

ABP-312571-22 Residential development at Dolcain House, Monastery Road, Clondalkin, Dublin 22

Introduction

South Dublin County Council hereby sets out its Chief Executive Report, including recommendations on the above Strategic Housing Development for An Bord Pleanála. An Bord Pleanála, as the competent authority will carry out an Environmental Impact Assessment and Appropriate Assessment Screening of the proposed development and will decide to grant or refuse this Strategic Housing Development Application.

Summary of Key Issues Arising

The following pages of the Planning Authority's Report goes into some detail on the various issues arising from the proposed development. For convenience, the key issues highlighted by the Planning Authority can be summarily outlined as:

- Principle – Having regard to the land use zoning and existing structures on the site, the principle of the proposed development is acceptable
- Amenity – mitigation should be provided where there is reduced amenity for the proposed apartments.
- Open Space & Public Realm – Concern at the level of functionality of the open space and levels of accessibility/ function for the public and residents.
- Transportation: concerns remain in relation to the suitability of the access for quarry/ancillary uses and residential.
- Use: Concerns in relation to the compatibility of land uses in the area, in particular at the access point.
- Part V – further consideration of the potential exemptions for refurbishments required

Proposed Development

The proposed development is a mixed-use scheme that consists of:

- (i) Demolition of existing single storey shed (15.7sq.m), ESB sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site;
- (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which ranges in height from 4-5 storeys over basement, together with modifications to the existing blocks;
- (iii) alterations to the existing Blocks A, B and C will include the removal of the existing fourth floor level and replacement with a new fourth floor level at Block A only, the provision of an additional floor level to all blocks with 2 setback floors proposed to the atrium to now provide for a height of 4-5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments;
- (iv) alterations to Block A to include a 5 storey extension to northern elevation;
- (v) alterations to Block B include the demolition of the existing single storey element on the eastern façade (73.2sq.m) which comprises a kitchen area, office and storage space, the demolition of the existing three-storey connection between Blocks B and C (23sq.m) and the relocation of the existing telecommunications mast equipment at roof level;
- (vi) construction of a new 6-storey Block D to the east of Block B to accommodate 29 apartment units.

The proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 apartment units, comprising

- 61 one-bedroom apartments,
- 59 two-bedroom apartments and
- 10 three-bedroom apartments,

as follows

- Block A (including atrium) will comprise 50 apartments (consisting of 22 one-bedroom apartments, 22 two-bedroom apartments and 6 three-bedroom apartments) and will range in height from 4-5 to 6 storeys over basement level;
- Block B will comprise 22 apartments (consisting of 9 one-bedroom apartments, 9 two-bedroom apartments and 4 three-bedroom apartments) and will be 5 storeys in height;
- Block C will comprise 29 apartments (consisting of 13 one-bedroom apartments, and 16 two-bedroom apartments) and will be 6 storeys in height; and,
- Block D will comprise 29 apartments (consisting of 17 one-bedroom apartments, and 12 two-bedroom apartments and will be 6 storeys in height;

the proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 310 bicycle parking spaces (254 at basement level and 56 at surface level); 78 car-parking spaces (62 at basement level and 16 surface level) including 5 car-club spaces and 3 accessible parking spaces and; 4 motorcycle parking spaces at basement level;

the basement level also comprises a proposed bin storage area and plant room;

the proposed development also includes landscaping, a pedestrian and cyclist access onto the adjacent Monastery Road to the north and internal pedestrian and shared surfaces;

(vii) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east; the application is accompanied by 2 site layout options, Option A and B;

- Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath;
- Option B provides for the omission of this footpath;

(viii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation and all associated site development works necessary to facilitate the proposed development.

Procedural Background/Pre-Planning History

SHD1SPP004/21 Change of use of the existing office use at Blocks A, B and C and the construction of a new Block D with the blocks ranging in height from 4/5 - 6 storeys over basement providing for a total of 126 residential apartment units comprising 58 x one beds, 64 x2 bed units and 4 x3 bed units as follows: Block A - 6 Storeys in height comprising 50 apartments (22 x1 beds, 28 x2 beds); Block B - 4/5 Storeys in height comprising 22 apartments (9 x1 beds, 9 x2 beds and 4 x3 beds); Block C - 5 storeys in height comprising 25 apartments (10 x1 beds, 15 x2 beds); and, Block D - 6 storeys in height comprising 29 apartments (17 x1 beds, 12 x2 beds). The proposed development provides for 126 parking spaces (68 spaces at basement level and 58 at surface level), 210 bikes spaces (184 spaces at basement level and 26 at surface level) with bin storage and plant room also proposed at basement level. Proposal also includes open space, landscaping, new pedestrian and cyclist link onto Monastery Road, utilisation of existing access/entrance, engineering proposals and all associated site works necessary to facilitate the development.

SHD2ABP-310416-21 Demolition of existing shed, sub-station and oil tank located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the provision of an additional floor level with 2 additional floors proposed to the atrium to now provide for a height of 5/6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation, (v) construction of a new Block D to the east of Block B to accommodate 29 apartment units. The proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 apartment units (comprising 61 one-bedroom apartments, 59 two-bedroom apartments and 10 three-bedroom apartments, as follows:- Block A will comprise 50 apartments (consisting of 22 one-bedroom apartments, 22 two-bedroom apartments and 6 three-bedroom apartments) and will range in height from 5 to 6 storeys over basement level; Block B will comprise 22 apartments (consisting of 9 one-bedroom apartments, 9 two-bedroom apartments and 4 three-bedroom apartments) and will range in height from 4 to 5 storeys over basement level; Block C will comprise 29 apartments (consisting of 13 one-bedroom apartments, and 16 two-bedroom apartments) and will be 6 storeys in height; and Block D will comprise 29 apartments (consisting of 17 one-bedroom apartments, and 12 two-bedroom apartments) and will be 6 storeys in height. The proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 340 bicycle parking spaces (252 at basement level and 88 at surface level); 78 car-parking spaces (62 at basement level and 16 surface level) including 5 car-club spaces and 3 accessible parking spaces and; 4 motorcycle parking spaces at basement level. The basement level also comprises a proposed bin storage area (33sq.m) and plant room (78sq.m). The proposed development also includes landscaping, a new pedestrian and cyclist link onto the adjacent Monastery Road to the north; a new public footpath on the southern site of Monastery Road to facilitate connections to the existing and planned pedestrian network; and internal pedestrian and shared surfaces. (vi) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east; (vii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

Statutory Requirements of this Report

This report sets out, in accordance with the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016 and the Planning and Development (Strategic Housing Development) Regulations 2017 - inter alia:

1. A summary of the points raised in the submissions received by An Bord Pleanála on the application.
2. The Chief Executive's view on the effects of the proposed development on the proper planning and sustainable development of the area and on the environment, having regard to matters specified in Section 34(2) of the Planning and Development Act, 2000 (as amended) and submissions received by An Bord Pleanála on the application.
3. A summary of the views of the relevant elected members on the proposed development as expressed at a meeting of Clondalkin Area Committee held on 16 February 2022.

4. The Planning Authority's opinion as to whether the proposed strategic housing development would be consistent with the relevant objectives of the development plan or local area plan, including a statement as to whether the Planning Authority recommends to An Bord Pleanála that permission should be granted or refused, together with the reasons for its recommendation.
5. Conditions of permission
 - (i) Where the Planning Authority recommends that permission be granted or refused, the planning conditions and reasons for them that it would recommend if An Bord Pleanála grants permission.

Key Statistics for Proposed Development
<p>130 Residential units (all apartment):</p> <p><u>Apartments</u></p> <ul style="list-style-type: none"> • 61 one-bedroom apartments (47%); • 59 two-bedroom apartments (45%); • 10 three-bedroom apartments (8%) <p>Site Area: stated as 0.81ha</p> <p>Net Density: 160 units ha.</p> <p>Height: 4-6 storey.</p> <p>Dual Aspect apartments: 61%</p> <p>Public Open Space: 10%</p>

Description of Site and Surroundings

The subject site is located on the southern side of Monastery Road in Clondalkin and currently consists of three vacant office buildings, an atrium and surface/underground car parking. The existing buildings range in height from four to five storeys. The site is bounded to the north by Monastery Road which provides pedestrian access to the site. On the opposite side of the Monastery Road there are two storey residential properties. To the west of the site is the Round Towers GAA club which consists of a surface car park, pitches and a clubhouse. To the south and east of the site there is a former quarry that is currently operating as an asphalt plant and service area for the plant which is accessed via a shared vehicular entrance off Monastery Road in the north-east of the site.

Site Area:

Site area is stated as 0.81ha

Site Visits:

Various site inspections have taken place in 2021/2022.

Zoning:

The site is subject to zoning objective 'RES' – *'To protect and/or improve residential amenity'*.

SEA Sensitivity Screening: No overlap
RPS No.427 to north of site
Section 22 landfill to the south west of site

Consultations:

- Roads Department – No objection, subject to conditions.
- Environmental Services (Water Services) – No objection, subject to conditions.
- Parks and Landscape/Public Realm Department – No objection, subject to conditions.
- Irish Water – No objection, subject to conditions.
- Housing Strategy - No objection, subject to conditions.
- TII - No objection, subject to conditions.
- Department of Housing, Local Government and Heritage - No objection, subject to conditions.
- TII – No objection, subject to conditions.

Representations/Submissions

A number of Representations/Submissions were received regarding the proposed development. These included submissions from private individuals/organisations:

- SIAC site on Monastery Road can operate 24 hours
- SIAC have no restrictions on night time working
- SIAC have no restrictions on asphalt output / production volumes / intake of materials or volumes thereof
- SIAC have restrictions on number and timing of HGV movements
- SIAC have restrictions on noise or air emissions
- SIAC have continuous plant / excavator movements along a climbing ramp that runs immediately beyond the application site boundary to the south east of Block C
- SIAC have no restrictions in terms of lighting arrangements
- SIAC is currently screened from view and not overlooked by any residential property
- Noted Dolcain House has been in place for many years but there has been little conflict as it has been largely vacant outside working hours and has been occupied much (if not all) of the time by a former sister company of SIAC.
- Asphalt production will continue at SIAC Monastery Road for the foreseeable future – alternative site could not be identified. Draft CDP looks to further restrict quarry development and there would be challenges obtaining permission for an alternative site in the future.
- Concrete or asphalt plant is ‘not permitted’ under ‘RES’. It therefore should be seen that new residential development should not be introduced adjacent to an existing asphalt plant. Concern that this will give rise to complaints about emissions from the facility, when there have been no significant complaints to date.
- SIAC do not wish to prevent development but highlight conflict issues:
 - Should recognize land use conflicts
 - Incorporates design measures to eliminate future conflict

- Visual screening/SIAC: It is noted that visual and environmental (noise/dust) screening of the asphalt plant and site activities from Dolcain House is currently provided by a line of tall trees inside SIAC BP's landholding, along the north-western boundary. These are not in applicant's control and no guarantee they will remain in place.
- Noise report states existing ambient noise is dominated by SIAC. The separation distance between the plant and the residential building identified as Block C (and the roof gardens thereon) will be just over 50m at its closest point and there will be a busy ramp located just 20m from the surrounding external public open space provided for residential amenity purposes. Noted plant not operational at time of data collection – should be noted there are no restrictions on operation. It is unclear to what, if any extent, the noise assessment has informed the proposed layout of the residential scheme at Dolcain House. SIAC is uneasy about the compatibility of the proposed development with its existing operations and that the site has not been adequately recognised or addressed in the development proposals.
- Air dispersion modelling previously undertaken by SIAC BP (around the time it replaced the former plant) principally had regard to impacts at existing residential development and did not factor in the prospect of residential development in much closer proximity, as is now proposed.
- Air Quality and SIAC: The Board should note that the top of the emission stack at the SIAC BP site is at approximately 100mOD, at broadly the same level as the roof of the proposed development blocks. The baseline Air Quality Assessment does not identify how close to ground level the baseline air quality monitoring equipment was placed, nor does it identify what, if any, variation in air quality parameters currently arise at different levels and distances from the emissions stack. baseline emissions should have been recorded at different residential levels within the existing office development, and in particular at the existing roof level, where there could be potentially less ambient dispersion of stack emissions.
- SIAC has received occasional complaints from neighbours about odours arising from the asphalt production plant, principally of tarry/hydrocarbon/burning smells. Concerned that these complaints will increase. Odour impacts have not been addressed.
- SIAC is concerned that there is little, if any, assessment of the potential for coarse dust dispersion to arise around the proposed development and the fact that it is currently substantially mitigated by the intervening vegetation/coniferous trees on third party lands which, as noted previously, the developer appears to assume will remain in place indefinitely, or at least for as long as asphalt production activities continue at SIAC BP's site.
- SIAC is concerned that, notwithstanding the designer's assumptions, some residents will elect to walk or cycle by Block D and enter/egress the site through the proposed vehicular access only gate and the junction with the link road between the Monastery Road roundabout and the SIAC BP facility.
- There may be an increase in complaints over night time activity at SIAC due to reduced distance to the proposed residential properties.
- Link road between the Monastery Road roundabout and the SIAC: traffic will increase. This is currently unlit. Concerned about traffic safety. this issue has not been identified or addressed by the TTA.
- Masterplan and SIAC:
 - o no consultations were undertaken by the developer with it or its management team in respect of the prospective future land-use and development across its property holding;
 - o No alternative site for SIAC in SDCC given planning restrictions

- the proposed masterplan is effectively unbuildable as it fails to recognise that there is a significant variation in ground levels / topography across the SIAC BP site as a result of it being sited within a worked-out quarry.
- SIAC BP urges An Bord Pleanála to have regard to the concerns outlined above when assessing the merits of the proposed development and that, where necessary, it should seek to amend or modify the design and layout of the scheme to ensure that it has due regard to the established asphalt production activity on the adjoining lands to the south-east, particularly in respect of Block C, which directly overlooks the facility and which, at its closest point, is just over 20m from a busy ramp used by construction plant and just over 50m from existing aggregate storage bins.

