



RESPONSE TO AN BORD PLEANÁLA OPINION

Knockrabo Phase 2 Strategic Housing Development (SHD)

LANDS AT MOUNT
ANVILLE ROAD, DUBLIN
14

PREPARED FOR:

KNOCKRABO INVESTMENTS DAC

PREPARED BY:

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REF: ABP-309990-21

OCTOBER 2021

TOWN PLANNING CONSULTANTS



TABLE OF CONTENTS

1.0	INTRODUCTION.....	2
2.0	SPECIFIC INFORMATION REQUESTED	2
2.1	Item No. 1	3
2.2	Item No. 2	4
2.3	Item No. 3	4
2.4	Item No. 4	9
2.5	Item No. 5	9
2.6	Item No. 6	10
2.7	Item No. 7	11
2.8	Item No. 8	11
2.9	Item No. 9	11
2.10	Item No. 10	12
3.0	NOTIFICATION TO PRESCRIBED BODIES.....	12
	APPENDIX 1 – Copy of Minutes from Tripartite Meeting, Inspectors Report and Bord Opinion, DL RCC CEO Report.....	14
	APPENDIX 2 – Copy of Notifications to Prescribed Bodies	15



An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

29th October 2020

Dear Sir/Madam

RE: RESPONSE TO AN BORD PLEANÁLA OPINION (REF: ABP-309990-21)

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants have prepared this *Response to the Notice of Pre-Application Consultation Opinion of An Bord Pleanála* (Opinion issued 3th September 2021) regarding the proposed strategic housing development of lands at Mount Anville Road, Dublin 14 (see ABP Ref: ABP-309990-21). This *Response*, made on behalf of Knockrabo Investments DAC, has been prepared under Article 285(5)(b) of the *Planning and Development (Strategic Housing Development) Regulations 2017* in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

The Board's Opinion contains 10 no. items that require the submission of specific information. Our Response to each specified information request raised is set out below and cross referenced to the relevant technical reports and other material, as required. All reports and assessments have been updated, as relevant, to reflect the matters raised in the *Opinion*. This Response together with all referenced relevant reports should be deemed the "Response to the Opinion" and read together as one.

2.0 SPECIFIC INFORMATION REQUESTED

The Opinion states that "*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 constitute a reasonable basis for an application for strategic housing 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."

In total, 10 no. specific information requests are set out in the Opinion and referenced below. For the purpose of this Response each item is numbered to reflect the numbering and information request as set out in the Opinion.



2.1 Item No. 1

Item 1 of the *Specific Information Requested* requires:

'Further justification, and where appropriate amendment/omission, for the provision of proposed Block E within the site, having regard to the concerns of the Planning Authority as expressed at the Tri-Partite Meeting and as set out in ABP-309990-21 Pre-Application Consultation Opinion Page 2 of 4 the Planning Authority's submission on this proposal, including that as set out within the report of the Conservation Officer.'

Applicants Response to Item No. 1

Please refer to Response to Item No. 1 prepared by OMP Architects which is contained within the Architectural Design Statement, Pages 60 to 63.

The design statement re-iterates the role of Block E within the site strategy on pages 37- 42 of the document.

To Summarise, the main justification for Block E is as follows;

- *Demarcation of the entrance to the avenue created by Knockrabo Way,*
- *Definition of the public open space at the entrance to the site, to the west of Knockrabo Way, which contains a mature oak tree,*
- *Provision of passive supervision of the public open space to the front of Cedar Mount house, which would otherwise be a large open space, with only small-scale buildings on its perimeter to provide passive supervision.*

The applicant also re-iterated their view that the distances between the protected structures and Block E are appropriate, particularly when combined with the screening effect of both existing mature trees, and proposed planting.

The applicant has retained many mature, high-quality trees within a generous provision of 22.4% of public open space within the overall Knockrabo lands, and strongly advocates the position that the location and design of Block E are appropriate and contribute positively to the placemaking of the scheme and achievement of appropriate density levels on valuable urban land. To support this argument, the applicant has prepared additional Visualisations, which show Block E from all angles.

The applicant also re-iterated their view that the distances between the protected structures and Block E are appropriate, particularly when combined with the screening effect of both existing mature trees, and proposed planting.

Please refer to the Photomontage and CGI report prepared by Modelworks for Knockrabo Phase 2, where Block E is shown in extensive detail through photomontages and CGI visualisations.



2.2 Item No. 2

Item 2 of the *Specific Information Requested* requires:

'Justification, and where appropriate amendment, to demonstrate that the proposed car parking quantity is appropriate, having regard to local, regional and national policy on same. In addition, it should be demonstrated road and pedestrian layouts, including footpath provision, permeability, design and materiality of the different street types within the street hierarchy complies with DMURS. To this end, matters raised in at the Tri-Partite Meeting and as set out in the Planning Authority's submission on this proposal, including that as set out within the Transportation report should be addressed in any report/justification relating to the outlined transport issues.'

Applicants Response to Item No. 2

Justification for the proposed car parking quantity, having regard to local, regional, and national policy on same, are detailed in the engineering submission traffic and transport assessment report (TTA).

Road and pedestrian layouts, including footpath provision, permeability, design, and materials of the street types within the street hierarchy demonstrates compliance with DMURS, as detailed within the DMURS statement of design consistency within the engineering assessment report (EAR).

Similarly, all matters raised in at the Tri-partite meeting and as set out within the Transportation report are addressed in the engineering submission reports, namely the above referenced Engineering Assessment Report (EAR) and Traffic and Transport Assessment (TTA), as well as the Travel Plan Report. (See Appendix 1 for copy of Tripartite Minutes, ABP Inspectors Report, Bord Opinion and Copy of DLRCC CEO Report)

The Architectural Design Statement prepared by OMP responds to Item No. 2 on Pages 64 and 65. Specifically the OMP response describes the reasoning for the preferred roads network layout, which in the design teams opinion is the most efficient layout for the steep gradients on the site.

In addition, following a meeting with DLRCC, the pedestrian footpath network was amended to include further pedestrian routes along desire lines. These routes are indicated on the Landscape Plans prepared by Dermot Foley Landscape Architects and within the Architectural Design Statement.

2.3 Item No. 3

Item 3 of the *Specific Information Requested* requires:

'A report (or reports) that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to an



amended daylight/sunlight/overshadowing analysis, overlooking, visual impact and noise. The report(s) shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development. The daylight/sunlight/overshadowing analysis shall have regard to the requirements of 'Building Research Establishment (BRE) Report 209 "Site Layout Planning for Daylight and Sunlight – a guide to good practice, 2nd Edition, 2011' and BS8206

– Part 2: 2008 Code of Practice for Daylighting, where applicable, and in relation to surrounding developments, should include a detailed analysis of all dwellings and amenity spaces with the potential to be impacted by the proposed development.'

Applicants Response to Item No. 3

Complete technical assessments regarding Sunlight/Daylight and Overshadowing, Visual Impact and Noise have been prepared to respond to any concern regarding residential amenity. This provides a detailed analysis of all dwellings and amenity spaces with the potential to be impacted by the proposed development, including surrounding developments.

The Daylight, Sunlight and Overshadowing Study prepared by IES concludes that the overall proposed development will provide an excellent level of residential amenity for both existing and new residents.

In Conclusion the report states;

'This study considers the proposed scheme and the impact it will have on existing neighbouring dwellings adjacent to the development site. The BRE Guide states that if the VSC results are greater than either 27% or 0.8 times their former value (that of the existing situation) there will be negligible impact on the existing adjacent properties. Of the 45 points tested 96% (43 points) comply with the BRE recommendations.

Therefore the proposed development will have a negligible adverse impact on the adjacent buildings outside of the wider development.

For the adjacent Blocks A, B, C and D in Knockrabo Phase 1 which are a part of the wider development, an ADF analysis was undertaken to determine the impact the proposed development has on these blocks. The BRE guide states that 'Use of the ADF for loss of light to existing buildings is not generally recommended. However, there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criterion for loss of light:

"Point F8 (i) 'where the existing building is one of a series of new buildings that are being built one after the other, and each building has been designed as part of a larger group."

As such, since the construction details for the Knockrabo Phase 1 (Plans, Elevations & Sections) were available and are part of the wider development, ADF calculations were generated for the neighboring development with the proposed scheme in place.



The proposed development has no impact on the apartment units tested in Block A & B which continue to exceed the BRE guidelines for internal daylighting. The proposed development has a negligible adverse impact on the existing units in Block C & D as only 1 room out of 42 rooms tested has a resultant ADF below the BRE recommended guidelines with the proposed development in place.

11.2 Shadow Analysis

Taking all of the above into account, the overall impact of overshadowing can be classed as a minor adverse impact, especially since the permitted development is Phase 1 of the Knockrabo development.

11.3 Sunlight to Existing and Proposed Amenity Spaces

As outlined in Section 3.3.17 of the BRE Guide, for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on the 21st of March.

Existing Gardens Adjacent to the Proposed Development

On the 21st of March, the existing gardens will continue to receive the same amount of sunlight even with the proposed development, thus complying with BRE guidelines.

Permitted Amenity Areas Adjacent to the Proposed Development

On the 21st of March, the permitted amenity areas with the proposed development in place will continue to receive over 2 hours of sunlight on at least 63% of their former value, thus exceeding BRE recommendations.

Proposed Amenity Areas

On the 21st of March, the proposed private communal amenity spaces within the development will receive over 2 hours of sunlight on 91% of their combined area, thus exceeding BRE recommendations.

On the 21st of March, the proposed public amenity spaces within the development will receive over 2 hours of sunlight on 99% of their combined area, thus exceeding BRE recommendations.

Overall, all amenity spaces assessed comply with BRE recommendations.'

The Noise and Vibration Assessment Report prepared by AWN concludes on Pg. 28 as follows;

'An initial site noise risk assessment has been carried out on the proposed Phase 2 residential development at Knockrabo, Mt. Anville Road, Dublin 14. The future noise environment with the proposed Dublin Eastern By-Pass (DEBP) in operation has been determined through modelling. This assessment has classified the development site as having a range of noise risks associated ranging from low to high risk.

Subsequent to the noise risk assessment a full Acoustic Design Statement has also been prepared to discuss how good acoustic design practice has been implemented. This document presents further discussion of the likely noise impact of both the external and internal areas of the proposed development.

It has been determined that mitigation measures in the form of boundary treatments to the external amenity spaces and façade treatments to development buildings will be required for the development. Furthermore, Winter Gardens have been provided to the facades most exposed to noise from the proposed DEBP. In addition, it will be necessary to provide enhanced acoustic glazing to the other façade elevations to ensure that when windows are closed that the internal noise environment is good. The specifications for all acoustic glazing have been provided in the body of this report. It is also proposed to provide mechanical ventilation to the development units which removes the need for any passive wall or window vents and effectively mitigates any noise intrusion via the ventilation path.

In conclusion, there are no building regulations that require new developments to achieve a certain level of noise insulation from external sources. However, for this development the site was identified as potentially being exposed to elevated noise levels due to the operation of the proposed DEBP road scheme. As a result, this report has provided specifications and design advice to the developer to ensure that the internal noise environment within the development buildings is fully compliant with best practice standards. This also ensures compliance with the requirements of the local Dublin Agglomeration Noise Action Plan document.'

A Landscape and Visual Impact Assessment has been prepared by Dermot Foley Landscape Architects. It concludes as follows;

'It is considered the initial development will have a significant effect on the existing predominantly overgrown character of the site. The landscape and visual change will be most pronounced during the mobilisation and construction stage, when activity is unfamiliar and when the existing character of the lands is altered by the removal of excess ground material and vegetation. The changes arising from the initial site development and construction works will have moderate negative landscape and



visual effects, predominantly from the east and north, due to the visual enclosure of the site.

The proposed development provides for a positive, detailed, site-specific response to site and local context. The open space network provides for an attractive and diverse range of amenity and recreational opportunities, designed to link and integrate seamlessly with the existing high quality Knockrabo Phase 1 development adjacent.

Equally the open space network enhances the strong urban design framework for the site. Existing development in Phase 1, Knockrabo, and in Ardilea Crescent has laid down a high-quality precedent which the proposed development will consolidate. As a whole the proposed development will make a significant contribution to the townscape of the wider area and the future context of the surrounding lands.

Likewise, the proposed network of open spaces will make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities for the future residents of the development.

The magnitude of change which would result from the proposed development is medium. It would introduce buildings to the site, however not necessarily uncharacteristic or inappropriate in the context. The character of the landscape would thus be altered by the development, but the area in which this would be experienced would be somewhat limited by the visual enclosure of the site and would be predominantly limited to the existing Knockrabo Phase 1 development immediately east of the subject site and to the north of the site.

Except for the views from the immediate environs of the site, particularly along Mount Anville Road and the existing open space northeast of the subject site, the proposed development will have slight to no impact. The proposed development would create a visual intrusion in short distance views, but not inappropriately or uncharacteristic in the context. The design of the buildings and open space are of a high quality and would be a well considered continuation and follow the urban design framework established by the Knockrabo Phase 1 development. For most short and mid distance views, as proposed boundary tree planting matures over time, the buildings will be further screened and integrated with the existing landscape vegetation, characteristic of the area.'

Please refer to response prepared by OMP Architects which is contained within the Architectural Design Statement, Page 66 to 68, which deals with specific issues raised other than the above.

The OMP response on Page 66 describes the relationship between the proposed development and the existing houses located to the south along Mount Anville Road. As indicated, it is proposed to provide vehicular access and services into the existing back gardens of those neighbouring properties enabling their future development. The Taking In Charge map submitted with this application indicates the carriageway and landscaped strip up the boundary of the back gardens for taking in charge by the Council, thus securing the future development of those lands. In addition, as indicated in the Sunlight, Daylight Overshadowing Report there is no impact on these gardens due to their position south of the proposed development.



DLRCC raised concerns about the 11.7m separation distance between the southern ends of Blocks G and H, and the relationships between opposing windows in that location. The OMP response on Page 67 explains the design of Blocks G and H, specifically in relation to separation distances and the relationship between opposing windows in that location. In summary, the careful arrangement of rooms, windows and balconies in this area avoids any inappropriate conditions between units, while also providing a good sense of enclosure and privacy to the communal courtyard.

The OMP response on Page 68 details the justification for the residential tenant amenity facilities located at Level OO in Block G and H. New CGI's have been prepared to illustrate the design of the scheme in this location. In addition, the entrance to the tenant amenities has been redesigned which will highlight the entrance and provide a strong contrast between the entrance the white finish of the rest of Block G.

