



STATEMENT IN RESPONSE TO AN BORD PLEANÁLA'S OPINION, FILE REF - 308642-20, WHITE PINES CENTRAL SHD

FOR PROPOSED RESIDENTIAL DEVELOPMENT AT WHITE PINES CENTRAL,
STOCKING AVENUE, DUBLIN 16



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1.0 INTRODUCTION

The following Statement is prepared by Tom Phillips + Associates¹ (“TPA”) in association with a multi-disciplinary team, instructed by the Applicant, Ardstone Homes Limited².

This Statement has been prepared to address the issues raised by An Bord Pleanála (ABP) in the Opinion dated 22nd February 2021 (Case Reference: ABP-308642-20) and issued subsequent to the Pre-Application Consultation stage of the subject SHD Application at White Pines Central, Stocking Avenue, Dublin 16.

What follows is a detailed response to each of the comments raised by ABP and discussion on how the proposed scheme has been modified or reviewed to address ABP’s comments.

A copy of the Boards Opinion is included at Appendix 1 of this Response.

In addition, it should also be noted that White Pines Central SHD is now proposed as Build to Rent (BTR). The decision to progress the application as Build to Rent is based on market requirements. As detailed in Section 4.5 of the Statement of Consistency, prepared by TPA, while all 114 no. residential units are now proposed as BTR, all units exceed the minimum floor area standards applicable to non-BTR apartments. This is confirmed in the Housing Quality Assessment, prepared by RAU.

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2.0 DESCRIPTION OF DEVELOPMENT IN CONTEXT

The White Pines Masterplan site has been provided in its entirety by Ardstone Homes and comprises the provision of 5 No. phases of developments (see Table 2.1), served by a new neighbourhood centre known as White Pines Retail. White Pines Retail comprises a single storey convenience retail unit (c. 1,688 sq m GFA) and a three storey creche building (c. 591 sq m. GFA).

White Pines Residential Phases	Units	Site Area in Ha	No. of Dwellings per Ha
1. White Pines North	175	6.17	c. 28.3
2. White Pines South	106	2.83	c. 37.45
3. White Pines Retail	N/A	N/A	N/A
Subtotal	281	9	c. 31.22
<i>Planning Applications to be Determined</i>			
4. White Pines East SHD	241	2.98	c. 80.9
5. White Pines Central SHD	114	2.2	c. 51.81
TOTAL	636	14.18	c. 44.85

Table 2.1: Residential Densities of White Pines Masterplan Site.



Figure 2.1: Ardstone Homes Development Sites [Source: Bing Maps: Annotated by TPA 2021]

Ardstone Homes Ltd. control the entire White Pines masterplan site area and have already provided for some 281 no. family homes at White Pines North and White Pines South. In addition to this, they also recently submitted a separate SHD planning application for the provision of 241 no. residential units on a site north of the subject site, at White Pines East SHD. It is therefore clear that Ardstone Homes are committed to delivering high quality residential accommodation in the Stocking Avenue area.

As noted in Section 1 of the *Planning Report* prepared by TPA and submitted with this Application, the subject Application at White Pines Central SHD represents the 5th and final phase of development for the wider White Pines Masterplan Site, identified in Figure 2.1 above..

Section 3 of this Response provides a detailed evolution of the scheme design confirming that the proposed development is not just an excellent design response for the subject site, but is the only design response for the site, in the context of National Planning Policy and Guidance relating to the best development option of these residentially zoned.

3.0 RESPONSE TO ISSUES RAISED BY AN BORD PLEANÁLA

In ABP's *Notice of Pre-Application Consultation Opinion*, the Board considered that the following issue needed to be addressed as part of the proposed Application, specifically to detail how the proposed design has been influenced by best practice design principles, as detailed in National Planning Policy and Guidance.

3.1 Design Strategy

The Board stated, *inter alia*, in their *Opinion*:

“Further consideration of the documents as they relate to the design and layout of the proposed development is required. Consideration is required as to how the proposed design has been influenced by the best practice design principles of the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)’ and criteria within the ‘Urban Development and Building Heights - Guidelines for Planning Authorities’, particularly in relation to addressing the street, contribution to the urban neighbourhood and streetscape, and the quality of detailed building design / material use. Further consideration of the principles or criteria described under these guidance documents may require amendment to the design proposals submitted. As part of this, further consideration is also required of the aesthetic impact of surface level car parking, and whether there is potential for an alternative car parking arrangement in the development. Photomontages, CGIs and a Landscape Visual Impact Assessment alongside verified views, will be required to accurately illustrate the appearance of the proposed development.”

3.2 Applicant Response

The following section will detail how the proposed development has been influenced by best practice design principles, as set out in National Planning Policy and Guidance. In addition, this section will also detail the evolution of the scheme design, setting out the detailed design options that have been considered for the site, confirming the current design represents the best development option for the site, in the context of the site's constraints and national and local planning policies and objectives.

3.2.1 Design Response to the Board's Opinion

The proposed development submitted to ABP for SHD Pre-Application stage consultation, in November 2020, proposed the construction of 137 no. residential units (including 6 no. studio, 52 no. 1 bed, 50 no. 2 bed and 29 no. 3 bed) in 6 no. blocks ranging in height from 3 to 8 storeys. Block A comprised an 8 Storey apartment building, with the remaining Blocks, Blocks B-E, proposed as 3 storey Duplex buildings.



Following a detailed review and consideration of the relevant National, Regional and Local Planning Policies and Objectives, as outlined below, and to address the Boards comment above, a number of specific design amendments have been incorporated to the scheme design. Most notably, Block A has been reduced in height by 2 no. storeys, from 8 no. storeys to 6 no storeys. As such, the number of residential units provided in Block A has reduced by 23 no. units. The development now no longer proposes any Studio units.

As a result of these amendments, the density and height of the proposed development, in particular Block A, has been significantly reduced. The overall height of the proposed development has reduced from a maximum height of up to 8 no. storeys to the current proposal with a maximum height of 6 no. storeys.

It is further noted that the development submitted for the pre-application consultation proposed a residential density of c. 62 No. units per hectare. The subject Application is proposing a residential density of c. 52 No. units per hectare, when considered in isolation (i.e. excluding the balance of the White Pines Masterplan site).



Figure 3.1: Pre-Application Proposal November 2020 showing view from Stocking Ave, looking east.
(Source: 3DDB)



Figure 3.2: Final Proposed SHD Development, showing view from same location as displayed in Figure 3.1. (Source: 3DDB)

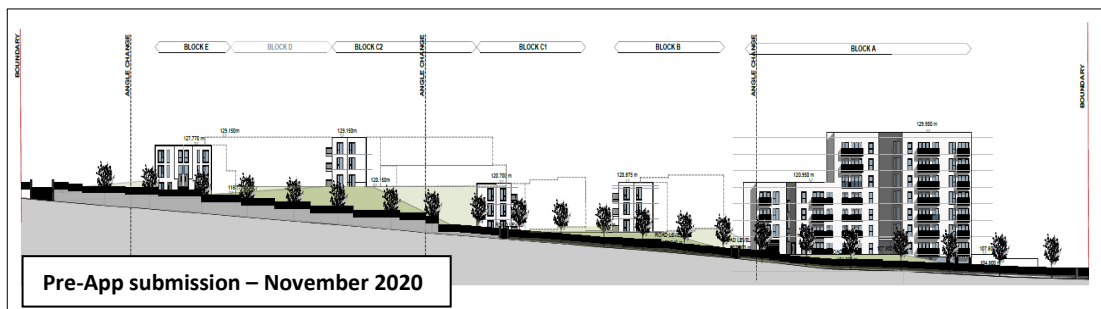


Figure 3.3: Site Section Pre-Application Proposal November 2020 (Source: RAU.)

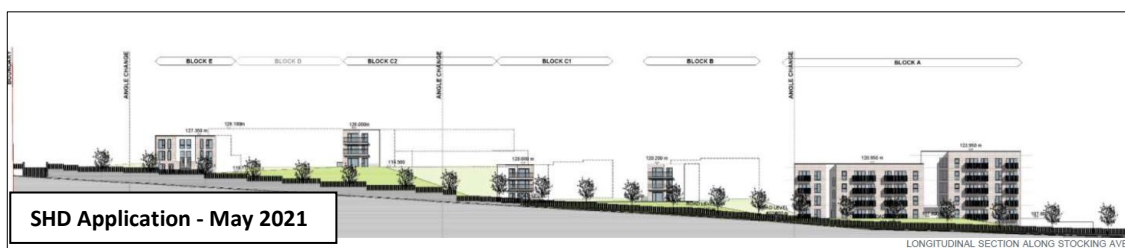


Figure 3.4: Site Section: Proposed Development May 2021 (Source: RAU.)

3.2.2 How the Proposed Design Has Been Influenced by National Best Practice Design Principles

The following section will detail how the proposed development has been designed in accordance with national best practice design principles, in particular the ‘*Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)*’ and criteria within the ‘*Urban Development and Building Heights - Guidelines for Planning Authorities*’, noted above in ABP’s response.