Summary of Views Expressed by the Elected Members

A meeting of members of the Clondalkin Area Committee was held on 16 February 2022. The following comments were made by the Councillors at that meeting:

Cllr Timmons

- Location not bad
- Welcome 1 and 2 bed apartments
- Not sure of drawings – design looks like a warehouse. Concern redesign.
- Not worst plan. Broadly welcome

Cllr Kavanagh

- Vehicle entrance proposed is shared with working quarry
- 76 car parking spaces is low ratio – realistic ratio needed.
- Is the roundabout capable of taking additional traffic
- Welcome 1 and 2 bed apartments

Affordability concerns

Cllr Carey

- Echoes concerns of other councilors
- Monastery road roundabout – concern re traffic impact
- Conversion only or is block D new?
- Well served by public transport but more car parking might be needed.
- Entrance / roundabout is a concern
- Possible future development on other side of site along Naas Rd needed.

Cllr O’Broin

- Previous application refused – what have they changed?
- Facades need improving
- Are roof gardens proposed?
- Are there any material contraventions?
- 3 bed apartments provided, more needed
- Consideration should be given to quarry/air quality/proximity to quarry and residential amenity

Cllr O’Hara

- Support previous comments made.
- Is local infrastructure ready for development?

Cllr Egan

- Support previous comments made.
- Traffic calming issues at roundabout at the moment.
- Is exit to south of apartments possible?
- Buildings – style and design needs improving
- Traffic – good location for public transport. People should use Luas.
- Is Block D at 6 storeys in keeping with surroundings.

Relevant Planning History:

Subject site

SHD2ABP-310416-21 Demolition of existing shed, sub-station and oil tank located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the provision of an additional floor level with 2 additional floors proposed to the atrium to now provide for a height of 5/6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation, (v) construction of a new Block D to the east of Block B to accommodate 29 apartment units. The proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 apartment units (comprising 61 one-bedroom apartments, 59 two-bedroom apartments and 10 three-bedroom apartments, as follows:- Block A will comprise 50 apartments (consisting of 22 one-bedroom apartments, 22 two-bedroom apartments and 6 three-bedroom apartments) and will range in height from 5 to 6 storeys over basement level; Block B will comprise 22 apartments (consisting of 9 one-bedroom apartments, 9 two-bedroom apartments and 4 three-bedroom apartments) and will range in height from 4 to 5 storeys over basement level; Block C will comprise 29 apartments (consisting of 13 one-bedroom apartments, and 16 two-bedroom apartments) and will be 6 storeys in height; and Block D will comprise 29 apartments (consisting of 17 one-bedroom apartments, and 12 two-bedroom apartments and will be 6 storeys in height. The proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 340 bicycle parking spaces (252 at basement level and 88 at surface level); 78 car-parking spaces (62 at basement level and 16 surface level) including 5 car-club spaces and 3 accessible parking spaces and; 4 motorcycle parking spaces at basement level. The basement level also comprises a proposed bin storage area (33sq.m) and plant room (78sq.m). The proposed development also includes landscaping, a new pedestrian and cyclist link onto the adjacent Monastery Road to the north; new public footpath on the southern site of Monastery Road to facilitate connections to the existing and planned pedestrian network; and internal pedestrian and shared surfaces. (vi) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east; (vii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

SHD1SPP004/21 Change of use of the existing office use at Blocks A, B and C and the construction of a new Block D with the blocks ranging in height from 4/5 - 6 storeys over basement providing for a total of 126 residential apartment units comprising 58 x one beds, 64 x2 bed units and 4 x3 bed units as follows: Block A - 6 Storeys in height comprising 50 apartments (22 x1 beds, 28 x2 beds); Block B - 4/5 Storeys in height comprising 22 apartments (9 x1 beds, 9 x2 beds and 4 x3 beds); Block C - 5 storeys in height comprising 25 apartments (10 x1 beds, 15 x2 beds); and, Block D - 6 storeys in height comprising 29 apartments (17 x1 beds, 12 x2 beds).

The proposed development provides for 126 parking spaces (68 spaces at basement level and 58 at surface level), 210 bikes spaces (184 spaces at basement level and 26 at surface level) with bin storage and plant room also proposed at basement level. Proposal also includes open space, landscaping, new pedestrian and cyclist link onto Monastery Road, utilisation of existing access/entrance, engineering proposals and all associated site works necessary to facilitate the development.

SD19A/0328 Construction of a new building of 71 residential units known as Block D, consisting of 46 one bedroom apartments, 19 two bedroom apartments and 6 three bedroom apartments across ground to 6th floor; relocation of the existing substation and the part removal of the existing podium slab between ground floor level and lower ground floor level; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas; public open space areas; surface and lower ground floor level car parking; motorcycle parking; cycle parking and bin storage; all with associated signage, drainage, mechanical plant, roof gardens with associated access and site development works, while maintaining the existing site and basement entrances on completion. **Permission Refused (SDCC)**

SD19A/0327 Change of use from office to residential use; extension and modifications of the existing block known as Block B, into 24 residential units consisting of 20 one bedroom apartments and 4 two bedroom apartments with associated gym facility and staff access; Block B across ground to 4th floor including the demolition of the existing single storey extension at ground floor level and external stairs; upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate proposed residential units throughout; gym facility and staff areas at ground floor level together with the construction of 1 additional floor; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas, public open space areas, surface and lower ground floor level car parking, motorcycle parking, cycle parking and bin storage; all with associated signage, drainage, mechanical plant, roof gardens with associated access, relocation of existing telecommunications aerials and site development works while maintaining the existing site and basement entrances on completion. **Permission Refused (SDCC and ABP)**

SD19A/0324 Change of use from office use to residential use, together with extensions and modifications of the existing blocks known as Block A and Block C and associated atrium, into 86 residential units consisting of 69 one bedroom apartments and 17 two bedroom apartments with associated staff areas; Block A across ground to 4th floor including the removal of the existing 4th floor; part removal of the existing podium slab between ground floor level and lower ground floor level; upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate the proposed residential units; construction of a replacement 4th floor and a 5 storey extension of the block to the north; Atrium across ground to 4th floor including the upgrading of the existing external fabric of the building; modifications to the structure to include the construction on 1 additional floor, together with modifications to internal layouts to accommodate the proposed residential units; Block C across ground to 5th floor including the upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate the proposed residential units, together with the construction of 1 additional floor; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas; public open space areas; surface and lower ground floor level car parking; motorcycle parking; cycle parking and bin storage; all with associated signage, drainage, mechanical plant, roof gardens with associated access and site development works, while maintaining the existing site and basement entrances on completion. **Permission Refused (SDCC and ABP)**

SD13A/0054 A set of powered sliding gates, new traffic island and revised kerb layout on the entrance roadway within the SIAC head office site to control vehicular access. **Permission Granted.**

SD10A/0064 10 year permission for a mixed use development comprising commercial (non-retail) use (c. 24259sq.m. gfa), 6 no. retail units (c. 1764sq.m. gfa), a crèche (c. 765sq.m. gfa), a cafe/restaurant (c. 400sq.m.), a management office suite (c. 111sq.m. gfa) and 380 no. residential units, all of which is to be accommodated in 18 no. blocks ranging in height from 2 to 8 storeys. Commercial (non-retail) uses to include general enterprise, medical and office based services coming under the definition of Class 2, 3 & 8 of the Planning and Development Regulations 2001, in Blocks A1, A2, B1, C, D1, D2 and E. 1 no. retail unit measuring c. 316sq.m. gfa is located at ground floor level in Block A2 and 5 no. retail units measuring c. 110sq.m., c. 450sq.m., c. 312sq.m., c. 220sq.m. and c. 356sq.m. gfa each are located at ground floor level in Block B2. The proposed crèche is located at ground floor level in Block D1. The proposed cafe is located at ground and first floor level in Block E. The proposed management office suite, to be made available also as a communal space for local residents is located at ground floor in Block E. Residential units are accommodated in Blocks B2, D3, E, F1, F2, G1, G2, H, J, K1, K2 & K3 and comprise 76 no. 3-bed duplex units, 51 no. 3-bed apartment units, 1 no. 2-bed duplex unit, 237 no. 2-bed apartment units and 15 no. 1-bed apartment units. All associated site development and ancillary works, including demolition of 2 no. habitable dwellings (nos. 13 & 15 St. Brigid's Cottages); dismantling of other existing non-residential structures on site, vehicular access via 1 no. existing site entrance with modifications to the roundabout junction on Monastery Road that provides access to the former quarry area and existing SIAC HQ building from its southwestern arm and to Woodford Hill from its northeastern arm and 1 no. new left-in, left-out site entrance opposite Monastery Gate Avenue; 1440 no. basement car parking spaces including the replacement of 67 no. existing spaces serving Dolcain House (SIAC HQ building) and 97 no. surface spaces; signage; pedestrian and cycle routes; bicycle parking spaces; hard and soft landscaping and boundary treatments; foul and surface water drainage and water supply infrastructure, including 3 no. surface water attenuation tanks and an extension of a foul sewer approximately 1.7km north from the site, eastwards past the Monastery Gate housing estate and northwards along the western boundary of the M50 motorway to the Council's public sewer 9B adjacent to the Camac River; 1 no. wood pellet bio fuel boiler district heating system and supplementary natural gas boilers; 6 no. new and 1 no. replacement ESB substations and associated switch rooms; local bin stores, central compactors and waste storage areas; associated plant and storage areas on a site (c. 6.8ha, including c. 1.7ha sewer extension) at the SIAC HQ lands, Monastery Road and Knockmeenagh Lane and Nos. 13 & 15 St. Brigid's Cottages, Clondalkin. Significant Further Information: The principal changes relate to the scale, massing and layout of the proposed development, full details of which can be obtained by reference to the public planning file. **Permission Granted**

SD08A/0616/EP Construction of 258sq.m. of additional office accommodation at fifth floor level set back from the existing parapet and an additional enclosed escape staircore to the south elevation (gross floor area of proposed development 292sq.m.) of the existing extension to SIAC HQ (planning ref. SD06A/1072) and the omission of 1 no. car parking space at basement level to facilitate the staircore construction; vehicular access to proposed penthouse storey extension to be via the existing access to SIAC HQ off the roundabout on Monastery Road. All of the aforementioned development to take place on a site of c3532sq.m. on lands that are bounded generally to the north by the headquarters of Siac, to the south and west by the existing quarry and industrial complex of SIAC and to the east by Round Towers GAA grounds, all at Monastery Road, Clondalkin, D22. **Grant Extension of Duration of Permission**

SD08A/0616 Construction of 258m² of additional office accommodation at fifth floor level set back from the existing parapet and an additional enclosed escape staircore to the south elevation (gross floor area of proposed development 292m²) of the existing extension to Siac HQ (planning ref. SD06A/1072) and the omission of 1 no. car parking space at basement level to facilitate the staircore construction; vehicular access to proposed penthouse storey extension to be via the existing access to Siac HQ off the roundabout on Monastery Road. All of the aforementioned development to take place on a site of c3532m² on lands that are bounded generally to the north by the headquarters of Siac, to the south and west by the existing quarry and industrial complex of Siac and to the east by Round Towers GAA grounds, all at Monastery Road, Clondalkin, D22.

Permission Granted

SD06A/1072 4 storey office extension (c1598sq.m) over undercroft car parking that is connected to the existing Siac HQ building on its southern elevation. Permission is also sought for a c.1212sq.m. car parking area to provide for a total of 28 no. car parking spaces to the rear (south) of the existing office structure at ground level, 16 no. of which are to be provided directly beneath the proposed office extension also at ground floor level; 7 no. existing car park spaces are to be omitted to provide access between the existing car parking area to north abounding Monastery Road and the newly proposed c.1212sq.m. car parking area to the rear via the sites western boundary with Round Towers GAA Club; vehicular access to the proposed office extension to be via the existing access to Siac HQ off the roundabout on Monastery Road; a new c.95m long access route for emergency services from a point due west of existing main entrance westwards to a hardstanding area east of the above mentioned proposed extension. This application also provides for boundary treatments and all other site and development works; all development works take place on a site of c.3525sq.m. on lands that are bound generally to the north by the HQ of Siac, to the south and east by the existing quarry and industrial complex of Siac and to the west by Round Towers GAA grounds all at Monastery Road, Clondalkin, D22. **Permission Granted**

S99A/0023 (A) Office and Science and Technology Enterprise 4 storey addition linked by a glazed atrium to their existing 4 storey offices; (B) Ground floor kitchen extension to the existing offices; (C) Revised surface carparking; (D) New underground carparking; (E) Railing and Fencing; (F) Associated site works. **Permission Granted**

Recent Relevant Enforcement History

GSM0169 Notif. under Class 31(k)(5) P&D Regs2001, to install 3G/UMTS Base Station **Closed – Exempted Development**

Relevant Government Policy

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018

The relevant policy documents are detailed below. The Planning Authority are of the opinion that of most significant relevance is the ‘*Project Ireland 2040 National Planning Framework*’. In this regard, National Strategic Outcome 1 of the NPF refers to and, stresses the importance, of ‘*Compact Growth*’. The NPF states,

‘From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people’

Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Additional National Policy Documents of Relevance

Urban Development and Building Height Guidelines for Planning Authorities, 2018

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, Department of Housing, Planning and Local Government (2020).

Regional, Spatial & Economic Strategy 2020-2032 (RSES), Eastern & Midlands Regional Assembly (2019)

- Section 5 – Dublin Metropolitan Area Strategic Plan, in Regional, Spatial and Economic Strategy 2019 – 2031.

Rebuilding Ireland, Action Plan for Housing and Homelessness, 2016.

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

Sustainable Residential Development In Urban Areas - Guidelines for Planning Authorities, Department of Environment and Local Government (December 2009).

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).

Design Manual for Urban Roads and Streets Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

OPR Practice Note PN01 Appropriate Assessment Screening for Development Management (March 2021)

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

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

Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Building Research Establishment, (1991).

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).

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

Policy H6 Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

Policy H7 Urban Design in Residential Developments

It is the policy of the Council to ensure that all new residential development within the County is of high-quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

Policy H8 Residential Densities

It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.