2.4 Item No. 4

Item 4 of the *Specific Information Requested* requires:

'A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartments/duplex units as required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December, 2020). The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements including its specific planning policy requirements.'

Applicants Response to Item No. 4

Please refer to the accompanying Housing Quality Assessment (HQA) prepared by OMP Architects, which clearly provides the specific information requested in relation to the New Apartment Guidelines (2020). The HQA clearly demonstrates how the proposed apartments complies with the requirements of the guidelines.

2.5 Item No. 5

Item 5 of the *Specific Information Requested* requires:

'A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments.'



Applicants Response to Item No. 5

The Architectural Design Statement prepared by OMP on Pages 70 to 74 indicates the Materials and Finishes proposed to be utilised within the proposed development including specific detailing of external finishes the treatment of balconies and boundary treatment. .

The proposed development will carry through the material palette and specification from apartment Blocks A, B, C and D of Phase 1 of the Knockrabo development as constructed, with a combination of red and white brick to the predominant facades and limited use of grey metal cladding to penthouses and recesses. Wintergardens will be a new addition to the scheme. It is proposed to use a “Lumon” or similar wintergarden system, which will provide private amenity spaces to apartments that are attractive and usable all year round, as well as mitigating against the noise of the future DEBP.

A high-quality palette of materials will also be used in the landscape, similar to that which has been used in Knockrabo Phase 1. Please refer to Landscape Section of the OMP Design Statement, Pages 49 to 52 which illustrates the proposed landscaping treatment. Please also refer to the Landscaping Plans and Reports prepared by Dermot Foley which explains and illustrates the landscape design and boundary treatments.

We would like to point out that Knockrabo Phase 1 designed by Dermot Foley Landscape Architects won the Design Award for Residential development from the Irish Landscape Institute in 2020 for the exceptional high quality landscape design of the residential development.

2.6 Item No. 6

Item 6 of the *Specific Information Requested* requires:

‘Drainage details such as would clearly address and respond to comments within the internal report from the Drainage Division of the Planning Authority, and having regard to the submission from Irish Water, namely additional details as relates to surface water proposals and additional details as relates to Flood Risk.’

Applicants Response to Item No. 6

All drainage details have been satisfactorily responded to in the accompanying engineering drawings and reports.

Drainage details to address and respond to comments within the internal report from the Drainage Division are addressed in the submission drainage layout, detail drawings and Engineering Assessment Report (EAR), 20-086r.002. Consultation with Elaine O’Carroll of the drainage department has been held in this regard to ensure each item is satisfactorily addressed, namely additional details as relates to surface water proposals.

An updated Flood Risk drawing accompanies the Flood Risk Assessment (FRA) report, 20-086r.005 to address the drainage report commentary in this regard.



As regards Irish Water (IW), along with the approved design drawings, a Statement of Design Acceptance is provided from IW, accompanying the EAR report.

2.7 Item No. 7

Item 7 of the *Specific Information Requested* requires:

'Additional CGIs/visualisations/3D modelling.'

Applicants Response to Item No. 7

We wish to confirm that additional CGI's/Visualisations prepared by Modelworks, which demonstrates the overall scheme, as well as the particular relationship of Block E to its context.

2.8 Item No. 8

Item 8 of the *Specific Information Requested* requires:

'8. All supporting technical/environmental reports to be updated as required.'

Applicants Response to Item No. 8

We wish to confirm that all supporting technical/environmental reports have been updated by the various consultants for the final proposed development, as submitted. These reports are listed in the accompanying Cover Letter to An Bord Pleanála prepared by TPA.

2.9 Item No. 9

Item 9 of the *Specific Information Requested* requires:

'A plan of the proposed open spaces within the site clearly delineating public, communal and private spaces.'

Applicants Response to Item No. 9

Please refer to Dermot Foley Landscape Architects Design Rationale Report on Page 12, Figure 9 – Diagram of open space type and location within site layout, which clearly delineates public, communal, and private open spaces.

2.10 Item No. 10

Item 10 of the *Specific Information Requested* requires:

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

Applicants Response to Item No. 10

Please refer to drawing No. 1307F-OMP-00-00-DR-A-1015 entitled Proposed Taking in Charge Plan prepared by OMP Architects, which comprises a site plan of areas proposed to be taken in charge by the planning authority. These areas were discussed and agreed with the planning authority as part of this Response.

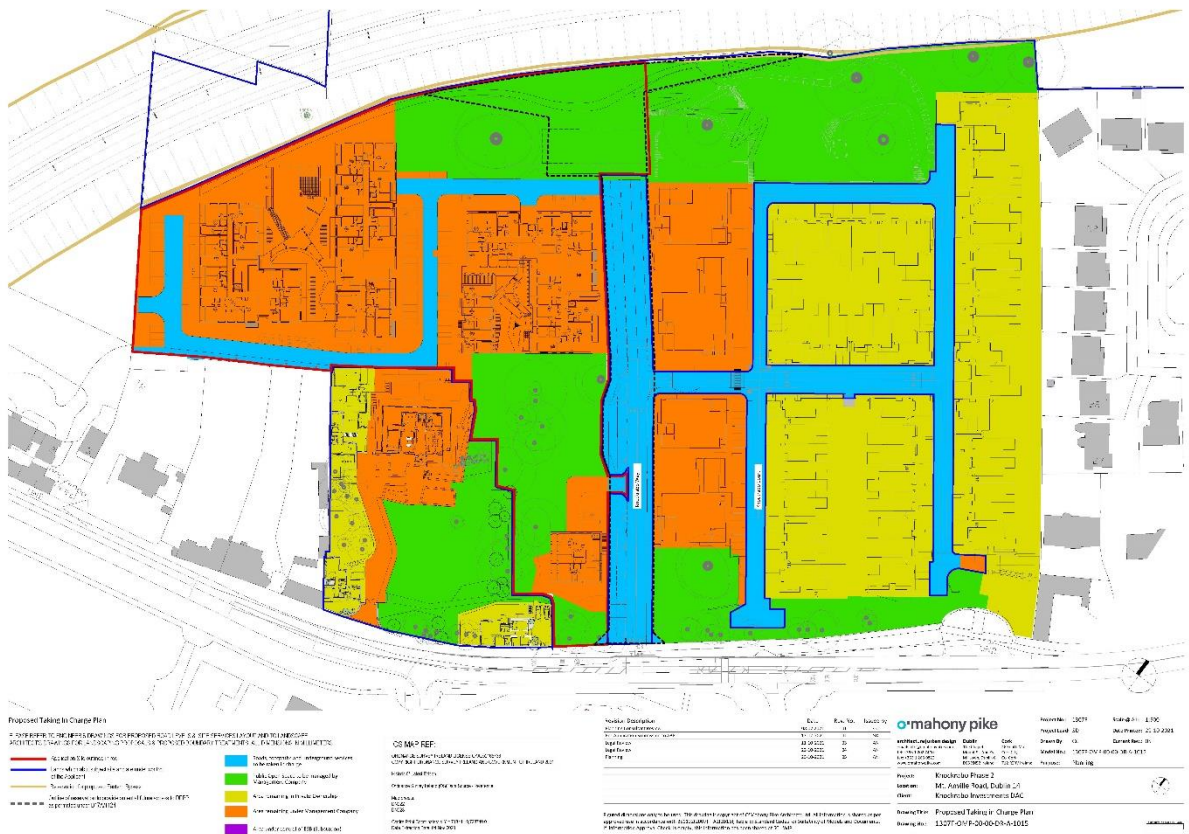


Figure 1 – Proposed Taking in Charge Plan, Drg No. 1307F-OMP-00-00-DR-A-1015 – Areas in blue to be taken in charge.

3.0 NOTIFICATION TO PRESCRIBED BODIES

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, as amended:

1. The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
2. The Heritage Council
3. An Taisce
4. Irish Water
5. National Transport Authority
6. Transport Infrastructure Ireland
7. Minister for Transport, Tourism and Sport
8. Dun Laoghaire Rathdown Childcare Committee

Applicants Response

Please refer to Appendix 2 of this Response to ABP Opinion Letter which contains a copy of all of the notifications issued, as requested including the following;

- The Department of Housing, Local Government and Heritage
- The Heritage Council
- An Taisce
- Irish Water
- National Transport Authority
- Transport Infrastructure Ireland
- The Department of Transport
- The Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media
- Dun Laoghaire Rathdown Childcare Committee

If you have any further queries, please do not hesitate to contact the office.

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates



APPENDIX 1 – Copy of Minutes from Tripartite Meeting, Inspectors Report and Bord Opinion, DLRCC
CEO Report



An
Bord
Pleanála

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Case Reference: ABP-309990-21

Proposed Development: 227 no. apartments and associated site works.

Lands at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

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 constitute a reasonable basis for an application for strategic housing 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. Further justification, and where appropriate amendment/omission, for the provision of proposed Block E within the site, having regard to the concerns of the Planning Authority as expressed at the Tri-Partite Meeting and as set out in

the Planning Authority's submission on this proposal, including that as set out within the report of the Conservation Officer.

2. Justification, and where appropriate amendment, to demonstrate that the proposed car parking quantity is appropriate, having regard to local, regional and national policy on same. In addition, it should be demonstrated road and pedestrian layouts, including footpath provision, permeability, design and materiality of the different street types within the street hierarchy complies with DMURS. To this end, matters raised in at the Tri-Partite Meeting and as set out in the Planning Authority's submission on this proposal, including that as set out within the Transportation report should be addressed in any report/justification relating to the outlined transport issues.
3. A report (or reports) that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to an amended daylight/sunlight/overshadowing analysis, overlooking, visual impact and noise. The report(s) shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development. The daylight/sunlight/overshadowing analysis shall have regard to the requirements of 'Building Research Establishment (BRE) Report 209 "Site Layout Planning for Daylight and Sunlight – a guide to good practice, 2nd Edition, 2011' and BS8206 – Part 2: 2008 Code of Practice for Daylighting, where applicable, and in relation to surrounding developments, should include a detailed analysis of all dwellings and amenity spaces with the potential to be impacted by the proposed development.
4. A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartments/duplex units as required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December, 2020). The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.

5. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments.
6. Drainage details such as would clearly address and respond to comments within the internal report from the Drainage Division of the Planning Authority, and having regard to the submission from Irish Water, namely additional details as relates to surface water proposals and additional details as relates to Flood Risk.
7. Additional CGIs/visualisations/3D modelling.
8. All supporting technical/environmental reports to be updated as required.
9. A plan of the proposed open spaces within the site clearly delineating public, communal and private spaces.
10. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

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, as amended:

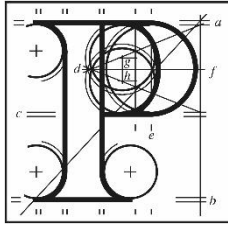
- 1. The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs**
- 2. The Heritage Council**
- 3. An Taisce**
- 4. Irish Water**
- 5. National Transport Authority**
- 6. Transport Infrastructure Ireland**
- 7. Minister for Transport, Tourism and Sport**

8. Dun Laoghaire Rathdown Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
September, 2021



An
Bord
Pleanála

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

**Inspector's Report on
Recommended Opinion
ABP-309990-21**

Strategic Housing Development

227 no. apartments and associated site works.

Location

Lands at Knockrabo, Mount Anville Road, Goatstown, Dublin 14

Planning Authority

Dun Laoghaire Rathdown County Council

Prospective Applicant

Knockrabo Investments DAC

Date of Consultation Meeting

2nd September 2021

Date of Site Inspection

23rd August 2021

1.0 Introduction

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

2.0 Site Location and Description

- 2.1. The subject site is located in Goatstown and is bounded to the south by Mount Anville Road, to the east by Phase 1 of the overall Knockrabo development, to the southwest by Cedar Mount (a protected structure) and to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP). The total site area is approximately 1.78 hectares. The site is accessed from a circa 100m section of constructed entrance road, Knockrabo Way.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development will consist of the following:
- Construction of 227 no. residential units in 4 no. separate apartment blocks ranging in height from 2 to 7 storeys which includes 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units;
 - Balconies/Winter gardens are provided on all elevations at all levels for the 4 no. apartment blocks with (Private) Terraces provided at top floor levels and a communal Roof Terrace of c. 198 sq m to be provided on Block F.
 - Provision of 511 no. bicycle parking spaces comprising 387 no. residential and 124 no. visitor bicycle parking spaces;

- Provision of 178 no. car parking spaces comprising of 125 no. residential podium car parking spaces, 35 no. residential on-street car parking spaces and 16 no visitor/drop off on-street car parking spaces; and 2 no. car sharing on-street parking spaces.
- Provision of 538.1 sq m internal tenant amenity space.
- The main vehicular access will be from Knockrabo Way;
- All other ancillary site development works to facilitate construction and the provision of site services, piped infrastructure, 2 sub-stations, public lighting, plant, bin stores, bike stores, boundary treatments and hard and soft landscaping.
- The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.

The following development parameters are noted:

Parameter	Site Proposal		
Application Site	c1.78 ha		
No. of Dwelling Units	277	Other Uses	n/a
Density	157.1 net		
Height	2 to 7 storeys (over podium)		
Car Parking	178 (125 residential podium spaces/35 residential on street/16 visitor; drop off); 2 car club spaces		
Part V	22 no. units		

3.3 The breakdown of the residential units is described as follows:

Unit Type	1 bed	2 bed	3 bed	Total
Duplex/Apartments	76	145	6	227
%	33%	64%	3%	

4.0 National and Local Planning Policy

4.1. National Planning Framework

The National Planning Framework supports increases in densities generally, facilitated in part by increased building heights. It is set out that general restrictions on building heights should be replaced by performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth (NPO Objectives 13 and 35 refer). Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

4.2. Regional Policy

Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 (RSES)

The primary statutory objective of the Strategy is to support implementation of Project Ireland 2040 - which links planning and investment through the National Planning Framework (NPF) and ten year National Development Plan (NDP) - and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region.

- RPO 3.2 - Promote compact urban growth - targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.
- RPO – 4.1 – Settlement Hierarchy – Local Authorities to determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES.
- RPO 4.2 – Infrastructure – Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES.

The site lies within the Dublin Metropolitan Area (DMA) – The aim of the Dublin Metropolitan Area Strategic Plan is to deliver strategic development areas identified

in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin's sustainable growth.

Key Principles of the Metropolitan Area Strategic Plan include compact sustainable growth and accelerated housing delivery, integrated Transport and Land Use and alignment of Growth with enabling infrastructure.

Transport Strategy for the Greater Dublin Area 2016-2035

The Transport Strategy for the Greater Dublin Area 2016-2035 provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). It also provides a transport planning policy around which other agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities.

