

November 2021

# Planning Response Report



Proposed Alterations to  
Approved Strategic Housing Development  
(Permitted under Ref. ABP-307092-20 & ABP-309899-21)  
Lands at Palmerstown Retail Park,  
Kennelsfort Road Lower, Palmerstown, Dublin 20

*Randelswood Holdings Ltd.*

**DOWNEY**

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## 1.0 Introduction

Downey Planning, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02RW64, have prepared this planning response, on behalf of the applicant, Randelswood Holdings Ltd. Downey Planning hereby wish to submit this response for the consideration of An Bord Pleanála, following receipt of the Board's correspondence dated 27<sup>th</sup> August 2021.

This response relates to the planning application for proposed alterations to the approved Strategic Housing Development (permitted under Ref. ABP-307092-20, as amended by ABP-309899-21) in accordance with Section 146B of the Planning and Development Act, 2000 (as amended), in respect of lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

The case reference for the current alteration request is An Bord Pleanála Reference Number ABP-310753-21. The Board decided in accordance with section 146B(2) of the Act, that the proposed alterations would constitute a material alteration to the terms of the development.

The permitted SHD scheme can be briefly described as a residential development of 250 no. 'Build to Rent' apartments in 5 no. apartment blocks (ranging from 3-8 storeys over basement in height), with a café and ancillary residential amenity facilities, and all associated engineering and site works.

This permitted development is now subject to this proposed alterations application. The proposed alterations to the approved scheme include a proposed increase to the total number of residential units previously permitted under Ref. ABP-307092-20 as amended by ABP-309899-21 i.e. an additional 24 no. units are now proposed resulting in an overall total of 274 no. units.

A planning report was submitted with the application which sets out the planning rationale and justification for the proposed alterations to the approved SHD scheme and demonstrates how it accords with the proper planning and sustainable development of the area. That report should be read in conjunction with the plans, drawings and documentation submitted as part of the overall planning application pack and indeed the additional documentation hereby being submitted in response to An Bord Pleanála's correspondence dated 27<sup>th</sup> August 2021.

The following consultants assessed the proposed alterations in the context of the approved SHD scheme (ABP-307092-20 & ABP-309899-21):

- Downey Planning & Architecture – Project Architects
- Jane McCorkell Landscape Architects – Landscape Architects
- Faith Wilson Ecological Consultant – Ecologist
- Lohan & Donnelly Consulting Engineers – Project Engineers
- AECOM Consulting Engineers – Traffic & Transportation Engineers
- Digital Dimensions – Sunlight Daylight Shadow Analysis Consultants
- Digital Dimensions – Photomontages and CGI Consultants
- Downey Planning – Planning Consultants

Additional reports have now also been prepared at the request of An Bord Pleanála's correspondence dated 27<sup>th</sup> August 2021. In this regard, the following documentation has been prepared:

- Digital Dimensions documentation in response to the Board's correspondence, in particular items 1 and 3;

- Downey architectural drawings and documentation in response to the Board's correspondence, in particular items 2 and 5;
- Jane McCorkell Landscape Architects drawings and documentation in response to the Board's correspondence, in particular item 4;
- Copy of site notice (x 4) erected on site 18<sup>th</sup> November 2021;
- Locations of site notices confirmed on the enclosed site location map;
- Newspaper notice published in two newspapers i.e. The Irish Daily Mail and The Irish Daily Star, dated 18<sup>th</sup> November 2021
- Notice letter to South Dublin County Council
- Notice letters to prescribed bodies (x 7)

## 2.0 Description of Previously Permitted Development

By Order dated 1<sup>st</sup> September 2020, An Bord Pleanála granted planning permission for a Strategic Housing Development on the subject site in Palmerstown, subject to 23 no. conditions. This planning permission was granted under Ref. **ABP-307092-20**. This approved Strategic Housing Development provides for the following:

*Demolition of all existing structures on site and the construction of a residential development of 250 no. 'build to rent' apartments (134 no. 1 beds, 116 no. 2 beds) in 5 no. blocks; with a café and ancillary residential amenity facilities, to be provided as follows:*

- *Block A containing a total of 27 no. apartments comprising of 13 no. 1 beds and 14 no. 2 beds, in a building ranging from 3-6 storeys over basement in height, with 1 no. communal roof garden (at third floor level), and most apartments provided with private balconies/terraces. Block A also provides a café, a reception/concierge with manager's office and bookable space at ground floor level; meeting rooms and workspace/lounge at first floor level; a gym at second floor level; and a cinema and a games room at basement level;*
- *Block B containing a total of 46 no. apartments comprising of 18 no. 1 beds and 28 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;*
- *Block C containing a total of 47 no. apartments comprising of 30 no. 1 beds and 17 no. 2 beds, in a building 6 storeys over basement in height, and all apartments provided with private balconies/terraces;*
- *Block D containing a total of 67 no. apartments comprising of 33 no. 1 beds and 34 no. 2 beds, in a building 7 storeys over basement in height, and most apartments provided with private balconies/terraces;*
- *Block E containing a total of 63 no. apartments comprising of 40 no. 1 beds and 23 no. 2 beds, in a building 8 storeys over basement in height, and all apartments provided with private balconies/terraces.*

*The development also includes the construction of a basement providing 120 no. car parking spaces, 10 no. motorcycle spaces, 250 no. bicycle spaces, and a plant room and bin stores. The proposal also incorporates 5 no. car parking spaces and 26 no. bicycle spaces at surface level; upgrades and modifications to vehicular and pedestrian/cyclist access on Kennelsfort Road Lower; utilisation of existing vehicular and pedestrian/cyclist access via Palmerstown Business Park (onto Old Lucan Road);*



*1 no. ESB sub-station; landscaping including play equipment and upgrades to public realm; public lighting; boundary treatments; and all associated engineering and site works necessary to facilitate the development.*

In recent months, proposed alterations to this approved scheme, mainly pertaining to Blocks A & B, were submitted under Ref. ABP-309899-21, which the Board deemed would not be material and therefore made the said alterations to the permitted development on 20<sup>th</sup> May 2021. The alterations made to the permitted development on 20<sup>th</sup> May 2021 under Ref. ABP-309899-21 were as follows:

