respectively.

These overlays demonstrate that the proposed layout fully aligns with the road objectives as included in the SDCC Development Plan. Furthermore, the proposed layout is generally consistent with the indicative road layout illustrated in the LAP Framework. In this respect, the majority of the principal streets directly align with the Framework Plan. Where deviations occur it has been necessary to ensure appropriate connections with permitted development are made; to minimise impacts on hedgerows and to ensure the efficient use of zoned land.

Pedestrian and cyclist permeability has been provided throughout the proposed development which will provide key linkages between the future school site, Newcastle village, existing schools and existing development.

The linkages detailed above demonstrate that permeability has been considered from a very early stage in the design and all links that can be provided by the applicant have been accommodated. Where identified links cannot be accommodated, provision has been designed to allow connections to be provided by the Local Authority.

3.2.2 Street Frontage

The proposed amendments to the road layout results in the relationship of the built edge to the east-west link street being reconfigured, again to create a more robust street frontage. A mix of terraced houses and wide fronted houses directly address the street. Corner dwellings and corner sites along the frontage have been designed to provide active frontages and where appropriate feature buildings created. It is considered that the modifications to the scheme assist in creating a strong sense of place, enclosure along the northern edge of the road given its width.

Please refer to MOLA Drawing Nos. MOLA- 01- ZZ- DR- A- XX-0601 which provides a contiguous elevation to illustrate the relationship between the street frontage and the east west link road.

Similarly, the street configuration around the area of zoned open space to the west of the site has been modified to more closely align with the framework indicated in the County Development Plan and the Newcastle LAP. In this respect, the proposed street forms the eastern and (part) southern boundary of the future planned square. Proposed semi-detached and terraced houses create an attractive frontage which provides opportunities for passive surveillance and overlooking of the future public open space.

Please refer to MOLA Drawing Nos. MOLA- 01- ZZ- DR- A- XX-0603 which provides a contiguous elevation to illustrate the relationship between the street frontage and the planned square.

Based on the foregoing, it is considered that the reconfiguration of the street layout has resulted in all dwellings being oriented towards the street contributing to the passive surveillance and improved security of the scheme, and providing a more clearly designed block edge and robust street frontage.

3.2.3 Street Layout

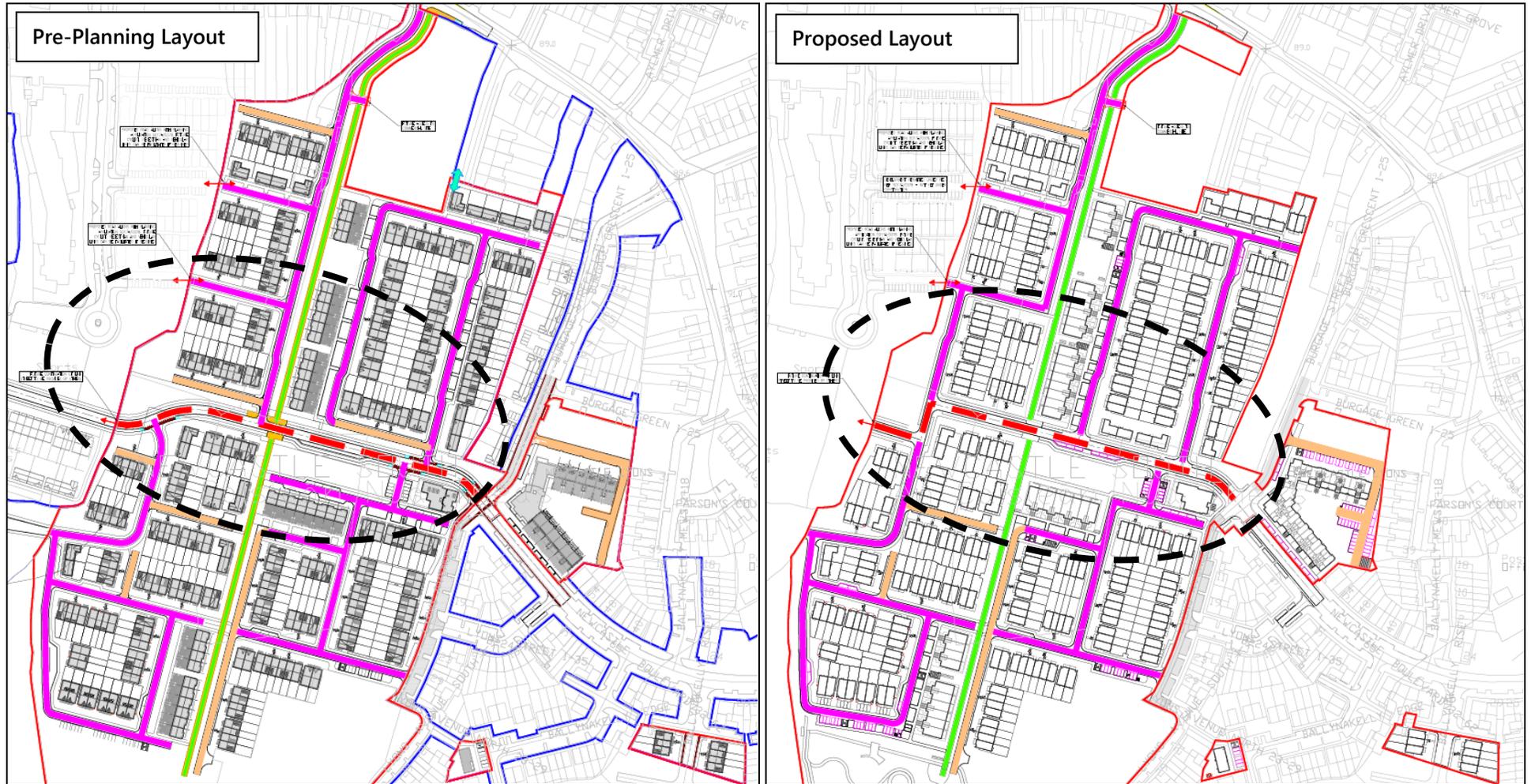
The street alignment serving the properties immediately north of the main east-west route has been rationalised to omit parallel carriageways and ensure those properties appropriately address the street, providing a strong urban edge.