Policy H9 Residential Building Heights

It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County.

Policy H10 Mix of Dwelling Types

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

Section 2.3.0 Quality Residential Development

Policy H11 Residential Design and Layout

It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H12 Public Open Space

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

Policy H13 Private and Semi-Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

Policy H14 Internal Residential Accommodation

It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

Policy H15 Privacy and Security

It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.

Policy H16 Steep or Varying topography Sites

It is the policy of the Council to ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.

Section 3.13.0 Open Space Management & Use

Policy C8(a) and C8(b) Childcare Facilities

Policy C12 Open Space

It is the policy of the Council that a hierarchical network of high-quality open space is available to those who live, work and visit the County, providing for both passive and active recreation, and that the resource offered by public open spaces, parks and playing fields is maximised through effective management.

Policy UC6 Building Heights

It is the policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.

Section 6.3.0 Walking and Cycling Policy TM3 Walking and Cycling

It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising.

Section 6.4.3 Road and Street Design Policy H12

It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present.

Section 6.4.4 Car Parking Policy TM7 Car Parking

Section 7.1.0 Water Supply & Wastewater Policy IE1 Water & Wastewater

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County.

Section 7.2.0 Surface Water & Groundwater Policy IE2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

Section 7.3.0 Flood Risk Management Policy IE3 Flood Risk

It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.

Section 8.0 Green Infrastructure Policy G1 Overarching

Policy G1 Green Infrastructure Network Policy G3 Watercourses Network

Policy G4 Public Open Space and Landscape Setting Policy G5 Sustainable Urban Drainage Systems Policy G6 New Development in Urban Areas

Section 9.3.1 Natura 2000 Sites Policy HCL12 Natura 2000 Sites

Section 10.0 Energy

Policy E4 Energy Performance in New Buildings – Place Making and Urban Design

Section 11.2.0 Place Making and Urban Design Section 11.2.1 Design Statements

Section 11.2.2 Masterplans The Planning Authority may also prepare Masterplans, or request them for areas that are considered to require an integrated design approach.

Table 11.17 Masterplan Considerations

Section 11.2.6 Residential Communities Section 11.2.7 Building Height

Section 11.3.1 Residential

- (i) Mix of Dwelling Types*
- (ii) Residential Density*
- (iii) Public Open Space/Children's Play*
- (iv) Dwelling Standards*
- (v) Privacy*
- (vi) Dual Aspect*
- (vii) Access Cores and Communal Areas*
- (viii) Clothes Drying Facilities*

Table 11.20: Minimum Space Standards for Houses Table 11.21: Minimum Space Standards for Apartments

Section 11.4.1 Bicycle Parking Standards Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards

Table 11.24: Maximum Parking Rates (Residential Development) Section 11.3.11 Early Childhood Care and Education

*Section 11.4.3 Car Parking for Electric Vehicles Section 11.4.4 Car Parking Design and Layout
Section 11.4.5 Traffic and Transport Assessments*

Section 11.6.1 (i) Flood Risk Assessment Section 11.6.1 (ii) Surface Water

Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS) Section 11.6.1 (iv) Groundwater

Section 11.6.1 (v) Rainwater Harvesting Section 11.6.1 (vi) Water Services

Section 11.7.2 Energy Performance in New Buildings

Section 11.8.1 Environmental Impact Assessment Section 11.8.2 Appropriate Assessment

An Bord Pleanála Direction

An Bord Pleanála (ABP) noted that the documents submitted with the request to enter into consultations, required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Pedestrian and Cycle Access

Further consideration of the documents as they relate to pedestrian and cycle access to/from the proposed development is required, in particular how the nature of this access/movement may alter as a result of the change of use from 'employment' to residential use. Consideration should include recognition of desire lines to public transport connections, particularly the Red Cow Luas stop to the east. As part of this, a pedestrian/cycle movement safety audit which would provide details of the scale of pedestrian movement associated with the existing office use, compared to that anticipated with the proposed residential use; along with a description of pedestrian and cycle routes from the site to surrounding areas; as well as any mitigation measures to ensure safe access and egress to the site for pedestrians and cyclists would assist, and demonstrate that these issues have been integrated into the design of the scheme. Further consideration of this matter may require an amendment to the documents and/or design proposals submitted.

The following specific information should be submitted with any application for permission:

1. Consideration is required of potential impacts upon the future residential populations of the proposed development on the site, resulting from the existing adjacent quarry use (noting that the applicant has no control over this use). Comprehensive air quality and noise assessments are required with monitoring of basis line levels to be undertaken from the subject site. Any mitigation should be clearly described alongside any measures to preserve mitigation features.

2. Consideration is required of any matters that have potential to be material contraventions of the Development Plan, with submission of a statement regarding the same if required.

3. Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality/usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.

4. A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.

5. A Daylight, Sunlight and Overshadowing Assessment is required to demonstrate how the proposed development responds to recommendations in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (the BRE guidelines). The methodology of the BRE guidelines should be followed and clearly stated within the submitted assessment. Analysis of all proposed units on each floor should be provided until it can be demonstrated that all units on a floor meet recommended targets, at which point it can be logically assumed units above will also pass (where a stacked arrangement to room use is proposed). APSH analysis of both the proposed accommodation and existing properties should be provided. Overshadowing analysis of all exterior amenity areas both within the development and in surrounding areas should also be provided.

6. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.

7. If telecommunications equipment is located on existing structures on the site, consideration is required on any potential impact as a result of the proposed works.

8. Details of waste storage and collection.

9. Details of Part V housing and evidence of discussion with the housing authority regarding the same.

10. Additional details and/or revised proposals in relation to ecology and a bat survey having regard to the comments of the Planning Authority.

11. Additional details and/or revised proposals in relation to comments from Transportation Planning at the Planning Authority.

12. Additional details and/or revised proposals in relation to comments from the Drainage Division at the Planning Authority.

13. A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.

14. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.

Assessment

This report will assess below how the applicant has addressed the issues raised by the Planning Authority and as outlined above by An Bord Pleanála, in addition to outlining other relevant matters:

It is the opinion of the Planning Authority that the issues for consideration are:

- Zoning and Masterplan
- Density and Height
- Adjacent Quarry
- Layout, Design and Residential Amenity

- Pedestrian and Cycle Access
- Visual impact
- Materials
- Apartment standards
- Residential amenity – Overlooking and Overbearing
- Residential amenity – Daylight, sunlight and overshadowing
- Part V
- Open Space and Public Realm
 - Landscaping
 - Open spaces
 - Streetscape
- Transport, Access and Parking
- Services and Drainage
- Construction and Waste Management
- Energy and Climate Change
- Ecological Surveys
- Appropriate Assessment and Environmental Impact Assessment

Zoning and Masterplan

The South Dublin Development Plan 2016-2022 is the relevant local policy context. There is no local area plan or non-statutory plan prepared for the area.

The site is subject to zoning objective: ‘RES’ – ‘To protect and/or improve residential amenity’.

The proposed ‘residential’ is permitted in principle under this zoning.

The demolition of the existing shed (15.7sq.m), sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site are also considered to be acceptable in principle within the zoning.

Section 11.2.2 Masterplans states “*The Planning Authority may also prepare Masterplans, or request them for areas that are considered to require an integrated design approach*”.

Whilst there is no policy requirement to provide a masterplan in this instance, the proposal represents part of a larger area of ‘RES’ zoned lands that could be redeveloped and has an existing 10 year permission. The previous applications on the subject site were refused due to their uncoordinated, piecemeal approach, which did not take into account the extant permission to the east and the redevelopment of these lands. The applicant has addressed this through the provision of a masterplan for the wider area. This indicates blocks of residential and open space, as well as access points and linkages. For the purposes of the assessment of this proposal, it is considered that the masterplan is sufficient. It is noted that the operator of the adjacent quarry has indicated that they do not intend to re-locate in the foreseeable future, notwithstanding this, there is an extant planning permission.

Conclusion

The Planning Authority is satisfied that the proposed development will not compromise the future delivery of co-ordinated cohesive redevelopment on the adjoining lands and is in accordance with the County Development Plan.

Adjacent Quarry

It is noted that the both the Planning Authority and the Bord requested the submission of detailed Air Quality and Noise Assessments, which have been assessed and significant concerns are maintained in this regard. In particular it was requested that consideration be given to the impacts arising from the adjacent quarry, which

the applicant has no control over. These concerns have been raised in submissions also, and it has been highlighted that the quarry is unrestricted in its operations in many ways. Whilst the owner of the quarry has indicated that they are unlikely to move, there is an extant planning permission and it would be possible to redevelop the site. Notwithstanding this, it is apparent that the applicant in this instance has relied upon mitigation measures that are not in their control. The Planning Authority believe that mitigation for noise and air pollution should be provided for within the application redline, where it can be effectively maintained by the applicant.

The report from the EHO states *“The main concerns from Environmental Health relate to the existing environment and how this might impact any future residents.*

The SIAC asphalt plant is located within close proximity to the proposed development. The Environmental Health Department previously expressed concerns with regard to the potential risk of air, odour and noise impact from the existing industrial site on the proposed development.

Air & Odour concerns

As part of this development application the applicant has submitted an air quality impact assessment. The report conducted by AWN and dated 29th of November 2021 advises that baseline air monitoring was undertaken over a two month period. The report concludes that baseline levels of pollutants are low and within the applicable ambient air quality standards in the region.

Environmental Health have strong concerns regarding air and in particular odour issues arising. Whilst the air quality report details a baseline assessment of the air quality in this area it does not include any detail around the potential impact of odours from the adjoining SIAC site.

The adjacent SIAC sites main activity is the asphalt production plant. By its very nature this activity produces strong burning and tar smells. The Environmental Health Department have received a large number of complaints over the past number of years, the majority of which relate to reports of strong odours and dust. It should be noted these complaints are from residents towards Clondalkin village and are therefore considerably further away than of the proposed 130 residential units.

The health impact of nuisance odours when experienced regularly can result in symptoms such as headaches, nausea, stress anxiety and vomiting. Environmental Health are concerned that without any distance attenuation the effect of odours could impact greatly on potential future residents. It should be noted whilst the air quality in the area may be compliant this does not necessarily imply that odours are not present as a result of the SIAC operations.

Given the SIAC site does not have any restrictions in terms of their operations should odour issues arise at such close proximity there is very little by way of mitigation that could be done given the nature of the asphalt production business.

Summary of Air & Odour Concerns

An asphalt plant by its very nature produces some odours and dust. These odours and dust can be mitigated to some degree through on site practices and preventative measures. However one key factor to ensuring these by-products, odour and dust, do not impact on the surrounding environment is through distance attenuation. It is therefore important that the relevant Planning Authority consider the appropriateness of this proposal given there will be little reduction by way of distance given the close proximity of the site to the SIAC site.

- *The potential impact of odours has not been addressed within the air quality impact assessment.*
- *Environmental Health have a long history of odour complaints from the SIAC site.*
- *The Air Quality assessment does not identify any mitigation measures or design parameters which should be included in the proposed design to reduce potential impact of odours.*
- *The Air Quality Assessment does not assess the potential impact of dust from the adjacent SIAC site.*
- *The Air Quality assessment does not identify the height above ground that the monitoring was conducted. The baseline air quality assessment does not include detailed dispersion modelling at different height levels which is applicable given the height of the proposed development.*

Noise Concerns

The close proximity of the proposed development to the existing SIAC site also raises concerns regarding noise. The Environmental Health Department have received reports of noise relating to night-time noise from the SIAC site in the past. It is also noted the SIAC Site does not have any planning restrictions regarding times of operation or large truck movements.

The noise assessment submitted by Dalton Acoustics Ltd, date the 15th of November 2021 advises that noise measurements were obtained on the 8th – 10th of January 2020 and also on the 9th – 11th of November 2021

Environmental Health raise the following points regarding the acoustic report:

- *The acoustic report does not include any noise predictions for night time noise from the SIAC operation. The SIAC site have confirmed within their submission that there may be instances where they are required to provide asphalt at night-time for major road re-surfacing. In these cases there would be significant movement of trucks. The closest residential block is proposed to be located approximately 50 meters from the SIAC site. Environmental Health have concerns that this would likely lead to significant disruption to residents and subsequent complaints. The potential long-term noise impact which the existing environment may have on future residents has not been fully considered within the acoustic assessment.*
- *The noise measurements have excluded levels of noise measured from the round towers generator located at the rear of the clubhouse. The report confirms the generator increases levels by 6dB. Therefore these levels should have been included within the assessment as this generator is used to create electricity supply for their pitch and lighting all year round. The report confirms the generator is likely to raise noise levels to 57dB which is above the desirable sound levels as outlined within the South Dublin County Council Noise Action Plan 2018 – 2023. The noise of a generator is also likely to generate complaints due to their tonal characteristics.*
- *The report refers to potential attenuation of the generator at the round towers football pitch at the boundary of round towers in order to reduce noise levels. Despite the reference to an already existing noise source adjoining the proposed site, the acoustic assessment does not include any recommendations or design specifications to safeguard against noise intrusion from the existing environment.*

- *The report confirms the noise measurements at noise monitoring location “NML3” are 7dB above the levels set out within Councils Noise Action Plan. The report confirms that noise levels at this location also exceed the WHO community noise guidelines.*
- *A portion of the noise monitoring was conducted on the 8/01/20 and 9/01/20 which are the weekend Saturday and Sundays. The SIAC site have confirmed that their facility was not producing asphalt on these days. It can be assumed that if they had been in operation the noise levels could potentially be higher. Therefore the noise measurements may not fully represent the daily noise levels experienced at this location.*
- *The acoustic report confirms the noise at the subject location is dominated by the presence of SIAC operations which include “the hum of machinery/plant, general vehicle movements with reversing sirens, personnel on site, a speaker system”. The characteristic of these noise sources are intermittent and of varying frequencies. These types of noise sources tend to generate complaints when located within close distance to high density residential areas.*

Considering the comments of the EHO, the Planning Authority would raise significant concerns in relation to the potential impact of the adjoining Asphalt plant on the residential amenity of the proposed development. Considering the serious nature of the issues identified by the EHO, including concerns raised in relation to deficiencies within submitted reports, the Planning Authority is unable to conclude that the proposed development would have an acceptable relationship with the adjoining use.