In response to this, we direct the Board to the *Statement of Consistency, Material Contravention Statement and Planning Report*, prepared by TPA, which provide detailed assessment of how the proposed development has been designed in accordance with all relevant National Planning Policy and Guidance.

Regarding the ‘*Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas*’ we direct the Board to Section 4.8 of the *Statement of Consistency*, prepared by TPA, which concludes:

“The proposed development is considered to be entirely in accordance with the provisions of the Sustainable Residential Development in Urban Areas (2009) guidelines by proposing a development, designed to respect the built form of existing and emerging developments on Stocking Avenue, with a density appropriate to its urban context, and, providing enhanced residential internal and external amenity spaces, that supports the local zoning objective of the site, to provided new residential development.”



Regarding the *Urban Design Manual (2009)* we direct the Board to Section 4.9 of the *Statement of Consistency*, which provides a detailed assessment of how the proposed development has been designed in accordance with the *Guidelines*, specifically the 12 no. design features integral to good residential development, concluding;

“Context: *The layout of the proposal seeks to maximise the location of the site, its sloping topography, and also takes advantage of the views looking towards the city.*

Connections: *This new residential area will connect with existing areas to the north and south through the provision of increased pedestrian entry points to the site.*

Inclusivity: *The provision of a landscaped amenity space with various character areas (e.g., landscaped buffer zone (wild grasses); kickabout / key public realm nodes; and children’s play area) will cater for a wide range of future users.*

Variety: *A mix of one-bedroom, two-bedroom and three-bedroom apartment and duplex units is proposed to provide for a wider variety of users, within an area dominated by three-bedroom and four-bedroom detached and semi-detached housing. This will help create a strong and sustainable mixed community in tandem with the permitted developments also forming part of the White Pines Masterplan Stie.*

Efficiency: *The proposed layout is predicated on the need to avoid unnecessary cut and fill, as set out in the Ballycullen-Oldcourt LAP 2014. The proposal will link into and make the most efficient use of existing services and infrastructure in the locality.*

Distinctiveness: *The proposal has taken a sensitive approach to design given the site’s setting. Its distinctive sloped topography is respected and emphasised through the high quality of the design proposal, with building heights increasing to the lower point of the site, at the western boundary on the roundabout to White Pines Retail, White Pines South and White Pines North. The provision of Block A, a 6 no. storey apartment building, in this prominent roundabout location will create a distinct sense of place, and act as a landmark/focal point for the wider area.*

Layout: *The site layout prioritises non-vehicular movement on internal streets, with pedestrian desire lines catered to, and non-essential vehicular through-movement minimised.*

Public Realm: *The passive surveillance of public spaces is prioritised throughout the scheme design. Variety is achieved between the character of public open space areas within residential development.*

Adaptability: *Unit types are designed to be adaptable and capable of catering for cross-generational use.*



Privacy & Amenity: *All apartment and duplex units enjoy dedicated private open space in the form of balconies which are not unduly overlooked.*

Parking: *Proposal provides 98 no. dedicated private parking spaces to serve the proposed residential units. This is seen as a suitable level of car parking provision which encourages sustainable modes of transport and also ensures that car parking is not a dominant feature of the public realm.*

Detailed Design: *The design of the proposal has been and will continue to be a collaborative effort with the various opportunities and constraints addressed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, and planning expertise) in an iterative manner.*

In addition to the above, we direct the Board to Section 6.1 of the *Architectural Design Statement*, prepared by RAU, which provides the Architectural Response to the 12 no. design criteria listed above.

Regarding the *Urban Development and Building Heights - Guidelines for Planning Authorities' (2018)* we direct the Board to Section 4.4 of the *Statement of Consistency* prepared by TPA, which provides a detailed assessment of the proposed development under the *Guidelines*, concluding;

“The proposed development is considered acceptable in the context of the above, including, the existing and emerging development surrounding the subject site, and the site’s accessible location.

The development is designed to be architecturally sensitive to the site location, responding to the existing urban form. There is a variety of building form design such as buildings varying in heights from 3 to 6 no. storeys.

A Landscape and Visual Impact Assessment, prepared by Mitchell + Associates Landscape Architects, is included at Chapter 9 of the EIAR submitted with this application, detailing the visual impact the proposed development will have on the surrounding area.

The proposed building heights have been assessed, and are considered appropriate, in the context of the each of the criterial outlined in the 2018 Building Height Guidelines, which are addressed in detail above.”

In addition to the above, we direct the Board to Section 4.6 of the *Architectural Design Statement*, prepared by RAU, which provides the architectural response and justification for the proposed height of Block A, in the context of its prominent location.

For a comprehensive assessment on how the proposed development has been designed in accordance with best design principles, as set out in National and Local Planning Policies and



Guidance, please refer to the *Statement of Consistency*, prepared by TPA, submitted with this Application.

3.3 Evolution of the Scheme Design

The following section will detail the evolution of the scheme's design, '*particularly in relation to addressing the street, contribution to the urban neighbourhood and streetscape*', to highlight the detailed consideration that has been given to the site-specific context of the proposed development.

3.3.1 Site Constraints

As outlined above, there have been a number of key constraints when it came to assessing and implementing the optimum design solution for the subject site. These include, but are not limited to;

- The irregular shape of the site.
- The marked contours and sloping topography of the site rising c.18 m from the site's western boundary to the eastern boundary.
- The requirement of the proposed development to fit within the context of existing and proposed elements of the White Pines Masterplan.
- National Planning Policies and Objectives contained within the *South Dublin County Council Development Plan 2016-22* and *Ballycullen Oldcourt Local Area Plan (2014)*.
- A large portion of the site is located within the *BOLAP (2014) Overhead Wire Wayleave*. The local area plan seeks to restrict development in this area to ancillary development infrastructure (e.g. roads, parking, open space, etc.)

The Design Team identified a number of key challenges to ensure a successful design response. It is considered that, through a number of design iterations, that the optimum solution has been reached in the final scheme presented to the Board in this Application.

A summary of those key challenges are listed below. They include:

- The provision of an urban edge.
- Ensuring accessibility for all ages and mobility levels.
- Ensuring permeability throughout the site.

- The provision of a viable and vibrant public realm.
- The provision of sufficient and usable open space.
- Ensuring variation in height across the site addresses its topographical challenges and presents a coherent development.
- Seeking to minimize the use of visual obtrusive retaining walls throughout the development.

3.4 Development Options Considered

As set out above and further detailed in Section 3 of the *Architectural Design Statement*, prepared by RAU, the Applicant's Design Team have been working to develop a viable and vibrant residential scheme for the White Pines Central site as part of the wider White Pines Master Plan since the acquisition of the overall site in 2017.

A wide range of development options have been explored and taken into consideration when finalising the final SHD design subject of this submission. However, a number of the site design options considered were discounted at an initial stage, due to the various site constraints noted above. As such, the examples provided below comprise an overview of some of the various development options considered. These were selected to highlight working examples of how the site's constraints have been considered, assessed and addressed, in the final SHD planning application design.

The following sections should be read in conjunction with Section 3 of the *Architectural Design Statement*, which provides a detailed description of the evolution of the scheme design.

3.4.1 Pre- Design Considerations for the Site

The following section will detail the initial considerations that were had for the development of the site, to confirm how the final layout now proposed has progressed from its inception.

3.4.1.1 2004 Masterplan

As noted in Section 3.1 of the *Planning Report* prepared by TPA, planning permission was granted in September 2005 (SDCC Ref. SD04A/0393/ ABP Ref. PL06S.212191) for the provision of a residentially led development, on lands comprising an area of approximately 22.97 ha, including the 2.2 ha site subject of this application.

The portion of the masterplan site comprising the subject site at White Pines Central is shown in Figure 3.6 below. As shown below, the application was granted planning permission for the

provision of 126 No. residential units, including 119 No. apartments and 7 No. four-bedroom houses, on the White Pines Central site.

Whilst the development provided a sufficient no. of dwellings, on review of the approved permission it became apparent that the proposed development had not taken adequate consideration the sloping topography of the site. As such, substantial excavations would have been required to flatten the site to permit the construction of the permitted development. This would have also given rise to the substantial use of retaining walls along the site boundary, particularly along the eastern boundary, where the consented development would have required an extremely high retaining wall, in excess of c. 10m.

While the scheme design was considered to have addressed Stocking Avenue, it would not have been achievable without substantial site excavations, which would have a detrimental impact on the consented developments ability to provide pedestrian links to adjoining and emerging residential developments. In addition, the slope of the proposed internal road would have provided serious implications for universal access at that location.

