

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

**Reg. Reference:** SDZ21A/0022      **Application Date:** 02-Dec-2021  
**Submission Type:** New Application      **Registration Date:** 02-Dec-2021

**Correspondence Name and Address:** Rory Kunz, John Spain Associates 39, Fitzwilliam Place, Dublin 2

**Proposed Development:** The construction of 569 dwellings, a creche, innovation hub and open space in the Clonburris South West Development Area of the Clonburris SDZ Planning Scheme 2019 as follows: 173 houses comprising 8 two bedroom houses, 153 three bedroom houses and 12 four bedroom houses (147 dwellings in CSW-S4 consisting of 8 two bedroom houses, 127 three bedroom houses & 12 four bedroom houses & 26 three bedroom dwellings in CSW-S3}, all 2 storey comprising semi-detached, terraced, end terrace units (with parking and private open space); (B) 148 duplex apartments/apartments {88 in CSW-S4 & 60 in CSW-S3} comprising 74 two bedroom units and 74 three bedroom units, in 16 three storey buildings. In CSW-S4 Duplex Blocks A,B,C,D,E,F,G,J,K, comprise 8 units (4 two bed & 4 three bed units), Duplex Block H comprises 16 units (8 two bed & 8 three bed units), In CSW-S3 Blocks L, N & O comprise 8 units (4 two bed & 4 three bed units), Block M comprises 14 units (7 two bed & 7 three bed units), Block P comprises 10 units (5 two bed & 5 three bed units), Block Q comprises 12 units {6 two bed & 6 three bed units), all to have terraces/pitched roof; (C) 396 apartments as follows: within CSW-S4, Block 1 consists of 172 apartments (76 one bedroom, 91 two bedroom and 5 three bedroom apartments), in a 2-building arrangement both 6 storeys in height. Within CSW-S3, Block 2 {4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments, Block 3 (4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments (all apartments to have terrace or balcony); (D) Provision of an innovation hub (626sq.m) and creche (c. 547sq.m) in a part 3/4 storey 'local node' building in CSW-S4; (E) Vehicular access will be from the permitted Clonburris Southern Link

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Street (SDZ20A/0021) and R113 to the east { along with provision of internal haul routes {for construction) to connect to the R136 to the west); (F) Public Open Space/landscaping of c. 4.1 hectares (to include Local Park and MUGA in CSW-S3, Grand Canal Park, along the southern and eastern boundaries of the site to connect to existing Grand Canal towpath) as well as a series of communal open spaces to serve apartments and duplex units (c. 0.39 ha); (G) all ancillary development works including footpaths, landscaping boundary treatments, public, private open space areas, car parking (656 spaces) and bicycle parking (672 spaces), single storey ESB substations/bike/bin stores, 'Gateway' entrance signage (2), solar panels at roof level of apartments, and all ancillary site development/construction works; (H) Permission is also sought for revisions to attenuation permitted under SDZ20A/0021 as well as connection to water supply, and provision of foul drainage infrastructure; this application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015; an Environmental Impact Assessment Report accompanies this planning application; the application applies for 7-year planning permission for development at this site of c. 17 .02 hectares (on two parcels of land to include entrance area) within the townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin all on wider lands bounded generally by undeveloped lands and the Dublin-Cork railway line to the north, undeveloped lands and the Grand Canal to the south, the R113 {Fonthill Road) to the east and the R136 to the west.

**Location:** Within the Townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin

**Applicant Name:** Cairn Homes Properties Ltd.

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

**Application Type:** Permission

(SW)

### **Description of Site and Surroundings:**

#### Site Area:

Stated as 17.02ha.

#### Site Description:

The subject site is located in the south-eastern section of Clonburris SDZ (Strategic Development Zone) and forms a section of the Clonburris Character Area within the Clonburris SDZ. The subject site is located in the south-western section of the Clonburris element of the SDZ lands, within development areas CSWS-3 and CSWS-4.

The application site consists of an undeveloped, greenfield site, which is situated to the north of the Grand Canal and to the west of the Fonthill Road (R113). The site is located approximately 200m from Clondalkin Train Station, 500m from Banougue Neighbourhood centre and approximately 1km from Clondalkin Centre.

The existing layout plan indicates varying topography across the site. Levels generally range from 58 to 60, however, this increases to 62.5 in the south-east corner. The lands steeply rise along the eastern boundary where it abuts Fonthill Road. The site is criss-crossed by trees and hedgerows. The Clonburris Southern Link Street (which has planning permission) site runs through the centre of the application site in an east – west direction.

### **Proposal:**

The proposed development consists of:

The construction of **569 dwellings**, a creche, innovation hub and open space in the Clonburris South West Development Area of the Clonburris SDZ Planning Scheme 2019 as follows:

- (A) 173 houses comprising:
  - 8 two-bedroom houses,
  - 153 three bedroom houses and
  - 12 four bedroom houses
  - Breakdown of dwellings in Character Areas CSW-S4 and CSW-S3
    - CSW-S4: 147 dwellings consisting of 8 two-bedroom houses, 127 three bedroom houses & 12 four bedroom houses
    - CSW-S3: 26 three-bedroom dwellings

\*\*All dwelling houses are 2-storey comprising semi-detached, terraced, end terrace units (with parking and private open space);

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

- (B) 148 duplex apartments/apartments in 16 three storey buildings comprising:
  - 74 two-bedroom units and
  - 74 three bedroom units,
  - Breakdown of dwellings in Character Areas CSW-S4 and CSW-S3:
    - CSW-S4: 88 x Duplex Blocks A,B,C,D,E,F,G,J,K, comprise 8 units (4 two bed & 4 three bed units), Duplex Block H comprises 16 units (8 two bed & 8 three bed units),
    - CSW-S3: 60 located in Blocks L, N & O comprising:
      - 8 units (4 two bed & 4 three bed units),
      - Block M comprises 14 units (7 two bed & 7 three bed units), Block P comprises 10 units (5 two bed & 5 three bed units), Block Q comprises 12 units {6 two bed & 6 three bed units),
    - all to have terraces/pitched roof;
- (C) 248 apartments as follows:
  - within CSW-S4, Block 1 consists of 172 apartments (76 one bedroom, 91 two bedroom and 5 three bedroom apartments), in a 2-building arrangement both 6 storeys in height.
  - Within CSW-S3, Block 2 {4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments, Block 3 (4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments
  - all apartments to have terrace or balcony;
- (D) Provision of an innovation hub (626sq.m) and creche (c. 547sq.m) in a part 3/4 storey 'local node' building in CSW-S4;
- (E) Vehicular access will be from the permitted Clonburriss Southern Link Street (SDZ20A/0021) and R113 to the east {along with provision of internal haul routes {for construction) to connect to the R136 to the west);
- (F) Public Open Space/landscaping of c. 4.1 hectares: to include
  - Local Park and MUGA in CSW-S3,
  - Grand Canal Park, along the southern and eastern boundaries of the site to connect to existing Grand Canal towpath
  - a series of communal open spaces to serve apartments and duplex units (c. 0.39 ha);
- (G) all ancillary development works including footpaths, landscaping boundary treatments, public, private open space areas, car parking (656 spaces) and bicycle parking (672 spaces), single storey ESB substations/bike/bin stores, 'Gateway' entrance signage (2no), solar panels at roof level of apartments, and all ancillary site development/construction works;
- (H) Permission is also sought for revisions to attenuation permitted under SDZ20A/0021 as well as connection to water supply, and provision of foul drainage infrastructure;

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

This application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015.

An Environmental Impact Assessment Report accompanies this planning application; the application applies for **7-year planning permission** for development.

Site measures approximately 17.02 hectares (on two parcels of land to include entrance area) within the townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin.

### SEA Screening

Adjacent to Grand Canal pNHA and 3 protected structures (No122, 123, 128) to the south. RMP 017-036 to the north. RMP 017-035 adjacent to access road to south

### **Zoning:**

This site is situated within Clonburris SDZ Planning Scheme lands and is subject to zoning objective 'SDZ' 'To provide for Strategic Development in accordance with approved planning schemes' under the South Dublin County Council Development Plan 2016-2022.

### **Consultations:**

*Waterways Ireland:* No report received at time of writing.

*TII:* No observations.

*EMRA:* No report received at time of writing.

*Sustainable Energy Ireland:* No report received at time of writing.

*OPW – Flood Defences:* No report received at time of writing.

*NRA:* No report received at time of writing.

*Irish Water:* Additional information requested.

*Inland Fisheries Ireland:* No report received at time of writing.

*Heritage Council:* No report received at time of writing.

*Department of Housing, Local Government & Heritage:* No objection, subject to conditions.

*Department of Defence:* No report received at time of writing.

*Chief Fire Officer:* No report received at time of writing.

*An Taisce:* No report received at time of writing.

*Parks and Public Realm Department:* Additional information requested.

*Heritage Officer:* Additional information requested.

*SDCC Housing:* Request additional information.

*Architectural Conservation Officer:* No report received at time of writing.

*County Architect:* No report received at time of writing.

*Forward Planning:* No report received at time of writing.

*EHO:* Additional information requested.

*Roads:* Additional information requested.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

*Pollution Control:* No report received at time of writing.

*Water Services:* Additional information requested.

*Waste Management:* No report received at time of writing.

*NTA:* via public consultation – Further information requested.

### Submissions/Observations/Representations

Date for final submissions 14 January 2022. A submission has been received from Cllr E O'Broin and the National Transport Authority.

- District heating options needs to be assessed;
- Welcome that there are no build to rent – more 3bed apartments needed – not clear what proportion dual aspect – is there sufficient ventilation for clothes drying – finishes welcome – would it be possible to ensure apartments are for individual purchase only;
- Tree planting – proposals welcome;
- Recreational facilities – areas for unstructured play welcome – covered play space would also be welcome – unstructured ball sports area would also be welcome.

### Recent Relevant Planning History

The site is located within the Clonburris Strategic Development Zone for which a Planning Scheme was prepared by South Dublin County Council and approved by An Bord Pleanála.

#### *Application Site*

The application site is dissected by the Link Street which was granted permission:

SDZ20A/0021 Planning Permission granted for roads and drainage infrastructure works as approved under the Clonburris Strategic Development Zone Planning Scheme (2019) to form part of the public roads and drainage networks. **Subject to conditions.**

#### **Condition 4:**

Condition 4 Link Street Design

Prior to the commencement of development the applicant, owner or developer shall submit the following for the written agreement of the Planning Authority: Revised plans that incorporate all of the following amendments-

**(a) All junctions required as stated in Figure 2.2.7 (Page 31) of the Clonburris Planning Scheme shall be in accordance with the Scheme, in terms of typology and location.** The applicant shall engage and reach agreement with the Planning Authority on the typology and location of each of the required junctions.

**(b) Parallel car parking shall be provided along the length of the link street, in accordance with Figure 2.2.5 (Page 29) of the Clonburris Planning Scheme. The applicant shall engage and reach agreement with the Planning Authority on the provision of the parallel car parking along the length of the Link Street.**

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

(c) The Proposed Strategic Cycle Network as notated in Figure 2.2.7 (Page 31) of the Clonburris Planning Scheme shall be fully incorporated within the design of the Link Street and spurs off this Link Street and shall be fully in accordance with the Planning Scheme. Revised drawings shall be submitted.

REASON: In the interest of clarity, compliance with the Clonburris Planning Scheme 2019 and to protect the amenities of the area and in the interests of the proper planning and sustainable development of the area

SDZ201/0006 Wastewater pumping station comprising of (a) below ground 24-hour emergency storage tank; (b) below ground inlet, wet well, flow meter and valve chambers; (c) control and welfare building with green roof and 2 odour control units; (d) boundary wall, fencing, entrance gate and landscaping; (e) site drainage system including a swale; (f) all associated ancillary and enabling works including hardstanding and access, located within the Clonburris Strategic Development Zone. **Permission Granted.**

### **Recent Relevant Enforcement History**

None recorded

### **Pre-Planning Consultation**

Pre planning carried out for the proposed development. References PPSDZC 01/19, PPSDZC 06/20 and PPSDZC 02/20.

### **Relevant National Policy**

The relevant policy documents are detailed below. Those identified as being of key significance include 'Project Ireland 2040 National Planning Framework' (NPF) and 'Regional, Spatial & Economic Strategy 2019 – 2031' (RSES).

*Project Ireland 2040 National Planning Framework,*

*Regional, Spatial & Economic Strategy 2019 - 2031,* Eastern & Midlands Regional Assembly, 2019.

### **Additional National Policy Documents of Relevance**

*Urban Design Manual: A Best Practice Guide,* A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage and Local Government, (2008).

*Quality Housing for Sustainable Communities-Best Practice Guidelines,* Department of the Environment, Heritage and Local Government, (2007).

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

*Greater Dublin Area Transport Strategy 2016 -2035, National Transport Authority*

*Design Manual for Urban Roads and Streets (DMURS) Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2019)*

*Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009).*

*National Cycle Manual – National Transport Authority (June 2011).*

*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).*

*The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).*

*Planning & Development of Large-Scale Rail focused Areas in Dublin- National Transport Authority (May 2013).*

### **Relevant Policy in South Dublin County Council Development Plan 2016 – 2022.**

#### ***CS Policy 7 Strategic Development Zones***

It is the policy of the Council to continue to implement the approved Planning Schemes for Adamstown SDZ and to secure the implementation of an approved Planning Scheme for the Clonburris SDZ.

#### **Clonburris SDZ Scheme, 2019**

The Clonburris Strategic Development Zone (SDZ) Planning Scheme represents a shared outlook for the future residential, social, economic and environmental development of a new planned and sustainable community in South Dublin County.

The Planning Scheme 2019 shall be used by the planning authority to assess planning applications in the SDZ. Planning Applications within the SDZ boundary shall be consistent with the Planning Scheme. The Planning Scheme forms part of the Development Plan and any contrary provisions of the Development Plan are superseded by the Planning Scheme.

In a period of renewed growth in Ireland, the County is in a strong position to increase its share of residential and economic development within the Dublin Region. The development of the entire Planning Scheme is expected to deliver a target of 9,416, new homes, a minimum of 7,300sq.m gross community floorspace, approximately 22,520sq.m gross retail floorspace and in the range of 30,000 to 40,000sq.m employment floorspace.



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Clonburris comprises 12 Development Areas, with the proposed development located entirely within Development Area 3 Clonburris South West (CSW-S3 and CSW-S4).

The key overarching principles of the 2019 Planning Scheme include the following:

- To prioritise the delivery of high quality services, utilities infrastructure, and sustainable urban surface water drainage;
- To ensure that the phasing and implementation of the SDZ occurs at a pace whereby it is supported by all necessary supporting community facilities, services, infrastructure and amenities, in order to ensure that place making is prioritised.
- To provide attractive, interesting and well used outdoor spaces using the latest place making and urban design principles, creating a pedestrian-centred environment with active, inviting public space, parks and private gardens.

The application is assessed in accordance with the criteria set out in Development Area 3. The Planning Scheme also comprises a Planning Framework which includes 12 Sections (Sections 2.1 – 2.12). These are set out below with the proposal appropriately assessed against each of them.

### Assessment

The application is assessed in accordance with the criteria set out in Development Area 3. The Planning Scheme also comprises a Planning Framework which includes 12 Sections (Sections 2.1 – 2.12). These are set out below with the proposal appropriately assessed against each of them.

The Clonburris Strategic Development Zone (SDZ) Planning Scheme 2019 is the principal Planning document for the SDZ. The Planning Scheme is the approved framework for the guidance of development in Clonburris, against which all planning applications must be assessed. Section 170 of the Planning and Development Act states that proposed development must be consistent with the Planning Scheme.

The assessment is set out under the following main headings:

- 1. Zoning and Council Policy**
- 2. Phasing**
- 3. Development Area 3: Clonburris South West**
- 4. Consistency with the Planning Scheme:**
  - Land Use and Density
  - Movement and Transport
  - Green and Blue Infrastructure
  - Retail, Economic & Community Facilities and Public Services
  - Built form and Design

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

- Services, Infrastructure and Energy Framework
- Landscape and Open Space
- Biodiversity and Natural Heritage
- Archaeological and Architectural Heritage
- Other

### 5. Environment Impact Assessment

### 6. Appropriate Assessment Screening

#### 1. Zoning and Council Policy

The site is situated in an area which is zoned 'SDZ' '*To provide for Strategic Development in accordance with the approved Planning Schemes*' under the South Dublin County Council Development Plan 2016-2022. The principle of the construction of residential units on this portion of the SDZ lands is consistent with the Clonburris SDZ Planning Scheme.

The proposal represents the first planning application for residential / commercial development with the SDZ area. The commencement of the build out of the SDZ is in accordance with the Core Strategy of the Development Plan and is welcomed by the Planning Authority.

#### 2. Phasing

The Planning Scheme includes a Phasing Programme in Section 4.

The Phasing Table of the Planning Scheme is an element of the Phasing Approach and details a schedule and programme to plan and deliver strategic infrastructure and amenities on a phased basis in tandem with development of residential units.

The Phasing Table includes a number of important prior to commencement plans / strategies that are required to be prepared. These include:

1. A Surface Water Management Plan to implement the Surface Water Strategy (Agreed by SDCC),
2. A Parks and Landscape Strategy (at Draft), and
3. Water and Wastewater Plans (Agreed by SDCC and Irish Water).
4. A Biodiversity Management Plan (BMP) (at Draft).

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Phase	Residential Units constructed and occupied	Minimum delivery in Phase
	<b>Prior to commencement of development</b>	<ul style="list-style-type: none"><li>» Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.</li><li>» Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.</li><li>» Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council.</li></ul>
<b>1A</b>	<b>0 – 1,000</b>	<ul style="list-style-type: none"><li>» Retail Core development in accordance with the Place Making Requirements.</li><li>» Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station &amp; completion of the realignment of Lock Road (R120).</li><li>» Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC.</li><li>» The planning of works for the provision of community floor space and the availability of childcare spaces.</li></ul>

It is noted that the plans and strategies above are required to be agreed prior to commencement of development and as such, the absence of agreement does not preclude the Planning Authority from permitted development. The agreed and draft plans and strategies will be considered as part of the assessment of this planning proposal. In the event of further information, clarity of compliance with a final agreed PLS and BMP will be sought.