The Strategy sets out the necessary transport provision, for the period up to 2035, to achieve the above objective for the region, and to deliver the objectives of existing national transport policy, including in particular the mode share target of a maximum of 45% of car-based work commuting established under in "Smarter Travel – A Sustainable Transport Future".

4.3. **Section 28 Ministerial Guidelines**

The following is a list of section 28 Ministerial Guidelines considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').(2009)
- 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (Updated December 2020)
- Urban Development and Building Height, Guidelines for Planning Authorities, 2018.
- 'Design Manual for Urban Roads and Streets' (DMURS) (2019) / DMURS Interim Advice Note – Covid 19 (2020)

- ‘The Planning System and Flood Risk Management’ including the associated ‘Technical Appendices’.
- ‘Childcare Facilities – Guidelines for Planning Authorities’.
- Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities – May 2021

4.4. Local Policy Context

Dun Laoghaire Rathdown County Development Plan 2016-2022

- 4.4.1. The subject lands are zoned Objective ‘A’, which is ‘To protect and-or improve residential amenity’.
- 4.4.2. The site is also subject to a Strategic Road Reservation. This reservation is for the Eastern Bypass, specifically to provide a construction access to same to facilitate its completion. There is a Specific Objective on the site to preserve Trees and Woodlands. There are three protected structures contained within the overall Knockrabo lands comprising two gatelodges and Cedar Mount House situated to the west of the development site. These protected structures are not part of the application site boundary.
- 4.4.3. Policy RES 3 Residential Density:

It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. In promoting more compact, good quality, higher density forms of residential development ...

Where a site is located within circa 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and/or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a minimum of 50 units per hectare will be encouraged.

Policy RES4: Existing Housing Stock and Densification:

It is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established

residential communities and to retain and improve residential amenities in established residential communities.

Policy RES7: Overall Housing Mix:

It is Council policy to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the Interim Housing Strategy.

4.4.4. Policy UD6: Building Height Strategy

It is Council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County.

- 4.4.5. Section 8.2.8.2 Communal open space. Requirement of 15 sq.m- 20 sq.m. of Open Space per person, based on a presumed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms. A lower quantity of open space (below 20 sq.m per person) will only be considered acceptable in instances where exceptionally high quality open space is provided on site.

Goatstown Local Area Plan 2012 (as extended to 2022)

- 4.4.6. The Goatstown LAP was adopted in April 2012. It was subsequently extended up to and including 10th April 2022.

- 4.4.7. Relevant Objectives include but are not limited to:

- Residential Development Objectives RD 1
- Architectural heritage objectives AH1 and AH3:
- Open Space & Biodiversity Objectives including OS5 to preserve trees located along Mount Anville Road
- Urban Design Objectives UD1, 2, 3, 5 (Height), 7 (Density)
- MT2 (Eastern Bypass Reservation)
- MT3 (Blueline)
- MT7 and 8 (Car Parking)

- 4.4.8. Section 6.4 sets out development guidance for 'Knockrabo Sites'.

4.4.9. LAP Table 6.3 provides the following guidance for the development site:

Zoning	'A' - To protect and/or improve residential amenity
Height	<p>Variation of height</p> <p>Benchmark height of four or five storeys depending on levels (with possible setback floor or occupied roof space on four storey buildings)</p> <p>Maximum height of two storeys along boundaries with existing residential properties</p>
Density	In accordance with County Development Plan
Design Objectives	<p>Respect the residential amenity of adjoining properties</p> <p>Provide for a mix of residential units that enhances the overall residential mix within the plan area</p> <p>High quality architectural design that makes a positive contribution towards the local built environment</p> <p>Provide a sensitive response to the streetscape along Mount Anville Road</p> <p>Protect and provide for the reuse of the existing Gate Lodge, which is a protected structure</p> <p>Integrate Gate Lodge in any redevelopment proposal</p> <p>Design to provide for a high standard of residential amenity in terms of orientation, internal layout, private open space and public open space</p> <p>Address and maximise orientation</p> <p>Provide measures to mitigate noise impact from any future road / BRT</p> <p>Consider location and design of ESB substations and bin storage</p>
Open Space	Residential units to be provided with adequate high quality useable private open space

	<p>Provide high quality useable public open space</p> <p>Provide a safe suitably located play area for children</p>
Landscaping	<p>Protect and enhance existing biodiversity - habitat assessment to be carried out</p> <p>Retain and integrate existing mature trees and planting</p> <p>Provide a detailed tree survey, landscape plan and planting plan</p>
Movement	<p>Permeability analysis to be carried out</p> <p>Provide for direct, safe pedestrian and cycle links</p> <p>Cycle parking to be provided for residents and visitors</p> <p>Mixture of underground and surface level car parking</p> <p>Minimise traffic impacts on the residential amenities of adjoining estates through the promotion of walking/cycling and traffic calming or other equivalent measures, where appropriate.</p>

5.0 Planning History

Western Portion (including subject site):

D17/1124 – Grant - 93 units – Block E omitted by condition in order to protect setting of the Protected Structure

Eastern Portion (excludes the subject site)

D16A/0960 – Grant- 18 apts/3 houses – (Phase 1 A)

D16A/0821 – Grant - Amend D13A/0689/APB 243799 – increase in apts from 41-51 (total increase from 88 to 98)

D13A/0689/APB 243799 – Grant - 88 dwellings

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

- 6.1. A section 247 pre-application consultation took place with Dun Laoghaire Rathdown County Council on 24th November 2020 and details of same are set out in Appendix A of the Planning Authority's submission on this pre-application.

7.0 **Irish Water Submission**

- 7.1. Irish Water: Irish Water has issued the applicant a Confirmation of Feasibility for connections to the Irish Water network. The applicant is required to provide additional details to Irish Water prior to advancing to SHD application.

8.0 **Forming of the Opinion**

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

8.2. **Documentation Submitted**

- 8.2.1. The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017 and I have had regard to same.

8.3. **Planning Authority Submission**

- 8.3.1. In compliance with section 6(4)(b) of the 2016 Act the planning authority for the area in which the proposed development is located, Dun Laoghaire Rathdown County Council have submitted a copy of the record of their section 247 consultations with the prospective applicant and their opinion in relation to the proposal.
- 8.3.2. Dun Laoghaire Rathdown County Council has also submitted a report on this pre-application submission which I have summarised below. Issues raised within the internal reports are also summarised below.

Legal/Procedural

- Procedural Issues with part implementing D17/1124 - undertaking works to Cedar Mount House as permitted under D17/1124 and surrounding lands but not to implement the remainder of D17/1124
- Cannot operate two mutually inconsistent planning permissions at the same time
- Must apply for a variation of the permission.

Design/Density/Standards/Amenity

- Proposed density is 157.1 unit/ha – overall net density for the entire site is 83 units/ha – in principle density is welcomed
- Height – subject to criteria within the Goatstown LAP – contravenes development guidance in the LAP – Material Contravention Statement submitted
- Notwithstanding – development of Blocks F, G and H would present a strong urban edge to the Dublin Eastern By-Pass
- Concerns raised regarding proposed development of Block E – impact on Cedar Mount House/single storey gate lodge/trees – recommend Block E is omitted/retention of 2 no. Cat A1 trees recommended
- Dual Aspect – a number of units are not true dual aspect
- ADF of north facing units has not been analysed/unclear if kitchen areas have been included in the assessment
- Concern re location of tenant amenity facilities to the north-west – should be more centrally located
- Pinch points to the north-western corner of the site
- Mix is acceptable
- Overlooking between Block G and H/Overlooking from proposed balconies (Block H) of existing dwellings on Mount Anville Road

Transport

- Permeability/Desire lines could be improved
- 1 space per unit recommended

8.2.3 Dun Laoghaire-Rathdown County Council Internal Reports

Transport – Car parking ratio of 1:1 would be acceptable – underprovision as proposed/should comply with standards as relates to parking and loading bays/disabled parking/set-down/drop off/cycle parking/motorcycle parking/EV charging points. Assessment of traffic noise from the proposed Eastern Bypass is recommended. Additional details of pedestrian access and desire lines required/access to adjoining lands/noise reduction measures/updated travel plan/car parking/amended crèche parking/cycle parking.

Housing – Condition recommended.

Parks and Landscape Services – Look at possibility of retaining Cat A1 Tree No. 802/Loss of the 3 No. A1 trees difficult to agree to/Conditions recommended

Conservation – Main concern is Block E/Previously omitted by DLR under D17A/1124 to protect the setting of the Protected Structures on site/Block E should be omitted from the Scheme.

Drainage – Additional details required in relation to surface water drainage and flood risk.

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

8.4. **Consultation Meeting**

8.4.1. A Section 5 Consultation meeting took place via Microsoft Teams on the 2nd September 2021. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. The main topics raised for discussion at the tripartite meeting were based on the agenda that issued in advance and contained the following issues:

1. Principle/Procedural Issues/Planning History
2. Conservation and Design including impact on Protected Structures, height and layout
3. Proposed residential amenity/daylight & sunlight/open space provision
4. Existing Residential Amenity
5. Transport
6. Trees/Ecology

7. Site Services

8. AOB

8.4.2. Both the prospective applicant and the planning authority were given an opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 309990-21' which is on file.

8.4.3. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

8.5. **Conclusion**

8.5.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

8.5.2. I have examined all of the submissions before me including the documentation submitted by the prospective applicants, the submissions of the planning authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, including section 28 Ministerial Guidelines and local policy via the statutory plans for the area.

8.5.3. Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act constitutes a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

8.5.4. I would also recommend that the prospective information applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision-making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

9.0 Recommended Opinion

The Board refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request

- (i) constitute a reasonable basis for an application under section 4 of the Act, or
- (ii) Require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, **An Bord Pleanála is of the opinion that the documentation submitted would constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**

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 arising from this notification:

1. Further justification, and where appropriate amendment/omission, for the provision of proposed Block E within the site, having regard to the concerns of the Planning Authority as expressed at the Tri-Partite Meeting and as set out in the Planning Authority's submission on this proposal, including that as set out within the report of the Conservation Officer.
2. Justification, and where appropriate amendment, to demonstrate that the proposed car parking quantity is appropriate, having regard to local, regional and national policy on same. In addition, it should be demonstrated road and pedestrian layouts, including footpath provision, permeability, design and materiality of the different street types within the street hierarchy complies with DMURS. To this end, matters raised in at the Tri-Partite Meeting and as set out in the Planning Authority's submission on this proposal, including that as set out

within the Transportation report should be addressed in any report/justification relating to the outlined transport issues.

3. A report (or reports) that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to an amended daylight/sunlight/overshadowing analysis, overlooking, visual impact and noise. The report(s) shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development. The daylight/sunlight/overshadowing analysis shall have regard to the requirements of 'Building Research Establishment (BRE) Report 209 "Site Layout Planning for Daylight and Sunlight – a guide to good practice, 2nd Edition, 2011' and BS8206 – Part 2: 2008 Code of Practice for Daylighting, where applicable, and in relation to surrounding developments, should include a detailed analysis of all dwellings and amenity spaces with the potential to be impacted by the proposed development.
4. A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartments/duplex units as required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December, 2020). The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.
5. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments.
6. Drainage details such as would clearly address and respond to comments within the internal report from the Drainage Division of the Planning Authority, and having regard to the submission from Irish Water, namely additional details as relates to surface water proposals and additional details as relates to Flood Risk.
7. Additional CGIs/visualisations/3D modelling.
8. All supporting technical/environmental reports to be updated as required.
9. A plan of the proposed open spaces within the site clearly delineating public, communal and private spaces.

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

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:

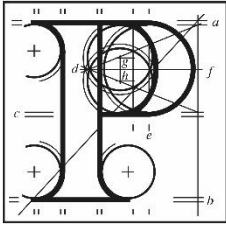
1. The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
2. The Heritage Council
3. An Taisce
4. Irish Water
5. National Transport Authority
6. Transport Infrastructure Ireland
7. Minister for Transport, Tourism and Sport
8. Dun Laoghaire Rathdown Childcare Committee

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.

Rónán O'Connor
Senior Planning Inspector

Date: 3rd September 2021



An
Bord
Pleanála

Record of Meeting ABP-309990-21

Case Reference / Description	227 no. apartments and associated site works. Lands at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	2 nd September 2021	Start Time	10:00 am
Location	Via Microsoft Teams	End Time	11:15 am
Chairperson	Tom Rabbette	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Ronan O'Connor, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Prospective Applicant:

Aodan Bourke, Applicant
Laura Finn, Tom Phillips + Associates
Susan Dawson, O'Mahony Pike Architects
Christopher Collins, O'Mahony Pike Architects
Richard Miles, Waterman Moylan
Karlis Spunde, Dermot Foley Landscape Architects
Bryan Deegan, Altemar
Patrick Tyrrell, Howley Hayes Cooney

Representing Planning Authority

Shane Sheehy, Senior Executive Planner
Catherine Hanly, Assistant Planner
Thiago Bodini, Executive Engineer
Dara O' Daly, Executive Parks

Elaine B Carroll, Executive Engineer
Sean Keane, Transportation

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the PA on 18th May 2021 providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000, as amended and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 20th April 2021 formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, as amended, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted.

Recording of the meeting is prohibited.