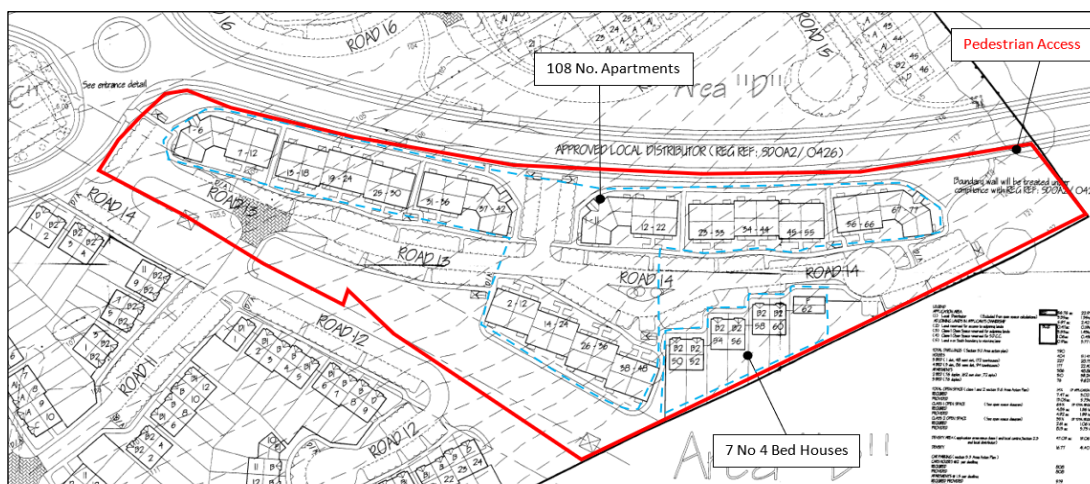


Figure 3.6: Approved Masterplan Layout Plan - SDCC Ref. SD04A/0393; ABP Ref. PL06S.212191.

In addition to the above, it is also noted (as shown in Figure 3.6) the consented development was approved with a high percentage of north facing single aspect units. These units were considered would provide poor levels of natural light and should therefore be minimised in the final scheme design.

As shown in Figure 3.7 below, the development was granted planning permission with three storey blocks fronting Stocking Avenue. The scale and massing of these blocks is greater than that proposed in the current design, given that the permitted units do not take advantage of the sloping nature of the site and also have pitched roofs. In addition to this, the permitted schemes perceived scale and massing is further exaggerated given their location adjoining Stocking Avenue.

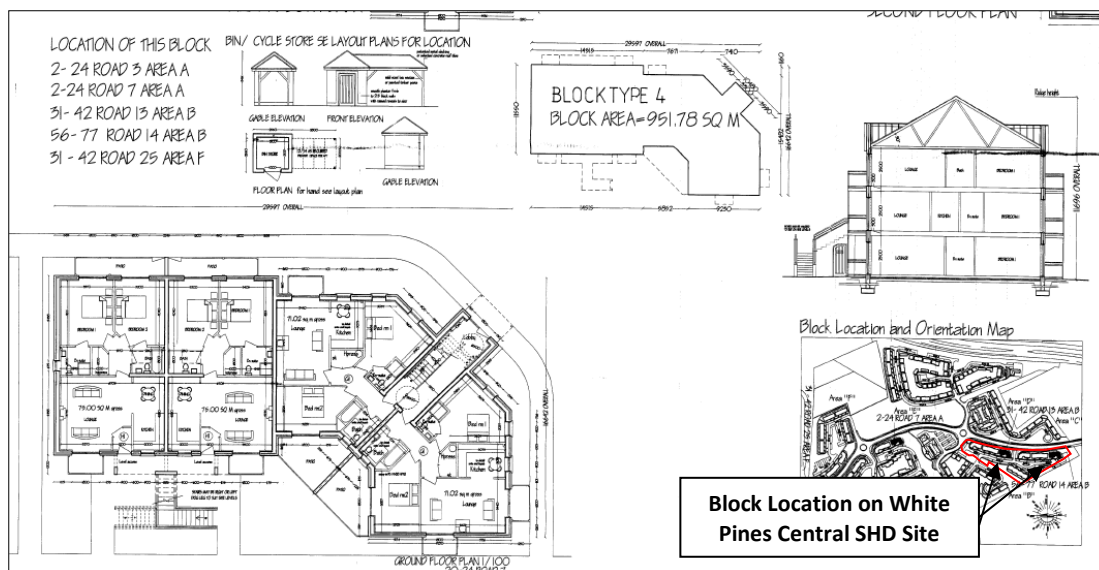


Figure 3.7: Section of Approved Blocks fronting Stocking Ave, SDCC Ref. SD04A/0393/ ABP Ref. PL06S.212191 [Source: SDCC Online Planning Register, annotated by TPA 2020]

Given this scheme design failed to take the existing site levels into consideration and was also proposing a high percentage of single aspect north facing units, the approved layout was considered to provide a poor level of residential amenity for future residents.

Furthermore, the proposed design would not have tied into the wider area, nor have been able to provide any meaningful links between White Pines South and Stocking Avenue, due to the excessive use of cut and fill to achieve the consented scheme.

That design solution would have required an excessive amount of visually imposing retaining walls, and the surface levels delivered as a result would have provided serious challenges for universal access.

As such, this scheme design was not progressed.

3.5 Design Options

The following section will detail the various design options considered and assessed in detail, to confirm how the proposed development, as currently submitted, has evolved through a detailed design process.

Following Ardstone Homes' acquisition of these lands and their assessment of the permitted scheme, a number of alternative options for the proposed development of White Pines Central were considered. Enhanced building heights and residential densities were also considered, in the context of the approved masterplan application (detailed above) and the recently published *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* (December 2020) and the *Urban Development and Building Heights Guidelines for Planning Authorities* (December 2018).

3.5.1 Design Option A

Option A comprised the provision of 195 No. Build to Rent apartments (9 No. studio apartments, 88 No. 1 Bed apartments and 98 No. 2 Bed units), arranged across 6 No. 4 storey blocks.

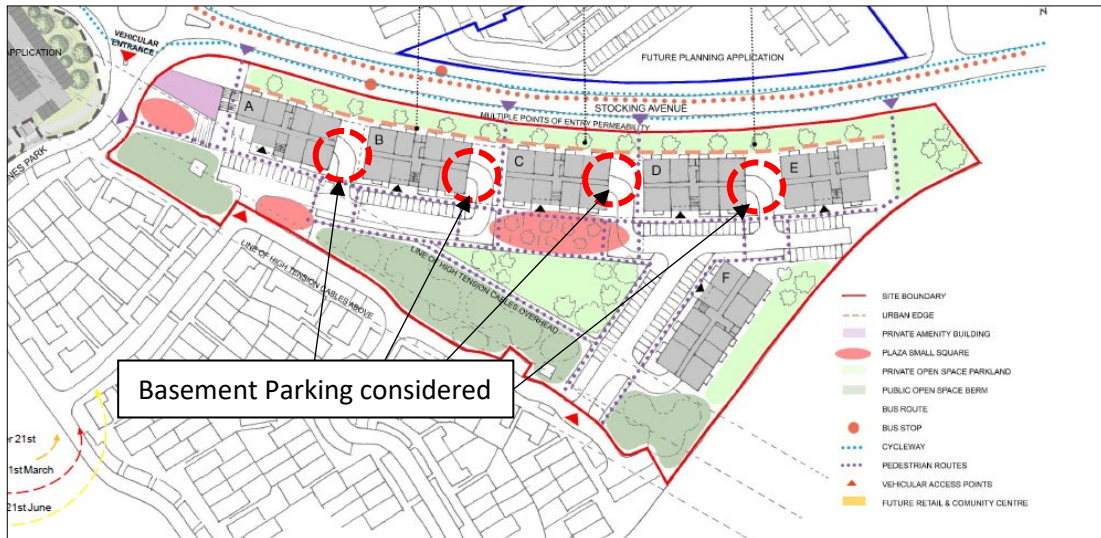


Figure 3.9: Option A Layout Plan.



Figure 3.10: Option A Contextual Elevation to Stocking Ave.

As shown above, the proposed design was considered to successfully address Stocking Avenue. However, the layout while addressing Stocking Avenue, could not adequately address the surrounding area, given the existing site levels as discussed above.

In addition to this, it is also noted that the proposed landscape design for Option A could not address the sloping topography of the site without extensive use of retaining walls, which would substantially impact on access to the site for individuals with mobility issues. In particular, a 3m level change would have been required to the front of Block C as shown in Figure 3.11 below.



Figure 3.11: CGI of the central area of 'Option A', showing the substantial use of retaining Walls to address the 3m level change.

As shown in Figure 3.9, underground parking was also considered for Design Option A. However, following an engineering review of the proposed design, it was considered that the proposed basement parking shown above was not achievable, due to the topography of the site and the associated cost implications. The underground parking shown in this option would have required a ramp with a steep 1:10 gradient, which would not have been compliant with relevant Building Regulations.

3.5.1.1 Issues to Address

Following a detailed analysis of Option A, a number of aspects were identified that may have resulted in the proposed development not functioning optimally.