As the first units in the SDZ and the quantum being below 1,000, it is considered that the minimum requirements of Phase 1A are not relevant to date. The applicant does states the following with regards the Phase 1A requirements:

- Retail Core development in accordance with the Place Making Requirements:

*Retail core will be developed in separate application*

- Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station & completion of the realignment of Lock Road (R120):

*n/a*

- Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC:

*Noted*

- The planning of works for the provision of community floor space and the availability of childcare spaces:

*A creche and community employment space is provided in current application.*

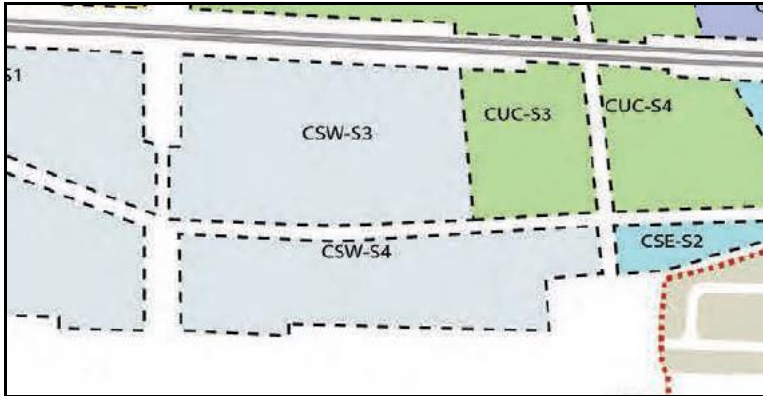
### 3. Development Area 3: Clonburriss South West

Section 2.13 of the Planning Scheme sets out a summary of the overall proposal for development. The application site is located within 2 subsections of Clonburriss South West Character Area CSW-S3 and CSW-S4 (The South West Character Area has 4 subsections). The proposed red line dissects CSW-S3 and incorporates the entirety of the CSW-S4.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive’s Order



Extract from Figure 2.13.3: Development Areas in Clonburris and Sub Sectors

Section 3.2 of the Planning Scheme states, in relation to the overall character area:

*“The Clonburris Character Area will comprise clustering of residential, retail and commercial uses to form a centre located around the Clondalkin- Fonthill Railway Station. The centre will comprise medium to high density development located close to the public transport hub of heavy rail and planned Core Orbital bus services. Civic and community uses will also locate at the Clonburris centre and will contribute to the creation of an active and busy centre organised around a high quality designed Urban Square at its retail core. Development will transition outwards from the centre to medium and lower density residential development with local nodes, community floorspace, schools and high quality open spaces. Development will benefit from park and canal frontage to the south and west”.*

The subject application proposes 569 units in the subject area which forms part of the overall Clonburris Character Area. The scheme targets 4,894 units for the Character Area across 6 Development Areas. The quantum of development for the subsections relevant to this proposal are summarised in Table 2.13.1 in the Planning Scheme and the relevant figures are included in the below.

Net Area (ha)	Average Net Density - Low Margin (-5 DPH)	Average Net Density - High Margin (+5 DPH)	Total Dwellings (Low Margin)	Total dwellings (Target)	Total Dwellings (High Margin)	Retail GFA (sqm) (Max)	Employment GFA (sqm) (Min)	Community / Civic Building GFA (sqm) (Min)	Local Parks and Squares (sqm) (Min)	Schools (existing / proposed)

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

CSW-S3	8.27	51	61	422	461	504				14,300	
CSW-S4	6.54	59	75	386	421	451	650	200	600		

*Extract from Table 2.13.1 Summary of Planning Scheme Tables*

Table 3.3.3 (below) sets out the development parameters for development, located within Sub-sectors CSW-S3 and CSW-C4.

*Table 3.3.3 Clonburris South West*

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## Record of Executive Business and Chief Executive's Order

<b>Area character type</b>	Mixed development area with medium density residential development and will contain local community facilities, including a primary and post primary school and small scale retail and commercial uses.	
<b>Net development area</b>	25.98ha	
<b>No of units (Target)</b>	1,441	
<b>Net Density</b>	<b>Sub Sector</b>	<b>Density Range</b>
	CSW-S1	45-55
	CSW-S2	45-55
	CSW-S3	51-61
	CSW-S4	59-69
	<i>* See also Table 2.1.5 for full range of density</i>	
<b>Affordable/Social dwellings</b>	To be negotiated in accordance with relevant legislation and SDCC Housing Policy	
<b>Non-retail commercial development</b>	200 sqm min	
<b>Retail development</b>	650 sqm max	
<b>Community</b>	600 sqm min	
<b>Building height</b>	<b>Sub Sector</b>	<b>Building Height</b>
	CSW-S1	2-6 storey
	CSW-S2	2-4 storey
	CSW-S3	2-6 storey
	CSW-S4	2-6 storey
	<i>* See also Figure 3.3.2 Building Height Concept</i>	
<b>Public open space</b>	14,300 sqm	

In terms of compliance with the above table, the proposal submitted is assessed as follows:

### *Area character type*

The proposal provides for a mix of uses: 569 dwellings, a creche (547sq.m), innovation hub and open space, which contains commercial space of approximately. 626 sq. m. The applicant calls this 'a community employment hub'.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

The applicant states that “...*the employment hub will serve as a community employment function and also a commercial function*”

The Planning Authority welcomes the diversity of uses in local node and considers that the approach is in accordance with the overall area character type. Some concerns are raised in relation to the mix of uses satisfying the minimum requirements in relation to community. There is addressed below.

*Net development area – 25.98 ha*

14.12ha is stated as the net development area of the subject site in the submitted Planning Report. It is noted the Planning Scheme outlines that some slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the gross or net development area of any Sub Sector. From review, it appears that some adjustment of sub sectors is proposed. It is considered that the applicant has not fully demonstrated that the net development area of the CSW-S4 and the CSW- S3 (partial) is in accordance with the 6.54 ha and 8.27 (partial). The submitted schedule outlines that the net area of CSW – S4 is 6.83ha.

Further information required and overlay of the net development area of the proposed development with the sub sector boundaries required.

*Target units – 1,441 target.*

The site is located within the higher density area of the CSW Development Area. It is proposed to provide 569 dwelling units within this designated higher density area, representing approximately 39.5% of the total target. The proposed development provides 407 no. dwellings on the CSW-S4 sector which is within the range of between 386 no. and 451 no. dwellings. The CSW-S3 sector has a range of dwellings of between 422 no. and 504 no. dwellings. The proposed development encompasses approximately 50% of CSW-C3 and provides 162 dwellings as the first element of CSW-S3. It is noted that the open space is provided as part of this application and the applicant owns the remainder of this sub-section, therefore, it is possible to ensure the required 260 dwellings to meet the minimum requirement are provided in the next phase.

*Net Density*

CSW-S4 has a proposed net density of 59 units per hectare and is in accordance with the parameters of the scheme. Noted that all this subsector is within the red line.

CSW – S3 has a density range of 59-69 units per hectare, however, the red line only contains c50% of the Sector. The proposed net density for the element of the development within CSW-S3 is stated as 74 units per hectare and exceeds the density range for the subsector. The applicants planning report states “*The Applicant controls of the lands within the Clonburris South West Development Area and it is the intention to fully develop CSW-S3 with a density that is in full*

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

*compliance with the 51-61 density range*". It is noted that there is no statement within the Planning Scheme which prohibits an individual planning application to exceed the range. The Planning Authority accepts that the applicant is a landowner for the remaining part of CSW-S3 and has control to comply with the density range in future proposals. Furthermore, the Planning Authority is satisfied that such an approach is feasible in the context of the remaining net development area in the subsector.

### *Affordable / social dwellings*

The applicant agrees to accept a condition on a grant of planning permission, if the Planning Authority is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with South Dublin County Council as per their requirements prior to the commencement of development. Housing Strategy has stated "*It is noted that the proposed Part V units include 56 no. duplexes. It is the preference of the Housing Department to have a mix of unit types and sizes more in proportion with the overall schedule of accommodation for the scheme and to include a specially adapted unit, suitable for persons with medical needs*".

Further negotiation between applicant and Housing Section required.

### *Non-retail / commercial – 200 sqm min*

In excess of the minimum is provided (greater than 200sqm) through an employment hub of 626sqm. This land use is welcomed, exceeds the 200sqm minimum and is consistent with Planning Scheme. Noted that Section 2.6 is supportive of such facilities in the SDZ.

### *Retail – 650 sqm Max*

None provided. It is noted that a maximum figure is provided, however, the site contains a local node and it is considered that some small scale local retail would be beneficial. The Planning Authority accepts the proximity of the subject site to a future urban centre and notes that the Planning Scheme has the provision of minimum retail convenience floorspace in Phase 1B and substantial primary retail frontage. It is noted that this sub sector is one of 4 Development Areas (apart from the Urban Centres) that has scope for local uses. Figure 2.5.1 provides a function map for the Planning Scheme and indicates a secondary retail frontage at and adjacent to the Local Node. The applicant is requested to demonstrate that the residential ground floor design has flexibility to change to a retail/non-residential use in the future. Amendments to the units shall be sought by further information.

### *Community – 600 sqm min*

The proposed development includes a creche of 547sq.m. Childcare is a community facility and is welcomed in the local node. The quantum of the childcare floorspace is below the stated minimum of 600 sqm and the applicant contends that the employment hub will serve a community employment function and also a commercial function and the combined floorspace of commercial/community of 1,173sq.m meets the combined minimum of 800 sqm. The Planning Authority can



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

see some merit in this rationale, however, more details in relation to the operation and management of the employment hub would be required.

The Planning Authority has concerns in relation to the achievement of the Park Hub at the local node. Table 2.7.2 outlines that the Park Hub community buildings be located adjacent to the main parks at the local nodes. The relevant park is Grand Canal Park and the relevant community building hub is Cappagh. The Cappagh Park Hub is a small scale community building to provide floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms. This provision is not satisfied in the proposed development and further information is required.

In summary, it is considered that the Planning Scheme envisages a minimum community floorspace of 600sq.m at the Cappagh Local Node and envisages a community building, known as a Park Hub, to facilitate floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms at the local node. The provision of the childcare and employment uses are welcomed and in combination, achieve the minimum floorspaces. However, concerns remain regarding the absence of the community building element. Further consideration and discussion required with South Dublin County Council. Further information required.

### *Building Height*

Both the subsectors have a height range of 2-6 storeys and the proposal is consistent with these parameters. Figure 3.3.2 of the Scheme provides further detail in the form of a building height concept and the urban design approach to building height will be assessed later in this report.

### *Public Open Space – 14,300sq.m*

It is noted that Table 2.13.1 designates the 14,300sq.m local park area to the CSW – S3 sub sector. The applicant has proposed a park at this location within CSW-S3 and states the area is 1.56ha. This is in excess of the 1.43ha required and in accordance with the minimum quantum of the scheme. Further assessment of the quality of the open space will be later in the report.

### Key Objectives for Clonburris South West Development Area

The following key objectives for Clonburris South West are.

- *To develop a high quality residential neighbourhood at Clonburris;*
- *To develop a new local node, Cappagh, comprising small-scale, local retail, service and community facilities, fronting the new Boundary Park;*
- *To develop new co-located primary and post-primary schools with direct access and frontage to the new Boundary Park;*
- *To provide locally accessible open spaces of local and strategic importance;*

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

- *To ensure high levels of legibility and ease of orientation;*
- *To provide a new north south avenue link connecting Clonburris North East, Clonburris South East and Deansrath/ Bawnogue;*
- *To provide a new link route/avenue in the heart of the neighbourhood as part of the main connection between Kishoge and Clonburris urban centres;*
- *To prioritise pedestrian and cyclist movement and to provide for bus services along the avenue;*
- *To provide for a range of housing along the new avenue and local streets including home zones;*
- *To provide a distinctive, diverse and quality frontage to the Canal corridor;*
- *Sensitively designed pedestrian access points to the Grand Canal;*
- *To retain and refurbish the Cappagh Overflow bridge;*
- *To seek the refurbishment and re-use of Omer's Lock House;*
- *Where possible, in preserving the architectural integrity of the Omer Lock House that a heritage centre be located on or close to the site of the Lock House to act as a centre for the promotion of the heritage, architectural and archaeological history of the Lucan and Clondalkin areas, whilst recognising that other more viable uses for the structure may present themselves and will be considered should that be the case;*

A number of the key objectives for the wider Development Area are not relevant to the subject site, including strategic links. The Urban Design related objectives will be assessed later in the report, as will the sensitive access points to the Grand Canal.

It is noted that the subject site does not include for the proximate Omer Lock House. The Planning Authority consider that the future plans for the Omer Lock House are a consideration in this proposal, due to proximity. The applicant outlines that they are in discussions with Waterways Ireland in respect of the Lock House and connections onto the Canal tow path and a future planning application will be brought forward in due course. The Planning Authority would welcome progress on the achievement of this objective.

#### **4. Consistency with the Planning Scheme**

In addition to the specific requirements of the development area, the planning application should satisfy the requirements of Section 2, which sets out 12 individual topic areas.

#### **Land Use and Density**

Section 2.1 of the Planning Scheme sets out the following sections relevant to this development:

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

- Types of Development
- Extent of Development
- Residential Density
- Residential Development Standards

### Types of Development

The site is located within a primarily residential area, in accordance with Figure 2.1.2 of the Scheme. The relevant land use matrix is as follows:

**Table 2.1.1** | Uses Permissible & Open for Consideration in Residential Areas

<b>Permitted in Principle</b>	Bed & Breakfast, Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Guest House, Health Centre, Housing for Older People, Hotel/Hostel, Industry-Light, Live-Work Units, Nursing Home, Offices less than 100 sq.m, Open Space, Public House, Public Services, Recreational Facility, Recycling Facility, Residential Institution, Residential, Restaurant/Café, Retirement Home, Shop-Locala, Shop-Neighbourhoodb, Sports Club/Facility, Traveller Accommodation, Veterinary Surgery..
<b>Open for Consideration</b>	Advertisements and Advertising Structures, Agriculture, Allotments, Betting Officea, Crematorium, Garden Centre, Home Based Economic Activities, Industry-General, Motor Sales, Nightclub, Office-Based Industry, Offices 100 sq.m - 1,000 sq.m, Off-Licencea, Petrol Station, Place of Worship, Science and Technology Based Enterprise, Social Club, Stadium.

- a. Local Nodes only
- b. Local Nodes only and subject to SDZ Section 2.5 (Retail) convenience cap for Local Nodes

The application primarily proposes residential with creche and employment. The proposed lands uses are permitted in principle and as such, is consistent with the scheme.

### Extent of Development

Section 2.1.4 states the full extent of development for the Planning Scheme. This is further broken down in the Planning Scheme by policy and quantitatively under Section 2.13 and Development Areas. Assessed above.

### Residential Development Standards

#### *Dwelling Mix*

It is noted that it is a key objective for the CSW Development Area to *provide for a range of housing along the new avenue and local streets including home zones.*

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

Section 2.1.6 of the Scheme states “*Prescribed densities and building heights (see Section 2.8 Built Form and Design) will, however, help inform the appropriate dwelling typologies in each Development Area*”. There is, therefore, no prescribed unit mix in the Scheme.

In accordance with SPPR 1 of the apartment guidelines ‘*Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)*’.

### Summary of Dwelling Mix:

<b>Number of Dwellings:</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>	<b>Total</b>
Houses	8	153	12	173
By Percentage	4.6	88.4	6.9	

<b>Number of:</b>	<b>1 Bed</b>	<b>2 Bed*</b>	<b>3 Bed</b>	<b>TOTAL</b>
<i>Apartments</i>	108	135	5	248
<i>Duplex</i>		74	74	148
<i>Total</i>	108	209	79	396
<i>% of mix</i>	27.3	52.8	19.9	

*\*No breakdown between 2bed 3p and 2bed 4p is given on the summary schedule.*

It is considered that the mix of units proposed will contribute to a good overall mix and achievement of the key objective for the CSW Development Area.

### *Dwelling Size & Private Amenity Space*

The design and layout of individual dwellings should provide a high quality living environment for residents. Dwellings should provide adequate room sizes that create good quality living spaces. Designers should have regard to the targets and standards set out under Quality Housing for Sustainable Communities Guidelines (2007) with regard to minimum room sizes, dimensions and overall floor areas.

Table 2.1.9

Type of Unit	Houses	Public Open Space
1bed	50sq.m	48sq.m
2bed	80sq.m	55sq.m
3bed	92sq.m	60sq.m

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

4bed+	110sq.m	70sq.m
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The Housing Quality Assessment submitted indicates that the minimum floor areas would be met. In terms of private amenity space, the schedule sets out that all the 2beds would have a minimum of 55sq.m, 3beds would have a minimum of 60sq.m and 4beds would have a minimum of 75sq.m. All apartments shall accord with or exceed the open space and floor area standards set out in Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015) including the minimum floor areas set out in Table 2.1.10 of this Planning Scheme. Noted that the Apartment Guidelines (2020) supersede the Scheme reference to 2015 (Section 1.6 of Scheme refers).

The following requirements are set out in the Apartment Guidelines:

Type of unit	Floorspace	Agg. Living etc sq.m	Agg. bed	Private open space	Communal open space	Storage
1bed	45sq.m	23	11.4	5	5	3
2bed 3p	63sq.m	28	20.1	6	6	5
2bed 4p	73sq.m	30	24.4	7	7	6
3bed	90sq.m	34	31.5	9	9	9

The Housing Quality Assessment indicates that all the standards are met for floorspace, aggregate living, dining and kitchen area, aggregate bedroom (it is noted that there is a typo in the duplex schedule for CSW-S3), private open space and storage. With regards communal open space, the Planning Report provides the following detail:

- Overall: required, 2,714sq.m; provided, 3,936sq.m
- CSW-S4: required, 1,766sq.m; provided 2,538sq.m
- CSW-S3: required 948sq.m; provided 1,398sq.m

Overall, the quantum of open space is in line with the guidelines.  
60% of apartments are 10% the minimum floorspace requirement.

### Dual Aspect

Whilst not set out in the Scheme, SPPR4 of the Apartment Guidelines (2020), the minimum number of dual aspect apartments that may be provided in any single scheme in suburban or intermediate locations shall be 50% and 33% in more central accessible urban locations. The overall summary of accommodation sets out that 61.36% of apartments are dual aspect. The applicant is requested to set out how many apartments are single aspect (north) by further information.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Movement and Transport

Section 2.2 of the Planning Scheme details the Movement and Transport elements of the Planning Scheme.

The overarching principle states the following; *'To develop the SDZ lands in a manner that maximises existing and proposed public transport opportunities, including high quality rail and bus services, and support these opportunities with an integrated network of streets and routes with a clear hierarchy that promotes walking and cycling.'*

### Public Transport Accessibility

The SDZ is well served by existing and planned public transport provision. The key element for the subject application is to provide for and integrate with a choice of direct or indirect multi modal routes to existing or planned public transport. In the context of the subject site, connection to the Train Station, the Fonthill Road and the Clonburris South Link Street is required.

### Pedestrian and Cycle Movement & Street Network and Vehicular Movement

Noted that a Key objective for the CSW Development Area is to prioritise pedestrian and cycle movement.

The Planning Scheme outlines the rationale behind the street network and outlines that the street network developed forms an integral part of the movement framework. The Planning Scheme outlines that the alignment of the street network should largely have an orthogonal grid layout and shall largely comprise an open network in terms of permeability. Local Streets that provide through routes for strategic pedestrian and cyclist should be filtered to prioritise pedestrians and cyclists where junctions intersect with Link or Arterial Streets. The Planning Scheme provides an Overall Movement Concept in Figure 2.2.7 to demonstrate same. The Movement Concept of the Planning Scheme is integrated with the accompanying Transport Assessment and Transport Strategy.

Having regard to the above, it is considered that the movement and street network proposed by the applicant is not consistent with the Planning Scheme in terms of an open permeability network and priority for cyclist and pedestrian movement at the junctions of the link street and local streets.