Agenda

1. Principle/Procedural Issues/Planning History
2. Conservation and Design including impact on Protected Structures, height and layout
3. Proposed residential amenity/daylight & sunlight/open space provision
4. Existing Residential Amenity
5. Transport
6. Trees/Ecology
7. Site Services
8. AOB

1. Principle/ Procedural Issues/Planning History

ABP Comments:

- The applicant is requested to ensure correct procedure is followed when making an application having regard to the planning history of the site.
- A legal opinion may be submitted at application stage in relation to procedural matters
- Provide further detail on the permitted creche within Cedarmount House including timescale for delivery
- Have consideration to any possible Material Contravention issues

Prospective Applicant's Comments:

- Proposing to review redline boundaries/will ensure correct procedure is followed
- Work on Cedarmount House had commenced but was paused due to Covid-19

Planning Authority's Comments:

- Have regard to the parent permission

2. Conservation and Design including impact on Protected Structures, height and layout

ABP Comments:

- Key Issue is the setting of Cedar Mount House and the Gate Lodge and impact of Block E on same.
- Provide additional photomontages/views of Block E in the context of the Protected Structures
- Address the pinch point at Block H
- Proximity of Blocks G and H

Prospective Applicant's Comments:

- There is significant open space around Cedarmount House and along Mount Anville Road
- Block E is 40 metres from Cedarmount House with significant screening provided
- Have permission for single-storey extension to the gate lodge
- The proposed development is a dense and high-quality scheme
- The gate lodge was originally associated with Mount Anville House not Cedarmount
- Will provide updated sunlight/daylight report at application stage
- Design Statement can be expanded further at application stage
- Can provide CGIs at application stage

Planning Authority's Comments:

- No further comments on conservation beyond the conservation report provided

3. Proposed residential amenity/daylight & sunlight/open space provision

ABP Comments:

- There is a lack of footpath provision on the eastern side of the proposed development
- Provide clarity on the open space provision and the quantum of space
- Provide clarity at application stage on which units are meeting the Building Research Establishment (BRE) and BS standards
- Location of tenant amenity space

Prospective Applicant's Comments:

- The tenant amenity is providing an active screen and high-quality edge
- Will have further consideration for visibility of the entrance
- The position of Block F relates to avoiding the removal of trees
- There is a continuous footpath alongside Block E
- Can have further consideration for lack of footpath provision on the eastern side of the proposed development for solution that does not impact the trees
- The footpath is raised on the eastern side of the existing access road due to the gradient of the road
- The Material Contravention is in relation to the height and carparking standards
- There are strong results from the daylight and sunlight reports but will take comments regarding same on board

Planning Authority's Comments:

- Have consideration for the position of Block F
- Query regarding how pedestrians will go from Block F to Block E, can discuss further with the prospective applicant
- Does not have any issue regarding the quantum of open space

4. Existing Residential Amenity

ABP Comments:

- Address the potential for overlooking of existing blocks
- Provide a daylight and sunlight analysis for existing blocks at application stage

Prospective Applicant's Comments:

- The residential amenity of the existing houses will not be affected
- Will have further consideration for taken in charge drawings
- It is intended that the roads within the proposed development would be taken in charge

Planning Authority's Comments:

- Existing houses currently benefit from long gardens, however there may be some overlooking of same.
- Have regard to the potential for other adjacent sites/back gardens to come forward for development and how the proposed development could facilitate such development in the future.

5. Transport

ABP Comments:

- The main issue is the carparking provision.
- Provide a justification for the carparking at application stage

Prospective Applicant's Comments:

- There is a high frequency of bus and tram services
- Cycle parking and 2 Go Car spaces to be provided
- There are no ramps to the cycle parking
- The shared area around the creche is DMURS compliant
- The carparking spaces are to be sold with the apartments

Planning Authority's Comments:

- No further comments regarding the carparking
- Consider high quality provision cycle parking and electric bike charging
- Provide taken in charge drawings at application stage

6. Trees/Ecology

ABP Comments:

- Have consideration to the Development Plan objective to preserve trees and woodland
- It does not appear a hard copy of the AA screening document was provided at pre-application stage / Soft copy has been provided
- EIA Screening - Refer to 299B of the Planning and Development Regulations

Prospective Applicant's Comments:

- An EIA screening document was provided at pre-application stage

Planning Authority's Comments:

- No further comments on trees/ecology

7. Site Services

Prospective Applicant's Comments:

- Will consult further with the planning authority on the below comments

Planning Authority's Comments:

- Provide taken in charge drawings at application stage for way leave areas that are privately managed

8. Any other matters

ABP Comments:

- Have consideration for SHD timeline and the likely conclusion of the process in February 2022
- Refer to the Goatstown LAP and the Dún Laoghaire Rathdown CDP
- Consider the impact of the Draft Development Plan and possible adoption of same.
- Need to consider how to deal with possible material contravention issues (if applicable) if a new development plan is adopted after the application is lodged but before the Board makes a decision on any such application. Issue further complicated with possible conclusion of the SHD process in February 2022

Prospective Applicant's Comments:

- Requests that the planning authority address if it is satisfied with the noise mitigation proposals
- The future bypass is up to 20 metres below the proposed development site
- Screening measures are proposed to protect the communal open space
- Have carefully considered the noise impact of the future road

Planning Authority's Comments:

- Nothing further to add regarding noise mitigation proposals
- Draft plans for the local area plan are currently available

Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published.
- A Schedule of Documents and Drawings should be submitted with the Application.
- Sample notices, application form and procedures are available on the ABP website.
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie.

Tom Rabbette
Assistant Director of Planning
September, 2021

REPORT OF CHIEF EXECUTIVE

Strategic Housing Development	
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PURSUANT TO S.5 OF THE PLANNING AND DEVELOPMENT (HOUSING) AND RESIDENTIAL TENANCIES ACT 2016 AND THE PLANNING AND DEVELOPMENT (STRATEGIC HOUSING DEVELOPMENT) REGULATIONS 2017

Prospective Applicant:	Knockrabo Investments DAC
Prospective Development Address:	32 Molesworth Street, Dublin 2, D02 Y512
DLR File Reference:	PAC/SHD/266/20
ABP File Reference:	TC06D.309990
ABP Description of Prospective Development:	227 no. Apartments and associated site works

- **FORMAT AND BACKGROUND**

1. Statutory Requirements of this Report pursuant to Section 6(4)(b) Copies of all records of the consultations held with the prospective Applicant by the authority pursuant to s.5(2), and
2. The planning authority's opinion in writing (including the reasons for its opinion) of what considerations, related to proper planning and sustainable development of the area concerned, may have a bearing on the Board's decision in relation to the proposed strategic housing development, having regard to the provisions of the relevant development plan or local area plan as the case may be.

Note: The planning authority's opinion is set out in this report and is without prejudice to third-party submissions or observations, as well as any decision by the Board on this prospective application, following its submission.

- **Competency**

The planning authority notes the Board is the competent authority in relation to: -

1. Screening the prospective development as a Strategic Housing Development (SHD).

2. Environmental Impact Assessment (EIA) Screening/Scoping, the consideration of any EIA Report prepared by the Applicant and the carrying out of an EIA of any SHD application.
 3. The consideration of the reports prepared by the Applicant in support of Stage 1 Appropriate Assessment (AA) - the Screening for Appropriate Assessment Report and where relevant in support of the Stage 2 Appropriate Assessment - the Natura --Impact Statement (NIS) and the carrying out of an AA of any SHD application.
- The determination of any SHD application.

- **Status of Section 247 Consultation and Requirements of S.5(2)**

The minutes of the Section 247 consultation meeting are appended to this report (Appendix A).

- **Internal Reports**

This report has been informed by the appended in-house reports on Surface Water Drainage, Parks and Landscaping, Transportation, Conservation and Housing (Appendix C).

- **Proposed Development**

The proposed development comprises the following:

- The construction of 227 no. Residential units in 4 no. separate apartment blocks ranging in height from 2-7 storeys over podium, comprising 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units.
- Balconies/ winter gardens are provided on all elevations at all levels for the 4 no. Apartment blocks, with private terraces provided at top floor levels and a communal roof terrace of c. 198sqm to be provided on block F.
- Provision of 387 no. private residential bicycle parking spaces and 124 no. Visitor bicycle parking spaces.
- A total of 178 no. Car parking spaces, comprising 125 no. Residential podium parking spaces, 35 no. On street parking spaces, 16 no. Visitor/ drop off parking and 2 no. Car sharing on street parking spaces
- 538.1sqm internal tenant amenity space
- The main vehicular entrance to the scheme will be from Knockrabo Way off Mount Anville Road,
- Ancillary site development works to facilitate site services, piped infrastructure, 2 no. Substations, public lighting, plant, bin stores, bike stores, boundary treatments and hard and soft landscaping

- **Development Summary**

Parameter	Proposed Development
No. of Apartments	227
Tenant Amenity Space	538.1 sqm
Site Area	1.78ha
Density	157.1 dwellings per hectare
Building Height	2 – 7 storeys (over podium)
Dual Aspect	(as stated)
Car Parking	178 no. spaces
Motorcycle Parking	no. spaces
Bicycle parking	387 no. spaces for residents and 124 no. spaces for visitors
Part V	22no. units
Communal and Public Open Space	7,797.5sq.m

The proposed mix of apartment units comprise:

Apartment Type	No.	Percentage
1 no. bedroom	76	33.4%
2 no. bedrooms	145	63.8%
3 no. bedrooms	6	2.6%
Total	227	100%

- **Supporting Documentation**

The following reports and documentation have been submitted:

- Planning Cover Letter
- Section 5 Pre-Application Consultation Request Form
- Statement of Consistency and Planning Report
- Material Contravention Statement
- Childcare Capacity Audit
- Cover letter to Dún Laoghaire Rathdown County Council
- Architectural Drawing Pack
- Part V Drawing
- Housing Quality Assessment
- Schedule of Accommodation
- Architectural Pre-Application Submission
- Engineering Assessment Report
- Flood Risk Assessment
- Traffic and Transport Assessment
- Travel Plan
- Construction Management Plan
- Outdoor Lighting Report
- Energy Statement

- Hydrological and Hydrogeological Qualitative Risk Assessment
- Engineering Drawing Pack
- Landscape Architecture Report
- Arboricultural Assessment
- Landscape and Visual Impact Assessment Report
- Landscape Drawing Pack
- Photomontage and CGIs
- Management Strategy and Lifecycle Report
- Ecological Impact Assessment
- Noise Assessment
- Conservation Report and Design Proposals
- Operational Waste Management Plan
- Construction and Demolition Waste Management Plan
- Archaeological Assessment

Planning History

Planning Histories relating to the 'Knockrabo' site can be broken down into the eastern and western portions.

Western Portion (includes the subject site)

D17A/1124

Permission was granted by the Planning Authority for the development of 93 residential units, childcare facility (c. 400sqm GFA) and community/ leisure uses (c. 223sqm GFA) and all ancillary works.

This permission is located on the western area of the landholding and is the location of the proposed development.

Condition no. 2 is noted which states the following:

'Prior to commencement of development, the applicant shall submit revised drawings which show Block E (6 units) omitted. This area of the site shall be incorporated into the area of open space and the existing trees on site protected and retained. Reason: To protect the setting and amenity of the Protected Structures on site.'

Note: Applicants have submitted two commencement notices in relation to part implementation of this permission. These relate to the refurbishment of Cedar Mount House, The Gate House and Gate Lodges.

Eastern Portion (excludes the subject site)

D16A/0960

Permission was granted by the Planning Authority for the construction of 1 no. Apartment block (block D), 18 no. Apartment units to the south east of Block B and the provision of an additional 3 no. Houses (phase 1A).

D16A/0821

Permission was granted by the Planning Authority to amend Reg. Ref D13A/0689 & ABP Ref. PL 06D243799. The development relates to the reconfiguration of Apartment blocks A, B and C.

The reconfiguration of these blocks results in an increase in the total no. Of permitted apartment units from 41 to 51 no. units. This resulted in an increase in unit numbers from 88 to 98.

D13A/0689 & ABP PL06D.243799

Permission was granted by An Bord Pleanala for 88 dwellings (47 houses and 41 apartments), 1 no. new vehicular entrance on the southern boundary of the site to Mount Anville Road.

This permission which comprises phase 1, is located to the east of the overall landholding and has been completed.

Eastern and part of Western portions (historic refusals)

D08A/0457 & ABP PL06D.232694

Planning permission was refused by An Bord Pleanala for 85 residential units and a creche.

The reason for refusal related to the application being premature to a final design on the Sandyford to Saint Helen's Link Road.

D04A/1546 & ABP PL06D.213634

Planning permission was refused by An Bord Pleanala for 369 no. Units in 8 blocks ranging in heights between 2 to 12 storeys.

The reasons for refusal related to the proposed density, height and scale and its impact on the residential and visual amenities of the area, the application being premature to a final design on the Sandyford to Saint Helen's Link Road and the large number of small one and two bedroomed apartments.

Context and Site Description

The subject greenfield site, measuring 1.78 hectares is located in Goatstown.

The site is bounded to the south by Mount Anville Road, to the east by Phase 1 of the overall Knockrabo development, to the southwest by allotments and Cedar Mount (a Protected Structure) which is in the applicant's control but outside the red line boundary and to the north by the reservation corridor for the Dublin Eastern By-Pass.

The site is accessed from Knockrabo Way to the south, which is the main entrance road leading to the Knockrabo development. This entrance route also provides access to phase 1 which is located to the east of the broader site. Phase 1 was granted under D13A/0689 and comprises of a mix of houses and apartments. The subject site is located on the western end of the broader Knockrabo site and has an existing grant of permission under D17A/1124 for 93 no. residential units and a childcare facility. The Knockrabo Way entrance road permitted under Ref. D17A/1124 is proposed to remain as previously granted.

- ***Pre-Application Consultation***

An online pre-application consultation meeting took place on the 24th November 2020. The minutes of this S.247 pre-planning meeting are appended (Appendix A).

- **Policy Context**

Plans, policies and guidelines of relevance to the proposed development are outlined in the following sections.

Project Ireland 2040 – National Planning Framework

The National Planning Framework includes several National Planning Objectives (NPOs) relating to the provision of sustainable housing. These objectives include:

- *NPO3a; Deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements.*
- *NPO4; Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*
- *NPO33; Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*
- *NPO35; Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019

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

Section 28 Ministerial Guidelines

The following ministerial guidelines are of relevance:

- Sustainable Residential Development in Urban Areas; Guidelines for Planning Authorities (DEHLG: 2009).
- Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (DHPLG: 2020).
- Urban Development and Building Heights; Guidelines for Planning Authorities (DHPLG: 2018).
- Childcare Facilities; Guidelines for Planning Authorities (2001).

- Part V of the Planning and Development Act 2000; Guidelines under Section 28 (DHPCLG: 2017).
- The Planning System and Flood Risk Management Guidelines (DEHLG: 2009).
- Appropriate Assessment of Plans and Projects in Ireland; Guidance for Planning Authorities (DEHLG: 2009).
- Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht: 2004 & 2011).
- Design Manual for Urban Roads and Streets (DTTS and DECLG: 2013).
- Urban Design Manual: A Best Practice Guide (DEHLG: 2009).

Other Relevant Plans and Guidelines

- Greater Dublin Area Cycle Network Plan (NTA: 2013).
- National Cycle Manual (NTA).
- Site Layout Planning for Daylight and Sunlight (2nd Edition).

Dún Laoghaire Rathdown County Development Plan 2016-2022

The site is zoned Objective 'A'; to protect and or improve residential amenity.

The site is subject to a Strategic Road Reservation for the Eastern Bypass.

The site contains an objective to protect and preserve trees and woodlands.

The following 3 no. Protected Structures are located in the overall site and outside the subject application boundary:

- Cedar Mount (RPS No. 783)
- Knockrabo Gate Lodge (West) (RPS No. 796)
- Knockrabo Gate Lodge (East) (RPS No. 740)

The site is located within the boundary of the Goatstown Local Area Plan 2010 -2022.

