

Comhairle Chontae Atha Cliath Theas

PR/0366/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0017 **Application Date:** 26-Jan-2022

Submission Type: New Application **Registration Date:** 26-Jan-2022

Correspondence Name and Address: Alison Clarke 1st Floor, 2 Chapel Hill, Lucan, Co. Dublin, K78 A6P7

Proposed Development: Demolition of an existing commercial two storey building and the construction of 2 commercial units with plantroom on ground floor level with 10 residential apartments comprising of: 1 studio apartment, 4 1-bedroom apartments and 5 2-bedroom apartments all with private balconies over 4 floors. A communal roof garden is located on the fourth floor; bin stores for the commercial and residential units are located at the rear of the building, 6 car parking spaces are provided for the development. 8 bicycle spaces are provided to the front for commercial units and 10 bicycle spaces at the rear for the residential units, and all associated engineering and site works necessary to facilitate the development.

Location: Paintworld, 1-2 Ballymount Road Lower, Dublin 12

Applicant Name: Alan and Monica Holmes

Application Type: Permission

(COS)

Description of Site and Surroundings

Site Area: stated as 0.0459 Hectares on the application.

Site Visit: 23rd of December 2021.

Site Description

The subject site is located on Ballymount Road Lower, proximate to the Walkinstown roundabout. The site comprises of a single storey structure, previously used as a retail store Paintworld and is currently boarded up. There is car parking to the front. A laneway is along the east of the site. Surrounding the site either side are buildings used for retail, commercial and restaurant uses. Across the road from the site are single storey residential housing within Dublin City Council's jurisdiction (zoned residential).

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Proposal

Permission is being sought for the following works:

- demolition of an existing commercial two storey building and the
- construction of 2 commercial units with plantroom on ground floor level with 10 residential apartments comprising of:
 - 1 studio apartment, 4 1-bedroom apartments and 5 2-bedroom apartments all with private balconies over 4 floors.
- A communal roof garden is located on the fourth floor;
- bin stores for the commercial and residential units are located at the rear of the building,
- 6 car parking spaces are provided for the development.
- 8 bicycle spaces are provided to the front for commercial units and 10 bicycle spaces at the rear for the residential units, and
- all associated engineering and site works necessary to facilitate the development.

Zoning

The subject site is subject to zoning objective 'LC': *'To protect, improve and provide for the future development of Local Centres'* under the South Dublin County Development Plan 2016-2022.

Consultations

Water Services – further information requested.

Irish Water – further information requested.

Roads Department – further information requested.

Public Realm Section – further information requested.

H.S.E. Environmental Health Officer – no objection subject to conditions.

Transport Infrastructure Ireland – observation received.

National Transport Agency – no report received.

SEA Sensitivity Screening – no overlap is recorded in the SEA monitoring system.

Submissions/Observations/Representations

A total of 4 third party submissions were received raising the following points in summary:

- Limited parking for residents and retail units. Will make parking unsustainable, dangerous and cause further congestion of surrounding streets and at the roundabout.
- Out of proportion with adjoining properties.
- Cause overshadowing and overlooking and injure residential and visual amenities. Including the cottages opposite the site.
- Exacerbate existing excess traffic

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- Ballymount Road is a local road.
- Overdevelopment by mass, scale, height and domineering effect. Not an appropriate transition in scale and fails to integrate with the character of the area. Overbearing and incongruous on the streetscape.
- Impact on the development potential of adjoining properties.
- No traffic lights or pedestrian crossing on this section of Lower Ballymount Road. Road too small for such a development.
- Development is premature in absence of a complete plan for the area. Lack of consultation between South Dublin County Council and Dublin City Council.

An observation was received from Transport Infrastructure Ireland that stated that they have no observations to make on the application.

These submissions and observations have been reviewed in full and taken into consideration in the assessment of the proposal.

Relevant Planning History

Subject site

SD05A/0751

Erection of a replacement sign on the front elevation and the replacement of two projecting signs and an ATM surround. **Permission granted.**

SD05A/0348

Replacement of existing external and internal doors with electronic interlocking doors and the installation of an electrically operated roller shutter. **Permission granted.**

SD03A/0510

To provide an external ramp for flush disabled access including removal of existing external step. **Permission granted.**

S99A/0805

Provision of A.T.M. with illuminated canopy and surround. **Permission granted.**

Relevant Enforcement History

None identified in APAS.