### Street Hierarchy and Movement

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order



Figure 1- Overall Street layout proposed

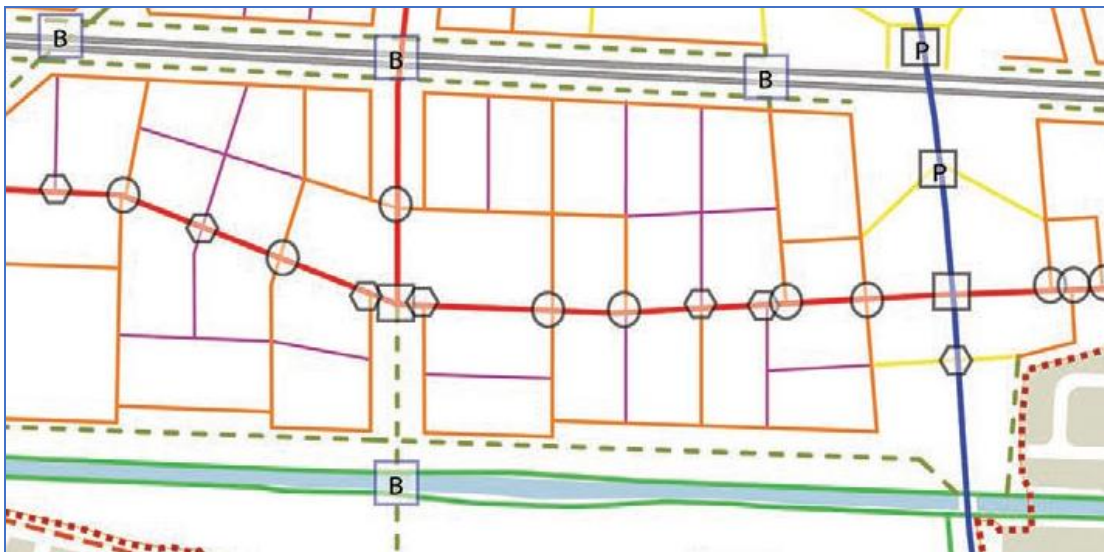


Figure 2 – Movement Concept in Planning Scheme

The Roads Section outline that the subject site's internal street layout has been designed with several junctions and a meandering alignment through the development to promote traffic calming. The overall street layout does not match the Planning Scheme. The NTA has recommended removal of access junction to street 3, to promote walking and cycling. The other access and road layout should conform to the Movement Concept. The Roads Section outlines that a three-way junction at

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

the south of street 3 (shown in Figure 3) should be restored to allow the open flow of traffic around the development in accordance with the transport assessment and strategy that accompanies the Planning Scheme.

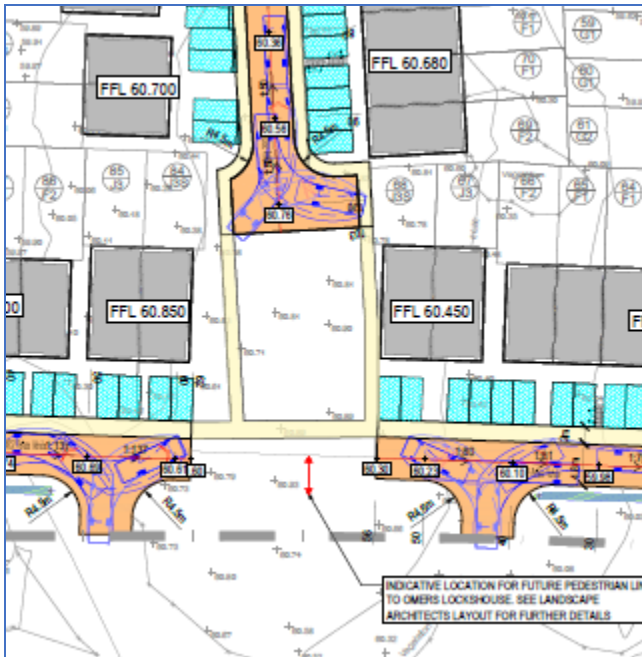


Figure 3 – Extract of proposed street layout

It is noted that the NTA submission focuses on the need for filtered permeability and prioritising cycle and pedestrian movements.

The submission states that *In a new development area, such as Clonburris, it is essential that a clear competitive advantage is given to these sustainable modes. The most appropriate method to achieve this is to provide for a greater number of access points for pedestrians and cyclists than for the private car, and to reduce the number of access points by private car to development blocks to the minimum required.*

*In preparing the transport elements of the Clonburris SDZ Planning Scheme, in collaboration with SDCC, and in our observations on proposals for the SDZ in the period since the Planning Scheme's adoption, the NTA has consistently recommended that a filtered permeability approach is implemented throughout the plan lands. This is reflected in Figure 2.2.7 of the Planning Scheme – Overall Movement Concept.*

*Figure 2.2.7 shows that the southern development area, subject of this planning application, is to be served by three general traffic accesses with three additional filtered junctions providing access for*



# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

*pedestrians and cyclists only. Similarly, the northern development area was to be served by four general traffic junctions and one filtered junctions.*

*The NTA notes that there seems to be some inconsistency in the material provided as part of the planning application as it relates to the number of accesses to the southern block, and in turn some inconsistency with the granted Clonburris Southern Link Street. For example, section 10.5.2.1 of the EIAR states that there will be 5 accesses to the development, while figure 10.27 appears to show 6, with the access to Street 4 not highlighted.*

*In the event that the proposed development is intended to provide for four general traffic access points to the southern housing block, the NTA would be of the view that this would serve to maximise access by private car for six of the seven residential streets, thereby failing to provide an advantage to walking and cycling. As such, the NTA recommends that the direct access from Street 3 is amended to allow for pedestrian and cycle access only, in accordance with the Planning Scheme, or that alternative access arrangements are developed for the southern block”.*

The Planning Authority notes the content of the submission and consider that further information is required to amend the main movement framework in terms of filtered permeability and ensuring an open network for the proposed development.

### **Street Design**

The principle of all designated streets in the Planning Scheme is fixed. It is considered that the approach of the proposed development in terms of street designation is generally consistent with the Planning Scheme.

Section 2.2.4 of the Scheme outlines that the centre line and alignment of the Local Streets and Homezones are flexible with the exception of streets with frontages prescribed under Section 3 (Development Areas). In this instance, the application site contains prescribed frontages in the form of Avenue Frontage, Canal Frontage and Park Frontage (Figure 3.1) as per image below.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order



Figure 2.4 – Site Layout Main Development Areas



The subject application largely maintains the Local Street alignments indicated in the Planning Scheme to provide a Canal Frontage to the south, Avenue frontage on both sides of the Link Street and on the Local Street indicated as Street 1 in the submitted layout plans.

Concerns are raised in relation to the absence of a Local Street to the east of Block 2, fronting to the Urban Square. This frontage is prescribed as a 'Avenue Frontage' in the Section 3 and as such the alignment of the Local Street is not flexible. The proposed development omits the street.

In addition, it is considered that the identified southern frontage for Block 1 is not delivered. This is an identified 'Park Frontage' and would provide passive surveillance and enclosure to the open space area to the south.

Noted that the building height concept envisages a 3-4 storey block on the southern perimeter of the location where Block 1 is located. Area includes a single storey bin store. Further information.

# **Comhairle Chontae Atha Cliath Theas**

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

The applicant outlines that a Gas Networks Ireland high pressure pipe/wayleave is located along the eastern boundary of the lands which is a significant constraint on the eastern side of the site and in particular the location of the internal blocks fronting onto the Fonthill Road. The Planning Scheme designates the existing Fonthill Road as an Arterial Street. Arterial Streets have a fixed centre line and alignment. Given that the Fonthill Road is existing, this is not relevant. In response to the wayleave and the prohibition of development in the wayleave, the applicant has set back the Block 1 frontage from the Fonthill Road and provides an area of open space that contributes to the Green Infrastructure on the site. The Planning Authority considers this to be a reasonable approach and note that the Avenue frontage is provided, albeit, set back.

It is noted the Planning Scheme outlines that some slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the gross or net development area of any Sub Sector.

The Scheme states that the onus is on developers/applicants to demonstrate that a proposed development involving a plot adjustment would not significantly affect the prescribed alignment or centre line of any fixed street; would not significantly affect prescribed building lines of any fixed street; would not adversely impact on the environment or environmental objectives contained in the SEA Environmental Report (including required setback from the Grand Canal); and would not have any implications in relation to European Sites. The Planning Authority considers that the approach, in this instance, given the existing nature of the Arterial Street, is not inconsistent with the Planning Scheme.

The Planning Authority notes that Gas Network Ireland have submitted to the planning application. The response states:

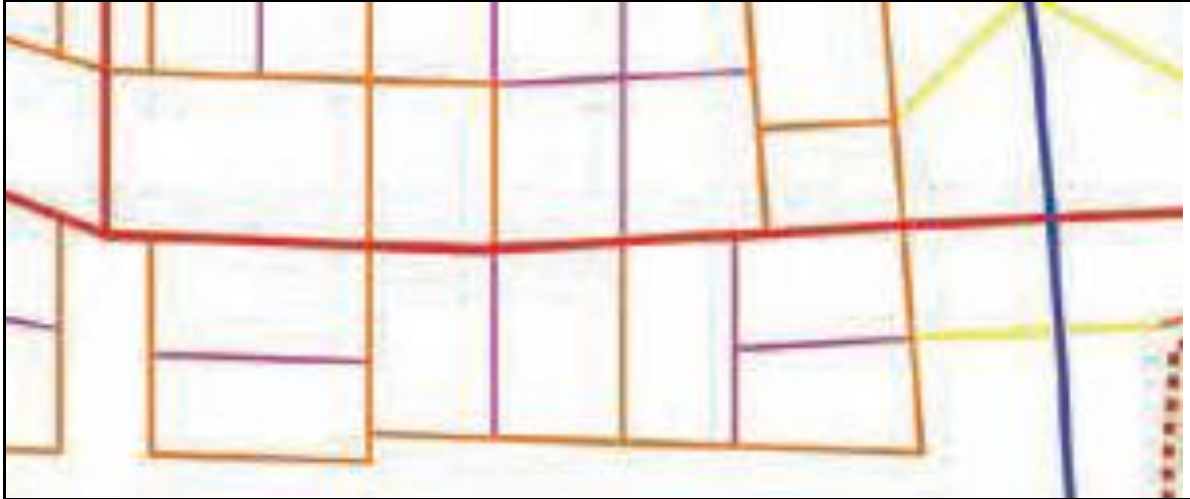
‘There are two Gas Transmission Pipelines within Gas Networks Ireland Wayleaves within the designated SDZ. These Pipelines are shown, in RED, on the drawing attached. Please treat all Gas Networks Ireland Drawings as ‘indicative’ only.

The Gas Transmission Pipeline exists within 14m (Pipeline #13) and 8m (Pipeline #72) wide Gas Networks Ireland Wayleaves. No excavation may take place within any such Wayleave unless consent, in the form of a valid Excavation Permit, has been granted by Gas Networks Ireland.’

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

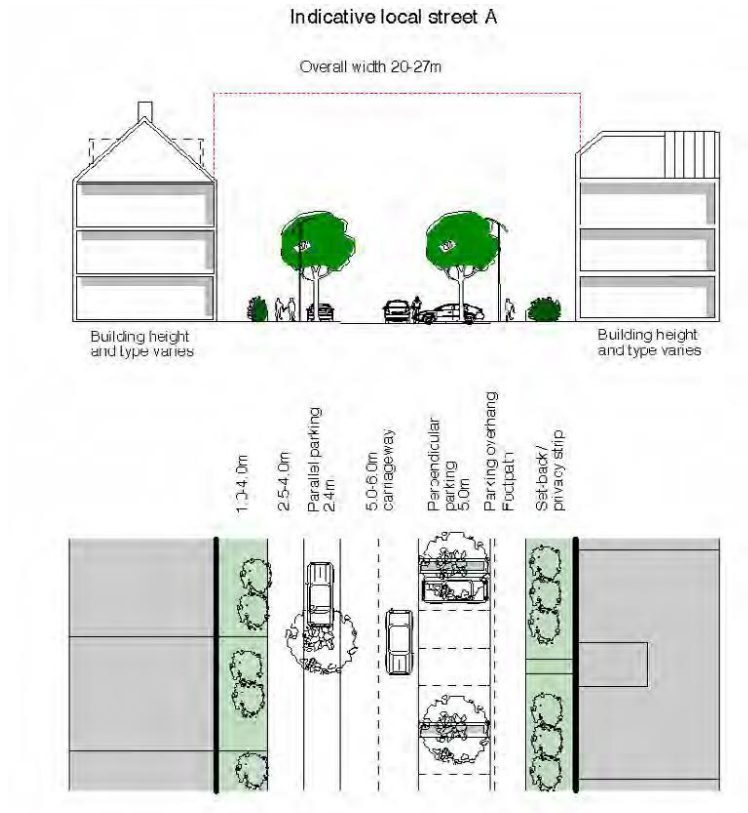


*Extract in context of Site from Figure 2.2.1 – Full Street Hierarchy*

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

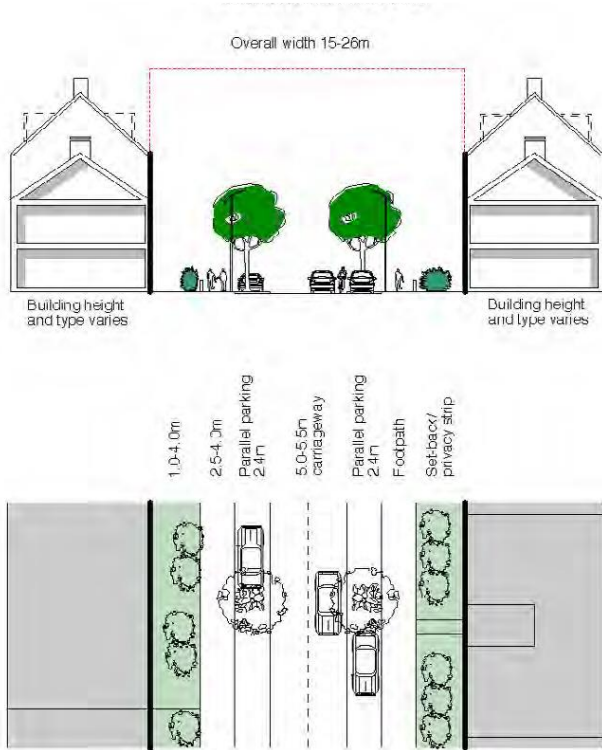
## Record of Executive Business and Chief Executive's Order



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

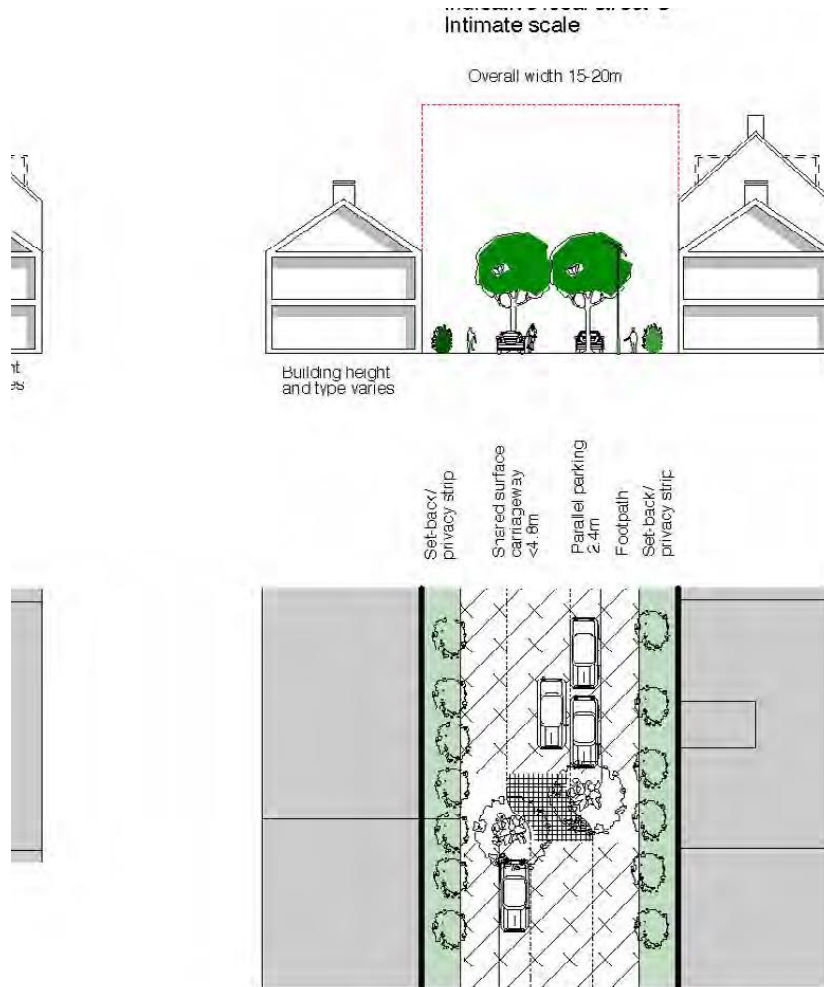
## Record of Executive Business and Chief Executive's Order



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order



**Figure 2.2.6** Example Local Streets including Homezones (Intimate Scale)

Link Streets: The Southern Link Street runs through the centre of the site and does not form part of this planning application, having been approved under SD21A/0020. It should also be noted that that Condition 4 of this permission requires agreement by compliance for a revised layout indicating that there was parallel parking the length of the Link Street in accordance with Figure 2.2.5. It is not apparent that this has been incorporated as part of this application. Clarity on this issue is required. Further information.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

**Local Streets/Homezones:** The majority of streets within the subject site in the CSW Development Area are designated as local streets/homezones in the Planning Scheme. The Scheme outlines that some local streets will comprise homezones or intimate Local Streets. It is noted that these streets also have a more flexible design, with a mix of parallel and perpendicular parking provided in the example designs in the Planning Scheme. The indicative layouts in the Planning Scheme show a verge, footpath, parking and carriageway in the centre. The Planning Authority has concerns about the level of perpendicular car parking on the local streets and the on curtilage parking in homezones. The applicant is requested to submit revised plans indicating revised details via further information. A cross section should also be provided. It is considered that Street Trees have also not been appropriately addressed. This is discussed in more detail below.

### Pedestrian Permeability:

The Roads Report outlines that overall pedestrian permeability is good, there are links to the surrounding developments. There are pedestrian/cycle links proposed along the central link road towards the R113 and the R136 allowing access to the rail and bus routes. An overall plan of the main pedestrian routes has been submitted detailing links to proposed foot bridges across the canal and to surrounding developments.



