

The Secretary,  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01V902

Date: 5<sup>th</sup> August 2022

Dear Sir / Madam,

**RE: STRATEGIC HOUSING DEVELOPMENT APPLICATION IN RESPECT OF A PROPOSED RESIDENTIAL DEVELOPMENT AT CARRICKMINES GREAT, GLENAMUCK ROAD SOUTH, DUBLIN 18**

### Introduction

On behalf of the applicant, Grafton Issuer DAC, we hereby submit an SHD application for a seven year planning permission for a Strategic Housing Development at lands at Carrickmines Great, Glenamuck Road South, Dublin 18. The site has an area of c. 3.056 ha. The lands are located to the south and west of Springfield Lane, to the east of Cairnbrook residential estate and north of Rockville Drive / Glenamuck Cottages.

This proposal falls under the definition of Strategic Housing Development as set out under Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) as it is a proposed development 'of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses'.

### Proposed Development

The proposed development for which a **seven year** permission is sought is described as follows in the public notices:

*"The proposed development seeks to demolish existing outbuildings on site and provide for the construction of 167 no. residential units, a childcare facility with a GFA of 188 sq.m., associated internal roads, pedestrian and cycle paths, open space, and all associated site and infrastructural works.*

*The residential component of the development consists of 98 no. apartments and 69 no. houses, to be provided as follows:*

- 30 no. 1-bed apartments;
- 47 no. 2-bed apartments;
- 21 no. 3-bed apartments;
- 43 no. 4-bed (Type A, A1 and D) houses;
- 26 no. 3-bed (Type B, C and E) houses;

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPi

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPi Rory Kunz BA (MOD) MScERM MAT&CP Dip EIA Mgmt. MIPi  
Stephen Blair BA (Mod) MRUP MIPi MRTPI Blaine Cregan B Eng BSc MSc

Senior Associate Directors: Luke Wymer BA MRUP Dip Plg & Env Law Dip PM Prof Cert Env Mgmt MIPi

Meadhbh Nolan BA MRUP MRTPI Kate Kerrigan BA MSc MRTPI

Associate Director: Ian Livingstone MA (Hons) Town & Regional Planning, MSc. Spatial Regeneration. MRTPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.

Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2. VAT No. IE 6416306U

*The 98 no. apartments are to be provided within 3 no. apartment buildings of 5 no. storeys in height, each over basement level, with adjacent surface car parking. The houses consist of 2 and 3 storey terraced, semi-detached and detached dwellings.*

*The proposal contains a total of 237 no. car parking spaces, including 173 no. at surface level and 64 no. at basement level, 253 no. bicycle parking spaces, including 34 no. at surface level and 219 no. secure spaces at ground floor level of the apartment buildings, and 6 no. motorcycle parking spaces at basement level. The vehicular access to the development is to be provided from Cairnbrook residential estate to the west, including associated works to facilitate same. A vehicular entrance is also proposed from Springfield Lane to access the house proposed on the northern part of the site. Pedestrian and cycle links are proposed to Springfield Lane to the north and to link to the permitted development (Reg. Ref.: PC/H/01/19) at Rockville Drive / Glenamuck Cottages to the south.*

*Bin stores, plant rooms and block cores are located at basement and ground floor level of the apartment buildings. The proposed development includes private amenity space, consisting of balconies / terraces for all apartments and private gardens for the houses, public and communal open space, including children's play areas and an ancillary play area for the childcare facility, PV panels and green roofs at roof level of the apartment buildings, public lighting, utilities infrastructure and an ESB Substation. The proposal includes all associated site and infrastructural works, including tie-ins to existing infrastructure in the Cairnbrook residential estate, foul and surface water drainage, attenuation tanks, hard and soft landscaping, boundary treatments, internal roads, cyclepaths and footpaths."*

### **Duration of Permission**

As set out in the public notices and having regard to the nature and scale of the proposed development, and given the time associated with normal post-planning, tender and construction processes, a seven year permission is sought having regard to the provisions of Section 41 of the Planning and Development Act 2000, as amended.

### **Site Location and Development Context**

The subject site has an area of c. 3.056 hectares and is located in the townland of Carrickmines Great, c. 750m south of the M50 Motorway Junction 15 (Carrickmines) and c. 300m to the south-east of Glenamuck Road South, immediately east of Cairnbrook residential development, The site is located in the Kilternan – Glenamuck LAP area and is zoned Objective A in the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028 (Development Plan).

The site comprises greenfield lands enclosed with mature hedgerows and trees. There is a collection of derelict structures to the northern section of the site, immediately north of the overhead 10kV power line which traverses the site running in an east-west direction.

