

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

04 March 2022

**Re: Strategic Housing Development Application to An Bord Pleanála**

**Construction of a residential development comprising of 111 no. apartments and ancillary and telecommunications infrastructure plus associated development and works at Sommerville House, Dundrum Road, Dundrum, Dublin 14**

**ABP Reference: 309697-21**

Dear Sir / Madam,

This application is made to An Bord Pleanála (ABP) under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 24 May 2021, the letter of notification dated 21 December 2021, issued to ABP pursuant to section 17(2)(a) of the Planning and Development (Amendment) (Large-Scale Residential Development) Act, 2021, and within the timeframe specified under section 17(2)(b) of the 2021 LRD Act.

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

1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001, as amended; and,
2. The information submitted pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 24 May 2021, as required under article 297(3) of the Planning and Development Regulations 2001, as amended.

## **1 Article 297 and 298 Requirements**

The documentation required under article 297 is identified below:

**Directors:**  
Declan Brassil &  
Sharon Gorman

**Reg No.:**  
329512

- **297(1)** – The planning application form is submitted herewith
- **297(2)(a)** – The Applicant is the legal owner of the majority of the application site.  
DLRCC controls an area on the Dundrum Road frontage that is included within the application boundary to accommodate localised landscaping works along the site frontage. A Letter of Consent from DLRCC to include those lands within the application boundary is submitted with the application
- **297(2)(b)** – A copy of the newspaper notice published in the Irish Daily Star on 4 March 2022 is attached herewith.
- **297(2)(ba)** – Not applicable – EIAR is not submitted.
- **297(2)(c)** – RAU Drawing No. 20-113D-RAU-ZZ\_XX-DR-MPL-100 provides a Site Location Map at a scale of 1:1,000 incorporating the requirements of parts (i) to (iv) is submitted herewith.
- **297(2)(d)** – Evidence form Irish Water that it is feasible to provide services is included at Appendix B of the Engineering Services Report, prepared by CS Consulting Engineers.
- **297(2)(e)** – It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- **297(2)(f)** – A full Schedule of Drawings and Documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **297(2)(g)** – Details of compliance with Section 96 of the Planning and Development Act, 2000 have been detailed in Section 3.8 of the Planning & Statement of Consistency Report submitted with the application. Details of Part V compliance including the location of units, layouts, calculations and methodology for calculating costs form the basis of ongoing consultation with the DLRCC Housing Department, as confirmed in a letter from the DLRCC Housing Section enclosed.
- **297(2)(h)** – Units to be transferred to the Planning Authority are identified on submitted Drawing No's P20-113D-RAU-ZZ\_UG-DR-PV-401 and -402, prepared by Reddy Architecture and Urbanism.
- **297(2)(i)** – A letter of consent from DLRCC is submitted herewith, together with an attached plan identifying the lands in question.
- **297(2)(j)** – The applicant has paid the appropriate statutory fee of €16,527.92 by way of EFT.
- **297(3)** – Section 2 below provides a statement of proposals to address the matters set out in the Board's Notice of Pre-Application Consultation Opinion dated 24 May 2021.
- **297(4) and 298(1)** – A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **298(2)** – This application does not propose any works to a Protected Structure or Proposed Protected Structure or to the exterior of a structure within an Architectural Conservation Area.

## 2 The Board's Notice of Pre-Application Consultation Opinion

The Board's Opinion dated 24 May 2021 states that '*...the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.*'

The Opinion identified the following requirements:

- **Specific information** to be submitted with the application pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 (in addition to the requirements specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017 (as set out under Section 1 above). This information is listed in Section 3 below.
- **Authorities to be notified** of the making of the application pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017. Copies of the letters sent to (1) Dun Laoghaire Rathdown Childcare Committee, and (2) Irish Water notifying them of the application in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016 are enclosed with this application.

## 3. Requested Specific Information

The table below list the specific information requested by the Board to accompany the application pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 (in addition to the requirements specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017. The requested information is listed in the left-hand column with a reference to the corresponding documents provided in the right-hand column.

**Table 3.1: Schedule of Required and Submitted Specific Information with the Planning Application**

Requested Information	Reference to Submitted Information
<p>1. <i>Notwithstanding that the proposal constitutes a reasonable basis for an application demonstrate/justify the suitability of the proposed site to accommodate the proposed height, residential density and housing mix with regard to the provisions of the current Dun Laoghaire Rathdown Development Plan and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020)</i></p>	<p>Matters surrounding the proposed Building Height; Density and Housing Mix are addressed in detail in the submitted Material Contravention Statement (Pursuant to Item No. 13, below) under sub-sections 3.2.7, 3.2.6 and 3.2.1, respectively.</p>