Pre-Planning Consultation

PP066/21

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Proposed mixed use development consisting of 11 residential apartments and 2 retail units at ground floor level. Site Area 295.4sq.m. Indicative proposed GIFA 1120sq.m.

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

Policy CS1 Consolidation Areas within the Dublin City and Suburbs including Key Metropolitan Consolidation Areas

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 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.

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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 H15 Residential Consolidation

It is the policy of the Council to support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.

Section 3.2.0 Community Facilities

Section 3.13.0 Open Space Management & Use

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 UC1 Urban Centres Overarching UC1 Objective 5:

To promote and facilitate environmental and public realm improvements in existing town, village, district and local centres to address environmental quality, urban design, safety, identity and image.

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Policy UC5 Local Centres

It is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the protection of the residential amenities of the surrounding area.

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.

Policy 8 Local Centres

It is the policy of the Council to maintain and enhance the retailing function of Local Centres.

R8 Objective 1:

To support the development of Local Centres as sustainable, multifaceted, retail led mixed use centres.

R8 Objective 2:

To ensure that the scale and type of retail offer in Local Centres is sufficient to serve a local catchment, without adversely impacting on or drawing trade from higher order retail centres.

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.

Section 6.4.3 Road and Street Design

Policy TM12

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.

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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

Section 11.2.0 Place Making and Urban Design

Section 11.2.1 Design Statements

Section 11.2.2 Masterplans

Table 11.17: Masterplan Considerations

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*

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(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 11.4.3 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

Relevant Government Guidelines

Project Ireland 2040 National Planning Framework, Government of Ireland, (2018).

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

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

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

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

Sustainable Urban Housing: Design Standards for New Apartments, Department of Housing, Local Government and Heritage, (2020)

Urban Development and Building Heights Guidelines for Planning Authorities, Department of Housing, Planning and Local Government, (2018).

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

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

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).

Childcare Facilities Guidelines for Planning Authorities, Government of Ireland (2001)

Assessment

The main issues for assessment relate to:

- Zoning and Council Policy;
- Part V;
- Residential and Visual Amenity;
- Landscaping;
- Traffic, Access and Parking;
- Services and Drainage;
- Environmental Health;
- Environmental Impact Assessment; and
- Appropriate Assessment.

Zoning and Council Policy

The subject site is largely zoned 'LC': '*To protect, improve and provide for the future development of Local Centres*' under the South Dublin County Development Plan 2016-2022. Residential, Shop-Local and Shop-Neighbourhood are uses that are Permitted in Principle under this zoning.

The subject site is within the area outlined in the Naas Road SLO for consideration as part of a planned approach to the regeneration of the area. Consideration of the integration of the proposal with the City Edge project is required.

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In accordance with Section 11.2.1 of the County Development Plan, development proposals such as this one (10 dwellings) should be accompanied by a Design Statement. No Design Statement has been submitted. **This should be requested via additional information.** It is noted that subject to addressing some of the concerns in this report a reduction in the total number of residential units may be required.

Part V

There is a granted Certificate of Exemption (Reg. Ref. CE21/0031) for the proposed development. A Part V condition, therefore, does not need to be included in the event of a grant of permission.

Residential and Visual Amenity

Unit Mix and Type

The proposed development would involve the construction of 10 no. apartments comprised of 1 no. studio (10%), 4 no. 1 bed (40%) and 5 no. 2 bed (50%). Policy H10 of the County Development Plan relates to providing a wide variety of adaptable housing types, sizes and tenures in accordance with the Housing Strategy. Section 11.3.1 requires proposals that include more than 10% 1 bed, such as this one, to demonstrate the need for such accommodation. Consideration should also be given to providing 3 no. bed units in line with Council policy that promotes a mix of unit types and sizes. **This should be requested via additional information.**

The proposed tenure of the apartments has not been specified in the application. It is noted that the units have been assessed against the Build to Sell standards of the 2020 Apartment Guidelines.

Residential Density

The proposed residential density would be approx. 217.9 units per ha. The subject site is located within 'Dublin City and Suburbs' in the Settlement Hierarchy under the County Development Plan (Variation 4). Policy H8 of the County Development Plan states it is Council policy to promote higher densities at appropriate locations having regard to the surrounding context. Policy H8 Objective 2 allows for higher residential densities at a location close to Local Centres and high capacity public transport corridors in accordance with the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.