Density and Height

Policy H8 Residential Densities, of the County Development Plan, states *It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.*

The proposals submitted provides for a density of 160 dwellings p/ha. This is lower than the previous stage, where density was 164 dwellings p/ha.

H8 Objective 1: To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

H8 Objective 2: To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009). The ‘*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009*’ generally encourage more sustainable urban development through the avoidance of excessive suburbanisation and the promotion of higher densities in appropriate locations.

The Planning Authority stated the following at Stage 2 “*Given the site’s location, proximate to the Luas and Clondalkin Village an increased density at this location is acceptable, however, this is subject to securing a quality layout and design for the overall proposal and conformity with the 12 urban design principles set out in the Guidelines and associated Urban Design Manual, including context*”.

The comments still stand, and the principle of increased density is acceptable, subject to detailed consideration of the design of the proposed development. The Architectural Design Statement (Appendix C) sets out the 12 principles, and these are discussed below.

Subject to the matters raised under design below, it is considered that an increased density is justifiable, given the location and associated public transport routes.

Height

Policy H9 Residential Building Heights

It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County.

Policy H9 of the County Development Plan, in particular Objective 3 states:

“To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).”

Section 11.2.7 is supporting text included in Chapter 11, the implementation chapter of the Plan. It includes the following text:

“The appropriate maximum or minimum height of any building will be determined by:

- The prevailing building height in the surrounding area;
- The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved;
- The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space; and
- The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development.”

Section 5.1.5 of the Development Plan states that varied building heights are supported in urban centres and regeneration zones and will be important in creating a sense of place, urban legibility and visual diversity. Tall buildings that exceed five storeys will be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones based on approved Local Area Plans or SDZ Planning Schemes.

The proposed development is seeking permission for the change of use and conversion of existing commercial office buildings that are 4-5 storey in height. Permission is also sought to increase the height of the existing Blocks A, B and C to now provide for 4-5-6 no. storeys with a new Block D also proposed at 6 storeys in height. The subject site is not identified for tall buildings exceeding five storeys in an approved plan

With regards to separation distances Section 11.3.1 (v) states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. The distance between the existing blocks and proposed Block D is c. 12m and between Blocks A and B the separation distance proposed is 11.3m. It is noted that the proposed development is over 35m from the existing dwellings to the north and west. The impacts of separation distances are considered further in terms of residential amenity below.

The 6 storey element of the proposal exceeds the five storeys in height as set out in Policy H9 Objective 4

The Planning Authority acknowledges these blanket height restrictions in the Development Plan run contrary to the Urban Development and Building Height Guidelines, specifically SPPR 1. It is noted that SPPR1 supports the incorporation of increased building height and density in locations with good public transport accessibility in development plans. SPPR3 provides a framework for planning authorities to grant permission contrary to their development plan subject to being satisfied that the applicant has met specified criteria. SPPR 3 states that it is a specific planning policy requirement that where:

- (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

In terms of the criteria for SPPR 3, the applicant must demonstrate to the Planning Authority certain matters as detailed in Section 3.0 of the Guidelines. The applicant has provided a statement of consistency, which sets out the following compliance with SPPR 3:

- ***The site is well served by public transport*** – *The subject site is located adjacent to Bus Stop Nos. 1974 and 1968 which are served by regular bus services providing access to Dublin city centre, including Dublin Bus Routes No. 51x, 68 and 69. The subject site is also proximate to Clondalkin Village which is c. 780m to the west of the subject site which offers additional bus services. Further to this, the Red Cow Luas Line is 820m to the south east of the site and offers a high frequency service with links to Tallaght Hospital, Citywest, and Dublin City Centre where passengers have the opportunity to use Heuston Station, Connolly Station and to switch to the Cross City LUAS service expanding connections to Cabra and Cherrywood. A number of bus routes use the Red Cow Luas as a transport hub with Dublin Coach providing services to Dublin Airport, Dundrum, Naas, Portlaoise, Cork, Waterford and Limerick. The Planning Authority concurs that the site is in an accessible location.*
- ***Integrates into/enhances the character and public realm of the area*** – *it has been detailed in the Architectural Design Statement, prepared by HA Design Studio, and the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, how the development will be assimilated into its surrounding context. We note that the subject site is not located within an architecturally sensitive area and is not surrounded by any unique locational characteristics. It is considered that the architectural composition of the proposed buildings which extend from 4 no. up to 6 no. storeys afford visual interest in this area. It is also important to note that the proposal is seeking 1 no. additional storey to that established on site*
The proposed development will revitalise and regenerate the subject lands noting that two of the office blocks are vacant.
The proposed development does not impact on key landmarks or key views. Photomontages are included with the planning application demonstrating the increase in 1 no. storey would not adversely impact on the visual amenity of the surrounding area.
The proposal is of a high- quality design which will make a positive contribution to the area and create a visual interest in the streetscape. The proposed development has been designed to improve the visual quality and public realm of Monastery Road. The scale and form of the proposed development responds to the scale of existing adjacent and planned

developments, with the development being appropriately recessed from adjacent lower rise buildings and sensitive interfaces, creating visual interest in the streetscape, with high quality architecture and materials/finishes.

The Planning Authority are of the opinion that the proposed development would not significantly change the character of the area, given the high level of conversion.

- ***Positive contribution to place making*** – N/A. The Planning Authority note that the applicant does not consider the site a ‘larger urban redevelopment site’. The Planning Authority agree with this and a mix of uses and large changes to streets / public spaces are not required, however, it is an urban redevelopment site and the Planning Authority are of the opinion that it contributes positively to the streetscape along Monastery Road.

At the scale of district/neighbourhood/street (points, where not dealt with above):

- ***Responds to its overall natural and built environment and makes positive contribution to the urban neighbourhood and streetscape.*** *The high quality design of the proposed development has regard to clear guidance provided in national planning policy which seeks the densification of sites in close proximity to significant employment locations and public transport such as the subject site.*
The proposed development has been designed having regard to the site’s existing brownfield nature with the stepping back of upper blocks of Block A, the varying heights across the scheme and the proposed increase in open space ensuring that the proposal response to the natural and built environment.
The high-quality materials utilised and landscaping in the scheme ensures that the development will make a positive contribution to the streetscape.
The Planning Authority believe the proposal makes a positive contribution to streetscape.
- ***The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered*** – *We note that this high-quality scheme provides adequate relief, the 4 no. blocks proposed varying in height from 4 to 6 storeys, with the 5 and 6 no. storey elements appropriately sited at a distance from adjoining residents to ensure no adverse impacts on residential amenity. A comprehensive Architectural Design Statement has been prepared by HA Design Studio and is submitted with this planning application which demonstrates the rationale for the design approach and how conscious efforts have been made to provide architecturally interesting forms and spaces.* The Planning Authority note that the buildings are largely conversion, with the exception of Block D. Materials are therefore paramount in ensuring acceptable design.
- ***Proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the flood risk requirements*** – *We note that the scheme will provide active surveillance of the open spaces and pedestrian/cycle paths proposed as part of the development the development. We note that a Site Specific Flood Risk Assessment has been carried out by Lohan & Donnelly Consulting Engineers which has due regard to the Flood Risk Management Guidelines and which confirms that the likelihood of on-site flooding is deemed to be low.*
The Planning Authority note the flood risk assessment.
- ***Makes a positive contribution to the wider improvement of legibility through the site or wider urban area within which the development is situated and integrated in a cohesive manner*** – *The high quality design of the scheme will ensure the development will be a legible and attractive addition to the area. A 2.0m path can be provided now or in the future which facilitates connection with future cycle links immediately east of the site once*

the adjoining lands are developed by a third party or by South Dublin County Council. A new pedestrian/cycle ramp is proposed to the north of the subject site onto Monastery Road which enhances permeability and connectivity whilst also providing a greater degree of integration between the proposed development its surrounding suburban environment. The proposal presents a significant improvement on the site when compared to the existing use of the site and is consistent with the surrounding land uses.

The proposed development cannot immediately integrate with the surrounding development, due to the existing quarry, however, it is noted that the applicant has taken future redevelopment of the adjacent site into account.

- ***The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood*** – As set out at Section 1.0 of this report, the proposed application seeks permission for a strategic housing development comprising a residential development featuring 130 no. apartments, in variety of sizes and layouts, and increased open spaces. The mix of apartments proposed on the subject site will ensure the creation of a sustainable community with ease of access to services and facilities in the surrounding area.

The proposal provides a mix of 1bed, 2bed and 3bed apartments, which is in keeping with the apartment guidelines.

At the scale of the site/building:

- ***The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*** – The proposed scheme has been designed having regard to access to natural daylight, ventilation and views and minimising overshadowing and loss of light with generous setbacks adopted from the northern boundary adjacent to sensitive interfaces, including windows and open space areas, and provision of generously proportioned open space areas with a variety of orientations within the proposed scheme. Design changes informed by daylight/sunlight analysis, including amendments to windows and balconies, reductions in height and massing and an increase in separation distances, have been adopted as the project has evolved to enhance the level of sunlight, daylight and ventilation received and minimise overshadowing and loss of light. The applicant has undertaken the relevant technical assessments.
- ***Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'*** We refer to the Daylight and Sunlight Assessment Report, prepared by Digital Dimensions, submitted with this application, which assesses all apartments within the scheme and demonstrates a high quality living environment internally and externally for future residents when assessed against the quantitative standards. This study confirms that all of the habitable rooms across the development have achieved the daylight factor target. The Design team has taken extensive care to ensure that ADF criteria were met. All open space areas receive the minimum 2 hours of sunlight required by the requirements. In the context of the surrounding properties, the study notes that the impact from the proposed development on the daylight of residential properties is negligible and would meet the recommendations of the BRE Guidelines. The applicant has undertaken the relevant technical assessments.
- ***Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local***

factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution. As outlined in the Daylight and Sunlight Assessment Report, prepared by 3D Design Bureau, the proposed development meets the requirements of daylight provision. The EN17037:2018 Standard was enacted prior to the publication of Sustainable Urban Housing: Design Standards for New Apartments in 2020 which has no reference to the new standard. Additionally, to date it is not referenced in any planning guidance document by any local authority. 95.8% of the rooms exceed the minimum illuminance level values for daylight provision. It must also be noted that the proposed development is for the reconfiguration of an existing building and therefore it is considered that the proposal meets a high standard of illuminance. The Planning Authority note the deviation from the standard. As the proposal is for conversion of existing buildings, the proposed development may be acceptable, subject to adequate compensatory measures. This is discussed in more detail under residential amenity.

In terms of specific assessments:

- Microclimatic assessment – N/A
- Ecological impact assessment undertaken
- The proposed development is retaining the existing telecommunications mast on site with the mast to be slightly relocated in accordance with the provider.
- the subject site is not proximate to any airports or hospitals
- An Architectural Design Statement prepared by HA Design Studio has been submitted with the application. The buildings featuring on site currently are not considered to be of any historical or architectural merit.
- An Appropriate Assessment Screening Report and Ecological Impact Assessment, both prepared by Altemar Ltd, are submitted with the planning application. An EIAR Screening Assessment Report and Regulations 299B Statement prepared by AWN are also enclosed with the application

Conclusion

It is the view of the Planning Authority that it has been demonstrated that the development is of a form that would comply with the requirements of SPPR3 (A), subject to detailed consideration of matters, as set out below.

Layout, Design and Residential Amenity

The Development Plan sets out policy in relation to design and layout including:

Section 2.3.0 Quality of Residential Development

Policy H11 Residential Design and Layout

It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Section 2.2.0 Sustainable Neighbourhoods

Policy H6 Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

Policy H7 Urban Design in Residential Developments

It is the policy of the Council to ensure that all new residential development within the County is of high-quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

Pedestrian and Cycle Access

The applicant has been asked to provide the following details:

Further consideration of the documents as they relate to pedestrian and cycle access to/from the proposed development is required, in particular how the nature of this access/movement may alter as a result of the change of use from 'employment' to residential use. Consideration should include recognition of desire lines to public transport connections, particularly the Red Cow Luas stop to the east. As part of this, a pedestrian/cycle movement safety audit which would provide details of the scale of pedestrian movement associated with the existing office use, compared to that anticipated with the proposed residential use; along with a description of pedestrian and cycle routes from the site to surrounding areas; as well as any mitigation measures to ensure safe access and egress to the site for pedestrians and cyclists would assist, and demonstrate that these issues have been integrated in to the design of the scheme. Further consideration of this matter may require an amendment to the documents and/or design proposals submitted.

The applicant has provided a 'Pedestrian Desire Lines Report', prepared by Dr Martin Rogers. A pedestrian survey, prepared by Lohan and Donnelly Consulting Engineers has also been provided. Movement Safety Audit

The design response has been to provide two options. Option A provides for a footpath along the southern side of Monastery Road on the lands within the control of the applicant. The applicant does not have any legal interest in the adjoining third party lands and accordingly can only provide the footpath within their legal ownership. The second option (Option B) provides for the omission of the footpath at this stage noting safety concerns arising from the Pedestrian and Safety Audit with the applicant willing to accept a condition requiring the land to be reserved for the provision of a footpath and contribution towards same, which will be constructed when the adjoining third party lands are developed.

Given the safety concerns, the Planning Authority welcome Option B.

Visual impact

The applicant has submitted a number of documents that demonstrate the suitability of the proposal, i.e. Architectural Design Statement and CGIs & Photomontages.

The overall approach to the layout has not changed from the previous SHD stage. Blocks A-C are existing and the redesign of these buildings is considered to have a positive visual impact, subject to acceptable materials. Block D has been set back from Monastery Road, thereby mitigating the visual impact of the new element.

The applicant has provided 8 photomontages indicating the site before and after development, as well as 3 CGIs within the site. The CGIs were provided at the previous stage. It is noted that there has not been any significant changes to the buildings and the most significant changes are to the landscaping/public realm.

In terms of streetscape, it is noted that vegetation would be removed from Monastery Road, however, an access ramp would be provided.

