

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

24th February 2022

RE: CASE REFERENCE ABP-311853-21

PLANNING APPLICATION UNDER SECTION 146B OF THE PLANNING AND DEVELOPMENT ACTS TO AMEND AN APPROVED STRATEGIC HOUSING DEVELOPMENT ON LANDS AT PALMERSTOWN RETAIL PARK, KENNELSFORT ROAD LOWER, PALMERSTOWN, DUBLIN 20 (PERMITTED UNDER REF. ABP-307092-20 AS AMENDED BY ABP-309899-21)

APPLICANT – RANDELSWOOD HOLDINGS LTD.

Dear Sir/Madam,

Downey Planning, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02RW64, on behalf of the applicant, Randelswood Holdings Ltd., 36 Mount Street Upper, Dublin 2, D02Y982, hereby wish to submit this response to An Bord Pleanála's correspondence dated 28th January 2022. This response relates to the planning application for proposed alterations to the approved Strategic Housing Development (permitted under Ref. ABP-307092-20, as amended by ABP-309899-21) in accordance with Section 146B of the Planning and Development Act, 2000 (as amended), in respect of lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20. The case reference for the current alteration request is An Bord Pleanála Reference Number **ABP-311853-21**.

The proposed alterations which are subject to this current Section 146B application can be briefly described as follows:

- *Proposed alterations to the previously permitted utilisation of the existing vehicular and pedestrian/cyclist access via Palmerstown Business Park (onto Old Lucan Road) to now limit this access to pedestrian/cyclist access only for Block E residents and visitors;*
- *Proposed alterations to the previously permitted site layout plan and landscaping proposals to accommodate the provision of a turning head; and,*
- *Proposed minor alterations to the configuration of the previously permitted access at Kennelsfort Road Lower*

The Board decided in accordance with section 146B(2) of the Act, that the proposed alterations would constitute a material alteration to the terms of the development. In this regard, please now find enclosed two hard copies and one electronic copy of the following:

- AECOM Consulting Engineers' response document to An Bord Pleanála's correspondence which was dated 28th January 2022;
- Copy of site notice (x 4) erected on site 24th February 2022;
- Locations of site notices confirmed on the enclosed site location map;
- Newspaper notice published in two newspapers i.e. The Irish Daily Mail and The Irish Daily Star, dated 24th February 2022
- Notice letter to South Dublin County Council
- Notice letters to prescribed bodies (x 7)

Downey Planning can confirm that both South Dublin County Council and the prescribed bodies have been notified and have received a full electronic copy of the original S.146B application documentation together with the additional documentation in response to An Bord Pleanála's correspondence dated 28th January 2022 as detailed above. A full set of drawings and documentation that clearly compare and contrast the proposed alterations with the development as permitted have been provided to South Dublin County Council (hard copy & electronic copy) and to prescribed bodies (electronic copy). South Dublin County Council have been requested that the information be made available for inspection or for purchase upon payment of a fee not exceeding the reasonable cost of making a copy.

AECOM Response to ABP Correspondence

An Bord Pleanála have requested that the applicant submit the following information:

- a) Full specification of the proposed works to the junction at Kennelsfort Road Lower including the sightlines proposed to the north and south of the junction;
- b) An updated Traffic Assessment and or plans detailing the proposed sightlines, having regard to the permitted works at the junction any local or national standards; and
- c) Details of any changes to bicycle and car parking, including a breakdown of the permitted strategy in both ABP-307092-20 and as amended by ABP-309899-21.

AECOM have prepared a visibility splay drawing showing the sightlines from the site access to the north and south along Kennelsfort Road Lower. It should be noted that vehicles are only permitted to turn left from the site access onto Kennelsfort Road Lower which is as per the permitted access arrangement (ABP-307092-20). This drawing has been included in Appendix A of AECOM's response.

The proposed updates to the site access junction consist of widening the access for vehicles egressing from the site, setting the raised pedestrian crossing back into the site and removing a section of path to facilitate turning movements. These changes are required to ensure that a refuse vehicle can exit the site safely without encroaching on the pedestrian footway at this location.

As per the permitted application (ABP-307092-20), a car and cycle parking strategy had been prepared by AECOM and had been included within Section 3.8 of the Traffic and Transport Assessment as part of that application. The SHD permission, ABP-307092-20, was amended by ABP-309899-21, however, the total quantum of car and cycle parking remained the same as that granted under the approved SHD scheme ABP-307092-20.