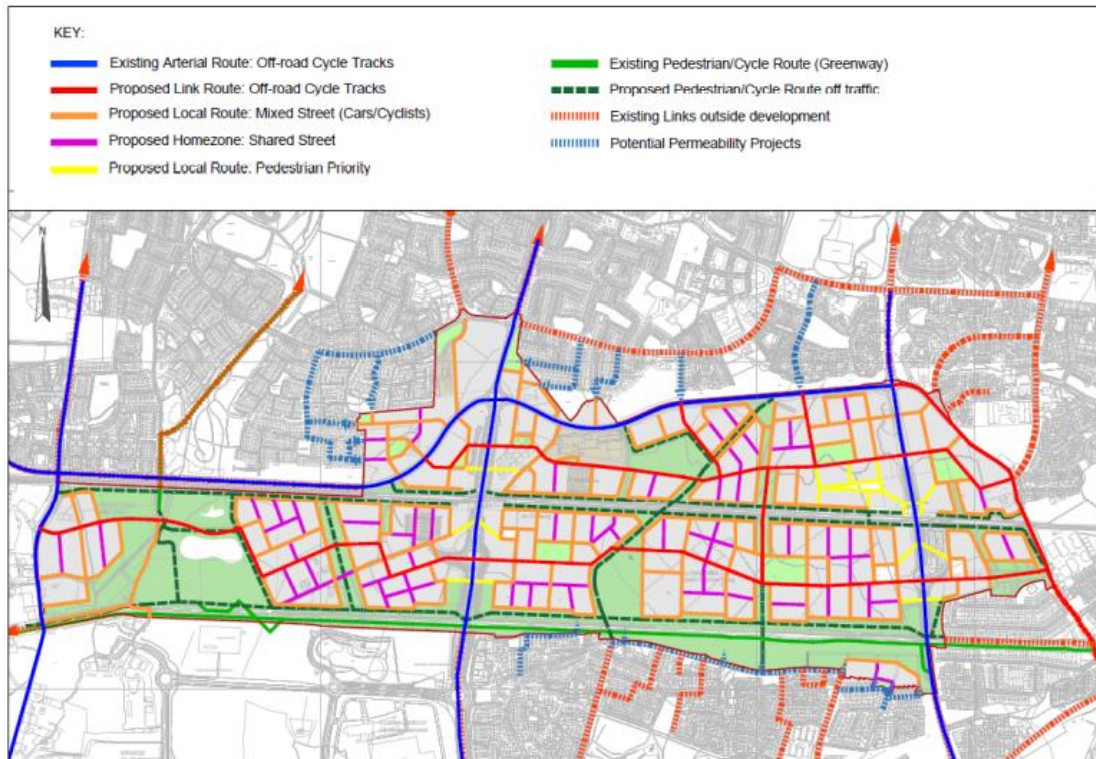


# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### *Street hierarchy*



*Pedestrian layout from the Planning Scheme Transport Assessment and Strategy*

### Car Parking

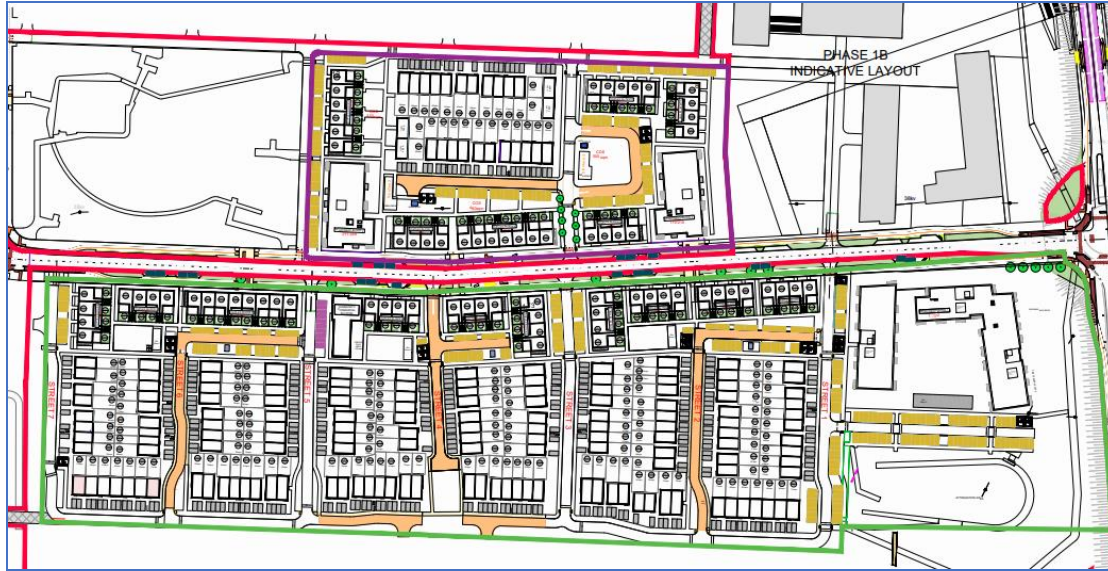
#### *Quantum*

The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies the Planning Scheme. Zone 2 parking standards prescribed under the South Dublin County Council Development Plan 2016 – 2022 shall be applied to all areas that have been identified with an accessibility level of 1, 2 or 3 (see Fig. 2.2.8 below).


# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order



*Parking allocation.*

	HOUSES
	DUPLEXES / APARTMENT BLOCKS
	CRECHE / OFFICES
	UNIVERSAL AND STANDARD ALONG THE MAIN STREET
	SPACES PERMITTED UNDER REG REF SDZ20A/0021

**CSW S3 PARKING** —

<b>Zone 2 - Parking Rates</b>	1 Bed @ 0.75 per unit	24 no
	2 Bed @ 1 per unit	74 no
	3 Bed @ 1.5 per unit	45 no
	3+ Bed House @ 1.5 per unit	39 no
	<b>Zone 2 - Total Permitted</b>	<b>182 no</b>
	<b>Total Provided</b>	<b>172 no</b>

*Parking Rates Table*

# Comhairle Chontae Atha Cliath Theas

## PR/0154/22

### Record of Executive Business and Chief Executive's Order

CSW S4 PARKING		
<b>Zone 2 - Parking Rates</b>	1 Bed @ 0.75 per unit	57 no
	2 Bed @ 1 per unit	135 no
	3 Bed @ 1.5 per unit	73.5 no
	2 Bed House @ 1.25 per unit	10 no
	3+ Bed House @ 1.5 per unit	208.5 no
	<b>Zone 2 - Total Permitted</b>	<b>484 no</b>
	<b>Total Provided</b>	<b>484 no</b>

The Roads report notes that the parking rates for 3 bed duplexes do not match the County Development Plan maximum of 1.25. The total number of parking spaces provide for CSW S3 and S4 is 667 and the total number of dwellings is 569.

Table 11.24: Maximum Parking Rates (Residential Development)

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1	ZONE 2
<b>Apartment</b>	1 Bed	1 space	0.75 space
	2 bed	1.25 space	1 space
<b>Duplex</b>	3 bed+	1.5 spaces	1.25 space
<b>House</b>	1 Bed	1 space	1 space
	2 Bed	1.5 space	1.25
	3+ bed	2 space	1.5

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

The Roads report provides the following tables as a breakdown of the number of parking spaces proposed. Table 1 is the amount of parking proposed for houses and apartments.

Table 1

The amount of parking proposed						
	Apartment / Duplex			House		
No. of Beds	1	2	3	2	3	4
CSW S3 parking spaces	24	74	45		39	
CSW S4 parking spaces	57	135	74	10	209	
<b>Total</b>	<b>81</b>	<b>209</b>	<b>119</b>	<b>10</b>	<b>248</b>	<b>0</b>

Table 2 is the number of units proposed for the development broken down by type and the SDZ parking guidelines applied to each, showing the maximum parking allowable for the development.

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## Record of Executive Business and Chief Executive’s Order

Table 2

Breakdown of the number of dwellings							
	Apartment			House			Total
No. of Beds	1	2	3	2	3	4	
Duplex		74	74				148
Houses				8	153	12	173
duplex (ABCDEFGJK)		4	4				
duplex H		8	8				
duplex LNO		4	4				
duplex M		7	7				
duplex P		5	5				
duplex Q		6	6				
BLOCK 1	76	91	5				172
BLOCK 2	16	22					38
BLOCK 3	16	22					38
number of units	108	243	113	8	153	12	569
Max Number of Parking in Zone 2	81	243	141.25	8	306	24	803.25

The maximum parking provision allowed by the Planning Scheme is 803no. spaces for the proposed development. The total for apartments/duplexs would be 465. spaces and the amount for houses would be 338. the applicant has proposed 409 spaces for the apartments/duplexs and 258 for the houses. This results in an 88% provision relative to the maximum standard for the apartments and 76% for the houses. Given the concerns raised elsewhere in the report in relation to street trees and compliance of parking design with Section 2.8.10, a reduction in the rate of car parking may be necessary to provide a quality public realm in accordance with the Scheme.

### *Type of Parking*

Section 2.8.10 Design of Parking and Loading in the Planning Scheme provides for design criteria for the provision of car parking. The Scheme outlines that car parking should be carefully considered as part of the overall public realm. In the context of the this area, the Scheme states that a mixture of on street parking for visitors and residents should be provided. The Scheme states ‘that a range of less formal or alternative parking arrangements may be used along Local Streets where densities range between 40 – 50 dwellings per hectare. This may include a mixture of on-street and in- curtilage parking, however, no more than 60% of residential parking spaces shall be provided as

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

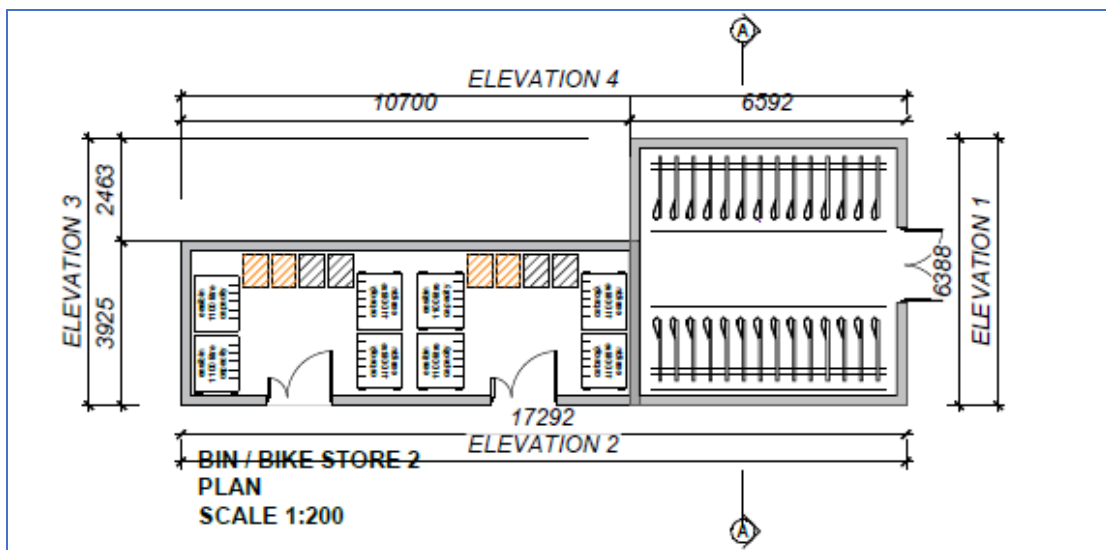
## Record of Executive Business and Chief Executive's Order

in-curtilage parking space in any Development Area. Parking within Home Zones/Intimate Local Streets shall be on- street.'

In this context, the Planning Authority has concerns in relation to the approach of the proposed development to car parking. It appears from the site layout plan and the taking in charge drawings that the majority of car parking is in-curtilage. The Scheme states that parking within Home Zones/Intimate Local Streets shall be on- street. Further consideration of the approach to car parking is required by way of further information. This issue is interlinked with the design of the public realm. Noted that the Parking Strategy in the Transport Assessment and Strategy examined the spatial requirement for residential on-street parking, concluding that maximum parking standard provision could be met on-street with only a few areas requiring supplementary parking.

### *Bicycle Parking*

Details of the bicycle storage have been submitted. All cycling infrastructure should confirm the NTA's cycle manual.



General Plan of Bicycle Storage.

Similarly, to the parking allocation, the Roads report outlines that the bicycle parking explanation needs further detail. A detailed submission highlighting the allocation, quantity and location of the bicycle parking provision should be provided, to ensure the provision is in accordance with the SDZ. The addition of electric bicycle charging facilities has been incorporated in the Clonburris SDZ requiring 10% of bicycle parking provision to provide for charging. Further information.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Green and Blue Infrastructure

The overarching Principle states the following: 'To deliver a network of high quality green and blue infrastructure spaces and public parks while protecting, enhancing and sensitively upgrading the natural, built and cultural assets of Clonburriss lands'

#### *Local Green Corridor*

The Green Infrastructure Network identified in Section 2.3.2 of the Scheme provides for a key 'Local Green Corridor' running north – south from the Grand Canal to the Railway. The subject proposal outlines a planted swale adjacent to Street 1 and due to the Gas Wayleave, a corridor of native meadow grass is proposed adjacent to the Fonthill Road. This is a positive contribution to the GI Network.

#### *Strategic Green Corridor*

The south boundary of the site, running adjacent to the pNHA Grand Canal is identified as a Strategic Green Corridor in the Green Infrastructure Network in the Scheme. The Scheme also requires a set back of 50m of buildings from the pNHA boundary.

The Planning Scheme states that 'development proposals on the SDZ lands close to the Grand Canal shall protect and incorporate high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and include for a 50m setback for all buildings and a 30m set-back distance for development (with the exception of bridges and footpaths) from the pNHA boundary to facilitate the continuity of the Grand Canal as a corridor for protected species, biodiversity, and a fully functioning Green Infrastructure network'

The proposed development is consistent with the setback required and it is noted that the Grand Canal Park Landscape Plan provides for a detailed landscaping proposal. This is assessed further below.

Concern is raised regarding insufficient Green Infrastructure - the potential of the development to sever green infrastructure and potential to create strong GI Links.

- a) Street tree provision is inadequate: there are large sections of streets without trees in the Public Realm. More effort is needed to create strong green infrastructure links throughout the development. This is best achieved through additional street trees and SuDS to create these connections.
- b) Greater efforts are required integrate, retain and enhance existing hedgerows into the local green space/infrastructure and local parks outside the 50m no development line.

### Retail, Economic Development & Community Facilities

The relevant elements of these Sections of the Planning Scheme are assessed under Development Area in this report. Further to that assessment, the Planning Authority welcome the provision of childcare in this planning application.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive’s Order

### Built Form and Design

The overarching Principle states the following: *‘To ensure that development across the SDZ lands is carried out in a design led manner that prioritises place making and accords with the core principles of urban design and the creation of integrated streets.’*

### Design Statements

To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ retail services development) shall be accompanied by a Design Statement that:

Demonstrates compliance with this SDZ Planning Scheme including its various requirements that relate to (inter alia) green infrastructure, blue infrastructure, movement, transport, land use, density (see Section 2.1.5 –Residential Density), built form and design;	The design statement does not clearly set out that all these matters have been complied with. This should be addressed via <b>additional information.</b>
Includes a masterplan that demonstrates proposed and future integration with the development of surrounding sites and Development Areas including vehicular, pedestrian, cycle and public transport connections;	Not provided. This should be addressed via <b>additional information. Indicative masterplan including remainder of CSW-S3 required.</b>
Demonstrates compliance with the 12 design criteria contained within the Urban Design Manual A Best Practice Guide (2009) in the case of residential development;	This is examined in the table below.
Demonstrates a range of dwelling sizes to support a variety of household sizes and dwelling types;	The design statement sets out details on the variety of the mix of units. The Planning Authority notes the mix.
Demonstrates compliance with the 10 design criteria contained within the Retail Design Manual (2012) in the case of retail development;	n/a
Includes street cross sections and plans that demonstrate compliance with DMURS (2013) in terms of ‘Movement, Place and	No cross sections evident. Applicant states that all streets designed in accordance with DMURS.

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## Record of Executive Business and Chief Executive’s Order

Speed’, ‘Streetscape’, ‘Pedestrian and Cyclist Environment’ and ‘Carriageway Conditions’ etc.;	
Includes a Quality Audit addressing street design as outlined under DMURS (2013);	<b>No quality audit provided. This should be addressed via additional information.</b>
Includes cross sections that demonstrates appropriate design responses to existing and proposed site levels including those that relate to streets, spaces, building frontages, services and SUDS;	<b>No existing cross sections provided. This should be addressed via additional information. The Planning Authority require before and after cross sections.</b>
Is accompanied by a detailed Landscape Plan that is consistent with the Parks and Landscape Strategy for the SDZ lands (see Section 2.10 – Landscape and Open Space) and specifies and illustrates the proposed treatment of streets and spaces including parking, street furniture, lighting (street and dedicated pedestrian/cycle routes), planting, surface treatment and children’s play facilities;	Landscape plan provided. <b>There are some concerns regarding landscaping and these are discussed under Parks and Landscaping below.</b>
Includes details in relation to the identification and incorporation of any features and structures of architectural merit and/or any sites and features of archaeological interest. Where practicable, the design of a development should be informed by its relationship with archaeological or architectural features located either within or outside the SDZ Lands such as the Clondalkin Round Tower.	The applicant indicates that discussions with Waterways Ireland are taking place in respect of the Lock House and connections onto the Canal tow path and a future planning application will be brought forward in due course. <b>Views / vistas in and out should be strengthened. Skewed street 4, draws attention to the Lock House. Other streets and structures need to be considered.</b>



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

*Urban Design Manual – A Best Practice Guide 2009*

Urban Design Criteria	Assessment
<p><i>1. Context: How does the development respond to its surroundings?</i></p>	<p>Land is unused at present. Planning Scheme framework has taken pNHA into consideration and public seating linked to lock house to the south. Gas and water infrastructure to west taken into consideration.</p>
<p><i>2. Connections: How well is the new neighbourhood / site connected?</i></p>	<p>Permeability through blocks provided. <b>A clear pedestrian / cycle linkages plan would assist in assessment. The Planning Authority seek quality and not just quantity in this regard. Welcome E/W pedestrian link to south of Link Street, however Planning Authority are concerned regarding usability and lack of surveillance. Applicant has not addressed concerns raised at preplanning. Application is heavily reliant upon vehicular connection. Significant improvement for pedestrian / cycle could be provided.</b></p>
<p><i>3. Inclusivity: How easily can people use and access the development?</i></p>	<p>High quality road, rail, cycle and bus network provided across over SDZ area. <b>Concerned regarding the accessibility to and from rail and the advantage for cycle and walking through the scheme. NTA also raised concerns regarding this.</b></p>
<p><i>4. Variety: How does the development promote a good mix of activities?</i></p>	<p>Residential development comprising a mix of houses, apartments and duplex. Variety of uses within overall SDZ area.</p>
<p><i>5. Efficiency: How does the development make appropriate use of resources, including land?</i></p>	<p>Residential development with public realm space and car and bicycle parking.</p>

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Urban Design Criteria	Assessment
6. <i>Distinctiveness: How do the proposals create a sense of place?</i>	Applicant states roads and junctions designed having regard to the <i>Design Manual for Urban Roads</i> . <b>Not apparent streets are in accordance with Scheme building line. The interface with the canal does not fully reflect the scheme – varying building heights and design types are required in this location.</b> <b>The high percentage of perpendicular parking across the scheme impacts the sense of place negatively.</b> <b>Strengthening turning corners would strengthen the sense of place.</b>
7. <i>Layout: How does the proposal create people-friendly streets and spaces?</i>	<b>Homezones and side streets with traffic calming measures proposed. However, not apparent streets are in accordance with Scheme. More activity could be provided along frontages (E/W aligned pedestrian way and all pedestrian linkages). Bedrooms appear to front main link street.</b>
8. <i>Public realm: How safe, secure, and enjoyable are the public areas?</i>	Passive surveillance of public open space areas. <b>Planning Authority are not satisfied with the design of the E/W aligned pedestrian street.</b>
9. <i>Adaptability: How will the buildings cope with change?</i>	Internal layouts can be easily adapted in the future. <b>3m minimum internal height required at ground level, link street and park. The applicant is requested to confirm that this standard is met.</b>
10. <i>Privacy / amenity: How do the buildings provide a decent standard of amenity?</i>	<b>Concern regarding the amenity of the duplex units and the interface with the homezones.</b>
11. <i>Parking: How will the parking be secure and attractive?</i>	<b>On-street surface and on-curtilage car parking provided. Not evident it is compliant with the scheme. Planning Authority have major concerns, see car parking and roads section of report.</b>

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Urban Design Criteria	Assessment
<i>12. Detailed design: How well thought through is the building and landscape design?</i>	<b>Areas of communal open space appear to be more incidental than functional open space.</b>

**The applicant is requested to provide an assessment setting out how the scheme complies with the Urban Design Manual. Additional information.**

### External Finishes and Appearance

Brick is primary material for public facing facades - 2 types to create variety. Corner of Block 1 will be stone clad. Blocks 2 and 3 will primarily use same materials as Block 1, with buff brick and render predominantly used. Brick plinth to be provided along core entrance to Block 2. Duplex blocks have 3 types of finishes. There are 2 types of monopitch duplex. Complete brick with grey plinth, second has a buff brick plinth at ground floor and white render. Lower density housing will use buff brick (different tone), with brick porch and stone capping. End treatment of houses provide passive surveillance.