The 2020 Apartment Guidelines provide further guidance on residential density. Under these Guidelines, there are 'Central and/or Accessible Urban Location', which are suitable for small to large scale and higher density development, that may wholly comprise apartments, including:

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;

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- Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

Along Greenhills Road and Walkinstown Road, within 5 mins walking distance of the site, are bus services with frequencies of 10-15 mins (including Dublin Bus No. 27). As part of BusConnects, it is proposed to have a spine/branch routes along this route. The site is therefore considered to be within a reasonable walking distance to high-frequency public transport both currently and in the future.

Given this, a higher density would be acceptable at the site subject to the impact on the amenity of adjoining neighbours and the surrounding area. This is assessed further in the following sections.

Building Heights

The proposed building would be 5 storeys and approx. 16.7 m in height overall. The existing building onsite is approx. 10.2 m in overall height. The existing buildings either side are 2 no. storeys in height, approx. 8.5 m and 9.8 m in overall heights. Across the road from the site are single storey dwellings. Given the difference in height with adjacent and surrounding buildings the proposed development would be visible from the surrounding area.

Under the County Development Plan proposals for buildings greater than the prevailing building height in the area should be supported by a strong urban design rationale and provide transitional elements. The appropriate height of a building will be determined by proximity to existing housing, including that new development adjoining 1 or 2 storey housing shall be no more than 2 storeys in height, unless a separation distance of 35 m or greater is provided.

It is noted that the sites on either side of the site are in commercial, retail or similar use (mostly at the ground floor) and are also zoned Local Centre. The proposed building would be setback approx. 20.4 m from the nearest front boundaries of the dwellings across the road and approx. 26.5 m from the nearest one of these dwellings. The proposed building would maintain the existing building line onsite and along the row of buildings. The proposed height could therefore be acceptable, however, not in its current form. Given the current design, the bulk and mass of the building mean it is not acceptable.

General Layout & Permeability

The proposed layout would be the existing building footprint replaced with a new building of a similar footprint. The new building would maintain the existing building line, which is welcomed.

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The ground floor would have 2 no. commercial units with residential apartments above. The retention of commercial/retail at the ground floor is welcomed given that the site is zoned Local Centre and having regard to Policy R8, to maintain and enhance the retailing function of Local Centres.

There would be a rear storage area accessed through the building to the rear. This area would also be accessible from the existing eastern laneway to the side of the site. This laneway is not shown within the site boundary nor as a wayleave. The applicant should be sure that they can legally access the site via this laneway. It is also not clear how bins would be collected, whether from this laneway or the front. **These points should be clarified via additional information.**

Standard of Accommodation

A Housing Quality Assessment has been submitted. The studio apartment and the 1 bed apartments bedrooms are under the minimum standard. However, they are only slightly under and are acceptable in this instance. All apartments would be dual aspect apart from Unit No. 02. This single aspect unit would have a south-facing aspect, which is compliant with the County Development Plan and Apartment Guidelines.

The bin and bicycle store for both the residential and retail units would be to the rear of the building at the ground floor. All apartments would be afforded private open space in the form of a balcony. There would be balconies above the bin store area, which is not ideal in terms of nuisances such as odour. The bin store should be enclosed and located away from the balconies above to address this. **This should be revised via additional information.**

The balconies to the front of the proposal are of concern. These balconies may not be overly usable given that they are directly adjacent to a road, car parking area and on the northern elevation of the building. **The applicant should consider revising the proposal so that this is addressed.**

Communal open space would be provided in the form of a roof terrace approx. 47sq.m in size. Under the County Development Plan and Apartment Guidelines, for this development, a minimum communal open space standard of 59sq.m is required. However, it is noted that the site is an infill site and there is the provision under the Apartment Guidelines for flexibility in this requirement for these cases. A privacy strip should be provided along the front of the window of Unit No. 09 adjoining the roof terrace. This might further reduce the communal open space provision.

A daylight, sunlight and shadowing assessment should be submitted to ensure that existing and proposed developments would be afforded adequate daylight and sunlight.

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Commercial Units

2 no. commercial units would be provided at ground floor, accessible from the front elevation. These would measure approx. 73.5sq.m and 73.9sq.m in size. The ground floor would have a floor to ceiling height of approx. 3.0m, which is to be welcomed. Signage is shown above the units. In the event of a grant of permission, it should be conditioned that permission is sought for signage when detail is available.