Relevant County Development Plan policies and development management guidance are listed in Appendix B.

Other Relevant Council Policy

- Standards for Cycle Parking and associated Cycling Facilities for New Developments (Dún Laoghaire-Rathdown County Council Municipal Services: 2018).

ASSESSMENT OF PRE-APPLICATION SUBMISSION

Principle of Development

The proposed development comprises an apartment scheme with ancillary tenant facilities/ amenities.

Residential development is permitted in principle on 'A' zoned lands.

The proposed development is therefore acceptable in principle.

Application Mechanism

As aforementioned, applicants have submitted two commencement notices under D17A/1124. In this regard the current red line boundary excludes these elements but does include a substantial portion of the redline associated with this application. Furthermore, the applicant is proposing to undertake the permitted works to Cedar Mount House under D17A/1124 and surrounding lands in conjunction with the proposed scheme, but not to proceed with the remainder of D17A/1124 that comprises the subject site.

In legal terms, it would appear problematic that the applicant is proposing to implement part of D17A/1124 alongside the entirety of a permission that would issue under the SHD process. Planning applications are not divisible in this way, and while a landowner is free to implement one of any number of planning permissions on a given site, it is not possible, in the planning authority's opinion, to implement component parts of mutually exclusive permissions.

The board's attention is drawn to the case of Dwyer Nolan -v—Dublin City Council IR 1985 No. 4567P (attached) which states that a planning permission does not have to be implemented in full unless there is a condition which requires this to be done. However, the same case concluded that a developer cannot operate two mutually inconsistent planning permissions at the same time but must opt for one or another. The case concluded that if a developer opts for one permission and does not want to complete the development, the developer must apply for a variation to the permission which has been taken up.

The Planning Authority advises that the Board satisfy themselves that the appropriate application mechanism, red line boundary and development description are used in any subsequent application.

Key Issues Arising

Given that the proposed development is acceptable in principle, it shall be assessed in relation to the following Planning criteria.

- Residential Density
- Height
- Conservation
- Trees
- Open Space/ Landscaping
- Housing Mix
- Privacy
- Impacts on Residential and Visual Amenities
- Standard of Accommodation
- Design and Finishes
- Road and Path Layout
- Parking
- Surface Water Drainage
- Social Housing

- Appropriate Assessment/ Environmental Impact Assessment

These matters are dealt with in detail in the following sections.

Residential Density

The development proposes to deliver 227 no. units at a net density of 157.1 units per hectare. The proposed development, in conjunction with the units to be delivered under D17A/1124 and the units completed in phase 1, will provide a total of 352 units. The applicant has identified an overall net site area of 4.19 ha, which excluding the 5no. units in the zone of sensitivity around Cedar Mount House would deliver a net density for the overall site of 83 units per hectare.

Noting the positioning of the site in relation to University College Dublin, Dundrum Shopping Centre and public transport, as well as to the site constraints, the proposed density in principle is welcomed, subject to an assessment of other pertinent matters.

Height

The proposed development ranges in height from 2 to 7 storeys over podium. The applicant proposes to use the height of the constructed block B at 5 storeys as the consistent building height for the streetscape to the rear of Cedar Mount House, with the height increasing in scale as the buildings approach the public open space / road reservation to the north.

The site is subject to the criteria contained within the Goatstown Local Area Plan (LAP). Table 6.3 of the LAP sets out the Development Guidance for the subject site. The Guidance states that a benchmark height of four or five storeys depending on levels is acceptable with a possible setback floor. It also states that a maximum height to two storeys should be provided along boundaries with existing residential properties. The proposed development therefore contravenes the Development Guidance in the LAP. It is noted that the applicant has submitted a Material Contravention Statement addressing this aspect of the proposed development.

Notwithstanding the contravention of the Goatstown LAP, which the planning authority would seek to uphold, this report is cognisant of the case before the board that the development of blocks F, G and H would present a strong urban edge to the Dublin Eastern By-Pass and also providing strong visual continuity in association with Block B when viewed from Cedar Mount House.

The Planning Authority however raises concerns regarding the proposed development of block E, at a height of 4 storeys which is considered to negatively impact Cedar Mount House and the single storey gate lodge. It is recommended that the applicant omit block E. This is expanded in further detail under the Conservation section below.

Regard is also had to Urban Development and Building Heights for Planning Authorities (December 2018), which supports increased heights and densities in urban locations. The Guidelines emphasize the considerations such as how a development responds to its urban neighbourhood and streetscape. Noting the positioning of the blocks, the orientation of the site and separation distances to existing housing to the south, it is considered that the proposed development could be considered as having responded appropriately to its receiving environment in terms of

height, as assessed against these guidelines. Issues in relation to impact on existing residential amenity are outlined below.

Conservation

The application proposes to construct a 4 storey apartment block, referred to as Block E. The Planning Authority concurs with the concerns raised by the Conservation Department, that the immediate grounds of the protected structure at Cedar Mount and western side of the avenue should be maintained free from development. This has been reflected in condition no. 2 of reference D17A/1124 which omitted development in the location of block E.

The development guidance for the site as set out in the Goatstown LAP states that a maximum height to two storeys should be provided along boundaries with existing residential properties. Block E at 4 storeys is proposed to sit 15.1m from the north eastern elevation of the Knockrabo Gate Lodge, which is a protected structure and a single storey bungalow. Noting the height of block E above the 2 storey Cedar Mount House, the positioning of Knockrabo Way and block E at a height of approximately 1.9m above the front Cedar Mount House (section CC), it is considered that block E will appear overbearing when viewed from the Gate Lodge and will impact the setting of both Protected Structures at this location and should be omitted. The removal of block E and the retention of the cluster of trees would allow for the existing trees to help demarcate the entrance whilst providing views of Cedar Mount House. This is expanded on below.

Please see Appendix C for Conservation Departments full report.

Trees

The Goatstown LAP emphasises how the mature trees on the Knockrabo site should be integrated into any redevelopment proposal to help assimilate the development and enhance the character of any new development. The Planning Authority raises concern that the development proposes to remove a cluster of trees at the entrance to the site to construct block E, in particular a Copper Beech Tree (no. 710) and a Blue Cedar Tree (711) both classified as Category A1. Noting the objective in the Development Plan to preserve trees and woodlands on the site, the Planning Authority considers the scheme should be amended to retain these 2 no. trees.

As highlighted above under the Conservation section, it is recommended that block E is omitted and that tree nos. 710 and 711 are retained and will therefore enhance the character and entrance to the development.

Open Space/ Landscaping

As per Section 8.2.8.2 of the Development Plan the proposed development should provide between 5,287.5 to 7,050sqm of public/ communal open space with an absolute minimum of 10% of the site area (resulting in 780 sqm being required). The development proposes to provide 5,679.1sqm of public open space and 2,316.4sqm of communal open space (including the roof terrace on block F). It is therefore considered that the proposed open space exceeds the Development Plan and the Design Standards for New Apartments requirements.

Standard of Accommodation

As per the Housing Quality Assessment submitted, the subject proposal would appear to comply with SPPR1, SPPR3, SPPR5, and SPPR6 in terms of unit mix, minimum floor areas, floor-to-ceiling heights and number of apartments per core.

With regards to SPPR4, whilst the application proposes that 55.9% of the units are dual aspect, the Planning Authority considers that some of the units identified as dual aspect are in fact single aspect, that is, in block F on the northern elevation. Examples of such units include nos. 205 and 204. The Planning Authority does not accept side windows as shown in these instances as an appropriate means of satisfying the dual aspect requirements of the Apartment Guidelines. It is recommended that the applicant review the dual aspect provision submitted as part of any future application.

The results from the Daylight, Sunlight and Shadow assessment are noted. The Planning Authority is generally satisfied that no significant impacts will be caused in surrounding properties. It is noted that the average daylight factors of north facing units have not been analysed. Furthermore, it is unclear if the kitchen area has been included in the assessment. It is recommended that these items are addressed in the final application.

The Planning Authority has concern about the location of the tenant amenities facilities in the north western corner of the site adjacent to a 3m noise barrier for the Eastern Bypass corridor. It is recommended that the tenant amenity facilities are re-located to a more central area of the site where they have the opportunity to engage with the open space and are more accessible to all of the proposed units.

Concern is had regarding the pinch points created in the open space in the north western corner of the site given the proximity of block H to the Eastern Bypass corridor. It is recommended that the final application include sections identifying the relationship between block H, the open space, boundary treatments and the Eastern Bypass corridor. It is recommended that the set back from the Eastern Bypass corridor is increased in the north-western corner of the site and provided with additional landscaping to enhance both the quality of the open space and future units in this location.

Housing Mix

The 47 no. 3 and 4 bedroom dwellings which have been constructed in phase 1 to the east of the site under ABP PL06D.243799 are noted. Having regard to the housing provision in phase 1, in conjunction with the wider housing provision in Goatstown which is predominantly 3 and 4 bedroom dwellings, the Planning Authority welcomes the provision of 1, 2 and 3 bedroom apartments which provide a greater overall housing mix to the wider area and provide a sustainable density on the site.

Privacy

The Planning Authority raises concern about the potential overlooking between the south-eastern elevation of block H and the south-western elevation of block G where there is a separation of 11.7m. It is recommended that the setback is increased at this location.

Impacts on Residential and Visual Amenities

The Planning Authority is concerned about the impact of the projecting balconies in the south eastern corner of block H on the residential amenities of the dwellings along Mount Anville Road by way of overlooking of their private amenity space. It is noted that the balconies in this location are located on 4 no. floors and are set back 13.2m from the

private amenity areas of Thendarra and Mount Anville Lodge. Considering the concerns raised under the privacy section above, it is recommended that the south-eastern corner of block H is set back, thereby removing the subject projecting balconies and increasing the separation distance to block G.

Overlooking concerns are also raised regarding the terrace area serving unit no. 601 on the southern elevation of block H. Noting the setback of 17m from the private amenity areas of The Garth and Chimes, it is recommended that the terrace area is limited by way of permanent planters or screening on the southern elevation.

Design & Finishes

The entrance to the tenant amenity facilities and reception area is located on the north eastern elevation of block G. The entrance is not distinguishable on the elevation drawing. It is recommended that this be addressed in the final application, in the interests of wayfinding.

Road and Path Layout

As noted in the report submitted by the Transportation Department (attached), it is considered that the desire lines from Knockrabo Way to Cedar Mount House and the apartments in the north-western corner of the site have not been adequately considered. Please refer to the report from the Parks Department in Appendix C for further details.

The proposed Taking in Charge drawing is noted. As flagged to the applicant under the 'Stage 1' S247 process, there is an opportunity to provide potential access to the properties to the southwest. It is noted that a 'ransom strip' situation would result from the TIC layout proposed. This should be omitted in any subsequent application, and the area to be taken in charge is brought up to both the southeastern and southwestern boundaries of the western portion of the site.

Parking

The development proposes 178 no. spaces. It is noted that the Traffic and Transport Assessment references 102 no. units and is unclear in the overall provision. 178 no. spaces result in a parking ratio of 0.78:1 and is significantly below the Development Plan standards. As noted in the Transportation Report a ratio of 1 space per unit would be accepted by the Planning Authority. Noting the walking distance to the Quality Bus Corridor on the N11 and the Luas, it is considered that car parking provision should be cognisant of car ownership rates to prevent from generating parking spill over on adjoining residential areas.

The applicant proposes a total of 511 no. bicycle parking spaces which is in excess of the Development Plan and Apartment Guidelines standards. Notwithstanding this and as highlighted by the Transportation Report, the applicant is advised to submit further details of the type of stands, location, spacing and access in any final application. The current application proposes stacked parking for the long-term parking. The Planning Authority would welcome a mix of cycle parking options.

The Planning Authority raises concern about pedestrian safety at the drop off area for the creche and potential conflict which could arise from reversing in this location. It is recommended that this area be included in the final application to address these concerns or as recommended in the Transportation Report, identify these spaces solely for creche staff.

The Board is directed to the report submitted by the Transportation Planning Department which is included in Appendix C.

Surface Water Drainage

Drainage Planning submitted a report, which contains recommendations of information which should be included in the final planning application. Please see Appendix C for Drainage Planning's full report.

Social Housing

The Board and the Applicant are referred to the report from the Housing Section in relation to the Part V proposal.

Appropriate Assessment/ Environmental Impact Assessment

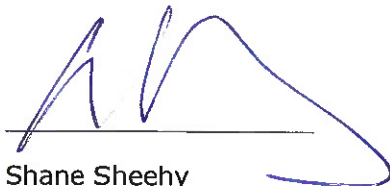
The Planning Authority has no comments in relation to environmental impacts or Appropriate Assessment, noting that An Bord Pleanála is the competent authority for the purposes of AA and EIA screening in this instance.

- ***CONCLUSION***

Whilst the proposed redevelopment of this site for residential purposes is generally welcomed and save for the proposed building heights materially contravening the County Development Plan, the development generally accords with the broader policy objectives of the Dún Laoghaire Rathdown County Development Plan 2016 – 2022. The planning authority has serious concerns however in relation to the impact of block E on the protected structures and consider it should be omitted in its entirety. The low level of car parking, the location of the tenant amenity facilities and the potential for overlooking to adjacent properties also needs to be addressed.

Catherine Hanly

Acting Executive Planner



Shane Sheehy

Senior Executive Planner

 18/5/2021

Ger Ryan

Senior Planner

APPENDIX A

S.247 Pre-Application Meeting Minutes

PAC/SHD/266/20 - Knockrabo Phase 2

Section 247 consultation

Meeting on 24th November 2020 via Microsoft Teams

In attendance:

On behalf of Dun Laoghaire Rathdown:- Ger Ryan - Planning, Shane Sheehy - Planning, Catherine Hanly - Planning, Elaine Carroll - Drainage Planning, Claire Casey - Transportation Planning & Dara O'Daly - Parks.

On behalf of Applicant:- Aodan Bourke – Knockrabo Investments DAC applicant, Laura Finn – TPA planner, Susan Dawson – OMP architect, Karlis Spunde – DFLA landscape architect, Patrick Tyrell – Howley Hayes conservation, Richard Miles – Waterman Moylan engineer.