- *Proposed external and internal alterations to previously permitted Blocks A & B only including elevational changes; increase in height to accommodate construction method requirements including lift shaft overrun, AOV and parapet; minor increase in footprint of Blocks A & B to accommodate construction method requirements; alterations to and increase of residential amenity spaces within Block A and at basement level including removal of basement plant room; alterations to previously permitted apartment layouts and communal spaces within Block A; alterations to previously permitted apartment layouts and communal spaces within Block B and alterations to the previously permitted apartment unit mix within this block only from 18 no. 1 beds and 28 no. 2 beds (46 units) to now provide 12 no. 1 beds and 34 no. 2 beds (46 units)*
- *Proposed alterations to previously permitted landscaping proposals including relocation of vents and of 1 no. bike shelter; and,*
- *Proposed alterations to previously permitted basement plan.*

At this juncture, it is important to note that this permitted SHD scheme is now under construction, with demolition works completed and excavation works well underway on site.

### **3.0 Proposed Alterations ABP-310753-21**

Randelswood Holdings Ltd. are now applying to An Bord Pleanála for proposed alterations to the approved Strategic Housing Development (permitted under Ref. ABP-307092-20 as amended by ABP-309899-21). The proposed alterations are the result of extensive collaboration between the design team in the post-planning stage of the project, in terms of the evaluation and progression of detailed design for construction purposes. The proposed alterations pertain to Blocks C, D and E including external and internal modifications and proposed increase in height with also an additional proposed setback floor on each of the three buildings, resulting in an overall increase of 24 proposed additional units, with associated alterations to the previously permitted basement, ESB sub-station and landscaping proposals. No alterations are proposed to the previously permitted Blocks A & B (as permitted under Ref. ABP-307092-20 and recent alterations made under Ref. ABP-309899-21).

The proposed alterations to the previously permitted Strategic Housing Development (permitted under ABP-307092-20 as amended by ABP-309899-21) provide for the following:

- *Proposed external and internal alterations to previously permitted Blocks C, D & E only including elevational changes; reduction in site levels; increase in height to accommodate construction method requirements including lift shaft overrun, AOV and parapet; minor increase in footprint/floor plans of Blocks C, D & E to accommodate construction method requirements and revised apartment mix/layouts;*

- *Proposed alterations to previously permitted apartment layouts and communal spaces within Block C, a proposed additional setback floor (i.e. proposed 7 storey building) comprising 7 no. additional units (6 no. 1 beds and 1 no. 2 bed), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 30 no. 1 beds and 17 no. 2 beds (47 no. units) to now provide 37 no. 1 beds and 18 no. 2 beds (55 no. units);*
- *Proposed alterations to previously permitted apartment layouts and communal spaces within Block D, a proposed additional setback floor (i.e. proposed 8 storey building) comprising 5 no. additional units (2 no. 1 beds and 3 no. 2 beds), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 33 no. 1 beds and 34 no. 2 beds (67 no. units) to now provide 38 no. 1 beds and 37 no. 2 beds (75 no. units);*
- *Proposed alterations to previously permitted apartment layouts and communal spaces within Block E, a proposed additional setback floor (i.e. proposed 9 storey building) comprising 7 no. additional units (6 no. 1 beds and 1 no. 2 bed), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 40 no. 1 beds and 23 no. 2 beds (63 no. units) to now provide 47 no. 1 beds and 24 no. 2 beds (71 no. units). This results in an overall total increase of 24 no. units from the previously permitted 250 no. units (134 no. 1 beds and 116 no. 2 beds) to now provide 274 no. units (147 no. 1 beds and 127 no. 2 beds);*
- *Proposed alterations to previously permitted ESB sub-station;*
- *Proposed alterations to previously permitted landscaping proposals to accommodate minor increase in footprint of Blocks C, D & E;*
- *Proposed alterations to previously permitted basement plan layout and configuration including minor increase in size and provision of an additional 24 bicycle parking spaces and 26 car parking spaces.*

#### Proposed Alterations to Previously Permitted Blocks C, D & E & Site Levels

This application proposes alterations to the previously permitted Block C, Block D and Block E. No alterations are proposed to the previously permitted Blocks A and B (as permitted under Ref. ABP-307092-20 and recent alterations made under Ref. ABP-309899-21).

The appointed structural and civil engineers for the construction stage of the development, Lohan & Donnelly Consulting Engineers, are proposing some minor site level changes across the site as a result of proposed revised finish floor levels for construction which brings about a minor revision to the proposed invert levels of the sewers, manholes and chambers serving the permitted scheme. These minor revisions are displayed in the attached civil works drawings 21133-LDEZZ-00-DR-SC-5C12-REV 2 and 21133-LDE-ZZ-00-DR-SC-5C13-REV 2. All sewer designs remain valid for the proposed changes in level and all works can still be carried out in compliance with their respective standards. For further information in this regard, please refer to the drawings and documents prepared by Lohan & Donnelly Consulting Engineers which accompanied the application.

The proposed alterations also include internal alterations to the previously permitted apartment layouts of these three apartment blocks (Blocks C, D and E) to accommodate construction and operational requirements. This has resulted in the reconfiguration of the apartments and associated

communal spaces. These modifications, together with a proposed additional setback floor to these three buildings, provide for a proposed increase of 24 units. The breakdown is as follows:

Block C: Proposed alterations to previously permitted apartment layouts and communal spaces within Block C, a proposed additional setback floor (i.e. proposed 7 storey building) comprising 7 no. additional units (6 no. 1 beds and 1 no. 2 bed), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 30 no. 1 beds and 17 no. 2 beds (47 no. units) to now provide 37 no. 1 beds and 18 no. 2 beds (55 no. units).

Block D: Proposed alterations to previously permitted apartment layouts and communal spaces within Block D, a proposed additional setback floor (i.e. proposed 8 storey building) comprising 5 no. additional units (2 no. 1 beds and 3 no. 2 beds), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 33 no. 1 beds and 34 no. 2 beds (67 no. units) to now provide 38 no. 1 beds and 37 no. 2 beds (75 no. units).