Limited information has been provided in relation to the uses of these units if known. Further information should be provided. It is also not clear how these units would be serviced in terms of loading and bin collection. **This should be clarified via additional information.**

Visual Impact

The applicant has submitted photomontages and drawings illustrating the visual impact of the proposed development. The proposed materials and finishes would be red brick, render and metal cladding. Brick would be provided on the front elevation with the top level encased in cladding. The side and rear elevations would be largely render. The use of these materials at this site is considered to match or complement existing buildings.

However, the Planning Authority has serious concerns in relation to the design, bulk and mass of the proposed building. The front and side elevations are considered to be of a particularly poor design quality. The lack of differentiation in the use of materials presents monotonous elevations, especially the front and side elevations. These elevations should be revised to provide for more varied use of the materials and finishes on these elevations. There is also limited articulation in the building to help break up its bulk and mass. Apart from the top floor, the building appears in a block form.

The applicant should be requested to submit a revised proposal that provides for better articulation in terms of materials and form. Further consideration should also be given to the side elevations and the use of primary windows on these. The location of primary windows on these elevations might prejudice the future development of the LC zoned sites on either side of the development. **This should be addressed via additional information.**

It is noted that the amendments to the proposal in response to these concerns may involve a reduction in the total number of residential units.

Landscaping

Public realm landscaping would be provided to the front of the building. Low level planting is proposed between the car parking spaces and the front of the building. This space is not considered

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of a high quality having regard to Policy UC1 Objective 5 *'To promote and facilitate environmental and public realm improvements in existing town, village, district and local centres to address environmental quality, urban design, safety, identity and image'*.

The current public realm along this part of Ballymount Road Lower is not considered to be of a high quality. The proposed development is an opportunity to provide for environmental and public realm improvements. It is not considered that the current proposed design and layout of the area to the front of the building goes far enough to achieve this. **A redesign of this space should be requested via additional information.**

No public open space has been identified. The applicant will need to demonstrate whether this is appropriate at this site in relation to proximity to existing areas of open space. **This can be requested via additional information.**

Public Realm has reviewed the proposed development and requested further information as follows:

Landscape Plan

The applicant has shown some planting on the proposed site plan for the development; however, this does not constitute an acceptable landscape plan. The applicant is therefore requested to submit a detailed landscape plan. The applicant is requested to provide a landscape plan including a detailed planting plan prepared by a suitably qualified landscape architect.

SUDS

There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. Natural SUDS features shall be incorporated into the proposed drainage system. The SUDS shall be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The Public Realm Section expects developments to achieve a greenfield surface water run-off rate where feasible once SuDS have been installed. Surface water should be managed as close to its source as possible. SuDS schemes should aim to:

- manage water on or close to the surface and as close to the source of the runoff as possible;*
- ensure pollution is prevented at source, rather than relying on the drainage system to treat or intercept it;*
- manage rainfall to help protect people from increased flood risk, and the environment from morphological and associated ecological damage resulting from changes in flow rates, patterns and sediment movement caused by the development;*
- use the SuDS Management Train, using drainage components in series across a site to achieve a robust surface water management system;*

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- *maximise the delivery of benefits for amenity and biodiversity;*

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following additional information be submitted by the applicant:

1. *There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated tree pits. The landscape proposals to be prepared by a suitably qualified landscape architect.*

2. *There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. Natural SUDS features shall be incorporated into the proposed drainage system. The SUDS shall be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The applicant shall provide the following additional information:*

a) *The applicant shall show further proposed SuDS features for the development such as Green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS features.*

b) *a maintenance plan and the means for the scheme for its design life.*

3. *The applicant shall submit plans and associated documentation detailing how water will be managed within the development, including an explanation of the proposed SuDS, the reasons why certain SuDS have been ruled out and detailed information on materials and landscaping. The Council will expect developments to achieve a greenfield surface water run-off rate where feasible once SuDS have been installed. Surface water should be managed as close to its source as possible.*

The report from the Public Realm Section is noted. These items should be requested **via additional information**.

Traffic, Access and Parking

The proposed development would provide for 6 car parking spaces to the front of the building. No mobility nor EV charging spaces have been provided. It is also not specified what parking spaces would be for the residential element and what spaces would be for the commercial. This would be important to ensure each has a sufficient level of parking provision.