- In the context of the site's sloping topography, the proposed scheme layout was considered to require further consideration to assess if the proposed development could respond to the site's topography in a more meaningful way.
- The proposed development was considered to respond positively to Stocking Avenue in isolation. However, when viewed in the context of surrounding sites, it was clear that the site did not respond well to the surrounding area with a poor aspect towards the overhead powerlines or a north facing aspect.
- It is also shown that Design Option A did not respond to or provide any meaningful connections to White Pines South. As such, further consideration was required on how the development would respond to the White Pines South development, to assess if it could be incorporated further into the scheme design.

- Further consideration was also required regarding the design/appearance of Block A given its prominent location, at the site's entrance adjacent to a roundabout on Stocking Avenue. A more prominent landmark/building of distinction was considered to be more appropriate.
- The inclusion of 3 No. plazas, shown in Figure 3.9, was considered excessive and dispersed. Further investigation was required to assess the usability of these spaces due to the respective site levels.
- Uniform heights across the site did not adequately address site's topography.
- The significant drop in height at the center of development, i.e. the 30m long DDA ramp between Blocks C and D shown in Figure 3.11 was not an optimum design solution.
- There was limited or no permeability relationship between each individual block or the surrounding area.
- The site layout would not have been Part M compliant.
- The proposed development would have provided an excessive number of north facing units.

3.5.2 Design Option B

Design Option B comprised the provision of 135 no. residential units across 6 no blocks. Block A comprised the provision of a part 9, part 6-storey building. The balance of residential units were proposed in 5 no. 3-storey duplex blocks.



Figure 3.12: Option B Layout Plan.

The proposed apartment blocks to the east of Block A were repositioned in a north-south orientation, to run along perpendicular to the gradient of the site's slope. In this regard, from street level, the development site would have a relatively flat perception (please see Figure 3.13.)

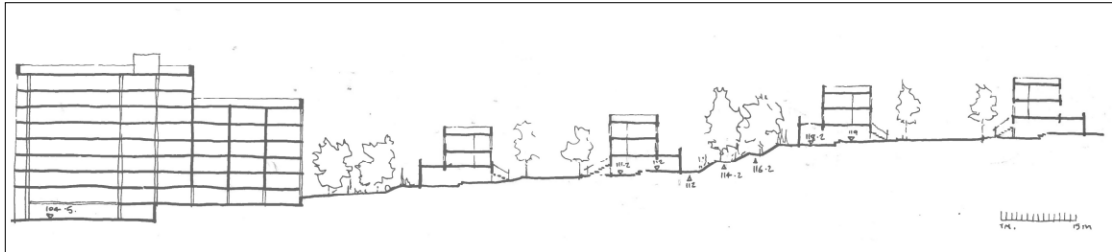


Figure 3.13: Option B Contextual Elevation to Stocking Ave.

The proposed building heights were also revised, in part to address the site's sloping topography, but also to address the site's prominent roundabout location, adjacent to the emerging neighborhood center at White Pines Retail.

The quantum of dwellings in the proposed development was reduced from 195 no. units in Option A to 135 No. units in Option B. The proposed unit Mix was also enhanced, Block A provided 69 No. apartments comprising principally 1 and 2-bed units. Blocks B-F provided 66 No. apartment and duplex units comprising principally 2 and 3 bed units. In total, the proposed development comprised 42 No. one bed units, 90 no two bed units and 3 No. three bed units.

The single storey residential amenity space building, proposed to the west of Block A in Option A, was removed and relocated within the ground floor of Block A. The removal of this building enabled the expansion of the public plaza in front of Block A to address White Pines Retail and to better comply with the *BOLAP*.

Furthermore, this design evolution saw a substantial reduction in the use of retaining walls from previous iterations of the scheme, as well as improved levels of separation distance between the respective residential blocks.

The option of running the duplex blocks perpendicular to Stocking Avenue, with active frontages on the north elevations, emerged a far better design solution for this challenging site. It was considered that it overcame a number of the challenges detailed above in Option A.

3.5.2.1 Option B: Pre-Planning Consultation with South Dublin County Council

Option B was presented to SDCC for Pre-Planning Consultation in March 2020 under section 247 of the *Planning and Development Act 2000* (as amended).



In their Response, SDCC provided commentary relating to the proposed scheme design, as follows:

- The density of the proposed development was considered excessive in the context of the *Ballycullen Oldcourt Local Area Plan 2014*.
- The unit mix was heavily in favour of one bed units with 60% of the total provision. (Notwithstanding the requirements of the *LAP* and *CDP* in terms of unit mix, *SPPR 1* of the *Apartment Guidelines (2018)* states that ‘apartment developments may include up to 50% one bedroom or studio type units’.)
- Building height was considered to be excessive at 8 stories in height, with regard to the provisions of the *Ballycullen Oldcourt Local Area Plan 2014*.
- Concerns were also raised regarding the proposed layout, specifically the relationship on Stocking Ave with buildings perpendicular to the road.
- Further discussions with the Parks Department with regard to landscaping, trees and the new open space proposed were also recommended.

3.5.3 Design Option C

Following detailed consideration of the comments raised above, a number of revisions were incorporated into the scheme design for Option C, which was again presented to SDCC for Pre-Planning Consultation in May 2020 under Section 247 of the *Planning and Development Act 2000* (as amended).

The amended development comprised the provision of 174 No. Build To Rent apartments/duplex units, in a mix of 1, 2 and 3-bed units, within 5 no. residential blocks ranging in height from 3 to 8 no. storeys.



Figure 3.14: Option C Layout Plan.

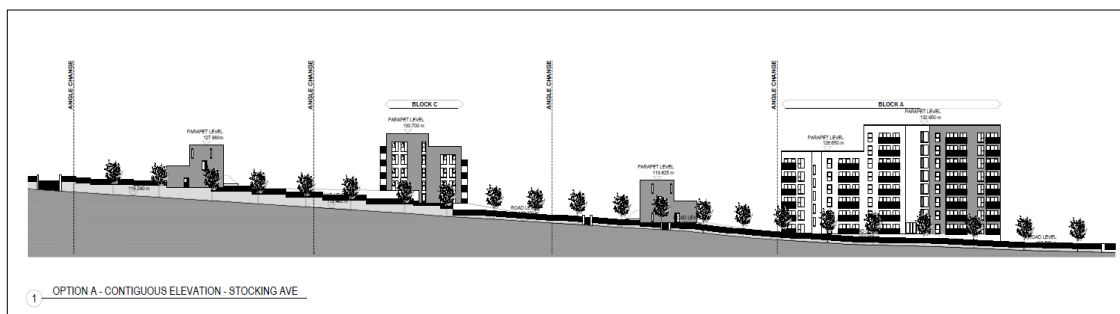


Figure 3.15: Option C Contextual Elevation to Stocking Ave.

Design Option C had evolved from Option B in response to comments received during the Section 247 meeting with the Council, detailed above. The design amendments to the previously presented scheme principally comprised;

- Reduction in height of Block A from 9no. to 8 no storeys;
- An increase of 39 no. residential units was achieved through the amalgamation of former Blocks C&D presented in Option B, with a 4-storey apartment block;
- Improved residential mix through the addition of 3 bed Duplex units; and
- A reduction in overall development footprint, which has allowed for the addition of an enhanced centrally located open space parkland.



3.5.3.1 Option C: Pre-Planning Consultation with South Dublin County Council

Comments received from SDCC through this additional round of public consultation comprised broadly similar comments to those raised through the initial round of consultation, namely:

- The density of the proposed development was still considered excessive in the context of the *Ballycullen Oldcourt Local Area Plan 2014*.
- The proposed residential mix was further questioned, as the council considered the unit mix to still be heavily in favor of one bed units.
- The proposed building height of Block A was still considered to be excessive.
- The design and layout still caused some concern due to the relationship of the proposed development with Stocking Avenue.

The Applicant and Design Team considered the comments raised above and sought to incorporate further design amendments to successfully address these issues within Design Option D.

3.5.4 DESIGN OPTION D – Pre-Application Consultation Submission to An Bord Pleanála

Design Option D comprised the provision of 137 no. apartment and duplex units, arranged across 6 no. residential blocks, with an overall height of 3 to 8 no. storeys:

- Block A was an 8-storey apartment block comprising 70 No. studio, 1 and 2 bed units;
- Block B was a 3-storey duplex block comprising 11 No. 1, 2 and 3 bed units;
- Block C1 was a 3-storey duplex block comprising 15 No. 1, 2 and 3 bed units;
- Block C2 was a 3-storey duplex block comprising 19 No. 1, 2 and 3 bed units;
- Block D was a 3-storey duplex block comprising 18 No. 2 and 3 bed units; and
- Block E was a 3-storey duplex block comprising 4 No. 2 and 3 bed units.

The development provided 6 no. studio units, 52 no. one-bedroom units; 50 no. two-bedroom units and 29 no. three-bedroom units.



Figure 3.16: Option C Layout Plan.