The lands are bound to the north by the rear gardens of three large detached residential properties with access from Springfield Lane. The Carrickmines Manor residential development is situated further north to the opposite side of Springfield Lane. The eastern and south-eastern boundaries are formed by a private section of Springfield Lane which serves further one-off dwellings and an equestrian centre. To the west the site is bound by the side gardens and cul-de-sac of Cairnbrook residential development which is accessed off Glenamuck Road South. To the south and south-west, the site borders the rear and side

gardens of Rockville Drive, an established residential road (and the site of the permitted development permitted under Reg. Ref.: PC/H/01/19) in Rockville Drive / Glenamuck Cottages.

Access to the site from Glenamuck Road South is proposed via the Cairnbrook residential development, subject to the extension of the existing internal access road to the site boundary, as provided for under the applicant's legal rights and easements, and included within the site boundary. Glenamuck Road South is the main arterial route linking the R117 Enniskerry Road to the M50 motorway. Access is also available from Springfield Lane to the north and a portion of the eastern site boundary. Springfield Lane is a relatively narrow rural road which serves 7 no. detached dwellings, an equestrian centre and agricultural buildings.

The site has good links to public transport being less than 500m from the 63 and 63a Kiltiernan Village - Dun Laoghaire bus route which runs along the Glenamuck Road and c. 1.7 km from the Luas Green Line Ballyogan Stop. Upgrades to the Glenamuck Road are planned to facilitate a Quality Bus/Bus Priority Route under the current Development Plan / LAP and the existing bus route will be replaced with an improved new BusConnects Route L26 Kiltiernan - Blackrock service which will operate daily at 30min intervals.

### **Land Use Zoning**

The site is zoned Objective A - *'To protect and-or improve residential amenity'* in the current Dún Laoghaire-Rathdown County Development Plan 2022 - 2028 (Development Plan), under which residential and childcare facility uses are permitted in principle.

The subject lands are also within the Kiltiernan Glenamuck Local Area Plan, 2013 (as extended to 2023) (the LAP) and the Planning Report and Statement of Consistency provides a detailed review of the proposed development in the context of the objectives of the LAP.

Please refer to the Planning Report and Statement of Consistency for further details.

### **Pre-Application Consultation Meeting with the Board (Tri-Partite Meeting)**

A pre-application meeting was undertaken with An Bord Pleanála on the 20<sup>th</sup> of April 2022, under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. The Board's Opinion was issued on the 21<sup>st</sup> April 2022.

This planning application is accompanied by a Statement of Response to the Board's Opinion prepared by JSA in consultation with the wider design team. The Statement of Response to the Board's Opinion prepared by JSA, which should be read in conjunction with relevant application documentation referenced therein, clearly sets out how the specific information items and further information requested by the Board have been fully addressed in the documentation now submitted for approval.

### **Consultation with the Planning Authority under Section 247**

The SHD process comprises three mandatory stages including Stage 1 which is a consultation with the Planning Authority (under section 247 of the Planning & Development Act, 2000, as amended).

A formal pre-application meeting was held with Dun Laoghaire Rathdown County Council on the 13<sup>th</sup> of December 2021. The meeting was attended by Anne-Marie Wood Wolfe, Laura Creagh- Planning, Tom Kilbride, Sean Keane- Transport, Johanne Codd, Elaine Carroll- Drainage, Donal Kearney- Parks, Aidan Conroy- Housing (Part V).

A summary of the pre-application consultation undertaken by the Applicant with Dun Laoghaire Rathdown County Council has been included in Section 4 of the accompanying Statement of Consistency and Planning Report.

### **Other Consultations**

As required in the Board's Opinion a copy of the application has been sent to the prescribed bodies / authorities set out below.

The following prescribed bodies have received soft copies (each confirmed that soft copies were acceptable prior to lodgement) of the application documentation:

- Irish Water
- Dun Laoghaire Rathdown County Childcare Committee

### **Irish Water Requirements**

The requirements in respect of Irish Water (IW) set out in Section 20 of the SHD Application Form are addressed in the form, the IW correspondence received, and the Engineering Services Report as prepared by Waterman Moylan Consulting Engineers (WM).

The applicant and WM Consulting Engineers have undertaken consultation with Irish Water prior to the lodgement of this application. A Confirmation of Feasibility letter was received from Irish Water on the 29<sup>th</sup> of November 2021, IW Ref.: CDS21007602, which confirmed that a connection is feasible for water and wastewater without upgrades being required. Some site specific comments are noted, which are addressed in the Infrastructure Report.

A Statement of Design Acceptance letter has also been received from Irish Water, which confirms that all the water and foul drainage services are designed in accordance with Irish Water standards. Please refer to WM application documentation for further information.