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Given the location of the site a reduced car parking provision may be acceptable. However, the applicant should be requested to provide further detail including a car parking strategy and how the residential and commercial elements would each be provided for. The Roads Department has raised concerns with the level of car parking proposed and recommend 10 should be provided for. It is noted that the revision of the development in response to items relating to the height and visual impact may result in a reduction in apartments. This might lead to a more appropriate car parking ratio; however, this should be explored as part of a car parking strategy. **This can be addressed via additional information.**

Bicycle parking spaces would be provided to the front and rear of the building. The applicant notes that 8 bicycle parking spaces would be provided for the commercial element of the development at the front of the building, in front of one of the units. 10 spaces would be provided for the residential element to the rear of the building, accessed via the building. The proposed provision is considered acceptable in this instance. External bicycle parking should be covered.

The Roads Department has reviewed the proposed development and requests additional information:

Access:

A side laneway to the east of the site provides access to residential and commercial bin storage. No details on visibility or right-turning movements (eg. Yellow Box) have been provided.

Car parking:

There are 6 No. car parking spaces provided to the front of the site.

Roads have concerns about cars reversing onto Ballymount Road when egressing.

No detail is provided in relation to the allocation of these spaces to residential/commercial units or a parking management strategy for the site. There are no details of the proposed nature of the commercial units.

With reference to Table 11.23: Maximum Parking Rates (Non Residential), Roads Department recommends the minimum number of car parking spaces for the commercial unit should be 6 No. (dependant on type of retail)

With reference to Table 11.24: Maximum Parking Rates (Residential Development), Roads Department recommends the minimum number of car parking spaces for the residential units should be 4 No.

There are no details of Mobility Impaired Parking or EV charging spaces.

Measures are required to prevent illegal/inappropriate on-street parking which is likely to occur at the front of the retail units.

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Bicycle Parking:

8 bicycle parking spaces are provided to the front for commercial units.

10 bicycle parking spaces are provided at the rear for the residential units.

Fire Tender and Bin Collection Access:

Bin stores for the commercial and residential units are located at the rear of the building. Access is via the laneway to the east of the property.

No swept path analysis (i.e. Autotrack) was provided as part of this application to confirm that larger vehicles such as refuse trucks/fire engines will have sufficient access to the site.

Roads recommend that the following ADDITIONAL INFORMATION be requested from the applicant:

- 1. The applicant is requested to submit accurate plans demonstrating the provision of a visibility splay of 2.4m x 45m in both directions from the entrance. Sightlines should be shown to the near side edge of the road to the right hand side of entrance and to the centreline of the road to the left hand side of the entrance (when exiting).*
- 2. The applicant is requested to submit a revised layout of not less than 1:200 scale showing details of right-turning movement provision to/from the access laneway.*
- 3. The applicant is requested to submit a revised layout of not less than 1:200 scale showing the location and a minimum of 10 No. car parking spaces to be provided at the development. Mobility Impaired Parking and EV charging spaces should also be provided. Please refer to the SDCC County Development Plan 2016-2022. Any details of the expected nature of the retail units should be submitted in the context of assessing parking provision.*
- 4. A swept path analysis (i.e. Autotrack) showing how cars can safely access and egress the parking spaces.*
- 5. A revised layout to include details of measures to prevent illegal/inappropriate on-street parking to the front of the retail units (on Ballymount Road).*
- 6. A swept path analysis (i.e. Autotrack) confirming that larger vehicles such as refuse trucks/fire engines will have sufficient access to the site.*

Should the permission be granted, the following conditions are suggested:

- 1. All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011)*
- 2. Prior to commencement of development, the applicant shall submit a developed Construction Traffic Management Plan for the written agreement of the Planning Authority.*
- 3. Any road marking proposed and or to be installed shall comply with most up to date Chapter 7 (ROAD MARKINGS) of the Traffic Signs Manual.*

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The report from the Roads Department is noted. The requested items should be requested **via additional information**. With regard to the use of the laneway the applicant should confirm if it is intended for vehicles (refuse trucks etc.) to access this.