Block E: Proposed alterations to previously permitted apartment layouts and communal spaces within Block E, a proposed additional setback floor (i.e. proposed 9 storey building) comprising 7 no. additional units (6 no. 1 beds and 1 no. 2 bed), with alterations also proposed to the previously permitted apartment unit mix within this block, resulting in an overall increase of 8 no. units in total i.e. from 40 no. 1 beds and 23 no. 2 beds (63 no. units) to now provide 47 no. 1 beds and 24 no. 2 beds (71 no. units).

The proposed alterations, as detailed above, result in an overall total increase of 24 no. units from the previously permitted 250 no. units to now provide 274 no. units (147 no. 1 beds and 127 no. 2 beds).

All apartment units have been designed in accordance with the pertaining Development Plan standards and '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines. Most apartment units within the development have been provided with adequately sized balconies or patios/terraces which have been designed in accordance with quantitative and qualitative standards and which have been provided with appropriate treatments to ensure privacy and security. There was a total of 9 no. apartments out of the 250 no. units permitted scheme that did not include a private amenity space (6 of which are located in Block D). There is no change to this permitted quantum as part of the proposed alterations to the previously permitted apartment layouts. However, the proposed additional setback floor on Block D includes 1 additional no. unit without private amenity space. For further information, please refer to the Architectural-Urban Design Statement and the Housing Quality Assessment (HQA) prepared by Downey Planning & Architecture.

It is considered that the overall quality of the facilities provided throughout the development is appropriate and of a high-quality and therefore provides an enhanced standard of amenity for the future residents of the scheme. In addition, the recent alterations application made under Ref. ABP-309899-21 provide increased residential amenity facilities for the overall scheme.

Overall, the approved SHD scheme with the design alterations now proposed, will form a distinctive new residential neighbourhood which is of a density and character that assimilates well to its location within walking distance of a public transport node, i.e. bus corridor. The units are suitable for all family

and age demographics and are designed such that there is adequate space and generously sized open space available within the development.

As part of the proposed alterations, an increase in the overall heights and footprint of Blocks C, D and E is required to accommodate the relevant necessary construction method requirements including lift shaft overrun, AOV and parapet, and insulation requirements, etc. There have also been elevational changes made to Blocks C, D and E as a result of these requirements. These alterations reflect the same alterations made to Blocks A & B of the scheme as amended by ABP-309899-21. The Board deemed that the alterations to Blocks A & B would not be material and therefore made the said alterations to the permitted development on 20<sup>th</sup> May 2021 under ABP-309899-21. The development is now under construction, with demolition works completed and excavation works well underway on site. Thus, it must be stressed that these particular alterations to Blocks C, D and E are essential for construction and the overall delivery of this development.



**Fig. 1 – Palmerstown Strategic Housing Development Under Construction**





**Fig. 2 – Palmerstown Strategic Housing Development Under Construction**

The proposals also accommodate additional units by way of an additional setback floor on each building. All such design revisions have been appropriately and comprehensively assessed within the Daylight Sunlight Internal Light Analysis Reports prepared by Digital Dimensions which concludes that *'100% of the rooms to the proposed development will exceed the minimum recommendations for the Average Daylight Factor and will be well daylit. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting.'* In terms of the residential amenity of adjoining properties, *'there will be minimal impact to the daylight and sunlight to the adjacent dwellings with no perceivable reduction in either daylight or sunlight. All areas assessed continue to meet or exceed the recommendations of the BRE guidelines.'*

An updated verified views/photomontages report has also been prepared by Digital Dimensions which assesses the existing context with the permitted scheme and the proposed alterations. It is considered that the proposed alterations, as demonstrated in these views, are of a high-quality design and are in accordance with the proper planning and sustainable development of the area.

All selected materials are of high-quality, low maintenance and durable, the variety of which adds interest to the development. The materials chosen complement the surrounding area, thus creating a development rooted to its context. The elevational treatment has been a key consideration throughout the design process. The distinct composition of the scheme alongside the chosen materials and external design will make a positive contribution to the area and surrounding environs.

Please refer to the plans, sections, and elevations drawings prepared by Downey Planning & Architecture for further details on the unit types and overall design. Please also refer to the Architectural-Urban Design Statement prepared by Downey Planning & Architecture for further details on the proposed alterations.