The junction geometry has been amended along this central spine road to provide, where possible, a rectilinear layout of streets with perpendicular junctions. This approach is consistent with the roads objective layout as illustrated in the South Dublin Development lands. The proposed street layout provides an informal grid pattern which will slow vehicular speeds and provide full permeability, offering a choice of movement throughout the scheme in accordance with the LAP Objectives.

A comparison of the pre-planning consultation street layout and that now proposed, and the general location of the principal modifications, has been indicated in Figure 2 below.

As outlined above, street links have been provided up to the ownership boundary with the development permitted under Reg. Ref. SD17A/0378 to the west of the subject site as shown on DBFL drawing number 170024-2001 & 2002. Similarly, streets have been provided up to the boundary with adjoining zoned lands to facilitate future potential linkages to neighbouring lands. Such linkages can be facilitated when such lands are brought forward for development.

Figure 2 Extract from Street Hierarchy illustrating omission of Parallel Carriageways & Provision of Perpendicular Junctions



(---) Principal Area subject to Amendment

4. Specific Information to be Submitted with Application

The Board's Opinion detailed specific information to be submitted with any application. The Table below details the information requested and where the information can be located:

	Specific Information	Location
1	Site layout plans showing the proposed development overlain with the zoning and roads objectives that apply to the south under the county development plan and the indicative layout set out in the local area plan.	Please refer to MOLA Drawing Nos. NCS18_MOLA_00_XX_DR_A_XX_0801 (Development Plan Overlay) and NCS18_MOLA_00_XX_DR_A_XX_0800 LAP Overlay.
2	A housing quality assessment which provides the specific information regarding the proposed apartments (including own-door units) required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building life cycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.	Please refer to Housing Quality Assessment for Apartments & Duplex Units prepared by MOLA and submitted herewith which demonstrates compliance of apartments, including own door duplex units, with the quantitative standards required by the Guidelines. Compliance with qualitative guidelines and the specific planning policy requirements is provided at Section 4.1.2 of the Planning & Statement of Consistency Report Please refer to Building Life Cycle Report prepared by Cairn and submitted herewith.
3	A report demonstrating compliance with the applicable design principles and specifications set out in in DMURS and the National Cycle Manual.	Please refer to Technical Note prepared by DBFL entitled DMURS & NCM Design Statement and submitted herewith.
4	A Site Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of the report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.	Please refer to Site Specific Flood Risk Assessment Report prepared by DBFL and submitted herewith. Details on the surface water drainage consultations between DBFL and South Dublin County Council Drainage department are detailed in Section 3.4 of the Infrastructure Design Report prepared by DBFL.
5	A phasing scheme for the development which would indicate how open space and access for the proposed housing would be provided in a timely and orderly manner, and a taking-in-charge plan.	Please refer to MOLA Drawing Nos. NCS18_MOLA_00_XX_DR_A_XX_0901 (Phasing Scheme) and NCS18_MOLA_00_XX_DR_A_XX_0900 (Taking in Charge Plan) submitted herewith.

6	Details of proposed boundary and surface treatments throughout the development, and of landscaping and planting.	<p>Please refer to Murray Associates (MA) Drawings Nos 1723_PL_DD_01 (Boundary Details) and 1723_PL_P_07 (Boundary Plan) for boundary details. Details of landscape, planning and surface treatments are included on the Landscape Plans submitted herewith. in particular please refer to Drawing Nos 1723_PL_P_01; 1723_PL_P_03; 1723_PL_P_04; 1723_PL_P_05; and 1723_PL_P_06 relating to the main development site and 1723-C1_PL_P_01; 1723-C1_PL_P_01.1 and 1723-C1_PL_P_01.2 for the Ballynakelly infill site.</p> <p>Further details of planting and materials are provided in the Landscape Design Report prepared by Murray & Associates.</p>
7	A draft construction management plan.	Please refer to Preliminary Construction and Environmental Management Plan prepared by DBFL Consulting Engineers submitted herewith.
8	A draft waste management plan.	Please refer to Operational Waste Management Plan prepared by AWN Consulting and Construction Waste Management Plan prepared by Cairn submitted herewith.

I trust that the application documentation is in order and I look forward to a favourable decision from the Board.

Yours sincerely,



Declan Brassil

Declan Brassil & Co.