Urban Design

Urban Design Manual – A Best Practice Guide 2009

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
<i>1. Context: How does the development respond to its surroundings?</i>	The proposed development makes efficient use of existing offices blocks that have been underutilised for some time. With the construction of an additional 6 no. storey block (Block D), the development will respond to the subject site in a manner that is consistent and considered. As for the surrounding area, the proposed development consisting of 130 no. units comprising of a variety of one, two and three-bedroom units will add additional housing to an area currently zoned as ‘RES’ – Residential in the South Dublin County Development Plan 2016-2022.	The proposed development re-uses existing buildings, which is welcomed. It is noted that there is an adjacent quarry and there are concerns that the proposal has not adequately responded to this in terms of noise and air quality mitigation.
<i>2. Connections: How well is the new neighbourhood / site connected?</i>	The proposed development scheme has been designed to facilitate quality all-round access, for pedestrian, cyclist and vehicular movement throughout the development and is accessible by Monastery Road to the north of the site. It is considered that the proposed residential density is appropriate to the site location in transport terms and will help support efficient public transport.	The Planning Authority notes the sites situation in relation to public transport.

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
<p><i>3. Inclusivity: How easily can people use and access the development?</i></p>	<p>The proposed development includes a variety of apartment types of varying sizes and configurations. All units in the development are accessible for disabled access. The development proposes a mix of one, two and three-bedroom units meeting a variety of housing needs for a range of households. It will be accessible along Monastery Road to the north of the site by steps or ramp, this ensure that cyclists of those with mobility issues can access the site easily. The open space provided can be used by all ages, with specific play areas for younger and older children. The communal open spaces have been designed with everyone in mind, with footpaths widths connection each open space that can be used by everyone. Public seating and play areas mean that the open spaces are a place for everyone. All floors in the building are served by lift, as well as by stairs meaning that moving around the development will be accessible to all.</p>	<p>The planning authority welcomes the variety of housing, communal open space and accessibility of buildings.</p>
<p><i>4. Variety: How does the development promote a good mix of activities?</i></p>	<p>The range of uses available within the development is limited by the residential zoning objective of the site however communal open spaces can facilitate a range of passive and active open space uses.</p>	<p>The Planning Authority welcome 3bed apartments. No mix of uses has been provided.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
<p><i>5. Efficiency: How does the development make appropriate use of resources, including land?</i></p>	<p>The re-use of the 4-5 storeys blocks, currently on site, along with the construction of a new block, will bring about a significant improvement to the site conditions, bringing the land back into a beneficial use. The redevelopment of this site for residential accommodation will significantly improve the physical environment and provide high-density accommodation on an underutilised site. The proposed open spaces and sedum roofs are designed with Sustainable Urban Drainage Solutions (SuDS) in mind ensuring that water run-off from rainfall which can lead to pluvial flooding is mitigated. 61% of units in the development are proposed to be dual-aspect and includes no units that are north-facing and single-aspect. This ensures that all units receive adequate daylight.</p>	<p>The Planning Authority concur that the proposal is efficient in its use of land.</p>
<p><i>6. Distinctiveness: How do the proposals create a sense of place?</i></p>	<p>The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of moderate scale on a brownfield site which is presently underutilised. The development has the potential to be used as a landmark due to its scale at present. Coupled with an improved façade and building finishes, the site will help to contribute positively to the identity of the area on a site that is currently underutilised, transforming the site from a space to a place.</p>	<p>Generally, the scheme is welcomed, as it reuses existing buildings.</p> <p>The Planning Authority does have some detailed concerns, however. These are:</p> <ul style="list-style-type: none"> Screening for the stairs to the basement to the front of the site. Variety in building finished – final details should be agreed.
<p><i>7. Layout: How does the proposal create people-friendly streets and spaces?</i></p>	<p>The development priorities pedestrians and cyclists. Car parking is provided at surface and basement levels with the quantum of spaces provided being purposely restricted. The proposed parking area at surface level is to the east of the site boundary, away from the residential blocks. Ensuring that cars have a minimal presence is vital for creating places that are enjoyable by people, enforcing a sense of security. The provided open spaces are connected and accessible by footpath creating spaces that are void of cars and are people-centric. The development proposes an additional c. 70 metres of public footpath at the northern boundary of the site along Monastery Road.</p>	<p>Concerns still remain regarding the impact of the quarry, however, the applicant has tried to mitigate the impacts.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
<p>8. <i>Public realm: How safe, secure, and enjoyable are the public areas?</i></p>	<p>The open spaces of the proposed development ensure that both active and passive uses can be enjoyed wherein passive refers to sitting and relaxing and active referring to a space being used for play. As mentioned, the ground-floor parking has been placed to the north-east of the site and so is away from the open space areas, to be enjoyed by people. Residents of the development can enjoy the safety of passive surveillance as the blocks overlook the public open greenspace, all combining to ensure safe, secure and enjoyable public areas</p>	<p>The applicant has defined communal and public open spaces. There is some concern regarding the functionality / usability of the open space along the east of Block A. Open spaces will be overlooked.</p>
<p>9. <i>Adaptability: How will the buildings cope with change?</i></p>	<p>Adaptability of the design has been considered and it is proposed that all internal walls be constructed in a non-masonry system, thereby allowing future modifications to layouts to be readily implemented. The proposed buildings will be thermally efficient, and it is proposed to use a centralised adaptable plant.</p>	<p>Increased floor to ceiling heights would be welcomed at ground floor.</p>
<p>10. <i>Privacy / amenity: How do the buildings provide a decent standard of amenity?</i></p>	<p>The proposed accommodation and the shared amenity spaces are designed to meet current design standards, as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020). In many areas, the minimum standards are exceeded such as the space requirements in units. Appropriate acoustic insulation will be designed to prevent sound transmission from one unit to another and from areas of non-residential uses to residential uses. All apartments have access to open space at each block which features a mix of hard and soft landscaping and amenity spaces, including children’s play areas. Every unit may access the communal open-space areas, the semi-privacy of these spaces create secure and overlook spaces</p>	<p>The potential overlooking between blocks has been considered.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
<i>11. Parking: How will the parking be secure and attractive?</i>	The development is provided with 78 on-site car parking spaces, including 5 car club spaces, which is considered appropriate given the sites proximity to the Luas and numerous bus/cycle routes. These car parking spaces, as well as the 310 bicycle spaces proposed, will be mostly accommodated at basement level. Vehicular and parking access will be via basement access to the east of the site. It is noted that a separate pedestrian and bicycle access to the basement is provided to along the north-western boundary of the subject site, off Monastery Road	Security measures should be provided for basement parking.
<i>12. Detailed design: How well thought through is the building and landscape design?</i>	The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance	Subject to minor amendments (see below Parks and Public Realm Section) the Planning Authority considers the proposals generally satisfactory.

Conclusion

Overall, the Planning Authority still has some concerns regarding urban design.

The following sets out the main issues in terms of layout, design and residential amenity.

Materials

Details of materials are set out in the Architectural Design Statement.

The proposed development is in a prominent location. It is considered that the subject site is highly visible and represents an opportunity for high quality finishes to set the pattern of development for the wider area.

The Design Statement, Section 7, states “*A selected brick combined with white render and stone are being used through the facade in order to blend into the nearby residential neighbourhood. Bronze metal will be adopted for balconies railing and windows*”.

Notwithstanding the information provided, should the development be granted planning permission, a condition is recommended seeking amendments and agreement of architectural treatment with the Planning Authority prior to the commencement of development.

Apartment standards

Specific Planning Policy Requirement 4 (SPPR 4) states:

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.
- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

The proposed dual aspect is as follows:

Dual – 61%

Single (south, east, west) – 39%

Single (north) – 0%

Paragraph 3.18 states “North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature. Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings”. No north facing single aspect apartments are proposed.

In terms of quantitative analysis, the Architectural Design Statement, Housing Quality Assessment sets out that the proposed development meets the minimum requirements in the majority of instances, with the exception of 2 apartments with Block B, that do not have the required amenity space. Section 3.39 of the Guidelines states that private amenity space standards for apartments are set out in Appendix 1. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, private amenity space requirements may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality. The proposed development provides for 130 apartments of which 2 no. apartments are proposed to be provided with Juliette Balconies. These are located at first floor level of Block B (Apartment 06-B and Apartment 05-B). It is not possible to provide balconies to these apartments due to site levels and existing site constraints. The apartments have been designed in excess of the minimum floor standards and meet and exceed daylight requirements.

The 2020 Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. The proposal largely complies with the Guidelines in this regard. The ground floor level units in Block D fall slightly short of this standard providing for floor to ceiling heights of 2.5m. the Planning Authority are of the opinion that the height should be increased to allow for future flexibility.

Mix

In accordance with SPPR 1 of the above 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)’.

The following mix is proposed:

	Previous Stage	Present Proposal
Unit mix studios	0	0
Unit mix one beds	61 (47%)	61 (47%)
Unit mix two beds (3 or 4 person)	59 (45%)	59 (45%)
Unit mix three beds	10 (8%)	10 (8%)

It is noted that the majority of 2-bed units are 4-person. It is considered that the above mix is in keeping with the guidelines. The provision of 3-bed apartments is welcomed.

Residential amenity – Overlooking and Overbearing

There is no potential for overlooking of existing residential properties. In terms of overlooking of existing blocks, the applicant states the following measures have been put in place:

- a hallway is proposed between apartments and the western elevation of Block B such that no direct overlooking of Block A occurs
- The proposed separation distance between existing Block B and proposed Block D comprise 12.1m. Block D has been carefully sited to ensure that there is no directly opposing windows to Block B.

The Planning Authority has no concerns regarding overbearing impacts.

Conclusion

Overall, the Planning Authority still has concerns that the amenity of some properties is lacking. Adequate compensation should be provided.

Residential amenity – Daylight, sunlight and overshadowing

Digital Dimensions has prepared a Daylight and Sunlight assessment.

In terms of daylight to existing residential properties, the report concludes *“The impact from the proposed development on the daylight of residential properties is negligible. The proposed development would meet the recommendations of the BRE guidelines”*.

In terms of ADF, the report concludes: *“Within the development the design was optimised for good quality daylight, where possible rooms are dual aspect. Main living spaces are located away from inner corners and projections to maximise daylight in preference over bedrooms, which have a lesser requirement for daylight. Most windows are large and full height. The building is an existing structure and while being modified for the current proposed development there are constraints to the extent of the modifications. 92% of the main Living / Kitchen / Dining space to the apartments achieve at ADF level of 2% while 100% of the units achieve an ADF level of 1.5%. 100% of the Bedrooms achieve the target level of 1% ADF. While a small number of units do not achieve an ADF level of 2% these units generally have very large windows covering the majority of the window wall and will be bright well daylit spaces”*.

It is noted from Appendix A – Average Daylight Factor Block B, that B05 (an apartment with no private amenity space) would meet the required minimum. B06, the second apartment that does not have private amenity space would not meet the prescribed standard for the living / kitchen / dining room. This is not considered acceptable.

The other apartments that do not meet the required ADF are:

Block	Apartment	Room	Required private amenity	Proposed private amenity
A	09	LKD	7	9
B	01	LKD	7	9
B	02	LKD	5	7
B	03	LKD	7	9
B	04	LKD	5	7
B	08	LKD	7	9
B	09	LKD	5	7
B	11	LKD	7	8
B	14	LKD	5	7
B	16	LKD	7	8

It is noted that in each instance, in excess of the minimum private amenity has been provided, however, the Planning Authority would welcome a more significant increase in light of the under provision in terms of ADF. The Planning Authority is concerned regarding the level of amenity provided for B06, given it is lacking in both ADF and private amenity space.

In terms of daylight provision EN17037:2018, the report concludes “95.8% of the rooms also exceed the Minimum illuminance levels values for EN17077:2018 daylight provision”. It is noted that some rooms failed to meet the standard. It is not apparent that any mitigation has been set out.

The BRE guidelines recommends that living rooms with window that face within 90° of due South be assessed for Annual Probable Sunlight Hours (APSH) and Probable Sunlight Hours (PSH) for the winter period from September to March. It is recommended that the APSH be greater than 25% of the total sunlight hours possible and that the PSH in winter be greater than 5%. The report concludes: “The design and layout of the apartment blocks is optimised to receive the available sunlight and maximise the number of living spaces to the units with a window wall within 90° of due South. Of these apartments 80% of these exceed the target values set out for sunlight, which includes many windows with overhanging balconies. The proposed development meets the recommendations of the BRE guidelines for sunlight”.

In terms of sunlight to gardens and amenity spaces, the report concludes:

- There are no areas of private amenity in the neighbouring dwellings that would be impacted by the Proposed Development
- A variety of amenity spaces have been designed into this scheme, they are well oriented for sunlight and will have over 2 hours sunlight on the 21st March. The proposed development meets the recommendations of the BRE guidelines.

Conclusion

The Planning Authority acknowledges that the proposal for Blocks A, B and C are for conversion. However, it is considered that more mitigation should be in place where prescribed standards cannot be met. The Planning Authority is particularly concerned regarding apartment B06, where there is no private amenity space and the ADF has not been met. Consideration should be given to changing the layout/amalgamating apartments at this location.

Childcare

Planning Guidelines for Childcare Facilities (2001), state that one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision.

Having regard to the above, it is noted that the proposed development provides for a total of 69 two and three bedroom apartment units (excluding one bedroom units as per the guidance above), and therefore falls below the 75 unit threshold for the provision of a childcare facility.

The applicant has stated *“Having regard to the Planning Guidelines for Childcare Facilities (2001), the provision of one child-care facility (equivalent to a minimum of 20 child spaces) for every 75 dwelling units is recommended to be provided. Furthermore, Section 4.7 of the Apartment Guidelines (2018), state that the threshold provision for any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the geographical distribution of childcare facilities and the emerging demographic profile of the area. It is also considered that one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision. Having regard to the above, it is noted that the proposed development provides for a total of 69 two and three bedroom apartment units (excluding one bedroom units as per the guidance above), and therefore falls below the 75 unit threshold for the provision of a childcare facility. The proposed development is therefore considered appropriate in this regard”*. The Planning Authority concurs with this assessment.