**Fig. 3 – Permitted CGI (View from Kennelsfort Road Lower Junction)**



**Fig. 4 – Proposed CGI (View from Kennelsfort Road Lower Junction)**

#### Proposed Alterations to Previously Permitted Landscaping Proposals & ESB Sub-Station

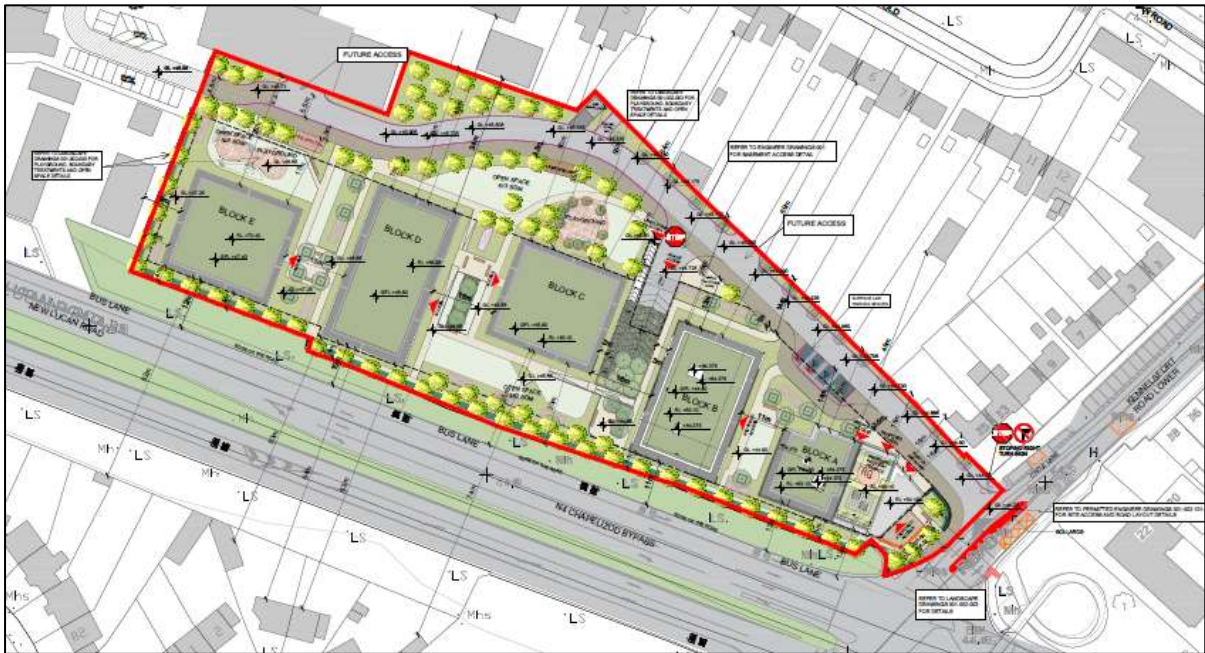
Minor proposed alterations are required to the previously permitted ESB sub-station on site in order to comply with ESB requirements for the scheme. Please refer to the proposed ESB sub-station drawing prepared by Downey Planning & Architecture for further details in this regard.

In term of open spaces, the landscape design incorporates minor alterations to accommodate the proposed minor increase in footprint/floor plans of Blocks C, D & E to accommodate construction method requirements and revised apartment mix/layouts. The landscape design creates a high-quality landscape for residents to partake with; an attractive landscape for people to live in and move through whilst enhancing the biodiversity value and ecological function of the green infrastructure network.

The design approach proposed as part of the overall scheme also aims to repair habitat fragments and provide for the regeneration of flora and fauna where existing landscape lacks. This is done by incorporating appropriate elements of green infrastructure, new tree planting, woodland style planting, mixed ornamental planting and raised planters positioned in areas of hard landscape, thus



reducing the amount of hardscape. The landscape character areas remain the same as those previously permitted, including a green boundary fringe, communal spaces, open space areas and children’s playgrounds, and a roof garden.



**Fig. 5 – Permitted Site Layout Plan (ABP-309899-21)**



**Fig. 6 – Proposed Site Layout Plan (with ground floor plan shown)**

These character areas are described as follows:

- A ‘Green Boundary Fringe’, creates a natural boundary between the apartment buildings and the surrounding environment thus acting as a transition zone. The proposed trees and hedges along the south boundary have been selected for effective wind mitigation and to provide a natural screen and buffer from the Chapelizod Bypass. As part of the landscape proposal,

woodland planting is proposed in a mix of indigenous native species that will provide shelter, habitats, as well as screening from adjacent properties.

- A set of 'Communal Spaces' across the development, will provide for an enjoyable attractive space to be appreciated from the above apartments, and a pleasant, inviting area for the residents to engage with while passing through as well as relaxing in one of the seating arrangements.
- A set of areas of 'Open Space and Children's Playgrounds', aim to create a strong pedestrian linkage throughout the scheme. The open space areas have been designed to provide both passive and active recreational amenities. There are two main areas designated for children's play with play equipment for all ages, which are located to the north of the apartment buildings to shelter the play areas from any potential noise from the road, as per the recommendations provided by the acoustic consultants as part of the permitted scheme and in accordance with best practice guidance. There is a plaza located by the access onto Kennelsfort Road Lower adjoining the café for the enjoyment of residents and the local community.
- A 'Roof Garden', can be enjoyed by the residents of the scheme throughout the year. The roof garden is located on the third floor of Block A and would provide a visually pleasing place for residents to enjoy and relax in, with seating provided on hard landscape areas of the garden. There is a 3m glass balustrade around the perimeter of the roof garden for wind mitigation.

The design and layout of the permitted development which is now subject to proposed alterations, is such that it provides a high-quality living environment for residents and indeed for visitors to the scheme. The landscaping has been designed to ensure high-quality active and passive recreational amenity spaces for the enjoyment of all residents including southerly facing public open space, play equipment for children and a high-quality designed roof terrace/garden, all of which contribute to the overall visual character, identity and amenity of the area. The amenity spaces benefit from passive surveillance from the residential units. The boundary treatments for the scheme also provide a sense of security and privacy whilst also providing visual interest and distinction between spaces. Furthermore, the public realm enhancements, as previously permitted, will improve the sense of place at Kennelsfort Road Lower. The development also provides additional complementary recreational land-uses such as a gym, community rooms, and residents' amenity areas to ensure that high-quality facilities are provided on-site for this new residential community.

A detailed set of updated landscape plans have been prepared by Jane McCorkell Landscape Architects submitted as part of the application.

#### Proposed Alterations to Previously Permitted Basement Plan

In terms of the basement, minor alterations are proposed to accommodate construction method requirements and compliance with relevant standards, including minor increase in size and provision of an additional 24 bicycle parking spaces and 26 car parking spaces to cater for the additional 24 units proposed as part of this alterations application. AECOM Consulting Engineers have carried out a Traffic & Transportation Assessment and Mobility Management Plan for the proposed alterations to the permitted scheme. Such assessments confirm that the additional units (24 no.) result in a relatively minor increase over the permitted and in accordance with TII Guidelines, the amended application does not meet the threshold requirements for traffic modelling analysis. An outline of the Mobility



Management Plan has been prepared indicating the potential measures that could be implemented by the management company to promote more sustainable forms of transport to potential residents/staff. It is AECOM's considered opinion that there is no traffic or transportation reason why this development should not proceed.