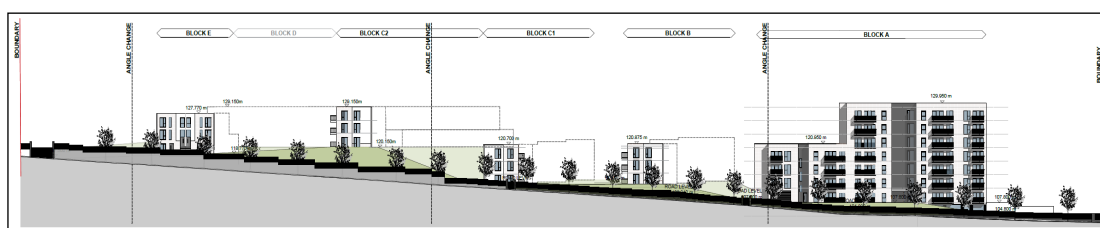


Figure 3.17: Option C Contextual Elevation to Stocking Ave.

Design Option D had evolved from Option C in response to comments received from SDCC and upon a detailed review of the scheme by the Design Team. Following a detailed review, a number of design amendments were incorporated, namely;

- A further reduction in height of Block A.
- A removal of the 4 storey apartment building and it's replacement by a 3 storey duplex building;
- The removal of the second direct vehicular access to Stocking Lane, which has resulted in a significant increase in the amount of useable open space for the development. It should be noted that this access point is being retained for emergency access only. As identified in Figure 3.16, the entrance to Stocking Lane was proposed to provided cycle/pedestrian access, which would also accommodate access for emergency vehicles. The removal of vehicles from this location allowed for the inclusion of additional child/play element and features, which resulted in this area becoming a destination location for the site. Additional pedestrian routes have also been facilitated to this location for residents of White Pines South and surrounding residential areas.
- Improved residential mix through the provision of 3-bed duplex units.



Figure 3.18: Option C rendition of Block A, showing how it assists in detracting from the visual dominance of the existing pylon.

The design of the development was carefully considered to ensure the proposed residential blocks would integrate well with the site. The proposed residential blocks, landscape design and mature trees would create a high-quality attractive space, with a number of incidental breakout and play areas, kickabout spaces, and hard and soft landscaping features.

The proposed landscape was designed to create a sense of place, supporting the urban design layout in the creation of streetscapes and residential spaces. This design strategy aims to promote sociability, providing places for social interaction and the creation of a sense of community.

The proposed design provides for minimal use of retaining walls with the level changes addressed through the residential blocks, the access roads from White Pines South and the landscaping.

3.5.4.1 Option D: Pre-Planning Consultation with An Bord Pleanála

Option D was submitted to ABP for Pre-Planning Consultation in November 2020. A detailed response to each item raised in the Board's *Opinion* is set out in Sections 3 and 4 of this document.

An overview of the design amendments incorporated into the scheme design, in response to the items raised in the Board's *Opinion* is set out in Section 3.2.1 of this Report.

3.5.4.2 Ballycullen Oldcourt Local Area Plan (2014)

Consideration was also given to the indicative site layout design, as set out in Figure 5.6 of the *Ballycullen Oldcourt Local Area Plan (BOLAP)*, see Figure 3.19 below.



Figure 3.19: *BOLAP* - 2014 Fig. 5.6, Option A - Illustrated Layout for Plan Lands (Source: *BOLAP* (2014).)

As shown above, a number of the features from the *BOLAP*'s indicative design have been incorporated and enhanced in the final scheme design, e.g.;

- The *BOLAP* indicative layout shows an apartment building structure located to the west of the site, with houses/duplex units provided to the east, on the wider site.
- The indicative layout shows blocks orientated in a north/south and east/west orientation. Upon review of this indicative layout, it was considered that due to the sloping topography of the site, the units proposed in a north south orientation represented a much better design response to the site, when compared to the units positioned in an east west orientation. In addition to this, it was also noted that the units arranged in an east west orientation would also contain a high percentage of north facing units.
- The area to the west of the site is shown as a large area of open space. This concept has been taken on board and enhanced through the current scheme design. It is now proposed to provide a public square (including child play elements) in this location that links with the White Pines Retail development and leads onto the large area of open space proposed beneath the Wayleave. This space will provide an enhanced area of parkland open space that will tie the proposed development into the existing residential units at White Pines South. It is considered that the location of the large area of open space currently proposed beneath the wayleave offers an enhanced offering for existing and emerging residents, given its central location between the White Pines South and White Pines Central sites. In addition to this, it is also noted that the current scheme design also provides a link of tracks and trails, that connect



to the White Pines Masterplan site and surrounding area, providing meaningful pedestrian/cycle links to significant areas of open space within the White Pines Masterplan site and the wider area. For further information please refer to the *Landscape Architect's Report*, prepared by MA, submitted with this Application.

- The indicative layout in the *BOLAP* also shows two areas of open space surrounded on all sides by residential blocks. Upon review of this layout, it was concluded that given the sloping topography of the site, these areas would require extensive excavations and the substantial use of retaining walls to ensure a useable area of open space could be provided. In addition to this, it is also noted that given these areas are surrounded on all sides by residential dwellings, this would impact the level of direct sunlight received and therefore provide a poor amenity.
- The indicative Roads layout shown in the *BOLAP* has been incorporated and enhanced in the current scheme design. The current proposal has cut down on the percentage of hardstanding road required for the site, by utilising the road connections already provided at White Pines South. In addition, the indicative direct access shown in the north east of the site is now proposed as an emergency vehicle access, that will also provide pedestrian/cycle connections. It is noted that the removal of this primary vehicle entrance will significantly cut down on the no. of vehicle movements through the site, providing access to White Pines South, thereby creating a more pedestrian friendly development. In addition, the removal of this direct access has also facilitated the inclusion of a no. of landscape play features to the northeast boundary at Stocking Ave, which would not have been possible if the area provided direct vehicle access, given the potential for vehicle/pedestrian conflicts. For further information, please refer to the *Infrastructure Design Report*, prepared by DBFL.

3.5.5 Aesthetics of Surface Car Parking and Alternatives

The Board have sought '*further consideration of the aesthetic impact of surface level car parking, and whether there is potential for an alternative car parking arrangement in the development*'.

As detailed in Section 3.5.1 above, as part of the initial design options for the site, the provision of basement parking was considered. However, this option was discounted at an early stage, in part, due to the sloping topography of the site leading to significant engineering constraints and cost implications which made such a solution unviable. These are elaborated on below.

Given the site's sloping topography, the provision of basement access for underground parking would require substantially long ramps, to facilitate access. As such, the provision of access to basement parking was not possible without long ramps running through the site, which would have a detrimental impact on the wider proposal. In addition to this is, it is also noted that the provision of basement car parking would require the substantial use of retaining walls.



If basement access ramps were orientated in an east/west orientation, this would have a detrimental impact of the level of residential accommodation achievable on site, as a large portion to the lands appropriate for residential accommodation would be required for the provision of basement access.

Furthermore, if the provision of basement access ramps were orientated north south, this would have a detrimental impact on the site's pedestrian permeability, specifically the large area of open space proposed beneath the Wayleave, where substantial retaining walls would be required through the wayleave, to the detriment of pedestrian permeability.

In addition to the above, the provision of basement parking to serve the development was also not considered economically viable for a development of this scale.

Regarding the level of car parking proposed we direct the Board to the *Parking Strategy*, prepared by DBFL, submitted with the SHD Application. This document presents a detailed rationale behind the identification of the quantum of vehicle parking proposed, concluding;

"Taking all of the above factors, such as the characteristics of the development, the baseline low levels of car use in apartment developments in the area, the proposed mobility measures, the level of car ownership & usage as well the requirement for reduced car parking as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments, into account it is considered appropriate that a parking provision of 98 car parking spaces, including 6 no. mobility impaired spaces, (0.85 spaces per unit) for 114 residential apartment units are provided. Also, 10 no. e-Car parking spaces will be provided in accordance with the SDCC standards of 10% of overall parking requirement."

The amendments to the proposed scheme following the Tripartite Meeting have resulted in a net decrease in the requirement for car parking due to a reduction in the number of units proposed at Pre application stage. This fact, along with carefully considered landscaping, has resulted in a scheme with sensitively located surface car parking that does not detract from the aesthetic of the overall development.

In addition to the above, it is also worth noting that the recently completed White Pines South and White Pines North residential developments were both granted planning permission (see Section 3 of the *Planning Report* prepared by TPA), for residential developments with entirely on street shared car parking. It is therefore concluded that the provision of on-street shared car parking, as proposed as part of the current SHD application, is entirely appropriate for the site and is furthermore in accordance with the pattern of residential development for the area.

3.5.6 Quality of Detailed Building Design / Material Use.

The scheme provides an exemplary modern design to complete the White Pines Master Plan site. For a comprehensive architectural assessment of the detailed building design and



materials proposed, please refer to Section 4 of the *Architectural Design Statement*, prepared by RAU.