Waste Management

An operational waste management plan has been provided by AWN Consulting. This states *“The basement level carpark is insufficient in height for a waste truck to access; therefore, all waste will be collected at grade. The location for collection can be viewed on the drawings submitted with the planning application under separate cover”*. The Roads Department has stated *“Refuse vehicle access to the development is on the east side while the bin storage is on the west side. The auto track identifies the turning location across the undercroft access roads. No set down area has been identified for refuse collection”*.

Conclusion

Further detail is needed regarding waste collection points

Layout and Noise, Air Quality

The site is located adjacent to a quarry.

As stated above, the EHO has raised concerns regarding the proposed development and the air quality and noise statements undertaken.

Part V

The applicant was requested to provide the following *“Details of Part V housing and evidence of discussion with the housing authority regarding the same”*.

In their Statement of Response to Pre-Application Consultation Opinion, the applicant has stated in section 3.9 *“The application is accompanied by details of the proposed Part V proposals including the proposals submitted to the Housing Department of South Dublin County Council on 16th November 2021. A letter confirming Hughes Planning on behalf of the applicant has engaged with South Dublin County Council with regards to Part V was issued on 24th November 2021 and is enclosed with this application. The 10% requirement was subsequently confirmed to the Housing Department on 24th November 2021 with land registry folio details confirming the lands were purchased in August 2019 by Randelswood Holdings Ltd and thus the 10% requirement applies. Please refer to the Part V documentation enclosed with the application for further details”*.

Housing Procurement has stated:

“I refer to the above application for planning permission, SHD3ABP-312571-22 and I wish to advise that a Part V condition should be attached to any grant of permission for this application.

The Part V proposal made to the Housing Department provides for 3 apartments to fulfil Part V for the proposed Block D and this is noted. The Part V letter lodged by the agents for the developer sets out their opinion in terms of Part V not being applicable to the 3 existing blocks under S.96 (14) (b) of the Planning and Development Act 2000.

Should the Planning Authority decide that 50% of the external fabric of the existing buildings is being retained, Part V will apply to the units in Block D only.

Should the Planning Authority determine that the provisions of S.96 (14) (b) of the Planning and Development Act 2000 do not apply, then Part V will apply to the full development.

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the applicant is required to provide proof of same to the Housing Department.

*South Dublin County Council’s preference is **to acquire units on site**. The Applicant is requested to submit a revised proposal to the Housing Department when the Part V liability is determined and to include a universal type unit to accommodate persons with medical needs.*

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage”.

The correspondence submitted states *“The proposed development at Blocks A, B and C comply with Section 96 of the Planning and Development Act 2000 (as amended) noting that the proposal provides for the conversion of an existing building to dwellings with over 50% of the external fabric of the buildings being retained. In this regard, the proposed elevations and sections outline in dashed red the extent of the proposed removals/demolitions with the remaining building fabric being retained. It is submitted that over 50% of the existing building fabric is being retained”.*

The existing/demolition plans, elevations and sections detail areas to be demolished, however, it remains unclear as to what elements of the original building fabric, i.e.

cladding/insulation/finishes are being retained. The Planning Authority request a condition seeking such a plan and for the Part V agreement to be based upon the information provided in this plan.

A condition is recommended in the event of grant.

Open Space and Public Realm

Landscaping and Open spaces

Policy H12 states, in relation to open space:

‘It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area’. Objective 2 of the same policy states ‘To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development’.

The documentation submitted as part of the current proposal provides for the following spaces:

- 810m² public open space, adjacent to Blocks A, C and D to the north of the site. (10%)
- 1,375m² total public and communal/semiprivate open space, along the western and southern boundaries. (16.98%)

At the previous stage, the Planning Authority stated:

1. *“it is considered that further consideration is required on the open space hierarchy and function, as well as connectivity to the wider area. Open spaces should be designed to all relevant standards and should be functional within the overall proposed development. Pedestrian connections should be clearly indicated, and the public realm should be integrated into the adjacent development areas*

A number of the specific information items requested by ABP also related to open spaces. Below sets out the requirements of ABP, followed by the applicants response in italics:

3. Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality/usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.

The application is accompanied by landscape proposals including a landscape report prepared by Jane McCorkell Landscape Architect. The landscape is structured to provide a diverse range of spaces and uses, that animate the space and create visual interest at the human scale. These spaces can be organized into 2 separate zones, each with a distinctive character; Zones: A and B. • ‘Zone A’ Proposed Open Space - characterized by the entrance landscape, natural play elements, seating, and planting. • ‘Zone B’ Proposed Communal Amenity Space – characterised by the informal playful landscape, communal seating areas, Specimen tree planting and an area tranquillity. The landscaping proposals (drawings and report) were submitted to South Dublin County Council following the tripartite meeting on 25th November 2021. The Parks Department confirmed via email correspondence on 2nd December 2021 that they have no further comment on the landscape proposals apart from replacing low play value items with a slide. This change has been implemented within the landscape proposals submitted with this application. Should it be deemed necessary, a condition requiring that the landscaping and play equipment details are to be agreed with the Planning Authority would be welcomed by the applicant. Please refer to the enclosed Landscape drawings and report for further details.

4. A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.

The application is accompanied by landscape proposals including a landscape report prepared by Jane McCorkell Landscape Architect. The provision of open space is set out in Drawing No. PP314-06A prepared by Jane McCorkell Landscape Architects and is as agreed with the Parks Department. The landscape strategy provides for diverse range of spaces, lawn, grass moulding, natural play and several smaller spaces with native tree planting and ground flora. The communal open space has both play for younger and older aged groups, with the emphasis on natural imaginative play through soil moulding, large rocks and boulder. Play equipment pieces have been selected for their quality and universal inclusion. Away from the moulded playful landscape there is a small tranquil garden space with ornamental planting and a lawn area for older residence to enjoy. The landscape design seeks to facilitate the use of the open spaces for both adults and children and will provide for a high-quality scheme for residents. Please refer to the Landscape drawings and report enclosed with this application for further details.

The application is accompanied by a Landscape Design Report, hard and soft landscape details and overall landscape plans. The proposal has been assessed by the Parks & Landscape Services/Public Realm Department.

The Parks Department has raised no objections, subject to conditions.

Conclusion

Overall, the Planning Authority welcomes the changes to the open space.

Transport, Access and Parking

The Roads Department has commented on the scheme These comments are summarised below.

“Traffic and Transportation Assessment:

The TTA has suggested that the proposed development will not have a significant impact on the surrounding Road Network. The RFC values at the Woodford Hill/Monastery Road roundabout currently exceed 0.85. As the TTA states there is insufficient capacity resulting in significant queuing at peak times. However, local knowledge would indicate that although the L1019 Monastery Road capacity will not be reached, the Woodford Hill, Woodford Walk roads will be further congested as a result of the proposed development as the controlling arm of the roundabout is the Monastery road eastbound lane. As this becomes busier it is harder for Woodford Hill traffic to enter the roundabout. The most traffic movements are from the Woodford Hill road in peak am and pm. Currently lengthy queues are experienced on the Woodford Hill road in peak am and pm. This will be exacerbated with increased traffic on the Monastery Road because of this proposed development. The TTA concludes with the following:

“In overall conclusion, while the Monastery Road/Woodford Hill junction is congested, in reality, the proposed development represents imperceptible increases on existing congestion. Furthermore, the proposed development through the mobility management process will actively drive the move away from private car usage for the journey to work. Cycle parking availability and the existence of high-quality public transport linkages will greatly aid this process of modal shift.”

Vehicular Accesses:

The proposed development avails of the existing entrance indirectly from Monastery Road via the Monastery Road/Woodford Road roundabout. The access road is also used by Quarry traffic. Most of the access road is outside the red line boundary and therefore no information has been provided on how traffic entering the development will negotiate the Quarry traffic.

Pedestrian and Cycle Access:

Pedestrian access to the site is from a signal-controlled pedestrian crossing on Monastery Road. The separate entrance for pedestrians and cyclists along the North of the site boundary includes a gently sloped ramp. The Vehicular access will have no footpath or cycle provision, this entrance will not be designed for cyclists or pedestrians to access the site via. This will be enforced by signage and an access gate, although there will be bicycle storage at the end of the vehicle access road. A footpath will be provided to the front of the development, this will end abruptly approximately 70 meters from the existing roundabout. A 2.0m wide footpath must be constructed along the northern frontage of the proposed development from the pedestrian crossing eastwards along the Monastery Road to the vehicular access road. A footpath must also be constructed along the access road from the roundabout as far as the eastern edge of the first block. Clear pedestrian routes need to be constructed through the development as wayfinding for pedestrians. Footpaths need to be a minimum width of 2.0m wide. The cycling routes need to be a minimum of 1.5m wide. A three-day pedestrian survey carried out in November has been submitted detailing movements along Monastery Road. The report concludes that most of the pedestrian desire lines are to the west towards Clondalkin Village. But the traffic and transport assessment conclude that LUAS use will be a mitigation for vehicular congestion at the local roundabout, resulting in increased pedestrian movements east when the development is complete, these pedestrian movements would require an improvement in surrounding pedestrian infrastructure. A movement

Safety Audit has been submitted detailing 4 options for pedestrians, the report recommends that there should be no footpath to the south of Monastery Road, although none of the reports options considered a complete footpath connecting to the roundabout to the east of the development.

Internal Layout:

The site entrance design includes an access ramp straight into the undercroft carpark of the development, encouraging most motorists to park within the undercroft. There are several surface parking spaces proposed to the north side of the development. The entry point onto the concourse is located beyond a series of vehicular bollards which prevent routine traffic from passing the entry point, meaning that pedestrians and cyclists can navigate through the site without requiring to interact with cars.

An auto track has been provided for fire tender access. The drawing shows the vehicle will only access the north side of the development.

Refuse vehicle access to the development is on the east side while the bin storage is on the west side. The auto track identifies the turning location across the undercroft access roads. No set down area has been identified for refuse collection.

Car Parking:

It is proposed to provide 78 car parking spaces, including 4 motorcycle spaces, 5 car club spaces and 340 cycle parking spaces. Most of the car parking is in a undercroft space. The 78 car parking spaces for the residential component equate to 0.60 car spaces per residential unit, reducing to 0.56 if the communal car club spaces are excluded. This level of provision is 52% of the quantum required under the South Dublin County Development Plan maximum standards.

Bicycle Parking Spaces:

In terms of cycle parking provision, it is intended to provide 340 cycle parking spaces, 872% of the requirements stated within the South County Dublin Development Plan. All spaces are proposed to be covered.

Public Transport Links:

A Preliminary Travel Plan has been submitted:

Its main findings are:

- (1) The nearest Luas Stop is 1.0km or 10 minutes' walk away.*
- (2) There is bus stop immediately adjacent to the proposed site with moderate services.*
- (3) The location is a semi-peripheral urban location.*

Should planning be granted, within 6 months a fully developed Mobility Management Plan needs to be agreed with SDCC which encourages the use of PT and Active Travel at the development.

Construction and Demolition Waste Management Plan:

An outline CDWMP has been submitted by the applicant. Prior to commencement of development a developed Construction and Demolition Waste Management Plan shall be agreed in writing with the roads department. The agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file.

Construction Management Plan:

The application is accompanied by an outline Construction Management Plan, Prior to commencement the applicant will be required to submit a developed CTMP for agreement with the SDCC Planning Department. Detailing working hours and construction staff parking arrangements.

Mobility Management Plan:

A preliminary Mobility Management Plan has been submitted by the applicant. Within 6 months of the development opening the applicant will be required to submit a developed Mobility Management Plan for agreement with the SDCC planning department.

Taking in Charge Layout:

A Taking in Charge layout needs to be agreed with SDCC. The items for taking in Charge must be in accordance with Appendix 6 of the Taking in Charge Standards.

Public Lighting:

A developed lighting design will have to be agreed by the Lighting Department of SDCC.

Conditions are recommended in the event of grant of permission. It is noted that some elements requested by the Roads Department are not within the applicant's control.

Services and Drainage

On surface water and flood risk, the Environmental Services Department has stated no objection to the proposed development on the basis of the services proposals submitted. This is acceptable to the Planning Authority.

For clarity, the Environmental Services Department report states:

“1.1 The applicant shall ensure that there are no trees located above any underground surface water attenuation system or main surface water drainage pipes. Any tree in close proximity to underground infrastructure shall have a suitable root barrier system installed to protect the adjacent infrastructure from tree root penetration.

1.2 Prior to commencement of development, the applicant shall submit a cross sectional detail of proposed green roof system.

- The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use.*
- All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.*
- All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works”.*

Conditions are also recommended regarding foul and surface water drainage.

It is noted Irish Water has also recommended conditions in the event of grant of permission.

Energy and Climate Change

At the previous stage, the applicant was advised that they should have full regard to the policy outlined in the Development Plan and should demonstrate in any application how the proposal conforms to objectives to increase renewable energy and to adapt to climate change.

The applicant has submitted a Sustainability and Energy Report. This looks at mechanical solution, electrical services, electrical vehicles and building fabric. It is indicated that the proposal will be Part L compliant.

Ecological Surveys

An Ecological Impact Assessment (including bat survey) was undertaken by Altemar. The report is based upon surveys of the site and desk stop studies.

A desk study was undertaken to gather and assess ecological data prior to undertaking fieldwork elements.

A field survey was carried out by Altemar Ltd. on the 17th June 2021 and on the 16th of January 2022, following completion of the desk based assessment. and a bat fauna survey by Altemar Ltd. (Bryan Deegan) on the 17th June of June 2021 (Appendix I). All surveys were carried out in mild/overcast conditions and covered the lands within the site outline and the land immediately outside the site. The bat survey also included inside the office buildings and the surrounding car park area. The purpose of the field survey was to identify habitat types according to the Fossitt (2000) habitat classification and map their extent. In addition, more detailed information on the species composition and structure of habitats, conservation value and other data were gathered.

A number of mitigation measures are outlined.