**The Planning Authority is concerned regarding the impact of the materials and the creation of a sense of place. It is not evident that the materials are suitable form the photomontages provided. View 4 shows no landmark or variety of height.**

### Block Form

All perimeter blocks shall be designed according to the following principles:

- Building massing to the perimeter of the block;

Buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme. Additional information.

- Building frontage to all sides, including the shorter sides (secondary street frontage) of the block;

Buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme. Additional information.

- Proper design and attention to corners, avoiding dead or windowless gables;

Buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme. Additional information. Noted that dual frontage provided however these could be strengthen with additional windows.

- A continuity of building frontage, which relates to the local or urban context, and avoidance of blank walls;

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

E/W pedestrian link does not achieve this. Quantum of blank rear boundary walls to rear of duplex, coupled with the bike, bin store and ESB, which blocks views and passive surveillance and taken in conjunction with house type F2s. Noted that dwelling that cited as being dual frontage are not and do provide habitable rooms overlooking. (e.g. dwg 19022 PL 105 and 19014 PL 112). Where there is a gable end facing onto public realm, walkways, they should be redesigned to provide active frontage. The house design for J3 is strong and this should be mimicked across the development.

- An appropriate scale of buildings to provide the appropriate level of enclosure of the streets and spaces;

There are concerns regarding building height in some locations and also passive surveillance. There should be more variety in building height and roof level, to add visual interest.

- Adequate back-to-back distances within the block;

Detail not provided on layout plan – additional information

- Appropriate building set-backs from the street in line with the use of ground floors;

Detail not provided on layout plan – additional information

- Adequate arrangements for car parking and access around, within or below the block;

Parking arrangement not in accordance with scheme – additional information

- Carefully considered subdivision of the block into plots where fine urban grain or mixed use is proposed –

No details of this provided – additional information

### Block Size

In order to encourage pedestrian permeability and ensure that streets and blocks are dimensioned to reflect their function and setting, reduced block lengths shall be utilised across the SDZ lands.

Block dimensions in the Development Areas that are contiguous to both urban centres should be no more than 100 metres. Larger or irregular blocks of up to 120 metres should be broken up using mid-block penetration with short cul-de-sac/mews development to serve a small number of dwellings. It is apparent that the proposal achieves this.

### Topography

All Development shall respond sensitively to level differences particularly in those areas of the SDZ Lands where levels change significantly either side of existing strategic roads. Development should therefore be laid out and designed in a manner that circumvents the need for retaining walls and blank frontages.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Gradients on all Link Streets and Local Streets should be as gradual as possible with a gradient of between 1 in 33 (or 3%) and 1 in 20 (or 5%) targeted. In pedestrian streets and the urban squares a gradient change of between 1 in 33 (or 3%) shall be targeted and all surfaces should be smooth and continuous with a gentle slope while avoiding, where possible, steps in level. In some areas level changes will need to be carefully regraded. In other areas basement car-parking, services or storage can be provided to raise building ground floor levels to the finished street or space level.

The applicant has submitted a range of contiguous elevations that demonstrates the approach to topography. It is noted that the set back from the Fonthill Road due to the location of the Gas pipeline has offset some of the level challenges envisaged in the Planning Scheme.

### Urban Grain and Façade Treatment

Figure 2.8.5 of the Planning Scheme provides for a fine urban grain at two locations fronting on the canal. The applicant has proposed a House Type H, a narrow gable fronted typology. The Planning Scheme states that each plot along the canal frontage (fine urban grain locations) shall be capable of development independently of other buildings/ plots within each block with own door access to dwellings. The approach of the 2 storey gable fronted dwellings are consistent with Section 2.8.4 of the Scheme, however, it is considered that the fine urban grain provides an opportunity for greater diversity and architectural interest. The applicant shall be requested to consider further alternatives, including different designs between the two locations. Noted that the Building Height concept envisaged a 3-4 storey height at this location. Further information.

### Building Setback

Development across the SDZ lands should present strong building frontages close to street edges. Setbacks from the street edge should therefore be minimised and on-street parking should be incorporated in line with the requirements of DMURS (2013), the street typologies illustrated under this Planning Scheme (Section 2.2 – Transport & Movement) and the requirements set out under Section 2.8.10 in relation to the design of parking and loading. Concerns are raised in relation to the set back of Block 1 from the Link Street. The set back may result in a wide feel to the link street. The submitted cross sections do not outline the building to building (likely building line of future development) width and demonstrate compliance with Figure 2.2.5 Example Link Street. Noted that this example indicates a building to building width of 22m-30m and a set back privacy strip of less than 3m.

**It is not apparent that the current proposal meets this requirement and further information is, therefore requested. If the perpendicular parking is reduced, it is likely a better setback would be achieved.**

Where dwellings front the street edge, privacy strips/short gardens that range from 1 to 3 metres in depth should be considered particularly along Local Streets and Link Streets.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

In curtilage parking should only be utilised along Local Streets in low density areas with front garden/driveway depths minimised to retain the required building height to street width ratios (see Section 2.8.6). As stated above, it is not considered that the parking arrangement is balanced on the local streets and **additional information is requested.**

### Building Heights and Street Widths

Designated building heights along Arterial and Link Streets have been determined by street width and proximity to the urban centres. Lower building heights are therefore required along Local Streets to provide a more intimate scale with the exception of park frontages where a modest increase in scale shall be utilised to provide adequate enclosure.

Figure 3.3.2 - Building Height Concept of the sets out the height concept for the SDZ. This is to be read in conjunction with the requirements of Section 2.8.6 and the relevant character area of the SDZ, in this case the area known as Development Area 3: Clonburriss South West.

Section 2.8.6 states 'the general building heights outlined in Figure 2.8.10 and the detailed requirements set out under Section 3.0 (Development Areas)'. The designated building heights of the Planning Scheme are the Tables in Section 3. Assessment of compliance with this Table was included earlier in this report. The Building Height Concept/Strategy is additional to aid understanding of implementation and inform the required urban design approach for development proposals. The Planning Authority is satisfied that the provision of 3 storey units fronting on to the Link Street is not inconsistent with the Planning Scheme. It is noted that the applicant has demonstrated that the design approach of the frontage onto the Link Street will provide enclosure comparative to a 4 storey building.

### Landmark Buildings (Section 2.8.6)

The Planning Scheme outlines that Local Landmark Buildings are permissible at key locations. The Local Node is identified as such a location in the Planning Scheme. The provision of a landmark building is not considered a requirement of the Planning Scheme, more an opportunity at key locations. The applicant states that the proposed local node is part 3/part 4 storeys which compares to the 3 adjacent 3 storeys of the duplex buildings and 2 storey houses and in compliance with achieving a local landmark. The Planning Authority considers that a landmark is not proposed as part of the subject application as landmark buildings should be designed in a manner that is distinctive from surrounding buildings both in terms of architectural treatment and use of materials. **The Planning Authority are concerned that the absence of a proposed landmark building is a missed opportunity to contribute to placemaking and legibility. Further information.**

### Privacy and Overlooking

The applicant is requested to indicate separation distances on the proposed layout plan. This should be provided via additional information. Balconies for proposed apartments should also be indicated.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### *Sunlight and Daylight*

The applicant has provided a Daylight, Sunlight and Overshadow study, prepared by IES. The conclusions are as follows:

- Shadow analysis – this illustrates different shadows being cast at key times of the year (March 21<sup>st</sup>, June 21<sup>st</sup> and December 21<sup>st</sup>) for existing and proposed. No additional shading will take place at 50-58B Cappaghmore Road.
- Sunlight to amenity – 2 hours of sunlight on March 21<sup>st</sup> and standard met.
- Private gardens – 66% of private gardens receive 2 hours of sunlight (March 21<sup>st</sup>). This is typical for a housing scheme where not all properties have south / east / west amenity space.
- Existing gardens adjacent – will receive same level of sunlight and exceed guideline
- Sunlight to existing buildings – no relevant buildings
- Sunlight to proposed development – the report concludes that the results are considered satisfactory (BRE guide / BS 8206-2:2008). Results are also considered satisfactory for IS EN 17037:2018.
- Daylight existing buildings – 100% have a value of not less than 0.8 times former value.
- Daylight proposed development – 3 standards assessed:
  - BRE guide / BS 8206-2:2008 – 95% compliance
  - IS EN 17037:2018 – 99.5% compliance
  - IS EN 17037:2018 National Annex – 99.9% compliance

Compensatory measures are proposed. These are

- 60% of apartments have 10% greater floorarea than what is required
- 61.36% are dual aspect
- 2.5 times the minimum open space provided
- Additional 80% overall of communal open space above the minimum required (60% for Block 1)
- High quality urban streetscape.

The report concludes that the development 'performs well' when compared to the recommendations.

**Due to the deficiencies, the minimum private amenity space for each apartment should be increased in order to mitigate deficits. Communal open space should also be more functional.**

### *Energy Efficiency & Resilience*

An Energy Report had been prepared by Waterman Moylan. This sets out how the buildings meet Part L requirements. Details of building fabric, heat / renewable energy options and proposed solutions have been provided. A building life cycle report has also been prepared. In the event of grant a condition is recommended to secure the measures set out.

It is noted that the ground floor of Block 1 provides space for future District Heating. In the event of a grant of permission, future proofing of development shall be conditioned.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Street Planting, Furniture and Materials

The Planning Scheme states that street trees should be considered as an integral part of the street environment in accordance with DMURS (2013) with the size of species selected proportionate to the width of the street. **Streets should be generously planted at frequent intervals to soften the impact of parking and strong building frontages at intervals of 14 – 20 metres.** Street trees should be planted in areas such as medians, verges and build outs. Street trees should also be augmented by planting within privacy strips along residential streets. In the interest of biodiversity and place making, reduced spacing between street trees should be considered where appropriate and achievable.

The Parks and Public Realm Report states:

*“Street tree provision is inadequate: there are large sections of streets without trees in the Public Realm. More effort is needed to create strong green infrastructure links throughout the development. This is best achieved through additional street trees and SuDS to create these connections”.* **Additional information has also been requested. The report identifies specific locations in which street trees are deficient, as well as details of where street trees are in inappropriate locations (e.g. in private curtilage).**

The Planning Authority considers that the design of the local streets/ homezones requires a multi disciplinary reconsideration in relation to the street trees and car parking to ensure a high quality urban design.

The Parks report outlines that SDCC do not accept front garden trees or trees between driveways as street trees. Such trees cannot be taken in charge and maintained by the Council. Parks note that street tree planting has been proposed on private curtilage and partly within the public footpath. This solution remains very problematic. The tree canopies and roots are still up to 50% on property not taken in charge by the Council which threatens the long term viability of the trees. The trees are also at risk from vehicles using the car parking spaces. The trees could be moved to the outside of the path shown on the drawing.

Further information to require street Trees to be provided fully in Public Areas to be an integral part of the street rather than in front gardens. The applicant is referred to the Clonburris SDZ Planning Scheme 2019, Clonburris SDZ Parks and Landscape Strategy and DMURS (2013) for guidance on street tree provision and appropriate design layouts for local streets and homezones.

### *Street furniture*

Landscape Plans shall seek to limit clutter. The provision of street furniture such as public art, lighting, bollards, seating and cycle parking must therefore be considered as part of the overall design of the street and should be considered as part of a wider strategy.



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Street furniture should be placed within a designated zone such as a verge and items should be selected from a limited palette that promotes visual cohesion. Further details in relation to street furniture including the design of good quality street lighting is provided in DMURS.

Noted that the applicant has included details of a gateway 'Clonburris' signage. This is considered to be acceptable.

### *Boundary Treatment*

The proposed boundary approach in the submitted drawings is generally consistent with this section of the Planning Scheme. To be reassessed following receipt of further information/ revised design.

## Services Infrastructure and Energy Framework

### *Water Supply*

Irish Water has raised no objections, subject to conditions.

### *Foul Water Drainage*

Irish Water has stated foul sewers such as 450mm diameter foul sewer south of Southern Link Road at eastern end of site are too close to proposed buildings. **Additional information has been requested.**

### *Surface Water Drainage and Sustainable Urban Drainage System (SUDS)*

The following context is noted from the Infrastructure report 'DBFL Consulting Engineers have undertaken a "Surface Water Management Plan" (SWMP) for the overall Clonburris Strategic Development Zone (SDZ). The SWMP for the SDZ been submitted to SDCC and agreed with SDCC. The SWMP outlines the surface water strategy for the overall SDZ lands and the requirements for each individual site within the SDZ which includes the subject site. The SWMP includes the strategy for attenuation design, SUDS features, run off rates and trunk infrastructure layout. The subject site has been designed in accordance the strategy agreed upon in the SWMP. The proposed site will benefit from trunk surface water infrastructure proposed as part of the Clonburris Infrastructure Development for which planning was granted under reference SDZ20A/0021. The planning application included trunk surface water sewers and regional attenuation to serve the subject site, this strategic infrastructure aligns with the SWMP proposals and allows for a treatment train of Suds measures within individual sites and within the regional features. It is intended that the stormwater run-off generated from the proposed development will be collected in a new gravity sewer and discharged to the regional attenuation systems constructed as part of the CSLS. The subject site spans across two separate catchments within the SWMP. The portion of the site to the north of the CSLS is within Catchment 4B and will be served by attenuation ATN 07, south of the Link Street the proposed development is designated as Catchment 4BB and will discharge to attenuation ATN 08 as shown in Figure 3-3. Both attenuation systems will consist of modular underground storage with over ground detention basins. Outflow from each attenuation structure within the SDZ limit flow to a rate of 3.1 l/s/ha as detailed in the SWMP for the SDZ. The subject development application has been coordinated with the Clonburris CSLS

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

application and therefore no significant alterations are proposed to the layout or design of the surface water infrastructure under planning reference SDZ20A/0021. Minor modifications to the footprints of the attenuation areas are proposed as part of this application however the general arrangement and attenuation volumes are to be maintained as per those permitted as part of the CSLS application.'

The Planning Authority notes the Surface Water concept for the subject site and considers that the strategic/regional approach is established for the subject site by way of the permitted SDZ20A/0021 planning application and the agreed SWMP.

The applicant states that the subject application design complies with the site design SWMP requirements and objectives as the development cells include the provision for at least two separate SuDS features and provides for swales for roads run off and permeable paving in private car parking areas. The Planning Authority notes the incorporation of SuDS features but also notes the concerns expressed by the Parks and Water Services Department. It appears that the scale of the proposed SuDS measures within the development cell is insufficient. Further information required.

Water Services has stated "*There are insufficient SuDS shown in proposed development. Submit a drawing showing additional SuDS for proposed development. The location, type and size of SuDS features shall be shown in revised drawing. Show what capacity in m<sup>3</sup> each SuDS feature has.*"

*Examples of SuDS include and not limited to:*

- *Rain gardens,*
- *Green roofs*
- *Channel rills*
- *Tree pits*
- *Swales*
- *Planter boxes, water butts*
- *Other such Suds"*

Additional information should be provided, as above.

The Parks and Public Realm Department has also raised concerns regarding SuDS. The report states:

*"The Clonburris SDZ strategy requires a green infrastructure based approach to drainage and stormwater management. SuDS are to be designed as an ecological resource designed into the street, public squares and open space network. These shall be of a high quality, designed as a series of 'wet' and 'dry' landscape elements to achieve a multifunctional space for amenity, biodiversity and surface water management.*

*It is essential that open spaces accommodating SUDS measures such as attenuation ponds and swales are designed in order to achieve a balance between surface water management and high-quality open space. The scheme requires:*

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

- *A system of infiltration trenches, tree pits, permeable paving, swales, green roofs, and other elements that should direct surface water to attenuation areas.*
- *Swales designed as linear landscape elements to enhance streetscape and neighbourhood character and identity.*
- *Surface water to be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units.*
- *The perimeter attenuation areas to be profiled to enable walkways, high quality planting, amenity edges, and habitat establishment.*
- *Open spaces to have 'important Sustainable Urban Drainage System functions' with 'SUDS features such as major detention ponds and swales' and 'Retention and enhancement of selected hedgerow'.*
- *Local Parks and Squares to 'include local level SuDS function with small swales and bioretention areas and Retention and enhancement of selected hedgerow*
- *Local Links to incorporate 'Tree lined street and avenues' and 'small scale SUDS features such as swales, where appropriate'*
- *The use of underground tanking systems are generally not permitted.*

### *Waste Management and Recycling Facilities*

The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities:

- The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants, - **concern has been raised by roads that tracking for bin trucks has not been provided across the site. There are a number of areas where bins are located at communal open spaces and do not benefit from passive surveillance the applicant is requested to address this via additional information.**
- Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant RWMP and the design considerations contained in Section 4.8 and 4.9 of the DECLG Design Standards for New Apartments (2015). Refuse storage for houses should be externally located, concealed/covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity, - **the applicant is requested to confirm that the scheme meets this requirement,**
- Access to private waste storage in residential schemes should be restricted to residents only - **the applicant is requested to confirm that the scheme meets this requirement,**

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

### *Aerodromes*

Surface of Casement Aerodrome and an eastern portion of the lands are located within the Outer Approach Area to the Aerodrome. No comments have been received from the Department of Defence. Standard conditions are recommended in the event of grant of permission.

### *Noise*

The EHO has stated:

*“The main concerns from Environmental Health relate to noise from the Cork-Dublin Rail line and the Fonthill Road which are the principal existing ambient noise sources that have the potential to impact on this proposed development.*

*Given that the EIAR (Chapter 8.6.8) concludes*

*a) the Lnight levels are above the undesirable noise limit specified in the Dublin Agglomeration Noise Action Plan 2018-2023 and the ProPG Assessment, the northern and eastern side boundaries are characterised as being medium risk zone and as such the development will require good acoustic design to ensure future residents are not adversely impacted by external noise.*

*The following information is required for submission to facilitate further assessment of this application:*

*1. An Acoustic Design Statement as part of a good acoustic design process must be submitted in order to demonstrate how the potential of a significant adverse noise impact will be avoided in the finished development from traffic noise and Dublin – Cork railway line noise. The statement should outline in detail the mitigation measures and specification of glazing and other design features to be used in order to reduce the impact of excessive noise on residents of the finished development”.*

Additional information has been requested.

### *Construction Environmental Management Plans*

Should planning permission be granted, a Construction Environment Management Plan would be required. This can be secured via condition.

### **Landscape and Open Space**

The overarching Principle states the following: *‘To provide attractive, interesting and well used outdoor spaces using the latest place making and urban design principles, creating a pedestrian-centred environment with active, inviting public space, parks and private gardens.’*

### *Proposed Open Spaces*

The proposed development provides for a Local Park in CSW S3 and provides a section of the northern side of Grand Canal Park. A Parks and Landscape Strategy (PLS) is at draft preparation stage and is submitted to the Planning Authority for consideration. Section 2.10.2 outlines that access to the northern tow path of the Grand Canal shall be carefully designed.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

It is noted that the applicant has indicated that an existing access to the towpath is maintained and provided indicative arrows 'for future secondary linkages to canal towpath' on landscaping plans and stated that there is also opportunity to link the development with the canal at certain points, to future detailed design and agreement with the relevant authorities. The Planning Authority note this and consider the statement to be acceptable, however, indicative locations are not considered to be necessary at this stage.