3.5.7 Photomontages, CGIs and a Landscape Visual Impact Assessment

Regarding the provision of Photomontages, CGIs and a Landscape Visual Impact Assessment we direct the Board to Chapter 9 of the *EIAR* which provides a Landscape and Visual Impact Assessment of the site. In addition to this we further direct the Board to the *Photomontages, CGIs* prepared by 3DDB submitted with this Application.



4.0 REQUEST FOR SPECIFIC INFORMATION

In addition to the item raised in Section 3 of this *Response*, the Boards Opinion requested the submission of additional information.

4.1 Request no. 1 – Compliance with Phasing Strategy of the *BOLAP 2014*

The Board requested:

“Additional details relating to compliance, or otherwise, with site specific requirements, phasing requirements and other relevant objectives as set out in the Ballycullen – Oldcourt Local Area Plan, 2014 (as amended 2017) and the South Dublin County Council Development Plan 2016-2022. The prospective applicant should satisfy themselves in relation to whether the proposed development represents a material contravention of the Local Area Plan and/or Development Plan and satisfy the subsequent submission requirements in relation to this.”

4.1.1 Applicant Response

We direct the Board to Section 5.4 of the *Statement of Consistency*, prepared by TPA. This section of the report provides a detailed assessment of the proposed development’s compliance with the phasing strategy set out in *the Ballycullen Oldcourt Local Area Plan (BOLAP) 2014*.

However, for the purposes of this planning application, the Applicant has identified aspects of the proposed development that may be considered a material contravention in this document.

Potential material contraventions with the *South Dublin County Council Development Plan (SDCCDP 2016-2022)* and the *BOLAP (2014)* are identified in the *Material Contravention Statement*, prepared by TPA. This document provides a justification for the Material Contravention of the provisions of the *SDCCDP 2016-22 and BOLAP (2014)*.

Ultimately, it is a matter for An Bord Pleanála (ABP), to determine whether the proposed development in fact materially contravenes the relevant Development Plan/Local Area Plan.

4.2 ABP Request no. 2 - Housing Quality Assessment

The Board requested:

“Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development. As well as associated details and

cross section drawings of any proposed retaining walls. Any potential resultant impacts from site excavation should also be given comprehensive consideration.”

4.2.1 Applicant Response

We direct the Board to the Architectural Drawing pack prepared by RAU. In addition, we further direct the board to Section 4 of the Architectural Design Statement, detailing the architectural considerations on how the site layout has influenced the final design. We further direct the Board to Section 2 of the Response to ABP Opinion, prepared by TPA.

The use of retaining walls has been minimised throughout the scheme design. For a comprehensive breakdown of the use of retaining walls, please refer to Section 4.7 of the Architectural Design Statement prepared by RAU.



Figure 4.2: CGI Showing the proposed development’s relationship to the existing White Pines South

4.3 ABP Request no. 3 – Separation Distances

The Board requested:

“A plan showing separation distances between the development to existing adjacent properties should also be included, annotating key distances to boundaries, buildings and windows.”

4.3.1 Applicant Response

We direct the Board to the Proposed Site Plan Drawing no. P18-153D_3.1_002, prepared by RAU, detailing the key distances from the proposed development to adjacent properties.

In addition to the above, Section 4.1 of the Design Statement provides a detailed assessment of the separation distances between the proposed residential blocks and to the surrounding area.

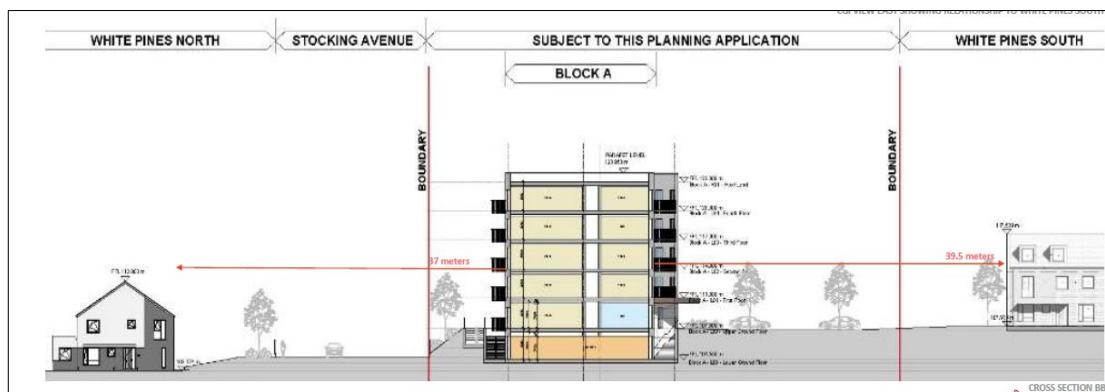


Figure 4.2: Separation distances with Existing Residential Properties (Source: RAU *Design Statement* p. 64.) Please note that this section illustrates the separation distances at the most proximate points to the units in White Pine North and White Pines South.

It is further noted in Section 5.3.15 of the *Statement of Consistency*, prepared by TPA, that these distances are in accordance with *South Dublin County Council Development Plan 2016-22 Housing Policy 9*, requiring;

“new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved.”

The proposed development maintains a distance of greater than 35m to any of the existing adjoining residential development.

4.4 ABP Request no. 4 – Proximity to Site Boundary

The Board requested:

“Additional details and/or revised proposals in relation to the proximity of the development to the south east boundary, and related potential impact upon the future development potential of adjacent lands.”

4.4.1 Applicant Response



We direct the Board to Section 4.7 (page 108) of the *Architectural Design Statement* prepared by RAU, which provides a comprehensive assessment of the ‘*proximity of the development to the south east boundary, and related potential impact upon the future development potential of adjacent lands*’.

That document demonstrates that the distances provided from the proposed development to the boundary will not prevent any future development to the east of the subject site as they are in excess of the 11 / 22 meter requirement for overlooking and privacy should an adjoining development run back to back apartment/housing units in this location.

4.5 ABP Request no. 5 – Ground Floor Uses

The Board requested:

“Additional details and/or revised proposals in relation to the quality of ground floor uses, entrance details and access to cycle storage, within Block A.”

4.5.1 Applicant Response

In response to the above, we direct the Board to Section 4.7 (pages 109-113) of the *Architectural Design Statement* prepared by RAU, which provides details on the quality of ground floor uses, and the entrance details, including details and access to cycle storage for Block A and the wider development, and the Ground Floor Strategy.

4.6 ABP Request no. 6 – Materials and Finishes

The Board requested;

“Additional details and/or revised proposals in relation to the proposed material palette for the proposed development. Details shall be described in a building life cycle report in accordance with section 6.3 of the ‘Sustainable Urban housing: Design Standards for New Apartments (2018)’. Details should include the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.”

4.6.1 Applicant Response

In response to the above we direct the Board to the following documents that accompany this Application:



Section 4.4 of the *Architectural Design Statement* prepared by RAU, provides details on the material palette for the proposed development.

We further direct the Board to the *Building and Lifecycle Report*, prepared by OCSC, which has been prepared in accordance with Section 6.3 of the *Sustainable Urban housing: Design Standards for New Apartments (2020)*.

Regarding the proposed landscape finishes, we direct the Board to the *Landscape Report, Planting Schedule, Outline Maintenance Specification and Outline Softworks Specification*, prepared by Mitchell & Associates Landscape Architects.

4.7 ABP Request no. 7 – Housing Quality Assessment

The Board requested:

“A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines. All documentation should be cross referenced to ensure reference to the correct number of units and breakdown of unit type.”

4.7.1 Applicant Response

A *Housing Quality Assessment (HQA)* has been provided RAU and is included with this planning application. The *HQA* provides detailed information on each residential unit proposed as part of the development, confirming that all residential units are designed in accordance with the requirements of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)*. The *HQA* confirms that 86 no. units (c. 75%) are provide as true dual-aspect., with additional enhanced features provided to some units which are not included within the dual aspect figures.

4.8 ABP Request no. 8– Daylight, Sunlight and Overshadowing

The Board requested:

“Submission of a comprehensive Daylight, Sunlight and Overshadowing Assessment providing analysis of both the proposed accommodation and any potential impact upon surrounding dwellings/amenity spaces. Analysis should consider whether all windows/rooms on the lower floor level meet target BRE values, before any assumption on the results for upper floor levels is made.”



4.8.1 Applicant Response

In response to the above, a *Sunlight Daylight and Shadowing Analysis* has been prepared by OCSC Consulting Engineers, submitted with this Application. This provides a quantitative assessment of all residential units proposed, in accordance with Section 3.2 of the *Urban Development and Building Heights Guidelines for Planning Authorities 2018*.

The report confirms c.100% compliance rate has been achieved across the development in relation to internal daylight levels. The Report confirms, all units not only meet but in the majority of cases exceed the Average Daylight Factor recommended in the BRE Guidelines.

In addition, the Report also shows that the proposed development has negligible daylight or sunlight impact on any of the surrounding properties.