#### **4.0 An Bord Pleanála Material Alteration Notification**

The Board decided in accordance with section 146B(2) of the Act, that the proposed alterations would constitute a material alteration to the terms of the development. In addition to this determination, An Bord Pleanála have requested the applicant to submit to the Board information specified in Schedule 7A of the Planning and Development Regulations 2001, as amended. Each item contained within the request is now addressed below. Downey Planning have responded to An Bord Pleanála's request in the same numerical sequence as detailed within the request letter dated 27<sup>th</sup> August 2021. Please note that this response document should be read in conjunction with all drawings, plans and documentation submitted by the design team in response to the request and indeed with the application.

##### **4.1 Item 1**

*"Having regard to the provisions of section 146B(3)(b)(i) of the Planning and Development Act 2000, as amended, the requester is required to submit to the Board the information specified in Schedule 7A of the Planning and Development Regulations 2001, as amended, in respect of the proposed alterations and a planning report which sets out any changes to the daylight and sunlight on the existing residential properties between the permitted scheme and the proposed alterations."*

An additional report has been prepared by Digital Dimensions in response to the request for additional information from An Bord Pleanála under planning ABP-310753-21's regarding daylight/ sunlight analysis. This report assesses the potential impact of the proposed alterations to Blocks C, D and E of the approved Strategic Housing Development (permitted under Ref. ABP-307092-20) on the subject lands. The report sets out any changes to the daylight and sunlight on the existing residential properties between the permitted scheme and the proposed alterations. For further information in this regard, please refer to the enclosed additional report prepared by Digital Dimensions.

In response to the Board's request dated 27<sup>th</sup> August 2021, particularly screening sub-threshold development for Environmental Impact Assessment, the EIA Screening Report previously prepared as part of this current application (ABP-310753-21) has been reviewed and updated to assess the additional documentation being submitted in response to the Board's request. The EIA Screening Report has assessed the potential impact of the proposed alterations to the permitted development on the environment and includes the information specified in Schedule 7A of the Planning and Development Regulations 2001, as amended, for the purposes of screening sub-threshold development for Environmental Impact Assessment.

The project under assessment, *Proposed Alterations to Approved Palmerstown Strategic Housing Development*, whilst it does involve a proposed increase to the total number of residential units previously permitted under Ref. ABP-307092-20 and ABP-309899-21 i.e. proposed additional 24 no. units resulting in a total of 274 no. units now proposed, this still does not meet the thresholds for

which the preparation of an Environmental Impact Assessment Report (EIAR) is a mandatory requirement.

The project is sub-threshold for a mandatory EIA but has been fully screened for potential significant effects on the environment in accordance with EIA Directives and Irish legislation. It is considered that the proposed alterations would not result in any significant changes to environmental impacts from those permitted under ABP-307092-20 & ABP-309899-21. The Board completed an environmental impact assessment screening of that original permitted development (ABP-307092-20) and considered that *'the Environmental Impact Assessment Screening Report submitted by the applicant, identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment. Having regard to: (a) the nature and scale of the proposed development on an urban site served by public infrastructure, (b) the absence of any significant environmental sensitivities in the area, (c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended), the Board concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The Board decided, therefore, that an environmental impact assessment report for the proposed development was not necessary in this case.'*

In addition, the Board in their assessment of the proposed alterations made to this permitted development on 20<sup>th</sup> May 2021 under Ref. ABP-309899-21 stated:

*'Having regard to: (i) the nature and scale of the Strategic Housing Development permitted under An Bord Pleanála Reference Number ABP-307092-20 for this site, (ii) the screening for appropriate assessment and environmental impact assessment carried out in the course of that application, (iii) the limited nature and scale of the alterations, and (iv) the absence of any significant new or additional environmental effects (including those in relation to Natura 2000 sites) arising as a result of the proposed alterations, and (v) the absence of any new or significant issues relating to the proper planning and sustainable development of the area arising from the proposed alterations, (vi) the report of the Planning Inspector it is considered that the proposed alterations would not be material. In accordance with section 146B(3)(a) of the Planning & Development Act, as amended, the Board hereby makes the said alterations.'*

A Screening for Appropriate Assessment was carried out by Faith Wilson Ecological Consultant under both Ref. ABP-307092-20 and Ref. ABP-309899-21, and again for this current application ABP-310753-21. These screening reports noted that given the nature of the project and implementation of best practice construction measures particularly in relation to protection of water quality, it is concluded that there will be no negative impacts on the qualifying interests or species of any Natura 2000 site within a 15km radius of the proposed development at Palmerstown. The proposed alterations to the permitted development at Palmerstown, either individually or cumulatively in combination with the other identified plans and projects, will not adversely affect the integrity of any Natura 2000 site. Thus, there will be no impact on SACs and SPAs / Natura 2000 sites, as confirmed by Faith Wilson, ecologist. For further information in this regard, please refer to the Screening for Appropriate Assessment report submitted with the application.

It is therefore submitted that no new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for the approved SHD scheme ABP-307092-

20 & ABP-309899-21. Thus, having regard to the above, and in particular to the nature, scale and location of the proposed project, by itself and in combination with other plans and projects, the proposed development is not likely to have significant effects on the environment and it is considered that an Environmental Impact Assessment is not required for this project. Please refer to the enclosed EIA Screening Report for further details.

#### **4.2 Item 2**

*“A report that sets out how the amended development would comply with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements and the quantum of residential amenity space for the entire scheme”.*

An additional report has been prepared by Downey Architecture in response to this request. This report titled, Qualitative Assessment Report, sets out in detail how the proposed alterations to the permitted development comply with the various requirements of the Guidelines on Design Standards for New Apartments, including its specific planning policy requirements and the quantum of residential amenity space for the entire scheme. For further information in this regard, please refer to the enclosed report prepared by Downey Architecture.