The applicant indicates that a single wide path catering for pedestrians and cyclists weaves through the space from east to west, off which various spaces and routes open up. The path links together grassed kickabout spaces, native meadows, woodland spaces, a large natural play area, seating spaces and allows for further connection to the west. A proposed further link utilising the existing crossing over the overflow stream from the existing canal towpath northwards towards the Fonthill Road gives additional pedestrian/cycle connectivity.

The Parks and Public Realm Department has made the following comments:

- i. *"We required a greater retention of existing trees and hedgerows within the pNHA, parks and public open space as required by the Clonburris SDZ Planning Scheme (2019) and Clonburris SDZ Parks and Landscape Strategy.*
- ii. *The use of compacted gravel is not suitable in Public Open Spaces use to attenuate water. We require paths to be a permeable solid surface.*
- iii. *Park Boundaries to have appropriate boundaries to a standard suitable for Public Realm, with entrances for vehicular access and separate entrances for pedestrians".*

### *Grand Canal Park*

- iv. *"It is unclear from the plans whether the proposed native hedgerow would be sufficient to protect the existing native hedgerow from damage from users. Further measures (defensive planting; native hedging, chestnut paling) should be proposed where required in localised areas to prevent damage to existing vegetation by users of the Park and to prevent desire lines or paths forming through this sensitive area".*

### *Local parks*

- i. *"Requires appropriate boundary fencing, planting, a lockable vehicular access for maintenance and a separate entrance for pedestrians. A line of removable bollards is not an adequate entrance".*

Additional information has been requested.

### **Biodiversity and Natural Heritage**

The overarching Principle states the following *'To maximise appropriate access to and use of the Grand Canal, Griffeen Valley Park and other biodiversity assets in an ecologically sensitive way, thereby offering unique selling points to the SDZ Planning Scheme.'*

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Grand Canal

The Parks and Public Realm Department has stated *“It is unclear from the plans whether the proposed native hedgerow would be sufficient to protect the existing native hedgerow from damage from users. Further measures (defensive planting; native hedging, chestnut paling) should be proposed where required in localised areas to prevent damage to existing vegetation by users of the Park and to prevent desire lines or paths forming through this sensitive area”*.

### Ecological Corridors

The comments set out in relation to Green Infrastructure and Hedgerows also provide the detail on ecological corridors.

### Hedgerows

*Clonburris Planning Scheme Section 2.22 Biodiversity and Natural Heritage, Hedgerows, states:*

*‘The Hedgerow/treeline habitat linking the Grand Canal Corridor and the Rail corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats. Where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.’*

The Parks and Public Realm Department has stated *“The applicant shall outline how this is going to be achieved and is it to be along roadways within this proposal. It is noted that 1,305m of hedgerow are proposed for removal due to construction and there are only 510 linear metres of proposed native hedgerow planting. The applicant is requested to propose compensatory hedgerow planting and indicate where the balance of replacement hedgerow is to be planted”*.

### Protected and Invasive Species

The Parks and Public Realm Department has stated *“We are concerned about the impact of the development on bats. In particular we have concerns about lighting design and bat sensitivity”*.

### *Protected Species – Bats*

The Heritage Officer has noted that ‘numerous previous surveys undertaken during the making of the Clonburris SDZ scheme record protected species along the Grand Canal and its associated towpaths and habitats. These include bats, otter, kingfisher, and crayfish. The protection of these species along this nationally important ecological corridor is central to the identification and delineation of the Grand Canal Corridor as described in the draft Biodiversity Management Plan (BMP) for Clonburris.

The submitted application adheres to the setback distances of 50m for buildings and 30m for other development (e.g. roads) as proposed in the SDZ Scheme and the draft BMP. The applicant is advised that the intervening zone of 20m between the 50m and 30m boundaries acts as a key buffer

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

area between the residential development area and the darker zone of the Grand Canal Corridor. Few details, however, have been submitted for the proposed lighting design within this 20m area.

The applicant is advised that significant attention is required to be applied to the appropriate design and operation of bat-sensitive lighting schemes in this buffer area.

Due to the essential nature of appropriate public lighting and to the requirement to protect foraging and commuting bats in a nationally important ecological corridor, it is advised that it is not feasible to address this matter under possible Conditions of planning. Further details on how this balance is to be achieved will therefore be required to demonstrate how the protection of these protected species can be achieved.'

The Planning Authority notes that a public lighting design is included and the EIAR states that 'the lighting plan will ensure that the guidelines recommended by BCT, 2018 will be implemented and therefore reducing the impact of the lighting plan on local bat populations. The landscape plan aims to retain as much of the trees and treelines along the boundary of the proposed development site. It will also undertake additional planting to provide foraging and commuting habitat for local bat populations. The development of the Grand Canal Park will provide a dark ecological corridor along the Grand Canal which will have a positive impact on local bat populations and other nocturnal wildlife. This is particularly important for commuting nocturnal wildlife. As part of the Landscape Plan, additional bat mitigation measures have been recommended in relation to a new eastern boundary and the erection of a bat box scheme. This will increase the positive conservation of the sections of the proposed development for local bat populations. Therefore the proposed development, if all mitigation measures including the Lighting Plan and Landscape Plan are strictly adhered to, will likely have a Permanent Slight Negative Effects on local bat populations, in the long-term. However due to extensive landscape mitigation measures proposed and the proposed dark corridor within the Grand Canal Park, the proposed development will likely have a Not Significant Negative Effects on local bat populations along the Grand Canal. This is an important factor in protecting this linear habitat that is the primary foraging area for local bat populations within the survey area.'

### ***Protected Species – Crayfish***

The Heritage Officer states that 'crayfish are recorded as being present within the canal overflow stream and within the Grand Canal itself. Any proposals in the vicinity of the overflow stream that are likely to impact on this species are to be avoided. Impacts can arise from physical disturbance of the stream bed or stream banks, by littering, or by soil movement.

In the design for the children's play zone which is proposed to interconnect with the overflow stream, the applicant has not demonstrated how negative impact on freshwater crayfish is to be avoided. Similarly, inadvertent disturbance of the overflow channel is possible along the length of its route along the edge of the Grand Canal Park.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive’s Order

The applicant is advised to revise the landscape design on the northern side of the canal overflow stream, and to provide greater details on how inadvertent disturbance by park visitors will be avoided/prevented. A possible solution is the planting of a native hedgerow at an appropriate distance to the northern side of the stream to prevent disturbance and interaction with the overflow channel.’

It appears that the impact on Crayfish is not included in the EIAR. An amendment to the EIAR and the design solutions suggested by the Heritage Officer shall be considered. Further information.

### Archaeological and Architectural Heritage

The overarching Principle states the following: *‘To retain and enhance architectural heritage and archaeological heritage features, sites and structures within the SDZ lands by encouraging conservation and incorporation including adaptive re-use, vwhere appropriate, within the built fabric and landscape of the SDZ Lands.’*

<i>To incorporate Architectural Heritage structures and features throughout the SDZ lands in a manner that promotes place making and capitalises on the unique industrial heritage of the surrounding area;</i>	It is not apparent that the applicant has given full consideration of Protected Structures.
<i>To ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process.</i>	The Department has raised no objections in this regard, subject to conditions.

### Other Issues

The applicant is also seeking permission for:

- solar panels at roof level of a’partments – it is noted locations are ‘indicative’. The applicant is requested to provide the exact location, sq.m and output in MW
- revisions to attenuation permitted under SDZ20A/0021 – Water services and Parks have requested additional information regarding SuDS.
- *Other Roads Issues*



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

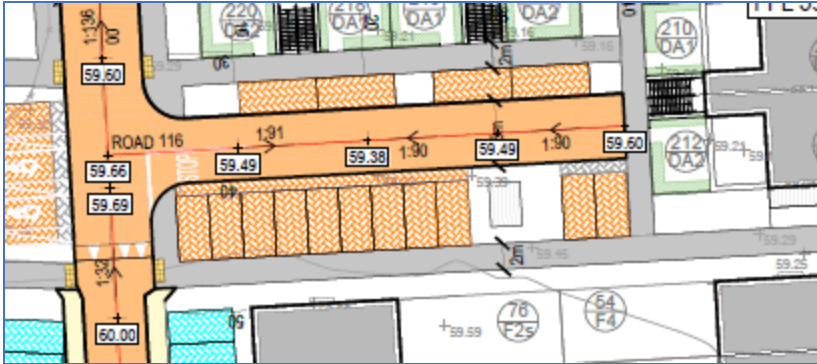


Figure 4 road without turning point

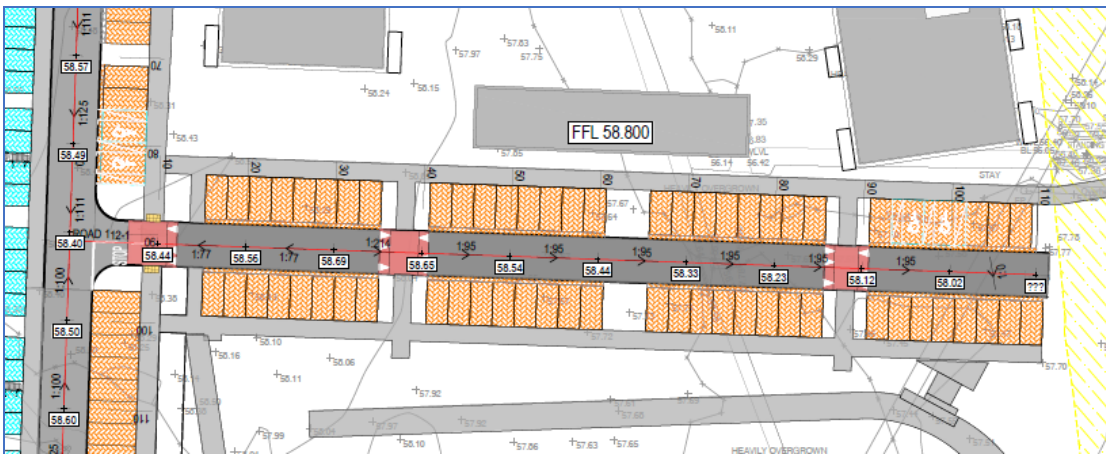


Figure 5 no turning point provided.

The main internal access roads are designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) and Local Authority taking in charge requirements. The applicant should ensure that turning manoeuvres are achievable on all roads unless short enough to allow reversing as per DMURS (see Figure 4 and Figure 5 below). Consideration should be given to the priority of the road being reversed onto.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

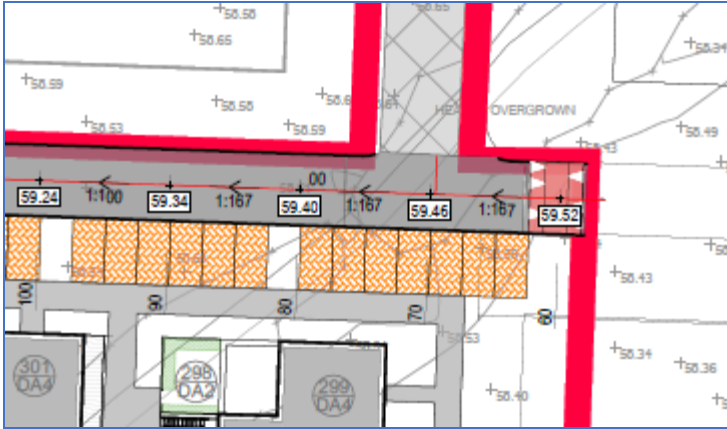


Figure 6 link road to future development

Where links to future developments are left the applicant shall insure that they are built right to the boundary, to ensure continued connections to neighbouring developments (Figure 6).



Figure 7 link road missing

The proposed Local streets will be 5.5m wide with a 2m wide footpath on the side of residential units. Intimate Scale/Home-Zone Streets are 4.8m wide with a 1.5m vulnerable user / service strip on each side. Maximum road corner radii of 4.5m are provided within the local streets, except for certain turning heads which have corner radii 6m to accommodate refuse vehicles. Where required to accommodate perpendicular parking either the parking bay width has been increased or the road width increased. All road dimensions and layouts should conform to the road hierarchy of the Transport Assessment report SDZ, reference should be made to Table 7.2 Proposed Walking and Cycling Infrastructure by link type, for specific layouts.

### *Fire Tender and Bin Collection Access*

An autotrack has been submitted detailing the refuse vehicles turning throughout the development. the autotrack has been provided only at certain locations across the development, this should be extended to show all locations where refuse vehicles or fire tenders require access.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### *Bin Collection*

The location and general details of the bin storage areas has been submitted. The autotrack analysis has been submitted detailing refuse vehicle movements around the development.

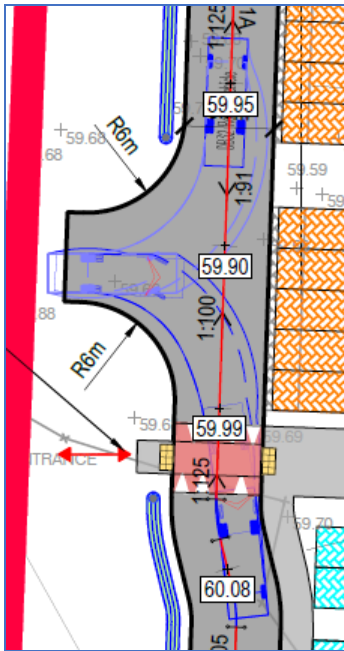


Figure 8 Refuse turning

A overall layout highlighting the refuse collection strategy for the apartment blocks and duplex areas is required.

### **Environmental Impact Assessment Report (EIAR)**

The applicant has submitted an Environmental Impact Assessment Report having regard to Article 103 of the Planning and Development Regulations, 2001 as amended for an EIAR to be undertaken on a precautionary basis.

An EIAR process is defined in the EIA regulations and Directive. That an environment impact assessment means a process consisting of:

- (i) The preparation of an environmental impact assessment report;
- (ii) The carrying out of consultations;
- (iii) The examination by the competent authority of the information presented in the EIA report and any supplementary information provided, where necessary, by the developer;
- (iv) The reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

referred to in point (iii) and, where appropriate, its own supplementary examinations and;

- (v) The integration of the competent authority's reasoned conclusion into any of the decisions.

The EIAR is prepared by the developer and is submitted to a Competent Authority as part of a consent process. The EIAR consists of a systematic analysis and assessment of the potential effects of a proposed project on the receiving environment. The amended EIA Directive prescribes a range of environmental factors which are used to organise descriptions of the environment and these factors must be addressed in the EIAR. These are listed in Article 3 (1) of the amended directive.

*What an EIAR is to contain:*

the developer shall include at least:

- (a) a description of the project comprising information on the site, design, size and other relevant features of the project;*
- (b) a description of the likely significant effects of the project on the environment;*
- (c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;*
- (d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;*
- (e) a non-technical summary of the information referred to in points (a) to (d); and*
- (f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.*

*Adequacy of Environmental Impact Assessment Report (EIAR)*

The EIAR sets out:

Chapter 1 – Introduction and Methodology

Chapter 2 – Description of the Proposed Development and Alternatives Examined

Chapters 3 – 14 sets out the required topics

Chapter 15 – Interactions of the forgoing and cumulative impacts

Chapter 16 – Summary of EIA mitigation and monitoring measures

Chapter 17 – Reference list

An Environmental Impact Assessment Report (EIAR) has been submitted as part of the planning application which contains the EIAR and an Appendices. The direct, indirect and cumulative effects of the proposed project on the specified factors are identified, described and assessed in the following sections:

- Alternatives
- Population and human health
- Biodiversity

# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

- Land and soils
- Water and hydrology
- Air quality and climate
- Noise and vibration
- Landscape and Visual impact assessment
- Traffic and transportation
- Material assets – waste management
- Material assets – utilities
- Archaeology, architecture and cultural heritage
- Risk management
- Interactions of the forgoing and cumulative impacts.

Subject to Article 108 of the Planning and Development Regulations 2001 (as amended) the Planning Authority is required to examine the adequacy of the EIAR submitted. It is considered that the proposed EIAR contains the information as set out in Schedule 6 of the Planning and Development Regulations (2001) as amended and in accordance with European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

### *Alternatives*

The EIAR examines the following alternatives:

#### *Alternative Locations*

The South Dublin County Council County Development Plan 2016-2022 zoning map notes the subject site as being within the Clonburris SDZ. As such the Clonburris SDZ Planning Scheme applies to this site. Given the project comprises the development of a site within the Clonburris SDZ and Planning Scheme area, the consideration of alternative locations is not relevant in this instance. The Clonburris SDZ Planning Scheme was prepared by SDCC to provide a framework for the future development of the subject lands. The Planning Scheme itself was subject to the Strategic Environmental Assessment (SEA) process.

#### *“Do-Nothing” Alternative*

A “do-nothing” scenario was considered to represent an inappropriate unsustainable and inefficient use of these serviced residential zoned lands within the SDZ.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Alternative Uses

The proposed development is located in the Clonburris SDZ and subject of a Planning Scheme. The proposed residential development with creche, innovation hub and open space is consistent with the zoning and related uses of the Clonburris Planning Scheme 2019. The location of new residential development at this site has therefore been pre-empted in the adopted Planning Scheme which itself was subject to Strategic Environment Assessment (SEA) and the consideration of alternatives for this site and area.

### Description of Alternative Processes

This is not considered relevant to this EIAR having regard to the nature of the proposed (residential) development. It is noted the proposed construction works comprise relatively standard building construction processes. As such there are no specific alternative construction processes identified. With reference to the operational phase, no new, unusual or technically challenging operational techniques are required, as such no alternative operational processes have been considered.

### Alternative Designs and Layouts

The project architects undertook an extensive appraisal to determine the appropriate scale, massing and layout of the proposed development... With reference to the final layout, the iterative process outlined above, which included alternative site layouts were considered with the objective of producing a new high quality residential development, which has undergone a robust consideration of relevant alternatives having regard to the comparison of environmental effects and meets the requirements of the EIA Directive, based on the multidisciplinary review across all environmental topics.

### *EIAR Reasoned Conclusion*

Having regard to the environmental information contained within the EIAR and information submitted as part of the application, it is considered that the main significant direct and indirect residual effects of the proposed development on the environment are as follows:

- Population and human health:
  - Construction phase: It is anticipated that subject to the careful implementation of the remedial and mitigation measures proposed throughout this EIAR document, and as controlled through the Construction and Environmental Management Plan, any adverse likely and significant environmental impacts will be avoided. The overall predicted likely impact of the construction phase will be short-term not significant, and neutral. Operational phase: the proposed development will result in a long-term positive impact on housing and is not likely to result in any significant negative effects on population and human health, and will result in some other positive impacts, including settlement patterns of a sustainable density at an appropriate location and economic benefits derived from the employment opportunities within childcare facility and employment hub proposed. Through generating additional

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

economic activity in the area, and providing for a high standard of residential accommodation, there will be a slight positive impact arising from the proposed development in the short-term (for economic activity) and in the long term for residential accommodation

- Biodiversity: With the successful implementation of outlined mitigation measures including a strong and biodiversity enhancing landscape strategy, no significant long term impacts are foreseen from the construction or operation of the proposed project. Residual impacts of the proposed project will be localised to the immediate vicinity of the proposed works and would be short-medium term, until the landscape strategy matures.
- Land and soils
  - Construction: Implementation of the measures outlined in Section 5.6 will ensure that the potential impacts of the development on soils and the geological environment are minimised during the construction phase and that any residual impacts will be short term, and imperceptible.
  - Operational: The residual impacts for a residential housing development, creche and open space are deemed to be imperceptible post construction (during the operational phase). Implementation of the mitigation measures outlined above will ensure that potential significant effects of the proposed development on land, soils and geology do not occur during the construction phase and that any residual effects will be short term and not significant.
- Water and hydrology: It is considered that by implementing the proposed construction and operational phase mitigation measures above, that the significance of the identified impacts will be reduced to a "Not significant" residual impact on the identified hydrological/hydrogeological receptors.
- Air quality and climate:
  - Construction: The predicted construction phase residual impacts on air quality will be negative, slight and short-term.
  - Operational: The predicted residual operational phase impacts on air quality and climate will be negative, imperceptible and longterm.
- Noise and vibration
  - Construction: The impact of the construction phase will result in an increase in daytime noise levels at the closest receptors to the site. With mitigation measures in place, it is predicted that the guideline construction noise limit of 70dB(A) LAeq, 1-hour can be complied with. Site activities, in particular ground clearance and piling works will generate perceptible vibration at the closest residential receptors located

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

west of the site. It is predicted that vibration levels associated with construction activities at the closest receptors to the site will not exceed 15 mm/sec PPV. Human response to groundbourne vibrations will be perceptible at levels between 0.14 to 1.0 mm/sec PPV.