<p><i>and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).</i></p>	
<p>2. <i>A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2020 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the guidelines should also be submitted.</i></p>	<p>Enclosed with this application is a Housing Quality Assessment and Building Lifecycle Report. Both reports were prepared by Reddy Architecture and Urbanism.</p>
<p>3. <i>A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regards to overlooking, access to day light/sunlight, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development. The assessment shall also include assessment of proposed units within the scheme and communal open space areas.</i></p>	<p>Enclosed with this application is a report prepared by Declan Brassil &amp; Co. Ltd and Reddy Architecture and Urbanism addressing Item 3.</p>
<p>4. <i>An Ecological Impact Assessment.</i></p>	<p>An Ecological Impact Assessment prepared by Wildlife Surveys accompanies this application.</p>
<p>5. <i>An Archaeological Impact Assessment.</i></p>	<p>Accompanying the application is an Archaeological Desk Study prepared by Archaeological Projects Ltd.</p>
<p>6. <i>A Tree survey, Trees Constraints Plan, Tree Restoration/Replacement Plan and Arboricultural Assessment.</i></p>	<p>Accompanying the application is a Tree Survey report prepared by Cunnane Stratton Reynolds. A full survey record is presented in Appendix 1, of this report together with accompanying drawings Tree Constraints Drawing No.</p>

	20417_T_101, Arboricultural Impact Assessment Drawing No. 20417_T_102 and Tree Protection Plan Drawing No. 20417_T_103.
<p>7. a) <i>Traffic Impact Assessment</i></p> <p>b) <i>Justification/rationale for the extent of car parking proposed, having regard to the location of the site and its proximity to public transport services. This should also include a Carparking Strategy and Mobility Management Plan.</i></p> <p>c) <i>Address issues raised in the Transportation Planning report included in the Planning Authority's Opinion dated the 26th April 2021.</i></p>	<p>Accompanying this application is a Traffic and Transport Assessment (TTA) that was prepared by CS Consulting Engineers, which provides a justification in support of the level of car parking provision by having regard to public transport accessibility. A Mobility Management Plan (MMP) also accompanies the application which sets out ; Mobility Management Targets and Mobility Management Measures.</p> <p>Sub-section 8.2 of the submitted TTA address all issues by way of individual responses to each of the items raised by the Planning Authority in their report dated 26th April 2021.</p>
<p>8. <i>Justification/rationale for approach to childcare provision.</i></p>	<p>This application is accompanied by a Social Infrastructure Assessment prepared by KPMG - Future Analytics.</p> <p>In summary, the above report clarifies under sub-section 2.1.3.1 that by discounting the proposed studio and one-bedroom units the demand for childcare spaces is considered on the basis of 57 dwellings. Applying Guideline standard of 20 places per 75 dwellings, the total requirement for private childcare is 15 childcare places. On the basis of data analysis and guidelines presented in the 2016 Quarterly National Household Survey (QHNS) (prepared by the CSO), only a certain portion of children aged 0-4 years will likely require private childcare. Statistics for the Dublin region indicate that 5% of children will require private / commercial childcare (Creche / Montessori / Playgroup / After-school facility, etc.).</p> <p>When applying the childcare facility figure of 25% for the Dublin region to the anticipated 15 children that could potentially require childcare, the demand for commercial / private</p>

	<p>childcare spaces is calculated at 4 children. It is acknowledged that the 25% QNHS estimate for the Dublin Region is an average and that there are other factors that would influence the need for private childcare. In order to account for such factors various sensitivities have been applied to the calculation of childcare space requirements, which has resulted in a pre-school childcare requirement of 4-8 spaces being generated by the development.</p> <p>On this basis it is anticipated that the demand for private childcare arising from the proposed development can be met by the various childcare facilities identified in the study area / surrounding areas.</p>
<p>9. <i>Address issues raised in the Drainage Division report included in the Planning Authority's Opinion dated the 26th April 2021.</i></p>	<p>Accompanying the application is an Engineering Services Report that was prepared by CS Consulting Engineers. Sub-section 6.1 of this report sets out responses to the issues raised by DLRCC Drainage Division.</p>
<p>10. <i>Address issues raised in the Irish Water Submission dated 16th April 2021.</i></p>	<p>Accompanying the application is an Engineering Services Report that was prepared by CS Consulting Engineers. Sub-section 6.2 of this report address issues raised by Irish Water in their submission dated 16 April 2021.</p>
<p>11. <i>A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority</i></p>	<p>A taking in charge plan – Drawing No. P20-113D-RAU-ZZ-XX-DR-MPL-101 (Rev. P02) prepared by Reddy Architecture and Urbanism.</p>
<p>12. <i>A draft Construction &amp; Environmental Management Plan and a draft Waste Management Plan.</i></p>	<p>Accompanying this application is an Operational Waste Management Plan and Construction and Environmental Management Plan that were prepared by TMS Environment Ltd.</p>
<p>13. <i>Where the prospective applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area</i></p>	<p>Please refer to the submitted Material Contravention Statement, prepared by Declan Brassil and Co. Ltd.</p>

*plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.*

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

Yours sincerely,



Hennie Kallmeyer  
**Declan Brassil & Co. Ltd.**