#### **4.3 Item 3**

*“Additional Computer-Generated Images (CGIs) illustrating the proposed development and the full context of the rear of the properties along Old Lucan Road and Rose View, above eye level”.*

An additional report has been prepared by Digital Dimensions in response to this request. The report provides additional verified views illustrating the Computer-Generated Image (CGI) model of the proposed alterations to the permitted SHD in the full context of the rear of the existing properties along Old Lucan Road and Rose View, above eye level. It must be recognised that access to third party private gardens or internal access to the upper floors of private property (to achieve above eye level views) could not be secured, and so every effort has been made to satisfy the Board’s particular request for the selected verified views being above eye level. Thus, the views are above eye level and have been taken in the public domain. Two verified views were taken above eye level from Old Lucan Road and Rose View as per the request, with both views taken through the gaps between the properties to ensure an exposed view of the scheme. Given that such verified views have not been requested before and in the interest of clarity, the additional views illustrate the existing view; the permitted view (ABP-307092-20 as amended by 309899-21); and the proposed view illustrating the proposed alterations to the permitted development. For further information in this regard, please refer to the enclosed report prepared by Digital Dimensions.

#### **4.4 Item 4**

*“Full specification of type and location of all planting proposed”.*

An additional report and drawings have been prepared by Jane McCorkell Landscape Architects in response to this request. Please find enclosed a Soft Landscape Plan and a Planting Specifications drawing. The planting detail specifies the tree type, its position and size at planting stage. For mixed planted areas, hedgerows and woodland plantation, the quantities have been specified as a percentage breakdown. Exact location and quantities for this smaller material shall be determined

during construction phase detail design. For further information, please refer to the enclosed report and drawings prepared by Jane McCorkell Landscape Architects.

#### **4.5 Item 5**

*“Details of all changes to bicycle parking”.*

Additional drawings have been prepared by Downey Architecture in response to this request. The drawings clearly illustrate all changes to the bicycle parking to be delivered as part of the overall scheme. The number of bicycle spaces in the permitted scheme Ref. ABP-307092-20 as amended by ABP-309899-21 is 276 no. spaces in total. 250 no. spaces of those spaces are provided in the basement, with 26 no. spaces on the surface. In this proposed alterations scheme Ref. ABP-310753-21, there are now 300 no. spaces in total. 274 no. spaces are proposed in the basement, with 26 no. spaces on the surface. There are no changes proposed to the bicycle spaces on the surface. The differences in the bicycle parking in the basement are as follows:

- Under Block B, there were 110 no. spaces permitted. In the proposed basement the number of bicycles spaces has increased to 154 no. spaces. In addition to this, there are 2 no. extra bicycle spaces proposed at the northeast corner beside the plant area.
- Under Block C, bicycle spaces were slightly reduced from 68 no. spaces to 64 no. spaces in the area north of the stair core.
- Under Block D, at the northeast corner, the number of bicycle spaces remain the same at 16 no. bicycle spaces, and there is a reduction of spaces from 20 no. spaces to 8 no. spaces adjacent to block D stair core.
- Between Blocks D & E, within western bin storage compound 4 no. new bicycle spaces have been added.
- Under Block E, bicycle spaces were reduced from 36 no. spaces to 26 no. spaces in the area adjacent to the stair core.

For further information in this regard, please refer to the enclosed drawings prepared by Downey Architecture.

#### **5.0 Appropriate Assessment Screening**

A Screening for Appropriate Assessment has been carried out by Faith Wilson Ecological Consultant. Given the nature of the project and implementation of best practice construction measures particularly in relation to protection of water quality, it is concluded that there will be no negative impacts on the qualifying interests or species of any Natura 2000 site within a 15km radius of the proposed development at Palmerstown. The proposed alterations to the permitted development at Palmerstown, either individually or cumulatively in combination with the other identified plans and projects, will not adversely affect the integrity of any Natura 2000 site. Thus, there will be no impact on SACs and SPAs / Natura 2000 sites, as confirmed by Faith Wilson, ecologist. For further information in this regard, please refer to the Screening for Appropriate Assessment report submitted with the application.



## 6.0 EIA Screening

In light of the Board's request dated 27<sup>th</sup> August 2021, the EIA Screening Report previously prepared as part of this current application (ABP-310753-21) has been reviewed and updated to assess the additional documentation being submitted in response to the Board's request. The EIA Screening Report has assessed the potential impact of the proposed alterations to the permitted development on the environment and includes the information specified in Schedule 7A of the Planning and Development Regulations 2001, as amended, for the purposes of screening sub-threshold development for Environmental Impact Assessment.

The project under assessment, *Proposed Alterations to Approved Palmerstown Strategic Housing Development*, whilst it does involve a proposed increase to the total number of residential units previously permitted under Ref. ABP-307092-20 and ABP-309899-21 i.e. proposed additional 24 no. units resulting in a total of 274 no. units now proposed, this still does not meet the thresholds for which the preparation of an Environmental Impact Assessment Report (EIAR) is a mandatory requirement.

The project is sub-threshold for a mandatory EIA, but has been fully screened for potential significant effects on the environment in accordance with EIA Directives. It is considered that the proposed alterations would not result in any significant changes to environmental impacts from those permitted under ABP-307092-20 & ABP-309899-21. The Board completed an environmental impact assessment screening of that original permitted development (ABP-307092-20) and considered that *'the Environmental Impact Assessment Screening Report submitted by the applicant, identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment. Having regard to: (a) the nature and scale of the proposed development on an urban site served by public infrastructure, (b) the absence of any significant environmental sensitivities in the area, (c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended), the Board concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The Board decided, therefore, that an environmental impact assessment report for the proposed development was not necessary in this case.'*

In addition, the Board in their assessment of the proposed alterations made to this permitted development on 20<sup>th</sup> May 2021 under Ref. ABP-309899-21 stated:

*'Having regard to: (i) the nature and scale of the Strategic Housing Development permitted under An Bord Pleanála Reference Number ABP-307092-20 for this site, (ii) the screening for appropriate assessment and environmental impact assessment carried out in the course of that application, (iii) the limited nature and scale of the alterations, and (iv) the absence of any significant new or additional environmental effects (including those in relation to Natura 2000 sites) arising as a result of the proposed alterations, and (v) the absence of any new or significant issues relating to the proper planning and sustainable development of the area arising from the proposed alterations, (vi) the report of the Planning Inspector it is considered that the proposed alterations would not be material. In accordance with section 146B(3)(a) of the Planning & Development Act, as amended, the Board hereby makes the said alterations.'*