Finally, the overshadowing assessment has shown that negligible impact will be perceived by any of the surrounding open spaces.

4.9 ABP Request no. 9 – Tree/Hedge Removal

The Board requested;

“Proposals for appropriate mitigation of tree/hedge removal should be considered.”

4.9.1 Applicant Response

We direct the Board to the Landscape Architects Report, prepared by MA detailing how the schemes design seeks to retain trees/hedges, where possible.

In addition to the above we further refer the Board to the Landscape Masterplan (Drawing Ref L-XX-XX-DR-L-0100) and Landscape Architects Report, prepared by MA. As detailed in Section 6.0 of the Report, one of the key Design Objectives for the proposed landscape layout is;

“To retain existing trees and hedgerows where possible so that the scheme has an appropriate degree of maturity from the outset.”

4.10 ABP Request no. 10 – Landscape Design

The Board requested:



“Additional details and/or revised proposals in relation to landscape design having regard to comments from the Planning Authority. A plan of landscape proposals clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.”

4.10.1 Applicant Response

In response to the above, we direct the Board to the Landscape Architects Report, prepared by MA. Section 7.0 of the report provides the following Response;

“We have worked closely with SDCC Parks Department to provide less formal and more natural playing environments in line with their new requirements. Rather than providing fenced in flat play spaces with manufactured play equipment it is now preferred to have more free-flowing meandering play areas. These play spaces include incidental play opportunities to allow for social, imaginative and risk play that are incorporated into the landscapes contours and include mounding and tree planting. We also understand that a high quality play space is required and that tree logs lying on the ground is not what SDCC’s or our interpretation of what natural play is. The play-ground will cater for toddlers to teenagers and comprise of formal play equipment of natural materials.”

Section 7.0 of the Report also provides a detailed breakdown of the quantum of proposed Public Open Space, confirming;

“The overall aim of the landscape design is to create a high quality attractive environment with amenity facilities for the residents of the proposed residential development. The following design objectives have been shaped through consultations with South Dublin County Council and An Bord Pleanála.

- *To create a high quality attractive environment with amenity facilities for the proposed residents. We are providing 4369m² public open space (20.1%), 1521m² of visual amenity (7%) and 3955m² of further usable public open space in the wayleave of the overhead power lines (18.2%). See page 17 for detailed breakdown.....”*

It is important to note that the formal public open space is above the requirements of the BOLAP, but the development also gains significant benefits from the additional space located under the power lines (which is not in the open space calculation).

For further information, please refer to the *Landscape Masterplan* and *Landscape Architects Report*, prepared by MA.



4.11 ABP Request no. 11 – Flood Risk and Drainage

The Board requested:

“Additional details and/or revised proposals in relation to attenuation/SUDs, Flood Risk, and any other matters raised by the Drainage and Water Supply Section of the Planning Authority.”

4.11.1 Applicant Response

In response to the above, we direct the Board to Section 3.2.6 of the *Infrastructure Design Report*, prepared by DBFL, which addressed SuDS measures in detail.

4.12 ABP Request no. 12 – Access Arrangements

The Board requested;

“Additional details and/or revised proposals in relation to access arrangements, and any other matters raised by the Roads Department of the Planning Authority.”

4.12.1 Applicant Response

In response to the above, we direct the Board to Section 4.2 of the *Traffic and Transport Assessment Report*, prepared by DBFL, which addressed all matters raised by the Roads Department of the Planning Authority during Pre-Application Consultation.

Furthermore, the site benefits from 4 no. of pedestrian links to Stocking Avenue along its northern frontage. These will play a vital part in connecting the entire White Pines Masterplan area.

4.13 ABP Request no. 13 – Childcare Demand Assessment

The Board requested;

“The Childcare Demand Assessment should reflect the most current data available at the time of submission in relation to surrounding existing childcare provision; Or describe the proposed solution for meeting childcare demand generated by the development, alongside cumulative demand within the White Pines development area.”



4.13.1 Applicant Response

In response to the above, we direct the Board to the *Childcare Demand Assessment*, prepared by TPA. Section 5.1 of that Report provides the following response;

“In order to determine the current levels of childcare provision in the Ballycullen study area, an independent childcare capacity audit of existing facilities was conducted by TPA in April 2021 for a study area comprising a c. 1.5km radius from the subject site (see Figure 5.1). A total of 27 No. operational facilities were identified in the area using the latest Tusla Early Years Inspectorate data¹⁶ which could be accessed from the site within a 10-minute drive time (c. 1.5km radius) as indicated in Table 5.3 overleaf.

Where the inspection reports on record were more than 2 years old (i.e., published before 2019), an e-mail/telephone survey was undertaken by TPA in April 2021 in an effort to determine current enrolment figures. We note that where current capacity could not be determined, the most recent Tusla Inspection figures were used. The final survey figures used to estimate local capacity are summarised in Table 5.3, which reflect ‘business as usual’ levels of childcare service unless otherwise noted, as the previous nationwide COVID-19 restrictions in place for childcare services were lifted in March 2021. Full details of the audit methodology are included in Appendix A for reference.”



5.0 PRESCRIBED BODIES TO BE NOTIFIED

Lastly, the Board's *Opinion* sets out a list of prescribed bodies, to be notified, in accordance with article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, in the event of making an application.

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

1. *Irish Water*
2. *The Department of Culture, Heritage and the Gaeltacht*
3. *The Heritage Council*
4. *An Taisce*
5. *Transport Infrastructure Ireland*
6. *National Transport Authority*
7. *South Dublin Childcare Committee”*

5.1 Applicant Response

We confirm that the relevant authorities identified in the pre-application consultation opinion from An Bord Pleanála have been notified of the submission of the planning application in accordance with article 285(5)(a) of the *Planning and Development (Strategic Housing Development) Regulations 2017*.

A copy of the letter issued to the following authorities is included in Appendix 2 of this report;

1. Irish Water
2. The Department of Culture, Heritage and the Gaeltacht
3. The Heritage Council
4. An Taisce
5. Transport Infrastructure Ireland
6. National Transport Authority
7. South Dublin Childcare Committee



6.0 CONCLUSION

This document indicates how the items outlined in the Pre-Application Consultation Opinion from An Bord Pleanála in relation to the proposed residential development, presented in November 2020, have been addressed in full by the Applicant and design team prior to lodgement of this SHD planning application to An Bord Pleanála.

The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the planning submission documentation.

The relevant authorities identified in the Pre-Application Consultation Opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the *Planning and Development (Housing) and Residential Tenancies Act 2016*.

It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.

Should you have any questions on any aspect of the proposed development, please do not hesitate to contact us.

Yours faithfully

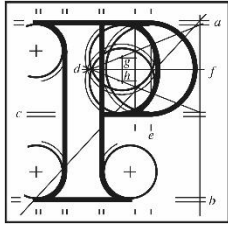
Gavin Lawlor

Director

Tom Phillips + Associates



APPENDIX 1 – ABP OPINION



An
Bord
Pleanála

**Case Reference:
ABP-308642-20**

Planning and Development (Housing) and Residential Tenancies Act 2016
Notice of Pre-Application Consultation Opinion

Proposed Development: 137 no. apartments / duplexes (6 no. studio, 52 no. 1 bed, 50 no. 2 bed and 29 no. 3 bed) in 6 no. blocks ranging in height from 3 to 8 storeys.

Land North [sic] of Stocking Avenue, Woodtown, Ballycullen, Dublin 16.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Design Strategy

Further consideration of the documents as they relate to the design and layout of the proposed development is required. Consideration is required as to how the proposed design has been influenced by the best practice design principles of the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas

(including the associated Urban Design Manual)' and criteria within the 'Urban Development and Building Heights - Guidelines for Planning Authorities', particularly in relation to addressing the street, contribution to the urban neighbourhood and streetscape, and the quality of detailed building design / material use. Further consideration of the principles or criteria described under these guidance documents may require amendment to the design proposals submitted. As part of this, further consideration is also required of the aesthetic impact of surface level car parking, and whether there is potential for an alternative car parking arrangement in the development. Photomontages, CGIs and a Landscape Visual Impact Assessment alongside verified views, will be required to accurately illustrate the appearance of the proposed development.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Additional details relating to compliance, or otherwise, with site specific requirements, phasing requirements and other relevant objectives as set out in the Ballycullen – Oldcourt Local Area Plan, 2014 (as amended 2017) and the South Dublin County Council Development Plan 2016-2022. The prospective applicant should satisfy themselves in relation to whether the proposed development represents a material contravention of the Local Area Plan and/or Development Plan and satisfy the subsequent submission requirements in relation to this.
2. Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development. As well as associated details and cross section drawings of any proposed retaining walls. Any potential

resultant impacts from site excavation should also be given comprehensive consideration.