The following items were discussed:

- Opening Statement & Overview of the scheme
 - Proposes 216 no. apartment units in 4 separate blocks in place of 76 units in phase 2.
 - 119 no. Units have been constructed in phase 1
 - Works to Cedar Mount House, the gate lodge, the outbuilding and the new gate lodge will be built in accordance with the existing permission.
 - Parking ratio of 0.75 spaces per unit, which will be included in the material contravention statement.
-
- Drainage
 - The applicant clarified that they are proposing Stormtech underground attenuation tanks which was acceptable to DLR.
 - DLR suggested maximising the areas covered by permeable paving and to extend it to parking areas.
 - DLR requested that the discharge rate is based on the net area that is drained. Applicant to liaise with DLR on updated figures.

- DLR requested that the applicant identify trees which are to be retained on the drainage drawing to show that sufficient protection is provided.

- Conservation
 - A member from the conservation department was unable to attend the meeting. DLR stated they would try and obtain advice from the Conservation Architect for the applicant.
 - DLR suggested that the applicant omit block E and raised concerns about its location, height, footprint, proximity to Mount Cedar House and the gate lodge and the removal of the Category A Copper Beech tree. The applicant stated that block E was included to demarcate the entrance to the site and for placemaking. If block E is excluded the open space increases to 30%.

- Planning
 - DLR welcomed the increased density on the site achieved through the replacement of houses with apartments.
 - DLR queried the location of the tenant amenities in the north western corner of the site, away from the existing apartment blocks. The applicant explained that phase 1 would be served by the community facilities in Mount Cedar House and that it is intended that the tenant amenities only serve phase 2.
 - The applicant confirmed that the apartments in phase 2 are designed as a build to sell development.
 - DLR advised the applicant to include a material contravention statement for the proposed height.
 - DLR welcomed the siting of blocks F, G and H.
 - DLR suggested that the applicant review the massing of block G.
 - DLR raised concern as to the siting of the duplex units to the west of block F and potential impacts around overbearing and overlooking from Block F. The applicant explained how bedrooms are located to the front of the duplex units to avoid bedrooms facing bedrooms. The applicant further stated that they have also been located adjacent to Mount Cedar House to provide varied scale between the apartments and Mount Cedar House.
 - DLR requested that the applicant submit sections showing the relationship between blocks H and G and the future road, with regards to levels, tenant amenity, pedestrian connections through the open space and any noise barriers.
 - DLR welcomed the provision of winter gardens and requested that a sunlight and daylight assessment be submitted.
 - DLR advised the applicant to provide connections to the back gardens of the sites to the west. The applicant agreed to examine potential connections.
 - DLR advised that a full and rigorous assessment of individual units had not occurred at this stage of the pre planning process.
 - DLR advised that a full Visual Impact Assessment would be required, so as to understand the interface between the proposed development, the protected structure and open space.

- Transport
- DLR raised concern about the provision of cul de sacs and ransom strips with the land to the west. DLR requested circulation routes and wayleaves over services.
- DLR raised concern that the homezone appeared to be dominated by car parking, eroding the place making that homezones can create.
- DLR stated that the parking ratio of 0.75 spaces per unit was too low given the distance from the site to the N11 and the Luas stop.
- DLR requested that the applicant examine potential locations for drop offs for delivery drivers, circulation routes, refuse collection arrangements and reversing routes.
- DLR requested the applicant examine the design of footpaths which in some instances require pedestrians to walk around parking spaces and trees.
- The applicant was advised to examine the A-G measures from the NRA in relation to the future road and to ensure that the measures are addressed. Concern was raised as to the impact of the excavation on the road.
- DLR welcomed the high level of cycle parking
- DLR planning raised concern as to the location of the 3 no. Drop off creche parking spaces located to the rear of Mount Cedar House which are not located within the application boundary. Concern was raised as to the provision of a homezone adjacent to the spaces and the requirement for reversing in this area beside the creche. The applicant stated that most people would be walking from with the development to the creche.

Appendix B

Relevant Policies and Development Management Guidance of the Dún Laoghaire-Rathdown County Development Plan 2016-2022

Chapter 1	Strategic Overview
Section 1.3	Development Areas and Regeneration
Chapter 2	Sustainable Communities Strategy
Section 2.1	Residential Development
<i>Policy RES3:</i>	<i>Residential Density*</i>
<i>Policy RES4:</i>	<i>Existing Housing Stock and Densification</i>
<i>Policy RES7:</i>	<i>Overall Housing Mix</i>
<i>Policy RES8:</i>	<i>Provision of Social Housing</i>
<i>Policy RES14:</i>	<i>Planning for Sustainable Communities*</i>
Section 2.2	Sustainable Travel and Transportation
<i>Policy ST4:</i>	<i>Accessibility*</i>
<i>Policy ST6:</i>	<i>Footways and Pedestrian Routes*</i>
<i>Policy ST7:</i>	<i>County Cycle Network*</i>
<i>Policy ST10:</i>	<i>Street Lighting</i>
<i>Policy ST12:</i>	<i>Quality Bus Network*</i>
<i>Policy ST19:</i>	<i>Travel Demand Management*</i>
<i>Policy ST20:</i>	<i>Travel Plans*</i>
<i>Policy ST27:</i>	<i>Traffic and Transport Assessments and Road Safety Audits*</i>
Chapter 4	Green County Strategy
Section 4.2	Open Space and Recreation
<i>Policy OSR3:</i>	<i>Hierarchy of Parks and Open Space*</i>
<i>Policy OSR5:</i>	<i>Public Open Space Standards</i>
<i>Policy OSR14:</i>	<i>Play Facilities</i>
Chapter 5	Physical Infrastructure Strategy
Section 5.1	Environmental Infrastructure and Management
<i>Policy EI8:</i>	<i>Sustainable Drainage Systems*</i>
<i>Policy EI9:</i>	<i>Stormwater Impact Assessment*</i>
Section 5.2	Climate Change, Energy Efficiency and Flooding
<i>Policy CC7:</i>	<i>Energy Performance in New Buildings*</i>
<i>Policy CC15:</i>	<i>Flood Risk Management*</i>
Chapter 7	Community Strategy
Section 7.1	Social Infrastructure and Community Development
<i>Policy SIC3:</i>	<i>Universal Access</i>
<i>Policy SIC11:</i>	<i>Childcare Facilities</i>
Chapter 8	Principles of Development

Section 8.1	Urban Design
<i>Policy UD1:</i>	<i>Urban Design Principles</i>
<i>Policy UD2:</i>	<i>Design Statements</i>
<i>Policy UD3:</i>	<i>Public Realm Design</i>
<i>Policy UD6:</i>	<i>Building Height Strategy</i>
<i>Policy UD7:</i>	<i>Urban Tree Planting*</i>
Section 8.2	Development Management
Section 8.2.3	Residential Development
<i>Section 8.2.3.1</i>	<i>Quality Residential Design</i>
<i>Section 8.2.3.2</i>	<i>Quantitative Standards</i>
<i>Section 8.2.3.3(iv & ix)</i>	<i>Apartment Development</i>
<i>Section 8.2.3.5</i>	<i>Residential Development – General Requirements</i>
Section 8.2.4	Sustainable Travel and Transport
<i>Section 8.2.4.2</i>	<i>Traffic and Transport Assessment</i>
<i>Section 8.2.4.3</i>	<i>Travel Plans</i>
<i>Section 8.2.4.4</i>	<i>Street Lighting</i>
<i>Section 8.2.4.5</i>	<i>Car Parking Standards</i>
<i>Section 8.2.4.7</i>	<i>Cycle Parking</i>
<i>Section 8.2.4.8</i>	<i>Motorcycle Parking</i>
<i>Section 8.2.4.9</i>	<i>Vehicular Entrances and Hardstanding Areas</i>
<i>Section 8.2.4.12</i>	<i>Electrically Operated Vehicles</i>
<i>Section 8.2.4.14</i>	<i>Construction Management Plans</i>
Section 8.2.8	Open Space and Recreation
<i>Section 8.2.8.2</i>	<i>Public/Communal Open Space – Quantity</i>
<i>Section 8.2.8.3</i>	<i>Public/Communal Open Space – Quality</i>
<i>Section 8.2.8.5</i>	<i>Apartments – Play Facilities</i>
Section 8.2.9	Environmental Management
<i>Section 8.2.9.7</i>	<i>New Developments – Environmental Impacts</i>
<i>Section 8.2.9.11</i>	<i>Drainage and Water Supply</i>
Section 8.2.10	Climate Change Adaption and Energy
<i>Section 8.2.10.3</i>	<i>Energy Efficiency and Climate Change Adaption</i>
<i>Section 8.2.10.4</i>	<i>Flood Risk Management</i>
<i>Section 8.2.11.2</i>	<i>Architectural Heritage – Protected Structures</i>
Section 8.2.12	Community Support Facilities
<i>Section 8.2.12.1</i>	<i>Childcare</i>
<i>Section 8.2.12.3</i>	<i>Community Facilities</i>
Section 8.3	Land Use Zoning Objectives
Section 8.3.3	Permitted in Principle
Section 8.3.11.3	Architectural Conservation Areas
Appendix 9	Building Height Strategy
Appendix 10	Development Management Thresholds
Appendix 16	Green Roofs Guidance Document

Appendix C

Internal Departmental Reports

Drainage Planning – Municipal Services

Drainage Planning report

Introduction

As the SHD process does not provide for Further Information the applicant should be advised to consult with and reach agreement with the Drainage Planning Section of Municipal Services on surface water drainage proposals for this site in advance of the lodgment (subject to the consent of An Bord Pleanála following this stage of the process) of a planning application.

Surface Water Drainage

1. Using the information supplied by the applicant the discharge rate is higher than expected for this site. The discharge rate for the site must be limited to Q_{bar} (calculated using site specific data) or 2l/s/ha, whichever is greater, subject to the orifice size of the flow control device not being less than 50mm in diameter. The applicant is requested to recalculate the attenuation volume using the revised discharge rate. This may lead to an increase in attenuation storage volume requested. The applicant should note that Q_{bar} is calculated for the NET area drained not the GROSS area of the site (i.e. red line boundary), any landscaped areas that will not contribute to the surface water system should be excluded from discharge and attenuation volume calculations.
2. The applicant has proposed to drain areas of carriageway to be offered for Taking in Charge to a surface water system that is located predominantly in privately maintained public open space. The Council will not partially take in charge the drainage system. The applicant will need to amend their taken in charge drawings to include the entire drainage system or agree a wayleave with the Council to accommodate future maintenance.
3. The applicant is connecting to the surface water sewer through the existing Phase 1 of this development. The applicant must demonstrate that both systems will operate adequately together. The applicant shall also provide drainage plans for

the system they propose to discharge to up to the point of connection with the public sewer.

4. The applicant is requested to provide sufficient detail in the Construction Management Plan regarding the measures proposed to construct the surface water drainage system during this Phase 2 of works while protecting the existing surface water drainage elements.
5. As standard, the applicant is requested to submit long-sections of the surface water drainage system, clearly labelling cover levels, invert levels, pipe gradients and pipe diameters.
6. The applicant is requested to provide details of the proposed green roofs and whether they will be accessed regularly as amenity areas. Regular amenity access requires intensive green roof build up and not extensive. The applicant shall also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. A detailed cross section of the proposed buildup of the green roof should be provided, including dimensions. The applicant should comment on the compatibility of the green roof with PV panels if they are to be incorporated into the design.
7. As standard, the applicant is requested to provide a penstock in the flow control device chamber and ensure that the flow control device provided does not have a bypass door. The applicant shall also clarify whether a silt trap is being provided in the flow control device chamber and if not to make provision for same.
8. As standard, the applicant is requested to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that all proposed SuDS measures, i.e. permeable paving, bio-retention treepits, filter drains, bio-retention swales, have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual) and are designed to adequately treat the discharge proposed to drain to them.
9. As standard, the applicant is requested to provide fully dimensioned plans and sections of the attenuation storage system. All relevant inlet and outlet levels, dimensioned clearances between other utilities, and actual depths of cover to the tank shall be provided. The applicant shall include confirmation from the chosen manufacturer of the storage system that the specific model chosen, with the depth of cover being provided, has the requested load bearing capacity to support the loading that may imposed upon it.

10. As standard, the applicant is requested to confirm that a utilities clash check has been carried out ensuring all utilities' vertical and horizontal separation distances can be provided throughout the scheme. The applicant should demonstrate this with cross-sections at critical locations such as junctions, site thresholds and connection points to public utilities. Minimum separation distances shall be in accordance with applicable Codes of Practice.

11. The applicant is required to ensure that all disciplines drawings reflect the requirements of the engineering proposals, such as landscaping and architectural drawings.

12. There appear to be sections of hardstanding which do not drain to a SuDS measure for interception or treatment. The applicant is requested to update their interception and treatment proposals, with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere.

13. If the applicant proposes SuDS measures that incorporate the use of infiltration, the applicant is requested to provide details of each SuDS measure and confirm whether it will be lined/tanked or not.

If lined/tanked systems are to be used, then the applicant will be requested to explain the rationale behind this.

If unlined systems are to be used then the applicant is requested to demonstrate on a drawing that all infiltration SuDS proposals, including the attenuation system, have a 5m separation distance from building foundations and 3m separation from site boundaries.

14. A Stormwater Audit will be requested for this application. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC prior to lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.

Site Specific Flood Risk Assessment

1. It is acknowledged that the applicant has provided commentary and a sketch of overland flow routes in the Flood Risk Assessment report. However, the applicant is requested to provide more detail. The overland flow route plan should identify

drop kerbs or ramps requested for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.

Signed: _____ Date: _____

Elaine Carroll

Executive Engineer

Drainage Planning

Municipal Services Department

Signed: _____ Date: _____

Bernard Egan

Senior Executive Engineer

Drainage Planning

Municipal Services Department

Conservation Department

The main area of concern over this development is Block E described by the applicant as a 'new visual landmark. Block E (at this location) was previously omitted by DLR under Reg Ref. D17A/1124 with the area to be incorporated as part of the open space, with the existing trees on the site protected and retained. The reason being " *to protect the setting and amenity of the Protected Structures on site.*"

I have previously stated my concerns over Block E and my views are on record under Reg Ref. D17A/1124 & PAC/72/17 Knockrabo Phase 2. My views remain the same and therefore are reiterated below:

- The immediate grounds of the protected structure and the avenue should be maintained free from development and associated works.
- The building height/scale of development to the front of the site should be relative to Cedarmount House, the topography, etc. but in no case should the building height exceed that of the protected structure.
- At a height of 4 –storey over basement; Block E will dwarf the existing single storey gate lodge and Cedar Mount House, and will have a detrimental impact on their setting and amenity. It is my view that the Block E is contextually misplaced and fails to accord with County Development Plan 2016-2022, Policy AR1 and Section 8.2.11.2 (iii) Development in Proximity to a Protected Structure; National Policy in the form of the Department's "Architectural Heritage Protection Guidelines, Chapter 13, Section 13.5 and 13.7.
- It is the view of the Conservation Officer that Block E should be omitted from the scheme and an alternative proposal sought for this location which will protect the character and setting of the Protected Structures on site.