A Screening for Appropriate Assessment was carried out by Faith Wilson Ecological Consultant under both Ref. ABP-307092-20 and Ref. ABP-309899-21, and again for this current application ABP-310753-21. These screening reports noted that given the nature of the project and implementation of best practice construction measures particularly in relation to protection of water quality, it is concluded that there will be no negative impacts on the qualifying interests or species of any Natura 2000 site within a 15km radius of the proposed development at Palmerstown. The proposed alterations to the permitted development at Palmerstown, either individually or cumulatively in combination with the other identified plans and projects, will not adversely affect the integrity of any Natura 2000 site. Thus, there will be no impact on SACs and SPAs / Natura 2000 sites, as confirmed by Faith Wilson, ecologist. For further information in this regard, please refer to the Screening for Appropriate Assessment report which is submitted with the application.

It is therefore submitted that no new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for the approved SHD scheme ABP-307092-20 & ABP-309899-21. Thus, having regard to the above, and in particular to the nature, scale and location of the proposed project, by itself and in combination with other plans and projects, the proposed development is not likely to have significant effects on the environment and it is considered that an Environmental Impact Assessment is not required for this project. Please refer to the enclosed EIA Screening Report for further details.

## **7.0 Conclusion**

Downey Planning have prepared this planning response report, on behalf of the applicant, Randelswood Holdings Ltd. Downey Planning hereby wish to submit this response for the consideration of An Bord Pleanála, following receipt of the Board's correspondence dated 27<sup>th</sup> August 2021.

This response relates to the planning application for proposed alterations to the approved Strategic Housing Development (permitted under Ref. ABP-307092-20, as amended by ABP-309899-21) in accordance with Section 146B of the Planning and Development Act, 2000 (as amended), in respect of lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

The case reference for the current alteration request is An Bord Pleanála Reference Number ABP-310753-21. The Board decided in accordance with section 146B(2) of the Act, that the proposed alterations would constitute a material alteration to the terms of the development.

A planning report was submitted with the application which sets out the planning rationale and justification for the proposed alterations to the approved SHD scheme and demonstrates how it accords with the proper planning and sustainable development of the area. That report should be read in conjunction with the plans, drawings and documentation submitted as part of the overall planning application pack and indeed the additional documentation hereby being submitted in response to An Bord Pleanála's correspondence dated 27<sup>th</sup> August 2021.

The proposed alterations pertain to Blocks C, D and E including external and internal modifications, proposed increase in height to accommodate essential construction requirements, and a proposed additional setback floor on each of these three buildings, resulting in an additional 24 no. units being proposed, with associated alterations to the previously permitted basement, ESB sub-station and

landscaping proposals. No alterations are proposed to the previously permitted Blocks A & B (as permitted under Ref. ABP-307092-20 and recent alterations made under Ref. ABP-309899-21).

As part of the proposed alterations, an increase in the overall heights and footprint of Blocks C, D and E is required to accommodate the relevant necessary construction method requirements including lift shaft overrun, AOV and parapet, and insulation requirements, etc. There have also been elevational changes made to Blocks C, D and E as a result of these requirements. These alterations reflect the same alterations made to Blocks A & B of the scheme as amended by ABP-309899-21. The Board deemed that the alterations to Blocks A & B would not be material and therefore made the said alterations to the permitted development on 20<sup>th</sup> May 2021 under ABP-309899-21. The development is now under construction, with demolition works completed and excavation works well underway on site. Thus, it must be stressed that these particular alterations to Blocks C, D and E are essential for construction and the overall delivery of this development.

The documentation submitted as part of the application, together with the additional documentation prepared in response to An Bord Pleanála's letter dated 27<sup>th</sup> August 2021, set out the planning rationale and justification for the proposed alterations to the approved SHD scheme and demonstrates how it accords with the proper planning and sustainable development of the area. The applicant is committed to delivering this high-quality residential scheme, with construction well underway on site. The development will provide for an effective, efficient, sustainable use of what is a brownfield site in a highly accessible location which is well served by public transport (QBC). Palmerstown village will benefit from the injection of population from this development as it will provide much needed additional homes and will help sustain the long-term viability of the existing community and social infrastructure offering.

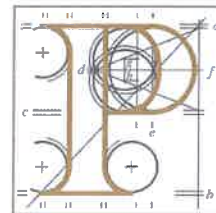
It is submitted that the proposed alterations to the approved Palmerstown SHD scheme are in accordance with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended).

## **Appendix A– An Bord Pleanála Letter, 27<sup>th</sup> August 2021**



**Our Case Number:** ABP-310753-21

**Your Reference:** Randelswood Holdings Limited



**An  
Bord  
Pleanála**

Downey Planning  
1 Westland Square,  
Pearse Street,  
Dublin 2

**Date:** 27 August 2021

**Re:** Amendments to previously permitted development ABP-307092-20 as amended by ABP-309899-21 to include elevational changes, apartment layouts, communal spaces, landscaping, basement plan layout and ESB substation.

Lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to your request in accordance with the provisions of section 146B of the Planning and Development Act 2000, as amended to alter the terms of the previously approved development (case reference numbers ABP-307092-20 as amended by ABP-309899-21).

Please be advised that in accordance with section 146B(2)(a) of the Act, the Board has decided that the proposed alteration would constitute a material alteration to the terms of the development.

Section 146B of the Act, as amended by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, provides that if the Board decides that the making of the proposed alteration would constitute the making of a material alteration, it shall, by notice in writing served on the requester, require the requester to submit to the Board the information specified in Schedule 7A of the Planning and Development Regulations 2001, as amended.