Services and Drainage

Water Services has reviewed the proposed development and requests further information:

1.1 The applicant has not submitted a SuDS (Sustainable Drainage System) plan or surface water drainage plans for the proposed development. The applicant is required to submit a drawing showing what SuDS are proposed for the development and show what surface water attenuation capacity proposed SuDS features have in m³. Examples of SuDS include:

- *Green Roofs*
- *Blue Roofs*
- *Rain Gardens*
- *Green detention areas*
- *Swales*
- *Permeable Paving*
- *Tree Pits*
- *Grasscrete*
- *Channell rills*
- *Planter boxes with overflow connection to the public surface water sewer*

1.2 Where SuDS does not provide sufficient surface water attenuation show what other methods of attenuation are proposed such as an arched type attenuation system. Show the existing and proposed surface water drainage layouts up to and including the point of connection to the public surface water sewer. The drawing shall include the location of all Aj's, manholes, pipe size, material type and direction of flow. Show in a drawing what surface water attenuation is proposed in m³ for the development.

1.3 Submit a report showing what SuDS are proposed for the development.

1.4 Submit a report showing surface water attenuation calculations for proposed development. The report shall show the Site area, the different surface area types such as green roofs, buildings, permeable paving, green areas in m², the SAAR value and Met Eireann rainfall data for the site. Show what surface water attenuation proposed and required for the site in m³.

The report from Water Services is noted. **These items should be addressed via additional information.**

Environmental Health

The H.S.E. Environmental Health Officer has reviewed the proposed development and finds it acceptable. This is subject to conditions relating to construction noise and air quality.

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Screening for Environmental Impact Assessment

Having regard to the nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Screening for Appropriate Assessment

No information has been submitted in relation to AA screening. The subject site is not located within nor within close proximity to a European site. The proposed development is located within an established residential area and comprises of a infill development.

Having regard to:

- the scale and domestic nature of the development,
- the location of the development in a serviced urban area, and
- the consequent absence of a pathway to the European site,

it is considered that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

Conclusion

Having regard to the:

- provisions of the South Dublin County Development Plan 2016-2022,
- the established character of the area, and
- the scale, design and standard of the proposed development,

it is considered that **Additional Information** is required, to ensure the proposed development would be in compliance with Council policy, would not seriously injure the amenities of the area or of property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.

Recommendation

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

1. The Planning Authority notes that the subject application would propose a form of development, in terms of height, scale and massing, which is a significant departure from its existing context. The suitability of the proposed design approach is required to be demonstrated, and the Planning Authority would maintain serious concerns the subject development could prejudice the future redevelopment of the surrounding lands. In this regard and in accordance with Section 11.2.1 of the South Dublin County

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Development Plan 2016-2022, the applicant is requested to submit a Design Statement that includes (but is not limited to) a Concept Plan/Masterplan, which demonstrates the following;

(a) How the proposed development would be in keeping with the future development of this Local Centre zoned lands;

(b) Demonstrate how the proposed development would comply with provisions of Objective CS6 SLO 1 of the South Dublin County Council Development Plan 2016-2022, which seeks to initiate a plan-led approach to the sustainable regeneration of the brownfield lands in the Naas Road/Ballymount REGEN zoned lands, as well as the Local Centre (LC) zoned lands at Walkinstown (otherwise known as City Edge Project).

This masterplan should show that the applicant has considered the proposed development in the context of the future potential development of adjoining and surrounding sites within this area. Consideration should be given to the potential provision of public realm and open space, building heights, form and relationships with potential development adjacent to the subject site. This will ensure that the proposed development would not prejudice the development of these sites.

2. The applicant is requested to submit a revised proposed development that provides for the following:

(a) Justification should be provided for allocating over 10% 1 bed units within the proposed development. Consideration should be given to provision of 3 bed units.

(b) Clarify whether the applicant has legal access to the laneway to the east of the site. If there is a wayleave a revised site location map should be submitted showing this.

(c) Clarify how bins for both the residential and commercial units would be collected. Revise the rear bin store so that it is enclosed and located away from balconies above.

(d) Locate balconies away from the front (northern) elevation of the proposed building.

(e) Provide a privacy strip along the windows of apartments which are directly adjoining the communal roof terrace.

(f) Further information should be provided on the proposed uses/type of occupiers for the proposed ground floor commercial units. Clarify how these units would be serviced in terms of loading/unloading.

(g) The applicant is requested to submit a report analysing the daylight and sunlight access to the proposed development. This report should also provide analysis of the shadowing impact of the proposed development on neighbouring buildings. Any recommendations from this analysis should be implemented and a revised proposal with a full set of revised drawings submitted.