### **Part V**

The Part V package accompanying this application includes the following:

- JSA Cover Letter;
- Part V Booklet prepared by OMP Architects, which includes site layout plans and floor plans, illustrating the location within the scheme of the proposed 32 no. Part V units within Block 01 (20% of the total) and a schedule of areas;
- Applicant's Estimated Table of Costs, including Estimated Total Cost to the Planning Authority and Estimated Cost Per Unit.

The Part V proposals relate to the provision of 32 no. units on site and within Block 01.

The applicant proposes to build and transfer to the Council, or Approved Housing Body, or in the case of the Affordable Housing provision, to approved Affordable Purchasers nominated by the Council, 10 no. 1-bedroom apartments, 11 no. 2-bedroom apartments and 10 no. 3-bedroom apartments. The proposals will be subject to further discussions and agreement with DLRCC following a grant of permission.

---

## **Drawings, Plans and Particulars**

The planning application is accompanied by a full set of architectural drawings as prepared by OMP Architects, which have been prepared in accordance with the requirements of Articles 297 and 298 of the Planning and Development Regulations 2001, as amended.

The architectural drawing package includes a full set of architectural drawings prepared by O'Mahony Pike Architects (OMP), including Survey Drawings, a Site Location Map and Site Layout Plans. In addition, a Landscape drawing pack and Engineering drawing pack accompanies the SHD application. Each drawing pack submitted is accompanied by a schedule / register of drawings, as required under Q. 23 of the Application Form.

The contents of this application is set out below in the enclosures section and includes full size drawings, i.e. a Site Location Map, Site Layout Plan, etc., and a HQA. In addition, a Design Statement prepared by OMP Architects is enclosed with this application.

## **Statement of Consistency with Planning Policy**

A Planning Report and Statement of Consistency prepared by John Spain Associates accompanies this planning application. The report demonstrates that the proposed development is consistent with the relevant guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and the Dun Laoghaire Rathdown County Development Plan 2022-2028 and the Kiltarnan-Glenamuck Local Area Plan 2013-2019, as extended.

## **Statement of Material Contravention**

As set out within the public notices for the application, the application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in Section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

The Statement of Material Contravention provides a justification which the Board may have regard to in the event that the development is considered to represent a Material Contravention of the Dun Laoghaire Rathdown County Development Plan 2022-2028 and Kiltarnan-Glenamuck Local Area Plan 2013-2019, as extended.

The proposed development does not represent a material contravention in relation to the zoning of land, as the subject site is zoned to facilitate the proposed uses.

## **EIA Screening Statement**

An EIA Screening Statement prepared by Enviroguide is enclosed with this application. It provides a description of the possible effects on the environment and demonstrates that an EIAR is not required for the proposed development on the subject site, as it is below the mandatory threshold of 500 residential units, 10 hectares in an urban area and does not have the potential to result in significant environmental impacts on the surrounding environment.

An Ecological Impact Statement and AA Screening Report are also enclosed to address environmental matters pertaining to the application site and proposed development.

In addition, a Section 299B Statement is submitted with the application.

## Application Site Boundary

Please note that the application site boundary has been provided by OMP Architects in .dwg format on CD ROM with all geometry referenced to ITM as specified in Section 6 of the Application Form.

## Fee

Please find enclosed with the application form a copy of the EFT receipt payment for the application fee of € 23,063.60. The calculation of the fee is included within the accompanying application form.

## Website

The application may also be inspected online at the following website set up by the applicant:

- [www.carrickminesgreatshd.ie](http://www.carrickminesgreatshd.ie)

A final PDF of all application documents has been uploaded to the above website address, which will go live on the day of lodgement.

## Enclosures

The following documentation accompanies this pre-application request in accordance with section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, and Articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, as amended:

### Application Particulars:

- Confirmation of payment of the application fee of € 23,063.60 by EFT to An Bord Pleanála- attached to the application form;
- 2 no. copies of the Strategic Housing Development Application Form, including Solicitors Letter, Irish Water COF and SODA letters,
- 2 no. copies of the site notice and newspaper notice (including original copy of newspaper notice);
- 2 no. copies of this Cover Letter to ABP prepared by John Spain Associates;
- 2 no. copies of the cover letters to prescribed bodies / authorities and Dun Laoghaire Rathdown County Council prepared by John Spain Associates;
- 2 no. copies of the Part V proposals, including Part V Document prepared by OMP Architects, a Part V Cover Letter prepared by John Spain Associates, an Estimate of Costs prepared by the applicant and a Part V Validation Letter from DLRCC;
- 3 no. soft copies of the application documentation;

### Planning Reports:

- 2 no. copies of Statement of Response to the Board's Opinion prepared by John Spain Associates;
- 2 no. copies of Planning Report and Statement of Consistency prepared by John Spain Associates;
- 2 no. copies of Social and Community Infrastructure Audit / Assessment prepared by John Spain Associates;
- 2 no. copies of Material Contravention Statement prepared by John Spain Associates;