- Operational: The operational phase of the development will not adversely impact the existing noise climate at local receptors. The residual operational noise impact will be neutral, long-term and not significant. The operational phase of the development will not generate ground borne vibration levels. The residual operational vibration impact will be neutral, long-term and imperceptible.
- Landscape and Visual impact assessment: In the longer term, the assessment concludes that there will be some not significant negative visual impacts to receptors to the south-west and south of the site with some imperceptibly negative visual impacts to the remaining residential receptors to the north and east. The visual impact to the users of the R113 and R136 will be not significant negative in the medium to long term. The mitigation measures will have only a small effect on the residual impacts on viewpoints that are further away from the site (over 100m). The development has a moderately negative effect on views from the Canal towpaths due to the proximity and scale of the adjacent development and the medium to high visual sensitivity assigned to this pNHA area. The residual impacts on views from the canal are impacted by the proposed removal of portions of the existing hedgerow and vegetation to create usable public open space, as defined within the Clonburris SDZ Planning Scheme and the associated Parks and Landscape Strategy (by Dermot Foley Landscape Architects, submitted to South Dublin County Council) and facilitate pedestrian links with the development from the canal towpath. This removal is mitigated by the inclusion of additional tree planting, hedgerow planting, woodland planting, resulting in a slight improvement in screening measures to the towpath, though not significantly enough to change the assessment.
- Traffic and transportation
  - Construction: Provided the above remedial or reductive measures and management procedures are incorporated during the construction phase, the residual impact on the local receiving environment will be temporary in nature and neutral in terms of quality and effect.
  - Operational:



# Comhairle Chontae Atha Cliath Theas

**PR/0154/22**

## Record of Executive Business and Chief Executive’s Order

**Table 10.12 – Impact Assessment – Operational Phase**

Junction ID	Location	Environment Character	Quality / Scale of Impact	Impact Significance	Duration
1	Ninth Lock Road / CSLS	Low Sensitivity	Negative - Low	Not Significant	Short/Medium-term
2	R113 Fonthill Road / CSLS	Low Sensitivity	Negative - Low	Not Significant	Short/Medium-term
3	CSLS / New Link Road	Low Sensitivity	Negative - Low	Not Significant	Short/Medium-term
4	CNLS / New Link Road	Low Sensitivity	Negative - Low	Not Significant	Short/Medium-term
5	R113 Fonthill Road / CNLS	Low Sensitivity	Negative - Low	Not Significant	Short/Medium-term

- Material assets – waste management
  - Construction: The management of wastes generated during the construction of the proposed development will be in accordance with a Site-Specific Construction Phase Waste Management Plan. With regard to how it has been demonstrated how construction wastes will be managed through design, management and waste reduction and recycling initiatives at the proposed development, it is predicted that the impact of the construction phase of the development will not have an adverse impact on the receiving environment, existing material assets and local and regional waste management services.
  - Operational: The development shall be designed to provide adequate domestic waste infrastructure and storage areas for all apartments. This will promote the appropriate segregation at source of domestic generated waste from all residential units at the development and thus reduce the potential for the generation of mixed un-recyclable domestic waste streams.
- Material assets – utilities
  - Construction: Implementation of the measures outlined in Section 12.6 will ensure that the potential effects of the proposed development on infrastructure, services and public utilities do not occur during the construction phase and that any residual effects will be short term and not significant.
  - Operational: As surface water drainage, foul water drainage, watermain and utilities design has been carried out in accordance with the relevant guidelines, there are no predicted significant negative residual effects on the drainage and water supply arising from the operational phase. All utilities ducting and diversions will be carried out as per the supplier instructions, therefore no predicted residual effects are expected from the operational phase.
- Archaeology, architecture and cultural heritage

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

- Archaeology: Following implementation of mitigation measures, no impacts are predicted upon the archaeological resource.
- Architecture: The proposed development is predicted to have an indirect moderate positive impact on the Grand Canal and Omer Lock House. This is due to the fact that the heritage features will be utilised by the residential development and this may also lead to the re-use or restoration of the Omer Lock House, which is an RPS and in very poor condition.
- Cultural heritage: Following implementation of mitigation measures, there are no impacts predicted upon the cultural heritage resource.
- 'Risk management: Through the implementation of mitigation measures, there are no identified incidents or examples of major accidents and or natural disasters that present a sufficient combination of risk and consequence that would likely lead to significant residual impacts or environmental effects. No residual impacts arise from the construction phase.

It is considered that the information contained within the EIAR allows for adequate assessment of the potential impacts of the proposed development on the receiving environment and complies with the requirements of Article 94 of the Planning and Development Regulations 2001 (as amended). However, further information is required relating to a number of matters that may impact the EIAR. As such, where relevant an update to the EIAR should be provided via **additional information**.

### 5. *Screening for Appropriate Assessment*

Information for the purposes of assisting in screening for Appropriate Assessment was prepared by Altemar. The report concludes

*“The proposed development at Clonburris is located in a wider suburban and developed environment 5.1 km from the nearest Natura 2000 site (Rye Water Valley/Carton SAC). Watercourses and surface runoff are seen as the main potential pathway for impacts on Natura 2000 sites. There is no direct hydrological pathway linking the proposed development site to a Natura 2000 site. There is an indirect pathway to Natura 2000 sites located within Dublin Bay via the proposed foul and surface water drainage networks in addition to a drainage ditch that leads to the Grand Canal. Foul wastewater will be connected to an existing public sewer network, which will subsequently be processed in the Ringsend Wastewater Treatment Plant. After attenuation on-site, surface water drainage will be directed to an existing surface water drainage network running under the R113 (east of the subject site), which outfalls to the River Camac, which in turn outfalls to the River Liffey and ultimately outfalls to the marine environment at Dublin Bay. However, given the minimum distance between the subject site and the nearest Natura 2000 site (12.2 km to South Dublin Bay and River Tolka Estuary SPA), any pollutants or silt produced by the proposed development during both construction and operational phases will settle, be diluted, or dispersed*

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

*prior to reaching Natura 2000 sites. In the event that surface water runoff or dust enters the Grand Canal via the drainage ditch, the slow flow rate of the canal, dense aquatic vegetation, the presence of the wide waterbody of Grand Canal Dock sites, the estuarine element of the River Liffey and the significant distance along this network (12.2 km), would result in the desilting of the surface water prior to reaching Natura 2000 sites. Silt or pollutants would settle, be dispersed, or diluted along this network prior to reaching Natura 2000 sites. In the absence of mitigation measures, no significant impacts on the qualifying interests of Natura 2000 sites are predicted. As such, the proposed development project will not have a significant effect on the conservation objectives or qualifying interests of Natura 2000 sites.*

*No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites. This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site. On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site”.*

Having reviewed the submitted information, the Planning Authority has concluded that, having regard to the nature of the development, connection to public services and the distance from the Natura 2000 sites, the proposed development would not require a Stage 2 Appropriate Assessment. It is noted that a Stage 2 Appropriate Assessment was not required as part of the making of the Planning Scheme.

### Other Considerations

#### *Development Contributions*

- Further information recommended. Applicant to supply an updated schedule if amendments.

### SEA Monitoring

FI recommended

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

### Conclusion

Overall, the Planning Authority welcomes the planning proposal for this strategic site in the County. The scale of the development is substantial and it is the first residential development to be considered in the SDZ with the Clonburriss Planning Scheme 2019.

The Planning Authority considers that the proposed development has addressed a lot of the requirements of the Planning Scheme, however, a range of further information is required in relation to:

- Urban Design & Layout;
- Movement;
- The street network
- Local node
- GI, SuDS and Heritage
- Design
- Part V
- Landscaping and Open Space

The applicant is requested to address these concerns.

### Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

#### 1. Movement & Transport

##### (a) Street Network

Section 2.2.4 of the Scheme outlines that the centre line and alignment of the Local Streets and Homezones are flexible with the exception of streets with frontages prescribed under Section 3 (Development Areas). In this instance, the application site contains prescribed frontages in the form of Avenue Frontage, Canal Frontage and Park Frontage (Figure 3.1 refers). Concerns are raised in relation to the absence of a Local Street to the east of Block 2, fronting to the future Urban Square. This frontage is prescribed as a 'Avenue Frontage' in the Section 3 and as such the alignment of the Local Street is not flexible. The proposed development omits the street. In addition, it is considered that the identified southern frontage for Block 1 is not delivered. This is an identified 'Park Frontage' and would provide passive surveillance and enclosure to the open space area to the south. The applicant is requested to consider the content of the Planning Scheme and amend the design to address these issues.

##### (b) Open Street Network and Vehicular Circulation

The Planning Scheme outlines that the alignment of the street network should largely have an orthogonal grid layout and shall largely comprise an open network in terms of permeability. Local Streets that provide through routes for strategic pedestrian and cyclist should be filtered to prioritise pedestrians and cyclists where junctions intersect with Link

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

or Arterial Streets. The Planning Scheme provides an Overall Movement Concept in Figure 2.2.7 to demonstrate same. The Movement Concept of the Planning Scheme is integrated with the accompanying Transport Assessment and Transport Strategy. Having regard to the above, it is considered that the movement and street network proposed by the applicant is not consistent with the Planning Scheme in terms of an open permeability network and priority for cyclist and pedestrian movement at a selection of junctions of the link street and local streets.

The NTA has recommended removal of access junction to street 3, to promote walking and cycling. The other access and road layout should conform to the Movement Concept. The Roads Section outlines that a three-way junction at the south of Street 3 should be restored to allow the open flow of traffic around the development in accordance with the transport assessment and strategy that accompanies the Planning Scheme. The applicant is advised to review the NTA submission for further context. The applicant is requested to provide consistent material as part of further information.

(c) Increased Car Parking and set back on Link Street

The Southern Link Street runs through the centre of the site, having been approved under SD21A/0020. It should also be noted that that Condition 4 of this permission requires agreement by compliance for a revised layout indicating that there is parallel parking the length of the Link Street. It is not apparent that this has been incorporated as part of this application. Clarity on this issue is required.

(c) Building Setback

Concerns are raised in relation to the set back of Block 1 from the Link Street. The set back may result in a wide feel to the entrance to the link street from the Fonthill Road. The submitted cross sections do not outline the building to building (likely building line of future development) width and demonstrate compliance with Figure 2.2.5 Example Link Street. Noted that this example indicates a building to building width range of 22m-30m and a set back privacy strip of less than 3m. It is not apparent that the current proposal meets this requirement and further information is, therefore requested.

(e) Bicycle Parking

The Roads report outlines that the bicycle parking explanation needs further detail. A detailed submission highlighting the allocation, quantity and location of the bicycle parking provision should be provided, to ensure the provision is in accordance with the Planning Scheme. The addition of electric bicycle charging facilities has been incorporated in the Clonburris SDZ requiring 10% of bicycle parking provision to provide for charging.

(f) Roads – Other

(i) The applicant is requested to provide details that indicate turning manoeuvres are achievable on all roads unless short enough to allow reversing as per DMURS

(ii) Where links to future developments are left the applicant is requested to provide plans indicating that they are built right to the boundary. No ransom strips should be created.

(iii) An overall management plan of refuse collection for the apartments should be

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

provided, detailing collection points and vehicle routes throughout the entire development.

### 2. Visual of Street

CGIs with accompanying cross sections of the different street types are required.

### 3. Built Form & Design

Street Design, Car Parking & Street Trees

(i) The Planning Authority has concerns about the level of perpendicular car parking on the local streets and the on curtilage parking in homezones. The applicant is requested to submit revised plans indicating revised details via further information. A cross section should also be provided.

(ii) Homezones (Intimate Local): In terms of design, the homezones have perpendicular parking and are not in accordance with the scheme. The applicant is requested to submit revised plans indicating revised details via additional information indicating a revised layout in accordance with figure 2.2.6. A cross section should also be provided.

(iii) Pedestrian Priority: A single pedestrian priority route is indicated in the scheme, to the south east corner (south of the proposed apartment block). There are a number of raised crossing points on this route but there is no indication given that the route is pedestrian priority. The applicant is requested to provide this street as pedestrian priority.

(iv) Carparking

Section 2.8.10 Design of Parking and Loading in the Planning Scheme provides for design criteria for the provision of car parking. The Scheme outlines that car parking should be carefully considered as part of the overall public realm. In the context of this site, the Scheme states that a mixture of on street parking for visitors and residents should be provided. The Scheme states 'that a range of less formal or alternative parking arrangements may be used along Local Streets...' and 'This may include a mixture of on-street and in- curtilage parking, however, no more than 60% of residential parking spaces shall be provided as in-curtilage parking space in any Development Area. Parking within Home Zones/Intimate Local Streets shall be on- street.' In this context, the Planning Authority has concerns in relation to the approach of the proposed development to car parking. It appears from the site layout plan and the taking in charge drawings that the majority of car parking is in-curtilage. The Scheme states that parking within Home Zones/ Intimate Local Streets shall be on- street. Further consideration of the approach to car parking is required by way of further information. This issue is interlinked with the design of the public realm. Noted that the Parking Strategy in the Transport Assessment and Strategy examined the spatial requirement for residential on-street parking, concluding that maximum parking standard provision could be met on-street with only a few areas requiring supplementary parking.

(v) Street Planting

The Planning Authority requires further information in relation to the provision of Street Planting. It is considered that the proposal for street planting do not meet the standards of the Planning Scheme and South Dublin County Council in terms of biodiversity, quantum,

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

management and street trees.

- A revised proposal shall be consistent with Section 2.8.11 of the Scheme. The Planning Authority considers that the design of the local streets/ homezones requires a multi disciplinary reconsideration in relation to the street trees and car parking to ensure a high quality urban design taking account of the following:

- The Parks report outlines that SDCC do not accept front garden trees or trees between driveways as street trees. Such trees cannot be taken in charge and maintained by the Council.

- Parks note that street tree planting has been proposed on private curtilage and partly within the public footpath. This solution remains very problematic. The tree canopies and roots are still up to 50% on property not taken in charge by the Council which threatens the long term viability of the trees. The trees are also at risk from vehicles using the car parking spaces. The trees could be moved to the outside of the path shown on the drawing.

- Revised proposal shall provide street trees to be provided fully in Public Areas and to be an integral part of the street rather than in front gardens. The applicant is referred to the Clonburris SDZ Planning Scheme 2019, Clonburris SDZ Parks and Landscape Strategy and DMURS (2013) for guidance on street tree provision and appropriate design layouts for local streets and homezones.

- All Street Trees planted within the Public Realm shall have suitable tree pits that incorporates SuDS features.

- Street Trees to be planted at:

o Minimum 18-20m girth along local streets

o Minimum 16-18cm girth on intimate local roads, i.e. homezones.

- Street trees to incorporate SuDs Tree pits including sufficient growing medium.

- The trees proposed for grass margins do not require SuDs tree pits, root deflectors, protection measures or tree grilles.

- Proposed trees, configured to lie within the Public Realm, have been provided along some streets according to the requirements of Clonburris SDZ Planning Scheme and DMURS (2019), however several local streets and homezones lack street trees, estimated as:

(i) Street 1: Western Side, approx. 140m - no street trees

(ii) Street 2 Homezone North-South approx. 70m - no street trees

(iii) Street 3 approx. 80m - no street trees

(iv) Street 4 Homezone North-South; approx. 90m - no street trees

(v) Street 5 approx. 50m - no street trees; and a further 35m has no street trees on western side,

(vi) Street 6 Homezone North-South; approx. 60m - no street trees

(vii) Street 7 North-south approx. 60m - no street trees

(viii) Street 7 East-West approx. 310m has no street trees on northern side (local street and home zone)

(ix) Northernmost Street: No street trees for approx. 90m.

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

(x) Various Streets: street trees are provided at up to 8 perpendicular car parking spaces. The Clonburris SDZ requires street trees at least every 6 perpendicular car park spaces.

### 4. Local Node/Park Hub

(a) The quantum of the childcare floorspace is below the stated minimum of 600sq.m and the applicant contends that the employment hub will serve a community employment function and also a commercial function and the combined floorspace of commercial/community of 1,173sq.m meets the combined minimum of 800sq.m. The Planning Authority can see some merit in this rationale, however, more details in relation to the operation and management of the employment hub are requested.

(b) The Planning Authority has concerns in relation to the achievement of the Park Hub function at the Local Node. Table 2.7.2 of the Scheme outlines that the Park Hub community buildings be located adjacent to the main parks at the local nodes. The Cappagh Park Hub is to be a small scale community building to provide floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms.

The Planning Authority considers that the Planning Scheme envisages a minimum community floorspace of 600 sqm at the Cappagh Local Node and envisages a community building, known as a Park Hub, to facilitate floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms at the local node. Concerns remain regarding the absence of the community building element. Further consideration and discussion required with South Dublin County Council.

(c) The Planning Scheme outlines that Local Landmark Buildings are permissible at key locations. The Local Node is identified as such a location in the Planning Scheme. The provision of a landmark building is not considered a requirement of the Planning Scheme, more an opportunity at key locations. The applicant states that the proposed local node is part 3/part 4 storeys which compares to the 3 adjacent 3 storeys of the duplex buildings and 2 storey houses and in compliance with achieving a local landmark. The Planning Authority considers that a landmark building is not proposed as part of the subject application as landmark buildings should be designed in a manner that is distinctive from surrounding buildings both in terms of architectural treatment and use of materials. The Planning Authority are concerned that the absence of any appropriately design landmark building is a missed opportunity to contribute to placemaking and legibility. In the context of the additional items above, the applicant is requested to consider additional height and landmark qualities for the Local Node.

### 5. Design.

(i) The applicant is requested to set out how the proposal meets the overarching objectives in terms of design (Section 2.8). These are:

- To ensure that development is designed in accordance with best practice and promotes identity and diversity between Development Areas;
- To ensure that development is laid out in a series of blocks and plots that are legible,



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

permeable and human in scale with appropriate topography responses, building heights, street widths, urban grain and street frontages;

- To design streets using a more integrated approach to pedestrian, cyclist and vehicular movement and ensure that the movement function of each street is reflected by an appropriate design response and design speed.

At present, the Planning Authority is of the opinion that the applicant has not fully demonstrated a promotion of an identity / diversity in this location, Further detail required in some areas. There is little variation in FFL, the existing layout plan indicates a topography that could have been used to create variety and Further detail required in some areas.