3. A plan showing separation distances between the development to existing adjacent properties should also be included, annotating key distances to boundaries, buildings and windows.
4. Additional details and/or revised proposals in relation to the proximity of the development to the south east boundary, and related potential impact upon the future development potential of adjacent lands.
5. Additional details and/or revised proposals in relation to the quality of ground floor uses, entrance details and access to cycle storage, within Block A.
6. Additional details and/or revised proposals in relation to the proposed material palette for the proposed development. Details shall be described in a building life cycle report in accordance with section 6.3 of the 'Sustainable Urban housing: Design Standards for New Apartments (2018)'. Details should include the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.
7. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development. Those windows considered to have a dual aspect should be clearly indicated. In relation to single aspect north-facing units, reference should be had to paragraph 3.18 of the 2018 Apartment Guidelines. All documentation should be cross referenced to ensure reference to the correct number of units and breakdown of unit type.

8. Submission of a comprehensive Daylight, Sunlight and Overshadowing Assessment providing analysis of both the proposed accommodation and any potential impact upon surrounding dwellings/amenity spaces. Analysis should consider whether all windows/rooms on the lower floor level meet target BRE values, before any assumption on the results for upper floor levels is made.
9. Proposals for appropriate mitigation of tree/hedge removal should be considered.
10. Additional details and/or revised proposals in relation to landscape design having regard to comments from the Planning Authority. A plan of landscape proposals clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.
11. Additional details and/or revised proposals in relation to attenuation/SUDs, Flood Risk, and any other matters raised by the Drainage and Water Supply Section of the Planning Authority.
12. Additional details and/or revised proposals in relation to access arrangements, and any other matters raised by the Roads Department of the Planning Authority.
13. The Childcare Demand Assessment should reflect the most current data available at the time of submission in relation to surrounding existing childcare provision; Or describe the proposed solution for meeting childcare demand generated by the development, alongside cumulative demand within the White Pines development area.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that

the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. The Department of Culture, Heritage and the Gaeltacht
2. The Heritage Council
3. An Taisce
4. Irish Water
5. Transport Infrastructure Ireland
6. National Transport Authority
7. South Dublin Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Rachel Kenny

Director of Planning

February, 2021



APPENDIX 2 – LETTERS TO PRESCRIBED BODIES

Gosia O'Sullivan
Spatial Planning Specialist
Irish Water
Colvill House
24-26 Talbot Street
Dublin 1

Wednesday, 2nd June 2021

Dear Gosia,

RE: STRATEGIC HOUSING DEVELOPMENT (SHD) AT A SITE KNOWN AS WHITE PINES CENTRAL, LANDS NORTH OF STOCKING AVENUE, DUBLIN 16

1.0 INTRODUCTION

On behalf of the applicant Ardstone Homes Limited¹ (Ardstone Capital Limited), please find the enclosed Strategic Housing Development (SHD) planning application for the above referenced proposal, submitted to An Bord Pleanála in accordance with Section 5 *Planning and Development (Housing) and Residential Tenancies Act, 2016* ('the 2016 Act').

The application is made following Pre-Application Consultation and the receipt of a Notice of Pre-Application Consultation Opinion (ABP Ref. ABP-308642-20) issued by An Bord Pleanála on 22nd February 2021.

Under article 285(5)(a) of the *Planning and Development (Strategic Housing Development) Regulations 2017*, we have been instructed by An Bord Pleanála to inform you of the aforementioned planning application in accordance with section 8(1)(b) of the *Planning and Development (Housing) and Residential Tenancies Act 2016*.

2.0 SUMMARY OF DEVELOPMENT

In summary, the development will consist of:

The development consists of the following;

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- *Block A is a part 6 part 4 storey apartment block comprising 47 No. 1 and 2 bed units;*
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¹No. 48 Fitzwilliam Square, Dublin 2, D02 EF89.



- Block C2 is a 3 storey duplex block comprising 19 No. 1, 2 and 3 bed units;
- Block D is a 3 storey duplex block comprising 18 No. 2 and 3 bed units; and
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The proposed development will also consist of the provision of: 110 sqm residential amenity space in the lower ground floor of Block A; waste storage facilities; 98 No. car parking spaces and 198 No. bicycle parking spaces; boundary treatments and street lighting; the provision of Sustainable Urban Drainage systems (SUDs); 1 No. ESB substation; plant and switch rooms and all ancillary works and services necessary to facilitate construction and operation; changes in levels across the site; associated hard and soft landscaping; and all other associated site excavation; and infrastructural and site development works above and below ground. The development will be served by a vehicular access from Stocking Avenue via White Pines South on the western side of the site.”

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Please do not hesitate to contact us if you require any further information.

Yours faithfully

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Gavin Lawlor
Director
Tom Phillips + Associates

Connor Rooney
Development Applications Unit
Department of Culture, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

Wednesday 2nd June 2021

Dear Mr Rooney,

RE: STRATEGIC HOUSING DEVELOPMENT (SHD) AT A SITE KNOWN AS WHITE PINES CENTRAL, LANDS NORTH OF STOCKING AVENUE, DUBLIN 16

1.0 INTRODUCTION

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Gavin Lawlor
Director
Tom Phillips + Associates

Alison Harvey,
Heritage Council,
Church lane,
Kilkenny,
R95 X264

Wednesday 2nd June 2021

Dear Ms. Harvey,

RE: STRATEGIC HOUSING DEVELOPMENT (SHD) AT A SITE KNOWN AS WHITE PINES CENTRAL, LANDS NORTH OF STOCKING AVENUE, DUBLIN 16

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Please do not hesitate to contact us if you require any further information.

Yours faithfully

Gavin Lawlor
Director
Tom Phillips + Associates

An Taisce – The National Trust for Ireland,
Tailors Hall,
Back Lane,
Dublin 8,
D08 X2A3

Wednesday 2nd June 2021

Dear Sir/Madam,

RE: STRATEGIC HOUSING DEVELOPMENT (SHD) AT A SITE KNOWN AS WHITE PINES CENTRAL, LANDS NORTH OF STOCKING AVENUE, DUBLIN 16

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Yours faithfully

Gavin Lawlor
Director
Tom Phillips + Associates

Olivia Morgan
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10

Wednesday 2nd June 2021

Dear Ms. Morgan,

RE: STRATEGIC HOUSING DEVELOPMENT (SHD) AT A SITE KNOWN AS WHITE PINES CENTRAL, LANDS NORTH OF STOCKING AVENUE, DUBLIN 16

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Gavin Lawlor
Director
Tom Phillips + Associates

David O’Sullivan
National Transport Authority
Floor 4
Dún Scéine
Iveagh Court
Harcourt Lane
Dublin 2

Wednesday 2nd June 2021

Dear Mr. O’Sullivan,

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Gavin Lawlor
Director
Tom Phillips + Associates

Marie Dowdall
South Dublin Childcare Committee
C6 Clondalkin Civic Offices
Ninth Lock Road
Clondalkin,
Dublin 22

Wednesday 2nd June 2021

Dear Ms. Dowdall,

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The proposed development will also consist of the provision of: 110 sqm residential amenity space in the lower ground floor of Block A; waste storage facilities; 98 No. car parking spaces and 198 No. bicycle parking spaces; boundary treatments and street lighting; the provision of Sustainable Urban Drainage systems (SUDs); 1 No. ESB substation; plant and switch rooms and all ancillary works and services necessary to facilitate construction and operation; changes in levels across the site; associated hard and soft landscaping; and all other associated site excavation; and infrastructural and site development works above and below ground. The development will be served by a vehicular access from Stocking Avenue via White Pines South on the western side of the site.”

3.0 SUBMISSION PROCEDURE

Any person may, within the period of 5 weeks beginning on the date of receipt by An Bord Pleanála of the application and on payment of the prescribed fee of €20 (except for certain prescribed bodies), make a submission or observations in writing to An Bord Pleanála, 64 Marlborough Street, Dublin 1, relating to the implications of the proposed development, if carried out, for proper planning and sustainable development in the area or areas concerned, and the likely effects on the environment or the likely effects on a European site, as the case may be, of the proposed development, if carried out. Submissions or observations duly made will be considered by An Bord Pleanála in making a decision on the application. Such submissions or observations must also include the following information:

- a) the name of the person, authority or body making the submission or observations, the name of the person, if any, acting on behalf of that person, authority or body, and the address to which any correspondence relating to the application should be sent,
- b) the subject matter of the submission or observations, and
- c) the reasons, considerations and arguments on which the submission or observations is or are based.

An Bord Pleanála may grant permission for the strategic housing development as proposed; or may grant permission subject to such modifications as it specifies in its decision; or may grant permission in part only, with or without any other modifications it may specify in its decision; or may refuse to grant permission for the proposed development. An Bord Pleanála may attach to a grant of permission such conditions as it considers appropriate.

Please note that the application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

A copy of the application may also be inspected online at the following website set up by the applicant: www.whitepinescentralshd.ie



Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100).

Please do not hesitate to contact us if you require any further information.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Gavin Lawlor', is written above a horizontal line.

Gavin Lawlor
Director
Tom Phillips + Associates