Comments:

In relation to the above proposed development, this section has reviewed the application and has the following comments;

1. Trees:

Knockrabo is characterised by its collection of stately specimen trees and parkland landscape. The seat of the Fitzwilliam family in the neighboring Mount Merrion would have established this local character. The hilly location with views out over Dublin Bay attracted wealthy residents. The 6 inch maps show a dispersed cluster of stately homes with large tree covered grounds. The local area is strongly associated with these large trees which creates a reference point on the suburban skyline.

A comprehensive arboricultural report has been submitted as part of the application. It is noted that a thorough assessment of the trees including the root zone areas has been undertaken.

The majority of the trees are to be retained but there is the proposed loss of 3no. A1 graded trees. It is noted that 2 of these were highlighted for removal under the current planning permission D17A/1124. Tree no 802 sits on one of the building lines in Block G. Is it within the scope of the project to shift the building line to retain this tree?

This is a special collection of large scale trees. These large scale trees have associated large scale root plates. It is vital that the trees are strictly cordoned, monitored and protected during the construction work.

2. Landscape Proposals:

- The design of the open space takes full advantage of the existing trees and the topography of the landscape to create a satisfying arrangement of open spaces, new planting and semi natural and natural play. The scheme will form a continuation of the work completed in Phase 1 which is a successful green space amenity.

Recommendation:

The applicant should submit FI as follows;

Reason: to ensure the protection, safety, prudent retention and long-term viability of trees to be retained on and immediately adjacent to the site.

1. Tree Bond and Arboricultural Agreement

Prior to the commencement of any permitted development or any related construction activity or tree felling on the site, the applicant shall lodge a Tree and Hedgerow Bond to the value of €50,000 with the Planning Authority. This is to ensure the protection of trees on and immediately adjacent to the site to make good any damage caused during the construction period.

The bond lodgement shall be coupled with an *Arboricultural Agreement*, with the developer, empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of any tree/hedgerow or trees/hedgerows on or immediately adjoining the site, or the appropriate and reasonable replacement of any such trees/hedgerows which die, are removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development. Any replacement planting shall use large semi-mature tree size(s) and species or similar as may be stipulated by the planning authority.

An *Arboricultural Assessment Report and Certificate* is to be signed off by a qualified Arborist after the period of 3 years of completion of the works. Any remedial tree surgery, tree felling works recommended in that Report and Certificate shall be undertaken by the developer, under the supervision of the Arborist. The bond will only be refunded upon receipt by Dlr Parks and Landscape Services of a satisfactory post-construction arboricultural assessment, carried out by a qualified arborist and provided that the hedges/trees proposed for retention are alive, in good condition with a useful life expectancy.

Reason: to ensure the protection, safety, prudent retention and long-term viability of trees to be retained on and immediately adjacent to the site.

2. Retention of Qualified Arborist/Tree Works:

Prior to the commencement of any permitted development, the developer shall engage the services of a qualified arborist as an arboricultural consultant, for the entire period of construction activity. The applicant shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a monthly basis, to ensure the implementation of all of the recommendations in the tree reports and plans.

To ensure the protection of trees to be retained within the site, the applicant shall implement all the recommendations pertaining to tree retention, tree protection and

tree works, as detailed in the Arboricultural Method Statement and Tree Protection Plan in the submitted tree report. All tree felling, surgery and remedial works shall be completed upon completion of the works. All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998: 2010 Tree Work - Recommendations. The clearance of any vegetation including trees and scrub should be carried out outside the bird-breeding season (1 March – 31 August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000.

The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees. A completion certificate is to be signed off by the arborist when all permitted development works are completed and in line with the recommendations of the tree report. The certificate shall be submitted to Dlr Parks and Landscape Services for written agreement upon completion of the works.

Reason: To ensure and give practical effect to the retention, protection and sustainability of trees during and after construction of the permitted development.

3. The retention of the Landscape Architect:

Prior to the commencement of any permitted development - the developer shall appoint and retain the services of a qualified Landscape Architect (or qualified Landscape Designer) as a Landscape Consultant, throughout the life of the construction works and shall notify the planning authority of that appointment in writing prior to commencement. A Practical Completion Certificate is to be signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of Dlr Parks and Landscape Services and in accordance with the permitted landscape proposals.

Reason: To ensure full and verifiable implementation of the approved landscape design

Conclusion:

This is a well-considered scheme, which in the most part, looks to adapt to the unique collection of trees and landscape of the site. The loss of 3no A1 graded trees is difficult to agree to as they are rare in the broader context of the county.

Recommendation:

Parks and Landscape Services Section recommend **granting** of this application based on proper compliance with the above listed conditions.

Signed: _____

Dara O'Daly, Executive Parks Superintendent

Endorsed: _____

Ruairí Ó Dúlaing, Senior Parks Superintendent

Housing Department

To: Mary Henchy,

Director of Services

Planning & Organisational Innovation

Level 2,

County Hall

Date: 12th May 2021

Re: PAC/SHD/266/20, ABP 309990-21– Permission for Proposed Development on a site at Knockrabo, Phase 2, Mount Anville, Road, Dublin 14; Knockrabo Investments DAC

I refer to your request for a housing report in connection with the above proposed development.

It is noted that the applicant proposes to comply with the Part V requirement for the proposed development by way of transfer of 22 units on site comprising; 9 x 1-bedroom units, 9 x 2-bedroom units and 4 x 3-bedroom units.

While the overall submission does not meet the current demand, it is noted that the applicant is prepared to make design adjustments to respond to the evolving housing needs. It is acknowledged that the stated costs are *estimated*, as actual costs cannot be quantified at this preliminary stage. As such, I wish to confirm that this proposal is capable of complying with the requirements of Part V of the Planning and Development Act, 2000, as amended, and of the County Development Plan and Housing Strategy.

Should planning permission be granted, the Council may seek an alternative mix of unit types, depending on housing demand at that time and, if validated costs prove to be of similar values as the indicative costs submitted, the Council will review the proposal and seek an alternative compliance option.

In order to fully assess the applicant's proposal, the Housing Department will require in the event that planning permission is granted, a detailed submission to include, inter alia, existing and development use land values, construction, development and any attributable costs associated with the development. Furthermore, in determining whether to enter into

an agreement under Section 96(3)(b) of the Acts the Council will consider the applicant's proposal having regard to the criteria set out in Sections 96(3)(c) and (h) of the Acts.

It is therefore recommended that should a decision be made to grant planning permission for the proposed development a condition be attached requiring the applicant/developer to enter into an agreement in accordance with Part V of the Planning and Development Act, 2000, as amended, prior to commencement, unless the applicant/developer shall have applied for and been granted an exemption certificate under section 97 of the Acts.

Aiden Conroy

Aiden Conroy

Administrative Officer

Housing Department

**PAC/SHD/266/20
Knockrabo Phase 2**

Case Office: Catherine Hanley

Development

The proposed development proposes the construction of 227no apartments in 4 blocks with a mix of 76no one-bedroom, 145no two-bedroom and 6no three-bedroom units.

The development makes provision of a total of 178 no. car parking spaces and 511no spaces bicycle parking spaces, 387no for the residential units and 124no for visitor parking.

The proposed development will be assessed under Section 8.2.4 – Sustainable Travel and Transport in the current County Development Plan (2016-2022)

Traffic Management and Road Safety (Section 8.2.4.1)

o Taking in Charge Standards

The submitted drawing No. 'Proposed Taking in Charge Plan / DR-A-1030' demonstrates the areas which the applicant will request to be taken in charge.

The submitted drawing No. 'Road Construction Details P116' shows the development in accordance with DLR's taking in charge standards.

o Access

The site is adjacent with recently developed lands to the east, named Phase 1 – Knockrabo (ref. D13A/0689), with entrance to the new Knockrabo way entrance, approved under D17A/1124.

The pedestrian access to the proposed blocks from the public road is not clearly identified. The previously approved access road, Knockrabo way, has a footpath to the eastern side and the lands of this proposed development, to the west, are not adequately serviced by footpaths. The current application does not include the access in the red line of works.

- Transportation considers that the desire lines have not been adequately considered, namely:
- Pedestrian desire line from Mount Anville on along the west of Knockrabo way.
- Diagonal Pedestrian / cyclists desire line from (i) Knocrack Way / Vehicular at proposed Block to (ii) gap between rear of creche and proposed buildings.
- Pedestrian desire line from rear of creche, along the south of proposed buildings to Knockrabo way.



o **DMURS**

'Section 7 – Design Manual for Urban Roads and Streets' in the submitted 'Engineering Assessment Report', dated April 2021 by Waterman Moylan is noted.

As noted in 'access' above, Transportation considers that pedestrian access, either in terms of desire lines, provision of footpaths and widths are not clearly defined.

o **Quality Audit**

The applicant has submitted a Quality Audit, prepared by Bruton Consulting Engineers, dated December 2020, found in Appendix E of the Engineering Assessment Report, dated April 2021 by Waterman Moylan Consulting Engineers

The Quality Audit reported on 4 issues, and the Audit and Design team have agreed on all the items in feedback form submitted.

If/when permission is granted, further Quality Audits will be requested as part of Detailed Design and post construction phase.

Traffic and Transport Assessment (Section 8.2.4.2)

The submitted 'Traffic and Transport Assessment' by Waterman Moylan, dated April 2021 is noted. The report presents the modelling results for junction 1 (Priority T Junction) at Mount Anville Road / Knockrabo Way.

The report states that 'based on junction assessment, it can be confirmed that there is sufficient capacity in the surrounding road network to facilitate the proposed Phase 2 development.

The report also included in Appendix A, the 'Traffic Assessment' carried out by DBFL in December 2017 for the site, albeit with the lower density of the current proposals (22 houses, 71 apartments and childcare and community facilities.

Travel Plan (Section 8.2.4.3)

The submitted 'Travel Plan' dated April 2021 by Waterman Moylan is noted.

Transportation considers that the report can be expanded and updated to incorporate the relevant section in the NTA Travel Plans guidelines found in <http://www.nationaltransport.ie/news/new-guidance-to-support-employers-workplace-travel-planning/>.

The travel plan shall push the interest of promoting and encouraging safe and sustainable travel, the applicant should submit a Travel Plan (Mobility Management Plan) for the proposed residential development detailing: a) Proposed measures to encourage the use of sustainable transport modes and reduce reliance on the private car as a means of transport to and from the proposed residential development. b) The appointment of a Travel Coordinator (to include Contact Name and Contact Details). c) Methods to monitor the progress of the Travel Plan to meet the Travel Plan targets.

The applicant will be requested to comply with standards conditions associated with Travel Plans if permission is contemplated.

Car Parking Standards (Section 8.2.4.5)

o Quantum of Car Parking

Based on the DLRCC CDP 2016-2022 Table 8.2.3 standard residential car parking spaces up to 306 car parking spaces for residents and visitors are recommended for the proposed 227 no. apartment units.

In accordance with Section 4.23 of the DHPLG Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018) some level of reduction is recommended in relation the current County Development Plan (2016-2022) car parking standards. For the proposed 227 apartment units a reduced provision of 227 car parking spaces, at a ratio of 1 per unit is acceptable.

Type	Total No.	DLR CDP 2016-2022 Table 8.2.3 Requirement	2018 DHPLG DLR Reduced Standard	Proposed
			1 per unit Apartment Unit	
1 Bed Apt	76	76	76	125

Podium

2 Bed Apt	145	218	145	35	on street
3 Bed Apt	6	12	6	16	visitor /drop off
				2	car sharing
Total Residential	227	306	227	178	

Ratio 0.78 car parking spaces per unit

Shortfall 49 car parking spaces to acceptable reduced standards

Transportation would accept the ratio 1 car parking space per apartment unit, therefore a total of 227no car parking spaces would be deemed appropriate.

The proposals consider the provision of 178 car parking spaces, a shortfall of 49 spaces from the requested minimum acceptable standards.

Transportation Planning have concerns regarding any reduced level of provision for residential car parking/car storage at this suburban development location. Adequate provision of residential spaces is recommended to ensure that the proposed residential development site is not to be reliant on parking provision/ car storage within the adjoining area and adversely impact neighbouring property.

Transportation recommends a minimum provision of 227 car parking spaces in accordance with the acceptable reduced standards as above.

Parking and Loading Bays (Section 8.2.4.6)

All proposed parking bays shall be designed with adequate dimensions.

o Disable parking

The submission shall comply with the 4% of the car parking spaces for dedicated disable parking. It is noted that the proposed disable parking is located outside the undercroft / podium parking areas. Transportation considers that some provision should be accommodated in the podium level, sheltered from elements, with easy access to the lifts.

o Set-down / Drop off

The provision of set-down and drop off areas is welcomed by Transportation Planning, catering for function and management and residential developments.

Cycle Parking (Section 8.2.4.7)

As the proposed level of car parking provision has been reduced availing of DHPLG Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018), the proposed mode share should be supported by high quality cycle parking.

o **Quantum**

The proposed provision of cycle parking of 511no is above the relevant standards for cycle parking both in the current County Development Plan (2016-2022) and the DHPLG Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018).

Unit Type	No. of Units	No. of Bedrooms	DLRCC Std.	DHPLG Std.	Proposed
1 bedroom	76	76	-----	-----	-----
2 bedroom	145	290	-----	-----	-----
3 bedroom	6	18	-----	-----	-----
Short Stay			45.4	113.5	124
Long Stay			227	384	387
Total	227	384	272	498	511

The proposed Quantum of 392no for Long-term cycle parking and 156no for short term-cycle parking is acceptable.

o **Long-term Cycle Parking Provision**

The proposals consider the provision of 387no secure long-term parking spaces for the use of the residents by way of stacked cycle parking stands.

Transportation would favour a mix of cycle standards type for the long-term cycle parking, including adequate space for cargo-bikes / rickshaws type bikes to accommodate a variety of users and facilitate the move to sustainable modes of transportation, including the provision of up to 10% of bicycle storage should cater for larger footprint cargo bikes.

The applicant will be requested to clarify the long-term cycle parking provision in terms of location, type of stands, spacing, access and others.

o **Short Term Cycle Parking Provision**

The proposals consider the provision of 124no short-term parking spaces within with the use of Sheffield Stands.

Transportation considers that the short-term cycle parking provision is adequate for both the northern and southern sections of the proposed development. The applicant will be requested to provide more details in terms of location of the cycle standards and position of proposed short-term cycle parking along the site.