The report concludes:

“No significant negative ecological impacts would be likely outside the immediate vicinity of the proposed development site following the implementation of mitigation measures on site. The majority of the western treeline will be retained. Due to the fact that the site is poor in species diversity and no habitats and terrestrial or avian species of conservation importance were found, impacts would be limited, localised and reversible depending on the planting regime. In relation to the bat species foraging on site, a sensitive lighting regime and additional roosting areas are proposed due to the loss of potential roosting areas on site. Foraging would be expected to continue on site. No significant negative long term impacts on biodiversity would be expected”.

It is considered that the mitigation measures outlined should be secured via condition, should planning permission be granted.

Appropriate Assessment and Environmental Impact Assessment

A Screening Report for Appropriate Assessment was carried out by Dixon Brosnan. The report concludes *“The proposed redevelopment project is located in a suburban environment 6.7 km from the nearest Natura 2000 site (Glenasmole Valley 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. Foul wastewater will be connected to an existing public sewer network, which will subsequently be processed in the Ringsend Wastewater Treatment Plant. Surface water will be directed to the existing public surface water drainage network on Monastery Road. As this network outfalls to the River Camac, a watercourse that feeds into the River Liffey, there is an indirect pathway to Natura 2000 sites located within Dublin Bay. Specifically, the South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, and the North Bull Island SPA. However, given the distance between the proposed site and the Natura 2000 sites (11.2km, 14km, 11km, and 14km respectively), pollutants or silt produced by the proposed development during both construction and operational phases will settle, be diluted, or dispersed within the marine environment. As such, the proposed development project will not have a significant impact on the conservation objectives 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. A Stage 2 Appropriate Assessment is not required for the proposed development”.

An Bord Pleanála is the competent authority in this regard.

An EIA Screening Report has been submitted. The proposal is sub-threshold. The report concludes that an EIA is not required. An Bord Pleanála is the competent authority in this regard.

Development Contributions

The following is assessable for development contributions purposes:

- 130 residential units stated as 8,536sq.m (apartment floorspace only)

SEA Monitoring

SEA Monitoring Information	
Building Use Type Proposed	Floor Area (sq.m.)
Residential, communal amenity with plant rooms etc	11,226sq.m
Land Type	Site Area (Ha.)
Brownfield	0.81Ha

Conclusion, Recommendation and Statement:

In conclusion, the Planning Authority acknowledges that the site has a number of constraints and the applicant has attempted to address the comments of the ABP and SDCC from previous stages.

There have not been significant amendments to the proposal since Stage 2, however, the applicant has undertaken a number of additional studies in order to support the proposal.

The proposed strategic housing development is generally in accordance with the Core Strategy of the SDCC Development Plan and the general area plan approach provides adequate connection opportunity for pedestrian access to the east. The Planning Authority considers that the proposal meets the criteria of SPPR 3 of the Urban Development and Building Height Guidelines.

Notwithstanding this, the Planning Authority has serious concerns that the development as proposed would result in an unacceptable standard of development in respect of air quality, the impact of odours and fumes and acoustic privacy. Accordingly, the applicant team has not demonstrated, to the Planning Authority, that the adjoining Asphalt plant would not detrimentally impact on the proposed residential amenity and therefore it is recommended that the subject application be Refused. In the event that An Bord Pleanála grants planning permission, Appendix 1 details the list of conditions recommended by the Planning Authority.

Colm Harte

Colm Harte
Senior Executive Planner



Eoin Burke,
Senior Planner

Date: 21/03/2022



Mick Mulhern,
Director of Land Use, Planning and
Transportation

Appendix 1: Strategic Housing Development table of Recommended Conditions

No	Condition	Reason
1	<p>Effective control on development as approved</p> <p>The development shall be carried out and fully completed in its entirety in accordance with the plans, particulars and specifications lodged with this planning application, save as may be required by the other conditions attached hereto.</p>	<p>To ensure that the development shall be in accordance with the permission, and that effective control be maintained.</p>
2	<p>Modifications to the Development</p> <p>No development shall take place under this permission until the applicant, owner or developer has submitted for written agreement of the Planning Authority revised plans, elevational drawings and a full suite of cross-sections, where necessary, that incorporate all of the following amendments or as otherwise agreed in writing:</p> <ul style="list-style-type: none"> (i) Revised plans incorporating ‘Option B’ (ii) Additional screening for the basement stairs (iii) Omission of apartment B06 (iv) Increased mitigation for individual apartments where amenity standards are not met (v) Increase floor to ceiling height of Block D, ground floor (vi) Details of waste collection points 	<p>In the interest of a high quality residential and visual amenity and sustainable development.</p>
3	<p>Phasing</p> <p>No development shall take place under this permission until a detailed phasing programme for the approved development that has been agreed in writing with the Planning Authority.</p> <p>The applicant, owner or developer is advised to consult with the Planning Authority in advance of lodging the required programme.</p>	<p>In the interest of clarity and to provide for the orderly and sustainable development of the site and compliance with South Dublin County Council's Development Plan</p>
4	<p>Sample External Material finishes</p> <p>(a) Prior to the commencement of construction of any road, pavement, cycleway, on-street parking bays or other hard landscaped areas within the development hereby approved, sample panels of 3m x 3m of the materials shall be erected on site at an accessible location. Subsequently the Planning Authority shall be notified in writing of the presence and location of the sample panels for inspection and once approved by the Planning Authority, the sample panels shall be retained in good condition for the duration of development for quality control purposes. The</p>	<p>In the interest of visual amenity, environmental quality and effective control of the development as approved.</p>

	development as approved shall be carried out in accordance with the approved samples.	
5	No sub-division Each proposed residential unit shall be used and occupied as a single dwelling unit for residential purposes and shall not be sub-divided or used for any commercial purposes, (including short-term letting).	To prevent unauthorised development.
6	Under-ground Public Services All public services to the proposed development, including electrical, information and communications technology (ICT) telephone and street lighting cables and equipment shall be located underground throughout the entire site. There shall also be provision for broadband throughout the site in accordance with the Planning Authority's policy and requirements.	In the interests of the visual amenities of the area, the proper planning and sustainable development of the area and compliance with the Council's Development Plan.
7	Occupancy and Services No dwelling unit shall be occupied until all the services (drainage, water supply, electricity and or other energy supply, public lighting and roads) for each dwelling unit have been completed thereto and are operational.	In the interest of the proper planning and sustainable development of the area.
8	Street Names and Dwelling numbers Prior to the date of any Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of any works on site the applicant, owner or developer shall lodge with the Planning Authority: (i) A street naming and dwelling/unit numbering scheme, for the development as approved that is in accordance with the Planning Authority's policy and requirements for such schemes, along with associated proposed signage for the scheme, and (ii) This has been acknowledged in writing and confirmed in writing as acceptable by the Planning Authority. Following receipt of written acknowledgement that the proposed scheme is acceptable, the agreed number shall be placed on each house upon completion so as to be clearly legible from the proposed access road or the public realm, and the agreed street name in both Irish and English, or Irish only shall be erected at the beginning of each street in a manner to be clearly legible, and in accordance with Council requirements. The development name shall; 1. Avoid any duplication within the county of existing names, and 2. Reflect the local and historical context of the approved development, and	In the interest of the proper planning and sustainable development of the area and compliance with the South Dublin County Council's Development Plan.

	<p>3. Comply with;</p> <p>(a) Development Plan policy, and</p> <p>(b) The guidelines on naming and numbering of the Department of the Environment, Heritage and Local Government, and</p> <p>(c) Have regard to the Guidelines issued by the Place Names Commission (An Coimisiún Logainmneacha) and Preferably make exclusive use of the Irish language.</p>	
9	<p>Irish Water.</p> <p>1. The applicant shall sign a connection agreement with Irish Water prior to any works commencing and connecting to our network.</p> <p>2. Irish Water does not permit any build over of its assets and separation distances as per Irish Waters Standards Codes and Practices must be achieved. (a) Any proposals by the applicant to build over or divert existing water or wastewater services subsequently occurs the applicant submit details to Irish Water for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Irish Water prior to connection agreement.</p> <p>3. All development is to be carried out in compliance with Irish Water Standards codes and practices.</p>	In the interest of public health and to ensure adequate water/wastewater facilities.
10	<p><u>Impacts on Biodiversity</u></p> <p>The mitigation measures and recommendations in the EcIA and Bat Survey Report and other plans and particulars submitted with the planning application with respect to biodiversity, tree protection and retention, bats, lighting and sustainable drainage both during the construction and operational phase, shall be implemented in full by the developer, except as otherwise may be required in order to comply with other conditions.</p>	In the interests of protecting the environment
11	<p><u>Retention of Arborist and Tree Protection</u></p> <p>i) Prior to the commencement of any permitted development, the developer shall engage the services of a Professional Member of Arboricultural Association who is an independent, qualified arborist, for the entire period of construction activity.</p> <p>ii) The applicant shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a monthly basis, to ensure the implementation of all of the recommendations in the tree reports and plans.</p> <p>iii) To ensure the protection of trees to be retained with the site the applicant shall implement all the recommendations pertaining to tree retention, tree protection and tree works, as detailed in the Tree Survey and Tree Protection Plan in the Charles McCorkell Arboricultural Consultancy tree report submitted January 2022. <i>Option B Tree Protection Plan to be updated to retain T69 which is intended for retention in that Option.</i></p>	To ensure and give practical effect to the retention, protection and sustainability of trees during and after construction of the permitted development.

	<ul style="list-style-type: none"> iv) Prior to the commencement of development, the arborist shall submit photographs and confirmation that fencing for retained trees meets BS5837:2012 “Trees in Relation to Design, Demolition and Construction – Recommendations” for the written agreement of the Public Realm Section. v) All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998:2010 Tree Work – Recommendations. vi) The clearance of any vegetation including trees and scrub shall be carried out outside the bird-breeding season (1st day of March to the 31st day of August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000. vii) The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees. viii) A completion certificate is to be signed off by the arborist when all permitted development works are completed and in line with the recommendations of the tree report. ix) The certificate shall be submitted to the planning authority for written agreement upon completion of the works. 	
<p>12</p>	<p><u>Tree Bond and Arboricultural Agreement</u></p> <p>Prior to the commencement of any permitted development or any related construction activity or tree felling on the site, the applicant shall lodge a Tree and Hedgerow Bond to the value of €102,240 (Option A) or €108,974 (Option B) with the Planning Authority. This is to ensure the protection of trees on and immediately adjacent to the site to make good any damage caused during the construction period.</p> <p>The bond lodgement shall be coupled with an Arboricultural Agreement, with the developer, empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of any tree/hedgerow or trees/hedgerows on or immediately adjoining the site, or the appropriate and reasonable replacement of any such trees/hedgerows which die, are removed or become seriously damaged or diseased within a period of three years from the substantial completion of the development. Any replacement planting shall use large semi-mature tree size(s) and species or similar as may be stipulated by the planning authority.</p> <p>An Arboricultural Assessment Report and Certificate is to be signed off by a qualified Arborist after the period of 3 years of completion of the works. Any remedial tree surgery, tree felling works recommended in that Report and Certificate shall be undertaken by the developer, under the supervision of the Arborist. The bond will only be refunded upon receipt by SDCC Public Realm Section of a satisfactory post-construction arboricultural assessment, carried out by a qualified arborist and provided that the hedges/trees proposed for retention are alive, in good condition with a useful life expectancy</p>	<p>to ensure the protection, safety, prudent retention and long-term viability of trees to be retained on and immediately adjacent to the site.</p>

<p>13</p>	<p><u>Landscape Plans /Retention of Landscape Architect</u></p> <p>i) The applicant shall retain the services of a suitably qualified Landscape Architect throughout the duration for the site development works.</p> <p>ii) The Jane McCorkell landscape plans as submitted to the Planning Authority in January 2022 shall be carried out within the first planting season following substantial completion of overall construction works.</p> <p>iii) All Planting shall be adequately protected from damage until establishment. Any plants which die, are removed or become seriously damaged or diseased, within a period of 3 years from the completion of the development shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p>iv) Installation of SuDS attenuation tree pits shall be supervised by the project landscape architect.</p> <p>x) The applicant's Landscape architect shall provide a certificate of completion of the approved landscape proposals within six months of substantial completion of the development.</p>	<p>In the interests of residential and visual amenity and to ensure full and verifiable implementation of the approved landscape design</p>
<p>14</p>	<p>Play</p> <p>Steps shall be added to the landscape mound associated with the double width slide to enhance accessibility.</p>	<p>In the interests of residential and visual amenity.</p>

15	<p><u>Landscape Plans</u></p> <p>The Landscape Plans once agreed, shall be implemented in full, within the first planting season following completion of the development (completion of construction works on site) and prior to occupation of the new apartments.</p> <p>(a) All hard and soft landscape works shall be completed in full accordance with the approved Landscape Plan.</p> <p>(b) All trees, shrubs and hedge plants supplied shall comply with the requirements of BS: 3936, Specification for Nursery Stock. All pre-planting site preparation, planting and post-planting maintenance works shall be carried out in accordance with the requirements of BS : 4428 (1989) Code of Practice for General Landscape Operations (excluding hard surfaces).</p> <p>(c) All new tree plantings shall be positioned in accordance with the requirements of Table 3 of BS 5837: 2012 “Trees in Relation to Design, Demolition and Construction – Recommendations”.</p> <p>(d) Any trees, shrubs or hedges planted in accordance with this condition which are removed, die, become severely damaged or become seriously diseased within three years of planting shall be replaced within the next planting season by trees, shrubs or hedging plants of similar size and species to those originally required to be planted.</p>	<p>To ensure satisfactory landscape treatment of the site which will enhance the character and appearance of the site and the area, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting of the CDP 2016-2022</p>
16	<p>Hard Landscape Surfacing</p> <p>There are discrepancies between Lohan and Donnelly Site SuDS plans, Surface Area Schedule and Jane McCorkell Landscape Plans. Permeable and play safety surfacing to be installed as per Jane McCorkell Hard Landscape Plan.</p>	<p>In the interests of residential and visual amenity.</p>
17	<p>Surface Water and SUDS</p> <p>a. The applicant shall ensure that there are no trees located above any underground surface water attenuation system or main surface water drainage pipes. Any tree in close proximity to underground infrastructure shall have a suitable root barrier system installed to protect the adjacent infrastructure from tree root penetration.</p> <p>b. Prior to commencement of development, the applicant shall submit a cross sectional detail of proposed green roof system.</p>	<p>To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS)</p>
18	<p>Flood</p> <ul style="list-style-type: none"> • The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use. • All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B. • All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works. 	<p>In the interest of public health, safety, the proper planning and sustainable development of the area and in order to ensure adequate sustainable drainage provision</p>