1. Having regard to the provisions of section 146B(3)(b)(i) of the Planning and Development Act 2000, as amended, the requester is required to submit to the Board the information specified in Schedule 7A to the Planning and Development Regulations 2001, as amended, in respect of the proposed alterations and a planning report which sets out any changes to the daylight and sunlight on the existing residential properties between the permitted scheme and the proposed alterations.
2. A report that sets out how the amended development would comply with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements and the quantum of residential amenity space for the entire scheme.
3. Additional Computer-Generated Images (CGIs) illustrating the proposed development and the full context of the rear of the properties along Old Lucan Road and Rose View, above eye level.

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

4. Full specification of type and location of all planting proposed.
5. Details of all changes to bicycle parking.

The information which is made available should also include a set of drawings that clearly compares and contrasts the proposed alterations with the development as permitted.

The Board would request that you furnish the said information as well as any further relevant information on the characteristics of the alteration under consideration and its likely significant effects on the environment. The information may be accompanied by a description of the features, if any, of the right alteration under consideration and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the alteration.

For ease of reference, the information to be provided under Schedule 7A is as follows:

1. A description of the proposed development, including in particular –
  - (a) A description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and
  - (b) A description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from –
  - (a) The expected residues and emissions and the production waste, where relevant, and
  - (b) The use of natural resources, in particular soil, land, water and biodiversity.
4. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

Prior to making a determination under section 146B(3)(b) or section 146B(4) of the Act, and in accordance with the provisions of section 146B(8) of the Act, you are required to carry out the following:

- (i) Deposit a copy of the information (including plans and particulars) relating to the request with the planning authority requesting that it be made available for inspection or for purchase upon payment of a fee not exceeding the reasonable cost of making a copy (the request will also be available for inspection and purchase at the offices of An Bord Pleanála);
- (ii) Send notice of the request, and a copy of the request (including plans and particulars), to the prescribed bodies stating that submissions or observations may be made in writing to the Board before a specified date (being the same date referred to in the public notices for the making of submissions/observations); and

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64 Marlborough Street  
Dublin 1  
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- (iii) Publish in two newspapers circulating in the area in which the development is located a notice stating that a request to alter the terms of the development has been made to An Bord Pleanála under section 146B of the Act, that the request will be available for inspection or for purchase upon payment of a fee not exceeding the reasonable cost of making a copy at a specified place and at specified times during a specified period, and that submissions or observations in relation to the request may be made in writing to the Board before a specified date.

With regards to requirements, (i), (ii) and (iii) above, the Board would ask that you ensure the Schedule 7A information be furnished to the Board and to the relevant planning authority in a timely manner so that they make be made available for public inspection for the duration of the relevant time period.

In respect of (iii) above, the notices should be published in two newspapers, one of which should be a national paper. If possible, these should be the same newspapers used in respect of the original planning application. In respect of the time limits for the making of submissions/observations in relation to the request to the Board, the specified time period shall be not less than 4 weeks. Please see draft public notices attached which should be followed in this regard.

You are also required to erect site notices at the same locations where the site notices for the planning application were erected, and at appropriate locations to reflect the proposed alteration. The date of the erection of the site notices is to be inserted; otherwise, it should contain the same information as the draft public notices included herein.

You should submit the relevant newspaper notices, the site notice, confirmation of where the site notices have been erected, and a copy of the notices issued under (ii) above to the Board as soon as same are available. In this regard, you are requested to submit two hard copies and one electronic copy of the documentation. Your response to this letter should be received by the Board as soon as practicable.

If you have any queries in relation to the above, please do not hesitate to contact the undersigned.

Yours faithfully,

  
Helen Keane  
Executive Officer  
Direct Line: 01-8737294

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**Láithreán Gréasáin**  
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## **Planning and Development Act 2000 to 2020**

### **Application to An Bord Pleanála Reference Number ABP-310753-21**

In accordance with section 146B of the Planning and Development Act 2000, as amended, An Bord Pleanála has received a request from Randelswood Holdings Limited to alter the terms of the grant of planning permission for a Strategic Housing Development at lands at Palmerstown Retail Park, Kennelsfort Road Lower, Plamerstown, Dublin 20 (An Bord Pleanála application Reference Number ABP-307092-20 as amended by ABP-309899-21).

The request relates to the demolition of existing structures, construction of 250 no. Build to Rent apartments and associated site works.

The proposed alterations relate to the following:

- Amendments to previously permitted development ABP-307092-20 as amended by ABP-309899-21 to include elevational changes, apartment layouts, communal spaces, landscaping, basement plan layout and ESB substation.

The case reference for the current alteration is An Bord Pleanála Reference Number ABP-310753-21

The Board decided in accordance with section 146B(2) of the Act, that the proposed development would constitute a material alteration to the terms of the development.

Under section 146B(8), submissions or observations in relation to the request may be made to An Bord Pleanála, during a period of 5 weeks relating to

- (a) Whether such an alteration should be likely to have significant effects on the environment,
- (b) Whether the Board should make the alteration to the terms of the development concerned being an alteration other than that to which the request relates or refuse to make the alteration.

The Board shall have regard to the submissions or observations made on foot of this invitation.



The information relating to the proposed alteration (including the details of the request) may be inspected free of charge or purchased on payment of a specified fee at the offices of South Dublin County Council and the offices of An Bord Pleanála during office opening hours for a period of 5 weeks commencing on \_\_\_\_\_.

An submission or observation in relation to the request to alter the terms of the development may be made to An Bord Pleanála, 64 Marlborough Street, Dublin 1. Any submissions must be accompanied by a fee of €20, except for certain prescribed bodies. There is no fee required to make a submission or observation by those parties or individuals who have already made a valid submission or observation to the Board in relation to the original application An Bord Pleanála Reference Number ABP-307092-20.

Submissions of observations must be received by the Board not later **than 5.30pm** on \_\_\_\_\_.

Such submissions or observations must include the following information:

1. The name of the person making the submission or observation, the name of the person, if any, acting on behalf of that person, and the address to which any correspondence relating to the application should be sent,
2. The subject matter of the submission or observation, and
3. The reasons, considerations and arguments on which the submission or observation is or are based.

Any submission or observation which does not comply with the above requirements cannot be considered by the Board.

Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8737100).

Signed: \_\_\_\_\_

Date of erection of site notice: \_\_\_\_\_