Architecture:

- 2 no. copies of Architectural Drawings and Drawing Schedule prepared by OMP Architects;
- 2 no. copies of Technical Document, including a schedule of accommodation and HQA, Design Statement prepared by OMP Architects
- 2 no. copies of Statement of Response to the Board's Opinion prepared by OMP Architects;

Engineering:

- 2 no. copies of Engineering Drawings and Drawing Schedule prepared by Waterman Moylan;
- 2 no. copies of Engineering Assessment Report prepared by Waterman Moylan;
- 2 no. copies of Flood Risk Assessment prepared by Waterman Moylan;
- 2 no. copies of DMURS Statement of Consistency prepared by Waterman Moylan;
- 2 no. copies of Preliminary Construction and Environment Management Plan prepared by Waterman Moylan;
- 2 no. copies of Traffic and Transport Assessment prepared by Waterman Moylan;
- 2 no. copies of Travel Plan prepared by Waterman Moylan;
- 2 no. copies of Report on Public Transport Capacity prepared by Waterman Moylan;
- 2 no. copies of Cycle Audit Report prepared by Waterman Moylan;
- 2 no. copies of Response to DLRCC Drainage Department, prepared by Waterman Moylan;
- 2 no. copies of Response to DLRCC Transportation Report prepared by Waterman Moylan;
- 2 no. copies of Response to An Bord Pleanala Opinion prepared by Waterman Moylan;
- 2 no. copies of Surface Water Audit prepared by Punch Consulting;
- 2 no. copies of Road Safety Audit prepared by Bruton;

Landscape:

- 2 no. copies of Landscape Drawings and Drawing Schedule prepared by Dermot Foley Landscape Architects (DFLA);
- 2 no. copies of Design Rationale - Landscape Architecture prepared by DFLA;
- 2 no. copies of an Arboricultural Assessment and Drawings prepared by Arborist Associates;

Environmental Reports:

- 2 no. copies of an Appropriate Assessment Screening Report prepared by Enviroguide;
- 2 no. copies of an Environmental Impact Assessment Screening Report prepared by Enviroguide;
- 2 no. copies of a Statement in accordance with Article 299B(1)(b)(ii)(II)(C) prepared by Enviroguide;
- 2 no. copies of an Ecological Impact Assessment Report prepared by Enviroguide, including the following appendices:
  - Value Of Ecological Resources
  - EPA Impact Assessment Criteria
  - NBDC Records of Invasive Plants & Rare or Protected Species
  - In-Depth Flora Survey and Hedgerow Assessment
  - Amphibian Survey Report
  - Bat Survey Report
  - Operations Environmental Management Plan
  - Invasive Alien Species Management Plan

- 2 no. copies of an Hydrological and Hydrogeological Assessment prepared by Enviroguide;
- 2 no. copies of a Landscape and Visual Impact Assessment prepared by Modelworks;
- 2 no. copies of a Verified Photomontages and CGI's brochure prepared by Modelworks;
- 2 no. copies of an Archaeology and Cultural Heritage Report prepared by Courtney Deery;
- 2 no. copies of a Microclimate Assessment prepared by AWN;
- 2 no. copies of a Noise & Vibration Impact Assessment prepared by AWN;
- 2 no. copies of a Resource & Waste Management Plan prepared by AWN;
- 2 no. copies of an Operational Waste Management Plan prepared by AWN;

Mechanical and Electrical Engineering

- 2 no. copies of Mechanical and Electrical drawings and Drawing Schedule prepared by McElligotts Consulting Engineers;
- 2 no. copies of Public Lighting Report prepared by McElligotts Consulting Engineers;
- 2 no. copies of an Energy, Utilities and Telecommunications Statement prepared by McElligotts Consulting Engineers;

Other Reports:

- 2 no. copies of a Daylight & Sunlight Assessments report prepared by Digital Dimensions;
- 2 no. copies of a Building Lifecycle Report prepared by Aramark;
- 2 no. copies of a Property Management Strategy Report prepared by Aramark;

Six no. hard copies and three no. soft copies of this SHD has been sent to Dun Laoghaire Rathdown County Council as the appropriate planning authority in which the proposed Strategic Housing Development (SHD) is located.

We trust that the documentation as submitted meets the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, and specifically the Planning and Development (Strategic Housing Development) Regulations 2017, as amended, and application guidance documents issued by An Bord Pleanála.

In preparing this planning application, including all drawings and reports, the applicant and design team have responded to the items raised in pre-application consultation meetings and the Board's Opinion.

If you have any queries, please do not hesitate to contact us.

Yours faithfully,

  
**John Spain Associates**