<p>19</p>	<p>Roads</p> <ol style="list-style-type: none"> 1. The proposed development shall make provision for the charging of electric vehicles. A total of 100% of the apartment car parking spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points, and 10% of the apartment car parking spaces must be provided with electric vehicle charging points initially. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport. 2. A total of 5% mobility impaired spaces should be provided at the development. 3. A total of 340 no. bicycle parking spaces are proposed to be provided at the development. The surface level bicycle spaces shall be covered spaces to protect bicycles from inclement weather. 4. A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file. 5. Prior to commencement a Public Lighting Design for the development must be submitted and agreed by the Public Lighting team of SDCC. 6. Prior to commencement of development a developed Construction Demolition and Waste Management Plan shall be agreed with the roads department. The agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file. 7. The items to be Taken in Charge shall comply with Appendix 6 of the Taking in Charge Standards. 	<p>In the interests of sustainable transport and to ensure that designs, materials and specifications shall meet with the requirements of the Local Authority and the Development Agency and in the interests of proper planning and sustainable development.</p>
<p>20</p>	<p>Mitigation Measures. All mitigation measures set out in the documentation submitted in support of the application, including in particular those set out in the Flood Risk Assessment, Ecological Impact Assessment Report and associated documentation, shall be implemented in full, except as may otherwise be required in order to comply with the following conditions.</p>	<p>In the interest of the protection of the environment.</p>

<p>21</p>	<p>Taking-in-charge/Management Company</p> <p>A. Prior to the commencement of development, the applicant, owner or developer, or any other person with an interest in the land to which the development as approved relates shall submit the following for the written agreement of the Planning Authority:</p> <p>(i) A plan clearly identifying and dimensioning the external common areas of the development to be retained in private ownership by an owners' management company (OMC) under the Multi-Unit Developments Act 2011, or other acceptable legal entity prior to the occupation of the [first residential unit], and this plan shall also clearly identify and dimension any areas of the approved development intended to be offered for taking in charge by the Council, and;</p> <p>) A detailed building lifecycle report which shall include an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of approval of the development, as well as demonstrating what measures have been specifically considered by the developer to effectively manage and minimise costs for the benefit of all potential residents.</p> <p>The said external common areas of the development to be retained in private ownership indicated in the plan required shall not be taken in charge by the Council and shall instead be maintained in perpetuity by an Owners' Management Company set up for this purpose pursuant to the Companies Acts, 1963 as amended and the Multi-Unit Developments Act 2011.</p> <p>B. Continued membership of an Owners' Management Company set up for this purpose pursuant to the Companies Acts, 1963 as amended and the Multi-Unit Developments Act 2011 shall be compulsory for all owners for the time being of property within the development.</p> <p>C. No development shall take place under this permission until the applicant, owner or developer has lodged for the written agreement of the Planning Authority:</p> <p>(i) A copy of the Certificate of Incorporation of the said Company responsible for the external common areas of the development to be retained in private ownership has been lodged with the Planning Authority in respect of the plan required above.</p> <p>D. Any changes to the status or nature of the Owners' Management Company shall be notified to the Council forthwith.</p> <p>E. The Owners' Management Company shall hold insurance for public liability risk at all times for all areas under its control or responsibility.</p>	<p>To ensure a proper standard of residential development and maintenance of the private areas within the development and compliance with the South Dublin County Council Development Plan..</p>
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<p>22</p>	<p>Part V Social Housing</p> <p>A .Prior to the commencement of development, the applicant shall submit plans and elevations which clearly indicate the original building fabric to be retained. The applicant shall provide details of the percentage of building fabric to be retained.</p> <p>B. The applicant, owner or developer, or any other person with an interest in the land to which the development as approved relates shall, prior to the lodgement of a commencement notice within the meaning of Part II of the Building Control Regulations 1997;</p> <p>(i) enter into an agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 (as amended) as referred to in the South Dublin County Council Development Plan 2016-2022, providing, in accordance with that section, for the matters referred to in paragraph (a) or (b) of subsection (3) of section 96, and</p> <p>(ii) when the agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 is finalised to the satisfaction of the Housing Authority, a certified copy of the agreement shall be lodged with the Planning Authority.</p>	<p>To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan 2016-2022.</p>
<p>23</p>	<p>Environmental Health</p> <p>Prior to the commencement of development, the applicant shall submit revised Air Quality and Noise assessments. These shall take account of the full impacts of the adjacent SIAC site and GAA club. Any mitigation proposed should be within the applicant's control.</p>	<p>In the interest of public health and to uphold the Council's policies set out in the South Dublin County Council Development Plan.</p>
<p>23</p>	<p>Minimise air blown dust</p> <p>During the construction phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances. The applicant/developer shall comply with British Standard B.S. 5228 Noise Control on Construction and Open sites and British Standard B.S. 6187 Code of Practice for demolition.</p>	<p>In the interest of public health and to uphold the Council's policies set out in the South Dublin County Council Development Plan.</p>

<p>24</p>	<p>Construction Noise</p> <p>To control, limit and prevent the generation of unacceptable levels of Environmental Noise Pollution from occurring, no Equipment or Machinery (to include pneumatic drills, on-site construction vehicles, generators, etc.) that could give rise to unacceptable levels of noise pollution as set out generally for evening and night-time in S.I. No. 140/2006 - Environmental Noise Regulations 2006 shall be operated on the site before 7.00 hours on weekdays and 9.00 hours on Saturdays nor after 19.00 hours on weekdays and 13.00 hours on Saturdays, nor at any time on Sundays, Bank Holidays or Public Holidays.</p> <p>Any work outside these hours that could give rise to unacceptable levels of noise pollution shall only be permitted following a written request to the Planning Authority and the subsequent receipt of the written consent of the Planning Authority, having regard to the reasonable justification and circumstances and a commitment to minimise as far as practicable any unacceptable noise outside the hours stated above. In this respect, the applicant or developer shall also comply with BS 5228:2009 Noise and Vibration Control on Construction and Open Sites, and have regard to the World Health Organisation (WHO) – Guidelines for Community Noise (1999).</p> <p>The applicant or developer shall also endeavour to engage in local consultation in respect of any noise sensitive location within 30 metres of the development as approved prior to construction activity commencing on site. Such noise sensitive locations shall be provided with the following:</p> <ul style="list-style-type: none"> - Schedule of works to include approximate timeframes - Name and contact details of contractor responsible for managing noise complaints - Hours of operation- including any scheduled times for the use of equipment likely to be the source of significant noise. 	<p>In the interest of public health by the prevention of unacceptable levels of noise pollution which could interfere with normal sleep and rest patterns and/or when people could reasonably expect a level of quietness, the proper planning and sustainable development of the area and to uphold the Council’s amenity policies set out in the South Dublin County Council Development Plan.</p>
<p>24</p>	<p>Archaeological Investigations:</p> <ol style="list-style-type: none"> 1. All ground works associated with the proposed development shall be monitored under licence by a suitably qualified archaeologist. 2. Should archaeological material be found during the course of works, the work on the site shall be stopped pending a decision as to how best to deal with the archaeology. <p>The developer shall be prepared to be advised by the National Monuments Service with regard to any necessary mitigating action (e.g. preservation in situ, or excavation) and should facilitate the archaeologist in recording any material found</p>	<p>To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.</p>

Water Services Planning Report

Register Reference No.: SHD3ABP-312571-22

Development:

Development: (i) Demolition of existing single storey shed (15.7sq.m), ESB sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the removal of the existing fourth floor level and replacement with a new fourth floor level at Block A only, the provision of an additional floor level to all blocks with 2 setback floors proposed to the atrium to now provide for a height of 4-5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation; (v) alterations to Block B include the demolition of the existing single storey element on the eastern façade (73.2sq.m) which comprises a kitchen area, office and storage space, the demolition of the existing three-storey connection between Blocks B and C (23sq.m) and the relocation of the existing telecommunications mast equipment at roof level; (vi) construction of a new 6-storey Block D to the east of Block B to accommodate 29 apartment units; the proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 apartment units (comprising 61 one-bedroom apartments, 59 two-bedroom apartments and 10 three-bedroom apartments, as follows: Block A (including atrium) will comprise 50 apartments (consisting of 22 one-bedroom apartments, 22 two-bedroom apartments and 6 three-bedroom apartments) and will range in height from 4-5 to 6 storeys over basement level; Block B will comprise 22 apartments (consisting of 9 one-bedroom apartments, 9 two-bedroom apartments and 4 three-bedroom apartments) and will be 5 storeys in height; Block C will comprise 29 apartments (consisting of 13 one-bedroom apartments, and 16 two-bedroom apartments) and will be 6 storeys in height and Block D will comprise 29 apartments (consisting of 17 one-bedroom apartments, and 12 two-bedroom apartments) and will be 6 storeys in height; the proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 310 bicycle parking spaces (254 at basement level and 56 at surface level); 78 car-

Water Services Planning Report

parking spaces (62 at basement level and 16 surface level) including 5 car-club spaces and 3 accessible parking spaces and; 4 motorcycle parking spaces at basement level; the basement level also comprises a proposed bin storage area and plant room; the proposed development also includes landscaping, a pedestrian and cyclist access onto the adjacent Monastery Road to the north; and internal pedestrian and shared surfaces. (vii) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east; the application is accompanied by 2 site layout options, Option A and B. Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath, Option B provides for the omission of this footpath; (viii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

Location: Dolcain House, Monastery Road, Clondalkin, Dublin 22.
Report Date : 15th February 2022

Surface Water Report:

Comments:

- 1.1 The applicant shall ensure that there are no trees located above any underground surface water attenuation system or main surface water drainage pipes. Any tree in close proximity to underground infrastructure shall have a suitable root barrier system installed to protect the adjacent infrastructure from tree root penetration.
 - 1.2 Prior to commencement of development, the applicant shall submit a cross sectional detail of proposed green roof system.
- The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use.
 - All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.
 - All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.

Water Services Planning Report

Flood Risk Report:

No objection:

Signed: _____
Ronan Toft AE

Date: _____

Endorsed: _____
Brian Harkin SEE

Date: _____

INTERNAL MEMORANDUM

HOUSING DEPARTMENT

22nd February 2022

Michael Mulhern

Director of Land Use, Planning and Transportation

Dept. of Development, Economic & Transport Planning

FAO: Sarah Watson

Re: Reg Ref: SHD3ABP-312571-22

Location: Dolcain House, Monastery Road, Clondalkin, Dublin 22.

Applicant: Randalswood Holding Ltd.

Proposal: : (i) Demolition of existing single storey shed (15.7sq.m), ESB sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the removal of the existing fourth floor level and replacement with a new fourth floor level at Block A only, the provision of an additional floor level to all blocks with 2 setback floors proposed to the atrium to now provide for a height of 4-5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation; (v) alterations to Block B include the demolition of the existing single storey element on the eastern façade (73.2sq.m) which comprises a kitchen area, office and storage space, the demolition of the existing three-storey connection between Blocks B and C (23sq.m) and the relocation of the existing telecommunications mast equipment at roof level; (vi) construction of a new 6-storey Block D to the east of Block B to accommodate 29 apartment units; the proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 apartment units (comprising 61 one-bedroom apartments, 59 two-bedroom apartments and 10 three-bedroom apartments, as follows: Block A (including atrium) will comprise 50 apartments (consisting of 22 one-bedroom apartments, 22 two-bedroom apartments and 6 three-bedroom apartments) and will range in height from 4-5 to 6 storeys over basement level; Block B will comprise 22 apartments (consisting of 9 one-bedroom apartments, 9 two-bedroom apartments and 4 three-bedroom apartments) and will be 5 storeys in height; Block C will comprise 29 apartments (consisting of 13 one-bedroom apartments, and 16 two-bedroom apartments) and will be 6 storeys in height and Block D will comprise 29 apartments (consisting of 17 one-bedroom apartments, and 12 two-bedroom apartments) and will be 6 storeys in height; the proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 310 bicycle parking spaces (254 at basement level and 56 at surface level); 78 car-parking spaces (62 at basement level and 16 surface level) including 5 car-club spaces and 3 accessible parking spaces and; 4 motorcycle parking spaces at basement level; the basement level also comprises a proposed bin storage area and plant room; the proposed development also includes landscaping, a pedestrian and cyclist access onto the adjacent Monastery Road to the

north; and internal pedestrian and shared surfaces. (vii) Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east; the application is accompanied by 2 site layout options, Option A and B. Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath, Option B provides for the omission of this footpath; (viii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

I refer to the above application for planning permission, SHD3ABP-312571-22 and I wish to advise that a Part V condition should be attached to any grant of permission for this application.

The Part V proposal made to the Housing Department provides for 3 no. apartments to fulfil Part V for the proposed Block D and this is noted. The Part V letter lodged by the agents for the developer sets out their opinion in terms of Part V not being applicable to the 3 existing blocks under S.96 (14) (b) of the Planning and Development Act 2000.

Should the Planning Authority decide that 50% of the external fabric of the existing buildings is being retained, Part V will apply to the units in Block D only.

Should the Planning Authority determine that the provisions of S.96 (14) (b) of the Planning and Development Act 2000 do not apply, then Part V will apply to the full development.

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the applicant is required to provide proof of same to the Housing Department.

South Dublin County Council's preference is **to acquire units on site.** The Applicant is requested to submit a revised proposal to the Housing Department when the Part V liability is determined and to include a universal type unit to accommodate persons with medical needs.

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage.

Yours Sincerely,

Edel Dempsey
Senior Staff Officer
Housing Procurement Section