3. The Planning Authority has serious concerns in relation to the design, bulk and mass of the proposed building. The building should be reduced in height. The front and side elevations are considered to be of a particular poor design quality. The lack in differentiation in the use of materials presents monotonous elevations, especially the front and side elevations. A revised proposal should be submitted that provides for better articulation in terms of materials and form. A full set

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of revised drawings of the revised proposed development should be submitted for assessment.

4. (a) There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated tree pits. The proposed public realm area to the front of the building should be redesigned to provide for a higher quality and layout. The landscape proposals to be prepared by a suitably qualified landscape architect.
(b) There is a lack of SuDS (Sustainable Drainage Systems) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system. The SUDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The applicant is requested to provide the following additional information:
 - (i) The applicant is requested to show further proposed SuDS features for the development such as Green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS features.
 - (ii) a maintenance plan and the means for the scheme for its design life.
 - (c) The applicant is requested to submit plans and associated documentation detailing how water will be managed within the development, including an explanation of the proposed SuDS, the reasons why certain SuDS have been ruled out and detailed information on materials and landscaping. The Council will expect developments to achieve a greenfield surface water run-off rate where feasible once SuDS have been installed. Surface water should be managed as close to its source as possible.
 - (d) The applicant is requested to justify the lack of usable public open space as part of the proposed development, in relation to the site's proximity to existing areas of public open space.
5. SDCC's Roads Department requests that the applicant submit the following information:
 - (a) Accurate plans demonstrating the provision of a visibility splay of 2.4m x 45m in both directions from the entrance. Sightlines should be shown to the near side edge of the road to the right hand side of entrance and to the centreline of the road to the left hand side of the entrance (when exiting).
 - (b) The applicant is requested to clarify if the laneway is to be used for any vehicles. If so, they may submit a revised layout of not less than 1:200 scale showing details of right-turning movement provision to/from the access laneway.

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(c) A car parking strategy for the proposed development justifying the proposed car parking provision. Mobility Impaired Parking and EV charging spaces should also be provided. Please refer to the SDCC County Development Plan 2016-2022. Any details of the expected nature of the commercial units should be submitted in the context of assessing parking provision.

(d) A swept path analysis (i.e. Autotrack) showing how cars can safely access and egress the parking spaces.

(e) A revised layout to include details of measures to prevent illegal/inappropriate on-street parking to the front of the commercial units (on Ballymount Road).

(f) A swept path analysis (i.e. Autotrack) confirming that larger vehicles such as refuse trucks/fire engines will have sufficient access to the site.

6. (a) The applicant is requested to submit a drawing showing what SuDS are proposed for the development and show what surface water attenuation capacity proposed SuDS features have in m³. Examples of SuDS include:

- Green Roofs
- Blue Roofs
- Rain Gardens
- Green detention areas
- Swales
- Permeable Paving
- Tree Pits
- Grasscrete
- Channell rills and Planter boxes with overflow connection to public surface water sewer

(b) Where SuDS does not provide sufficient surface water attenuation show what other methods of attenuation are proposed such as an arched type attenuation system. Show the existing and proposed surface water drainage layouts up to and including the point of connection to the public surface water sewer. The drawing shall include the location of all A_j's, manholes, pipe size, material type and direction of flow. Show in a drawing what surface water attenuation is proposed in m³ for the development.

(c) Submit a report showing what SuDS are proposed for the development.

(d) Submit a report showing surface water attenuation calculations for proposed development. The report shall show the site area, the different surface area types such as green roofs, buildings, permeable paving, green areas in m², the SAAR value and Met Eireann rainfall data for the site. Show what surface water attenuation proposed and required for the site in m³.

7. The side-facing windows should be omitted or redesigned so as not to prejudice adjoining sites.

It is noted that this would result in the creation of north-facing single aspect units, which are not acceptable and should be omitted or redesigned

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REG. REF. SD22A/0017

LOCATION: Paintworld, 1-2 Ballymount Road Lower, Dublin 12

Colm Harte

Colm Harte,
Senior Executive Planner

Eoin Burke

Eoin Burke,
Senior Planner

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

Date: 22 March 22

Mick Mulhern

Mick Mulhern, Director of Land Use,
Planning & Transportation