The applicant will be requested to clarify the long-term cycle parking provision in terms of location, type of stands, spacing, access and others.

Motorcycle Parking (8.2.4.8)

The applicant shall demonstrate compliance with the minimum provision of 4% of spaces dedicated for motorcycle parking.

Electrically Operated Vehicles (8.2.4.12)

The applicant will be requested to make adequate provision of a minimum of 10% of parking spaces equipped with EV charging points, with additional infrastructure for the future upgrade to electric charging in the form of electric cable tray running along the structure from the Landlord Distribution Board to allow wall-mounting or ceiling-mounting of Electric Chargers for both cars and bicycles.

Construction Management Plans (Section 8.2.4.14)

The submitted 'Construction Management Plan', dated April 2021, prepared by Waterman Moylan is noted. The relevant section 11 – Development Control Measures for Development Adjacent to the DEBP (Dublin Eastern By-pass) Route Corridor is noted.

If permission is contemplated, the applicant and any appointed contractors will be requested to comply with standards conditions associated with Construction Management Plans.

Emergency Access (Section 8.2.4.15)

The drawings submitted in Appendix F of the Engineering Assessment Report are noted.

Traffic Noise (Section 2.2.10.4 Policy ST27)

Due to the proximity of proposed development to DUBLIN EASTERN BYPASS, and County Development Plan (2016-2022) Policy ST27 – Traffic Noise, an assessment of traffic noise impacts (existing and future) and mitigation measures for the proposed development is recommended.

The following items are recommended for consideration:

1. Pedestrian Access: The Applicant is requested to submit detailed drawings addressing issues with pedestrian access, desire lines and permeability links from the public road, through the site and to main entrance areas. The drawings should show the dimension of footpaths with a minimum width of 2m as per DMURS recommendations.
2. The Applicant is requested to submit details demonstrating any potential accessible road link/s and accessible permeability links to the adjoining existing and future development land can be facilitated by the proposed development
3. In accordance with the County Development Plan Policy ST27: Traffic Noise 'the effect of traffic noise on new development must be considered and appropriate measures undertaken to mitigate same.' The Applicant shall show what mitigation measures (if any) will be provided in order to keep noise within the development to acceptable levels i.e. boundary treatment, and double/triple glazing etc.
4. The applicant shall consider expanding and updating the submitted Travel Plan in the interest of promoting and encouraging safe and sustainable travel, the

applicant should submit a Travel Plan (Mobility Management Plan) for the proposed residential development detailing: a) Proposed measures to encourage the use of sustainable transport modes and reduce reliance on the private car as a means of transport to and from the proposed residential development. b) The appointment of a Travel Coordinator (to include Contact Name and Contact Details). c) Methods to monitor the progress of the Travel Plan to meet the Travel Plan targets. The Travel Plan shall incorporate the applicable guidelines in the <http://www.nationaltransport.ie/news/new-guidance-to-support-employers-workplace-travel-planning/>.

5. The applicant shall show a minimum car parking provision of 1 space per apartment units, complying with DLR's acceptable reduced car parking standards.
6. The applicant shall shown in a detailed layout drawing that the car parking spaces at the rear of the creche to be designated for creche staff only.
7. **Short-term Cycle Parking:** The Applicant shall submit revised drawings and details which demonstrate 124 No. of short term cycle parking spaces designed in accordance with Section 3 & Section 4 of DLRCC's *Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)*. The drawings should clear identify the location and also demonstrated that a minimum of 50% of short-term cycle parking should be covered with minimum spacing of 1m between cycle stands. Drawings should clearly identify the locations, type of cycle stands, dimensions and spacing in accordance with the DLR's Standards.
8. **Long-Term Cycle Parking:** The Applicant shall submit revised drawings showing the provision of long-term cycle parking designed in accordance with Section 3 & Section 4 of DLRCC's *Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)*. Stacked cycling parking is not recommended and the preferred type of cycle parking stand is the Sheffield cycle stand. Accordingly, all proposed cycle parking at the development should be of the preferred "Sheffield" type and be constructed in accordance with the DLRCC standards. The provision shall accommodate a variety of users and facilitate the move to sustainable modes of transportation, including the provision of up to 10% of bicycle storage should cater for larger footprint cargo bikes. The drawings should clearly identify the location, quantum of cycle parking provision, type of stands, access routes to and from the public road, storage compounds and to core of apartment units / lifts.
9. The Applicant is requested to ensure they can prevent parked vehicles at the car parking spaces overriding the proposed pedestrian walkways. The provision of wheel stoppers is recommended where suitable.
10. The Applicant shall demonstrate in a detailed layout drawings adequate provision of motorcycle parking spaces for the development in accordance with section 8.2.4.8 of DLRCC Development Plan 2016-2022.
11. The Applicant shall comply with Section 8.2.4.12 of the current County Development Plan (2016-2022) showing in a detailed layout drawing(s) a minimum provision of 10% of the car parking spaces have fully operational electric charging points for electric vehicles.
12. The applicant shall demonstrate that all proposed car parking spaces are constructed to be capable of accommodating future electric charging points for electrically operated vehicles. The following weblink is recommended <http://www.esb.ie/electric-cars/index.jsp>.

13. The Applicant is requested to ensure provision of at least 4% of parking spaces within the proposed development reserved for use by disabled persons in accordance with Section 8.2.4.5 of the Dun Laoghaire-Rathdown County Development Plan, (2016-2022). Parking bay widths suitable for disabled parking bays shall be a minimum of 2.4m wide - with a 1.2m buffer on both sides - and 6m in depth. The provision shall be distributed along the site, including in the podium level allowing spaces sheltered from the elements.

05/05/2021
Thiago Bodini
Executive Engineer



APPENDIX 2 – Copy of Notifications to Prescribed Bodies

Conor Rooney
Development Applications Unit
Department of Housing, Local Government and Heritage
Newtown Road
Wexford
Y35 AP90

29th October 2021

Dear Sir/Madam,

**RE: KNOCKRABO PHASE 2 SHD, PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD)
AT MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14**

APPLICANT: KNOCKRABO INVESTMENTS DAC

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the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

The site is bounded to the south-east by Mount Anville Road; to the south by 'Mount Anville Lodge' and by the rear boundaries of 'Thendara' (a Protected Structure – RPS Ref. 812), 'The Garth' (a Protected Structure – RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development 'Knockrabo'. There are 3 no. Protected Structures located in the overall 'Knockrabo' landholding, but which are outside the application boundary. These include 'Cedar Mount' (a Protected Structure - RPS Ref. 783), 'Knockrabo Gate Lodge (West)' (a Protected Structure - RPS Ref. 796), including Entrance Gates and Piers, and 'Knockrabo Gate Lodge (East)' (a Protected Structure – RPS 740) including Entrance Gates and Piers. For clarity no works are proposed to any Protected Structures as part of this proposed development.

The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium. The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

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All other ancillary site development works to facilitate construction, site services, piped infrastructure, 2 no. sub-stations, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. The development will be served by the



permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.

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

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

Alison Harvey
The Heritage Council
Áras na hOidhreachta,
Church Lane,
Kilkenny
R95 X264

29th October 2021

Dear Sir/ Madam,

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Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

An Taisce - The National Trust for Ireland
Tailors' Hall,
Back Lane,
Dublin 2
Email: heritage@antaisce.org

29th October 2021

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

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

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

29th October 2021

Dear Gosia

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AT MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14**

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

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

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

29th October 2021

Dear Mr. O Sullivan

**RE: KNOCKRABO PHASE 2 SHD, PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD)
AT MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14**

APPLICANT: KNOCKRABO INVESTMENTS DAC

1. Introduction

Please be advised that our client – Knockrabo Investments DAC - intends to apply to An Bord Pleanála for permission for a proposed Strategic Housing Development on lands at Mount Anville Road, Goatstown, Dublin 14.

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Knockrabo Investments DAC intend to apply to An Bord Pleanála for permission for a Strategic Housing Development with a total application site area of c. 1.78 ha, on a site located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

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the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

The site is bounded to the south-east by Mount Anville Road; to the south by 'Mount Anville Lodge' and by the rear boundaries of 'Thendara' (a Protected Structure – RPS Ref. 812), 'The Garth' (a Protected Structure – RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development 'Knockrabo'. There are 3 no. Protected Structures located in the overall 'Knockrabo' landholding, but which are outside the application boundary. These include 'Cedar Mount' (a Protected Structure - RPS Ref. 783), 'Knockrabo Gate Lodge (West)' (a Protected Structure - RPS Ref. 796), including Entrance Gates and Piers, and 'Knockrabo Gate Lodge (East)' (a Protected Structure – RPS 740) including Entrance Gates and Piers. For clarity no works are proposed to any Protected Structures as part of this proposed development.

The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium. The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

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

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

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

29th October 2021

Dear Ms. Morgan,

**RE: KNOCKRABO PHASE 2 SHD, PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD)
AT MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14**

APPLICANT: KNOCKRABO INVESTMENTS DAC

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The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium. The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

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Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

The Manager
Department of Transport
2 Leeson Ln,
Dublin 2, D02 TR60

29th October 2021

Dear Sir/ Madam,

**RE: KNOCKRABO PHASE 2 SHD, PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD)
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Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

The Manager,
Dún Laoghaire Rathdown County Childcare Committee,
Unit 16, Deansgrange Business Park,
Blackrock,
Co. Dublin

29th October 2021

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The proposed development relates to Phase 2 of the development on the 'Knockrabo' lands. Phase 1 of 'Knockrabo' was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units. The proposed development will consist of the amendment of the permitted 'Phase 2' residential development of 93 no. units, childcare facility and community/leisure uses (DLRCC Reg. Ref. D17A/1124) on a site of 2.75ha. The proposed development will provide for the reconfiguration and redesign of the approved residential development. The Knockrabo Way entrance road (constructed and unconstructed), the renovation of Cedar Mount House including childcare facility and community/leisure uses, the Coach House, Gate Lodge (West), the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

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The site is bounded to the south-east by Mount Anville Road; to the south by 'Mount Anville Lodge' and by the rear boundaries of 'Thendara' (a Protected Structure – RPS Ref. 812), 'The Garth' (a Protected Structure – RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development 'Knockrabo'. There are 3 no. Protected Structures located in the overall 'Knockrabo' landholding, but which are outside the application boundary. These include 'Cedar Mount' (a Protected Structure - RPS Ref. 783), 'Knockrabo Gate Lodge (West)' (a Protected Structure - RPS Ref. 796), including Entrance Gates and Piers, and 'Knockrabo Gate Lodge (East)' (a Protected Structure – RPS 740) including Entrance Gates and Piers. For clarity no works are proposed to any Protected Structures as part of this proposed development.

The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium. The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

- **Block E** (c. 1015.3 sqm GIA) is a 5-storey including semi-basement podium apartment block comprising of 8 no. units (1 no. one bed unit and 7 no. 2 bed units).
- **Block F** (c. 8042.2 sqm GIA) is a Part 2 to Part 8 storeys including semi-basement podium apartment block comprising 84 no. units (53 no. 1 bed units and 31 no. 2 bed units).
- **Block G** (c. 8626.5 sqm GIA) is a Part 6 including semi-basement podium to Part 8 storey including semi-basement podium apartment block comprising of 82 no. units (37 no. 1 bed units, 40 no. 2 bed units and 5 no. 3 bed units).
- **Block H** (c. 5413.7 sqm GIA) is a Part 6 to Part 7 storey apartment block including semi-basement podium comprising 53 no. units (7 no. 1 bed units, 45 no. 2 bed units and 1 no. 3 bed unit).

Residential Tenant Amenities comprising c. 537.2 sqm are provided at Level 00 of Block G and H to serve all residential units within this application. Balconies/Wintergardens are provided on all elevations at all levels for the 4 no. apartment blocks, with (Private) Terraces provided at top floor levels and a communal Roof Terrace of c. 198 sqm to be provided on Block F. The development will also provide 178 no. car parking spaces, which comprises 125 no. residential podium parking spaces, 35 no. on-street parking spaces, 16 no. visitor/drop off parking and 2 no. car sharing on-street parking spaces are provided; Provision of 389 no. private residential bicycle parking spaces and 130 no. visitor bicycle parking spaces; Provision of 12 no. motorcycle parking spaces.

All other ancillary site development works to facilitate construction, site services, piped infrastructure, 2 no. sub-stations, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. The development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.



3. Submission Procedure

The application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dun Laoghaire-Rathdown County Council. The application may also be inspected online at the following website set up by the applicant: www.knockraboshd.com

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.

Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100). A person may question the validity of a decision of An Bord Pleanála by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I. No. 15 of 1986), in accordance with sections 50 and 50A of the Planning and Development Act 2000 (No. 30 of 2000), as amended. Practical information on the review mechanism can be found in the Judicial Review Notice on the An Bord Pleanála's website: <http://www.pleanala.ie/> or on the Citizens Information Service website: <https://www.citizensinformation.ie/en/>

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

Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates

The Manager
Department of Tourism Culture Arts Gaeltacht Sport and Media
23 Kildare Street,
Dublin 2,
D02 TD30

29th October 2021

Dear Sir/ Madam,

**RE: KNOCKRABO PHASE 2 SHD, PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD)
AT MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14**

APPLICANT: KNOCKRABO INVESTMENTS DAC

1. Introduction

Please be advised that our client – Knockrabo Investments DAC - intends to apply to An Bord Pleanála for permission for a proposed Strategic Housing Development on lands at Mount Anville Road, Goatstown, Dublin 14.

Pursuant to Article 285(5)(a) of the *Planning and Development (Strategic Housing Development) Regulations 2017*, and Section 8(1)(b) of the *Planning and Development (Housing) and Residential Tenancies Act 2016*, please find enclosed a copy of the application for your information.

2. Description of Development

Knockrabo Investments DAC intend to apply to An Bord Pleanála for permission for a Strategic Housing Development with a total application site area of c. 1.78 ha, on a site located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

The proposed development relates to Phase 2 of the development on the 'Knockrabo' lands. Phase 1 of 'Knockrabo' was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units. The proposed development will consist of the amendment of the permitted 'Phase 2' residential development of 93 no. units, childcare facility and community/leisure uses (DLRCC Reg. Ref. D17A/1124) on a site of 2.75ha. The proposed development will provide for the reconfiguration and redesign of the approved residential development. The Knockrabo Way entrance road (constructed and unconstructed), the renovation of Cedar Mount House including childcare facility and community/leisure uses, the Coach House, Gate Lodge (West), the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

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Yours sincerely

Laura Finn
Associate
Tom Phillips + Associates