For this current Section 146B application, no changes were made to the quantum of car and cycle parking, as noted in Section 3.9 of the Traffic and Transport Assessment. For ease of reference, the car and cycle parking strategy that was prepared as part of the approved SHD scheme (ABP-307092-20) has been included within Appendix B of AECOM's response document.

There is also another S.146b application regarding the development, which is currently pending decision with An Bord Pleanála, reference no. ABP-310753-21. The alterations proposed include the provision of additional units and additional car parking and bicycle parking to serve them. AECOM Consulting Engineers carried out a Traffic & Transportation Assessment and Mobility Management Plan for those proposed alterations to the permitted scheme. Such assessments confirmed that the additional units (24 no.) result in a relatively minor increase over the permitted and in accordance with TII Guidelines, the amended application did not meet the threshold requirements for traffic modelling analysis. It is AECOM's considered opinion that there is no traffic or transportation reason why this development should not proceed. In the interests of clarity, the car parking and bicycle strategy for that other S.146b application which is pending decision is also included as an appendix of AECOM's response document.

Justification for Proposed Alterations

Randelswood Holdings Ltd. are now applying to An Bord Pleanála for proposed alterations to the approved Strategic Housing Development (permitted under Ref. ABP-307092-20 and as amended by ABP-309899-21). This permitted SHD scheme is under construction, as can be seen in Figure 1 below.

This application proposes alterations to the previously permitted utilisation of the existing vehicular and pedestrian/cyclist access via Palmerstown Business Park (onto Old Lucan Road), as permitted under Ref. ABP-307092-20 and as amended by Ref. ABP-309899-21).

As mentioned in the documentation submitted as part of this S.146B application, the proposed alterations are the result of consultation between the applicant and their legal advisors following legal complaints made by the management company of the adjoining business park. It has since transpired that the established right of way via the business park could potentially be restricted to use only by occupants of Block E, and this is now subject of a legal case with the adjoining landowners. In light of this to ensure the completion of the development, whilst taking account of the management company concerns, it is now proposed to limit this access to pedestrian/cyclist access only for Block E residents/visitors. This alteration therefore proposes that all vehicular movements, including refuse

vehicles, will now be solely accommodated via the vehicular priority junction access off the Kennelsfort Road Lower which is the main access to/from the site and to be taken in charge. It is proposed to provide a turning head within the site such that refuse vehicles and other such vehicles can also then utilise the main access to/from the site on Kennelsfort Road Lower. Minor alterations to the configuration of the previously permitted access at Kennelsfort Road Lower are also proposed for refuse vehicles and other such vehicles. This has been the subject of pre-planning consultation with South Dublin County Council prior to lodgement of this S.146B application.



Fig. 1 – Palmerstown Strategic Housing Development Under Construction (Feb, 2022)

Given the proposed alteration to the subject site, the traffic arriving to and departing from the development is to be all from the Kennelsfort Road Lower site access with the wider trip distribution onto the network being cognisant of current and future traffic patterns. The removal of the secondary access onto the Lucan Road results in a relatively minor increase over the permitted and in accordance with TII Guidelines, the amended application does not meet the threshold requirements for traffic modelling analysis. It is AECOM's considered opinion that there is no traffic or transportation reason why this development should not proceed.

This application also proposes alterations to the previously permitted site layout plan and landscaping proposals. These alterations are required to accommodate the provision of a turning head within the site. The alterations can be considered minor in nature and on foot of the potentially restricted right of way via the business park, the proposed turning head on site is now essential for the successful operation of this development. This alteration has a very minor impact on the previously permitted landscaping proposals as this small pocket of open space is located north of the main internal road at a removed location from the primary areas of open space. It is still intended that this zone will provide for woodland style planting and act as a green boundary fringe to the north of the site albeit slightly less now than that previously permitted.

At this juncture, it is important to stress that the applicant is committed to delivering this high-quality residential scheme, with site construction works currently underway on site. Such alterations are now essential for the successful operation of this strategic housing development. The permitted development, now under construction, will provide for an effective, efficient, sustainable use of what is a brownfield site in a highly accessible location which is well served by public transport (QBC). Palmerstown village will benefit from the injection of population from this development as it will provide much needed additional homes and will help sustain the long-term viability of the existing community and social infrastructure offering.

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

We trust that the enclosed additional plans and particulars pertaining to this application for proposed alterations to the approved Strategic Housing Development are in order and look forward to hearing from An Bord Pleanála in relation to this application in due course. Should any clarification be required, please do not hesitate to contact the undersigned.

Yours sincerely,



Eva Bridgeman MIPI
Director
For and on behalf of Downey Planning