(ii) The Planning Authority remains concerned regarding the E/W aligned pedestrian walkway to the south of the Link Street. Quantum of blank rear boundary walls to rear of duplex, coupled with the bike, bin store and ESB, which blocks views and passive surveillance and taken in conjunction with house type F2s is concerning for the urban design quality. The applicant is requested to amend the design to address this issue and provide a series of CGIs/photomontages for the area at various point, including communal open spaces, narrower points and the car parking.

(iii) Visual impact.

The Planning Authority is concerned regarding the impact of the materials and the creation of a sense of place. It is not evident that the materials are suitable form the photomontages provided. View 4 shows no landmark or variety of height. The applicant is requested to address this matter.

(iv) Block Form.

All perimeter blocks shall be designed according to the following principles (Section 2.8.3). The below sets out principles with the Planning Authority's Concerns:

- Building massing to the perimeter of the block; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme.  
- Building frontage to all sides, including the shorter sides (secondary street frontage) of the block; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme.  
- Proper design and attention to corners, avoiding dead or windowless gables; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme. Additional information. Noted that dual frontage provided however these could be strengthen with additional windows.

- A continuity of building frontage, which relates to the local or urban context, and avoidance of blank walls; E/W pedestrian link to the rear of duplexes does not fully achieve this. Noted that dwelling that cited as being dual frontage are not and do provide habitable rooms overlooking. (e.g. dwg 19022 PL 105 and 19014 PL 112). Where there is a gable end facing onto public realm, walkways, they should be redesigned to provide active frontage. The house design for J3 is strong and this should be mimicked across the development.

- An appropriate scale of buildings to provide the appropriate level of enclosure of the

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

streets and spaces; there are concerns regarding building height in some locations and also passive surveillance. There should be more variety in building height and roof level, to add visual interest.

- Adequate back-to-back distances within the block; detail not provided on layout plan
- Appropriate building set-backs from the street in line with the use of ground floors; detail not provided on layout plan
- Adequate arrangements for car parking and access around, within or below the block; Parking arrangement not in accordance with scheme

The applicant is requested to address Planning Authority's concerns above.

### (v) Urban Grain and Façade Treatment

Figure 2.8.5 of the Planning Scheme provides for a fine urban grain at two locations fronting on the canal. The applicant has proposed a House Type H, a narrow gable fronted typology. The Planning Scheme states that each plot along the canal frontage (fine urban grain locations) shall be capable of development independently of tother buildings/ plots within each block with own door access to dwellings. The approach of the 2 storey gable fronted dwellings are consistent with Section 2.8.4 of the Scheme, however, it is considered that the fine urban grain provides an opportunity for greater diversity and architectural interest. The applicant shall be requested to consider further alternatives, including different designs between the two locations and further divergence from the adjacent corner house types. Noted that the Building Height concept envisaged a 3-4 storey height at this location.

### (vi) Gradients

19014 PL200 indicates a change in topography at ground level and this should be replicated at roof level and this would create a higher quality design. The applicant is requested to consider this across the entire site.

### (vii) Street Interface and Building Setback

- a. No own door access have been provided for apartment blocks 1, 2 or 3. The applicant is requested to address this.
- b. The applicant should provide a layout plan indicating that distances between entrances is in accordance with Table 2.8.1
- c. Development across the SDZ lands should present strong building frontages close to street edges. Setbacks from the street edge should therefore be minimised and on-street parking should be incorporated in line with the requirements of DMURS (2013), the street typologies illustrated under this Planning Scheme (Section 2.2 – Transport & Movement) and the requirements set out under Section 2.8.10 in relation to the design of parking and loading. It is not apparent that the current proposal meets this requirement and additional information is, therefore requested.

Where dwellings front the street edge, privacy strips/short gardens that range from 1 to 3 metres in depth should be considered particularly along Local Streets and Link Streets. Most are 1m and there is no variety. The applicant is requested to provide more variety. Buildings should not be set back from the street or space where commercial uses are

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

proposed at ground floor

In curtilage parking should only be utilised along Local Streets in low density areas with front garden/driveway depths minimised to retain the required building height to street width ratios (see Section 2.8.6). It is not considered that the parking arrangement is acceptable at present.

(viii) Roofscape

A variety of roofscapes are encouraged to contribute to the architectural and visual diversity of the SDZ Lands. the application fails to recognise changes in levels and create an interesting visual impact. The applicant is requested to address this.

(viii) Privacy and Overlooking

The applicant is requested to indicate separation distances on the proposed layout plan. This should be provided via additional information. Balconies for proposed apartments should also be indicated.

(viii) Sunlight and Daylight

The Planning Authority note the deficiencies in these areas. The minimum private amenity space for each apartment should be increased in order to mitigate deficits. Communal open space should also be more functional. The applicant is requested to provide revised details in accordance with this.

### 6. SuDS

The applicant states that the subject application design complies with the site design requirements and objectives in the agreed Surface Water Management Plan as the development cells include the provision for at least two separate SuDS features and provides for swales for roads run off and permeable paving in private car parking areas. The Planning Authority notes the incorporation of SuDS features but also notes the concerns expressed by the Parks and Water Services Department. It appears that the scale of the proposed SuDS measures within the development cell is insufficient.

(i) There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Although permeable paving in parking bays; limited swales, a filter drain; and two detention basins have been provided. Further natural SuDS measures are required to deliver a treatment train for improving water quality and utilising water to maximise amenity and biodiversity to comply with the Clonburris SDZ planning scheme. Water needs to be attenuated in more localised SuDS features.

(ii) Where detention basins have underground tanks, water should be directed to the detention basin to allow it to fill first with the 1 in 100 year storm allowing the underground tank to fill. Detention basins should have a low flow channel and a sloped face.

(iii) There appears to be a conflict between the number of swales shown in the drainage proposals and those shown on the landscape drawings. SuDS proposals should be consistent and all SuDS features included in attenuation calculations.

(iv) Further localised SuDS measures shall create an above ground treatment train and

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

include:

(a) bioretention tree pits, green roofs on apartment buildings, further swales, disconnected downpipes, rain gardens, channel rills, ponds, wetlands etc.

(b) Swales to be planted with native and pollinator perennial riparian wildflowers using local species. Full species lists for the SDZ can be found in Ecological Survey of Clonburris (FERS Ltd., 2018).

(c) Details on how the SuDS elements function.

(d) Drainage and Landscape proposals to be consistent regarding SuDS provision.

(e) Inclusion of all above ground SUDS features in attenuation calculation (avoid underground systems).

(f) Detention basins to have deeper areas that fill first before being directed underground. Detention basins should have a low flow channel and a sloped face. The base of detention ponds should not be flat, they should include some lower areas to ensure that some areas only remain mucky, and the vast majority of the base of the detention pond can dry out cleanly. Where detention basins have underground tanks, the water should be directed to the detention basin first, followed by the underground tank being allowed to fill for the 1 in 100 year storm.

(g) Paths in Public Open Spaces used to attenuate water to be a permeable solid surface rather than compacted gravel.

(v) The location, type and size of all SuDS features shall be shown in a revised site layout drawing with a separate report to show what capacity in m<sup>3</sup> each SuDS feature has.

Examples of SuDS include and not limited to:

- Rain gardens,
- Green roofs
- Channel rills
- Tree pits
- Swales
- Planter boxes, water butts
- Other such Suds.

### 7. Green Infrastructure

(a) Street tree provision is inadequate: there are large sections of streets without trees in the Public Realm. More effort is needed to create strong green infrastructure links throughout the development. This is best achieved through additional street trees and SuDS to create these connections.

(b) Greater efforts are required integrate, retain and enhance existing hedgerows into the local green space/infrastructure and local parks.

(c) The submitted designs fail to maintain interconnectivity between the Grand Canal Corridor, urban streets, public parks and open spaces, and the Railway Corridor.

The current proposal has not availed of the opportunity to build upon the existing green infrastructure links on this site, and thereby falls short in the delivery of a resilient

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

development with a distinctive identity.

Where green infrastructure links are not possible to retain, it is a key objective of the planning scheme to incorporate new biodiversity opportunities into the developments. While this is not a 'like-for-like' compensatory measure, benefits can be achieved by creating new and appropriate habitats and the inclusion of a variety of different SuDs measures, including green roofs.

### 8. Open Space Design

Grand Canal Park:

(i) It is unclear from the plans whether the proposed native hedgerow would be sufficient to protect the existing native hedgerow from damage from users. Further measures (defensive planting; native hedging, chestnut paling) should be proposed where required in localised areas to prevent damage to existing vegetation by users of the Park and to prevent desire lines or paths forming through this sensitive area.

(ii) The canal overflow stream is an important habitat for freshwater crayfish that enter and exit the canal through this channel. The prevention of disturbance to the existing sensitive habitat conditions is critical to maintaining the health of this population. The applicant is therefore requested to revise the landscape design for the interface area at the northern edge of the canal overflow stream, demonstrating how inadvertent disturbance of this sensitive habitat will be achieved.

(iii) The applicant is also requested to remove the suggested locations on site layout plans/ landscaping plans for two possible future secondary linkages to the canal towpath unless agreed in a finalised PLS. The proposal should retain the proposals for the crossing of the overflow channel at the existing Fonthill Road end and at a location to link with Omer Lock House. Any potential additional permeability can be considered post occupation of the area, as required.

(iv) The applicant is requested to provide details of the crossing point of the canal overflow and detail if any works are required.

Local Park:

(i) Requires appropriate boundary fencing, planting, a lockable vehicular access for maintenance and a separate entrance for pedestrians. A line of removable bollards is not an adequate entrance.

All Public Open Space:

(i) Parks require a greater retention of existing trees and hedgerows within the pNHA, parks and public open space as required by the Clonburris SDZ Planning Scheme (2019) and Clonburris SDZ Parks and Landscape Strategy.

(ii) The use of compacted gravel is not suitable in Public Open Spaces use to attenuate water. We require paths to be a permeable solid surface.

(iii) Park Boundaries to have appropriate boundaries to a standard suitable for Public Realm, with entrances for vehicular access and separate entrances for pedestrians.

Other Detail

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

The applicant is requested to provide further details of the following matters:

- The applicant is requested to provide details of plot width for houses and duplexes
- There are a number of areas where bins are located at communal open spaces and do not benefit from passive surveillance the applicant is requested to address this. The applicant is also requested to provide details of the impact of bin / cycle stores on open space but providing cross sections and details of materials.
- Overlooking of the open space to the south east
- Interface with Lock House.

### 9. Part V

It is noted that the proposed Part V units include 56 duplexes. It is the preference of the Housing Department to have a mix of unit types and sizes more in proportion with the overall schedule of accommodation for the scheme and to include a specially adapted unit, suitable for persons with medical needs.

### 10. Foul Water

Foul sewers such as 450mm diameter foul sewer South of Southern Link Road at eastern end of site are too close to proposed buildings. The applicant is requested to contact [diversion@water.ie](mailto:diversion@water.ie) Irish Water to agree the setback distance to all proposed foul sewers for the proposed development.

### 11. PLS & BMP

It is noted that the Parks and Landscape Strategy and the Biodiversity Management Plan at draft stage. As part of the response to the further information, the applicant is requested to review the final PLS and BMP and demonstrate compliance with each document.

### 12. Net Development Area

The applicant is requested to overlay the proposed net development area proposed with Figure 2.13.3 in the Planning Scheme. It is noted that the Planning Scheme outlines that some slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the gross or net development area of any Sub Sector.

It is considered that the applicant has not fully demonstrated that the net development area of the CSW-S4 and the CSW- S3 (partial) is in accordance with the Planning Scheme.

### 13. Future Retail /Retail Services Opportunity

The Planning Authority accepts the rationale for not providing retail at this location at this time due to the proximity of the subject site to a future urban centre. The Planning Authority notes that the Planning Scheme has the provision of minimum retail convenience floorspace in Phase 1B and substantial primary retail frontage. Figure 2.5.1 provides a function map for the Planning Scheme and indicates a secondary retail frontage

# **Comhairle Chontae Atha Cliath Theas**

**PR/0154/22**

## **Record of Executive Business and Chief Executive's Order**

at and adjacent to the Local Node. The applicant is requested to demonstrate that the residential ground floor design at the location of the retail frontage has flexibility to change to a retail / non residential uses in the future. Amendments to the design of the subject units is requested.

### **14. Lighting.**

The Clonburris SDZ Planning Scheme requires lighting throughout the SDZ to be at a low level, directional and should follow guidance provided by Bat Conservation Trust (2018) Guidance note 08/18 Bats and artificial lighting in the UK. The Grand Canal pNHA buffer zone is a national ecological route and the applicant must demonstrate sensitivity to bats. It is Public Realm's preference that open spaces would not be lit unless it can be demonstrated that a specific need such as active travel use exists. In the context of a finalised Biodiversity Management Plan, the applicant is requested to resubmit the public lighting plan showing compliance with the Planning Scheme and BMP. Where possible, lighting zones shall be integrated onto Landscaping and site layout plans.

### **15. EIAR**

Further information is required relating to a number of matters that may impact the EIAR. As such, where relevant an update to the EIAR should be provided via additional information.

### **16. Environmental Health**

An Acoustic Design Statement as part of a good acoustic design process must be submitted in order to demonstrate how the potential of a significant adverse noise impact will be avoided in the finished development from traffic noise and Dublin – Cork railway line noise. The statement should outline in detail the mitigation measures and specification of glazing and other design features to be used in order to reduce the impact of excessive noise on residents of the finished development.

### **17. Landscape Plan**

A revised detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of Council's Public Realm Section. The revised landscape plan shall integrate tree planting and SuDS drainage to provide strong green infrastructure links throughout the development in accordance with Clonburris SDZ Planning Scheme and Parks and Landscape Strategy. The proposed ornamental shrub planting within Canal Park and Streets/Public Realm; and the proposed ornamental grass planting within the swales would require labour intensive maintenance and therefore are not suitable for Taking in Charge by South Dublin County Council. SDCC can take in charge Trees, hedgerow, grass, wildflower and bulb areas. Plant species to be predominantly native and/or pollinator friendly.

The revised Landscape Plan should incorporate:

(i) Street trees that are in line with the requirements set out in the Clonburris Strategic Development Zone Planning Scheme (Clonburris SDZ) 2019' and the 'Design Manual for

# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

Roads and Streets (DMURS) 2019. Street tree provision to incorporate small scale SuDS features that enhance biodiversity, provide amenity, manage surface water volume while providing water quality treatment.

(ii) Details of street tree planting to be submitted to the Public Realm Section of SDCC for agreement. Urban tree pits to include SUDs measures.

(iii) Street trees Size at planting a minimum of 18 to 20-centimetre girth (cmg) within local streets and a minimum of 16 -18 cmg on intimate local streets (homezones) as per the requirements of the Clonburris SDZ Parks and Landscape Strategy. The developer shall submit cross section details of the tree pits and growing mediums. The tree pits shall include storm water attenuation.

(iv) Retained, removed and compensatory hedgerow to be clearly identified on Landscape Plans.

(v) Parkland/Open Space tree planting to include a range of semi-mature specimens that are a minimum of 20-25cmg and specimen ornamental trees to include trees that are 30-35 cmg.

(vi) Details of all natural SuDS features including further swales, rain gardens, bioretention tree pits, channel rills, filter strips, ponds, detention basins with lower areas allowed to fill first (low flow channels), wetlands etc

(vii) Landscape masterplan/planting plan to clearly delineate street lighting to ensure street tree proposals are realistic. If this is not currently the case, proposals to be revised to ensure street tree delivery.

(viii) Tree and hedgerow protection measures: show extent and position of tree and hedgerow protection fences including protection of all vegetation within the 30m pNHA buffer zone.

(ix) Tree Impact Plan: an updated tree impact plan is required reflect the latest landscape and tree retention proposals, maximising tree and hedgerow within parks and open spaces, particularly the pNHA.

(x) Implementation timetables.

(xi) Grassed areas and slopes need to provide for safe grass cutting (generally 1 in 8 slope, max 1 in 6) with ride on lawn mowers or tractor with a 16 foot mower pulled behind.

(xii) Detailed proposals for the future maintenance/management of all landscaped areas.

(xiii) Lockable (preferably automated) vehicular access to local parks and that maintenance vehicular access is possible where required throughout the park area.

(xiv) Full entrance details for pedestrians and cyclists that minimise the need for removable bollards, a line of removable bollards is not an adequate entrance. Where removable bollards are proposed we recommend an extra socket be provided for temporary displacement.

(xv) Northwest Local Park boundary to have railing suitable to public realm, i.e. a low wall with heavy duty round bar, minimum 16mm diameter galvanised and powder coated matt black metal railing, 1.8m high, suitable for public realm.

(xvi) Boundary details and planting to be to taking in charge standard and to be agreed



# Comhairle Chontae Atha Cliath Theas

PR/0154/22

## Record of Executive Business and Chief Executive's Order

with SDCC Public Realm.

(xvii) Commit to ensuring further measures (defensive planting; native hedging, chestnut paling) are implemented to protect existing vegetation within the pNHA, i.e. at the interface between wilder area of Canal Park and parkland.

(xviii) All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance including ease of access. Soft landscape areas intended for taking in charge should predominantly consist of grass, hedges, trees, woodland planting, meadowland or bulb planted areas using predominantly native and/or pollinator friendly species and comply with the requirements of the Clonburris SDZ Biodiversity Management Plan. Trees to be grouped appropriately to enable access to meadowlands for cutting.

(a) avoid use of ornamental ground cover or ground cover or treatments that need intensive maintenance or herbicide use e.g. For ornamental planting proposed within the Local Park on Drawing No. 1738\_PL\_P\_06 Landscape Site Plan 03 is not suitable for taking in charge.

(b) extensive areas of herbaceous perennial ground cover should also be avoided.

(c) minimise the use of shrubs that require regular maintenance

(d) the exception to the planting criteria above are the planted swales required for SuDS where riparian planting is required. Swales to be planted with wildflowers.

(xix) Open space shrub planting within Canal Park to be native and include pollinator friendly species. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*.

(xx) Native species should be used for formal hedging proposed within Clonburris SDZ e.g. residential. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*. *P Lusitanica* is not appropriate.

(xxi) Woodland planting should use the Miyawaki technique (3-5/m<sup>2</sup>) in order to establish quickly and reduce maintenance costs. This will require an establishment period and maintenance of 5 years for newly planted woodland areas prior to taking in charge.

(xxii) Paths to be a permeable solid surface. Extensive use of gravel should be avoided as, at present, it increases maintenance requirements and the potential use of herbicides, alternative surfaces are preferred unless the areas will be heavily trafficked. Loose or bound gravel should be judiciously used.

(xxiii) All playspace surfacing to be engineered woodchip surfacing.

(xxiv) Any sand play areas to be enclosed with fencing.

(xxv) Details of all play items and natural play features to be provided and agreed with SDCC Public Realm Section.

(xxvi) The relevant requirements of the Clonburris Parks and Landscape Strategy.

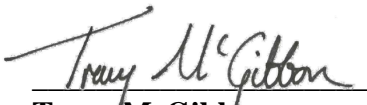
# Comhairle Chontae Atha Cliath Theas

PR/0154/22


## Record of Executive Business and Chief Executive's Order

REG. REF. SDZ21A/0022

LOCATION: Within the Townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin



Tracy McGibbon,  
A/Senior Executive Planner



Eoin Burke,  
Senior Planner

**ORDER:** I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date: 4th February 2022



Mick Mulhern, Director of Land Use,  
Planning & Transportation