

STATEMENT OF RESPONSE TO PRE-APPLICATION CONSULTATION OPINION



BUILD-TO-RENT RESIDENTIAL AND COMMERCIAL DEVELOPMENT
FORMER CHADWICKS SITE, GREENHILLS ROAD,
WALKSINTOWN, DUBLIN 12

MARCH 2022

SUBMITTED ON BEHALF OF:
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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Response to Pre-application Consultation Opinion on behalf of our clients, Steeplefield Limited, 32 Molesworth Street, Dublin 2, to accompany a planning application to An Bord Pleanála for a 633 no. Build-to-Rent development at the Former Chadwick's Builder Merchants Site, Greenhills Road, Walkinstown, Dublin 12. Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted, and a pre-planning consultation meeting was facilitated on 4th October 2021.

An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 7th October 2021 under ABP. Ref. 310421-21, which identified 3 no. items that required further consideration, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 3 no. items were as follows:

1. City Edge Masterplan

Further consideration/clarification is required of how the proposed development responds to the preferred scenarios identified for the City Edge Project. Further consideration of this matter may require an amendment to the documents and/or design proposals submitted.

2. Density and Building Height

Further consideration is required of how the proposed development density and building heights up to 19 storeys align with National Planning Policy principles, including those described in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; and Urban Development and Building Heights Guidelines for Planning Authorities. Clarification is specifically required in relation to how the character of the site location and its public transport accessibility meet the criteria set out in those guidelines, both presently, and in the future context, following alterations to the frequency of bus routes serving the site. Further consideration of this matter may require an amendment to the documents and design proposals submitted.

3. Design Strategy

The prospective applicant should provide further justification and/or detail in relation to the design strategy. In particular, the prospective applicant should provide further justification and/or detail in relation to the following:

- (i) The visual impact of the development upon the surrounding area;*
- (ii) The elevational treatment of blocks;*
- (iii) The mass of development form;*
- (iv) The treatment of the frontage to Greenhills Road in both its current and anticipated future form; and*
- (v) Connectivity through the site.*

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

The Board also indicated, pursuant to Article 285(5)(b) of the Planning and Development Regulations 2001 (as amended by the Planning and Development (Strategic Housing Development) Regulations 2017), that the following specific information should be included and/or addressed in any planning application made to An Bord Pleanála:

- 1. Consideration is required of potential impacts upon future residential populations of the site, resulting from the existing uses. Any mitigation should be clearly described alongside any measures to preserve mitigation features.*

2. *Consideration is required of any matters that have the 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. Consideration of security of access to communal amenity space is also required.*
5. *Cross sections of the development should be submitted, clearly detailing the change in levels from the site to surrounding areas and how this will be addressed in both the existing and future conditions.*
6. *The relationship of the proposed development with the development potential of surrounding lands as envisaged as part of the City Edge Project should be described.*
7. *A plan annotating separation distances between all windows and balconies/terrace areas, to surrounding areas.*
8. *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. Consideration should include the potential impact on future development sites.*
9. *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.*
10. *Details of waste storage and collection.*
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 Water Services / Drainage Division at the Planning Authority.*
13. *Additional details and/or revised proposals in relation to comments from the Parks & Landscape Services / Public Realm Department at the Planning Authority.*
14. *A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. The Department of Culture, Heritage and the Gaeltacht
2. Irish Water

3. Transport Infrastructure Ireland
4. National Transport Authority
5. South Dublin Childcare Committee
6. Dublin City Council Planning Department

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the application cover letters are enclosed with the application.

2.0 Response to Issues Raised

The following sections of this document set out how the applicant and design team have addressed the 3 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1 Item No. 1 – City Edge Masterplan

The Board required the following:

Further consideration/clarification is required of how the proposed development responds to the preferred scenarios identified for the City Edge Project. Further consideration of this matter may require an amendment to the documents and/or design proposals submitted.

2.1.1 Applicants Response to Item No. 1

In response to Item No. 1 of the Board's opinion, it is noted that the City Edge Project is a large-scale collaboration between Dublin City Council and South Dublin County Council which seeks to master plan and regenerate a large land bank located in the Naas Road, Ballymount and Park West areas of Dublin. this 700-hectare area of land is currently well served by public transport and located in close proximity to Dublin City Centre. Today the area is home to a thriving employment base with 1,500 businesses and some 25,500 employees, along with 5,000 residents living in well-established communities. Over time this area could be more intensely used with the potential to provide a new urban quarter accommodating up to 40,000 homes and 75,000 jobs.

In response to national policy, which seeks to make better use of land close to cities, Dublin City Council and South Dublin County Council are working together to prepare a framework for the future growth of this area. Work on this commenced in July 2020 and is funded under the Government's Urban Regeneration and Development Fund (URDF). The current phase of the Project, (Phase 1) has two stages:

1. Baseline Analysis and Emerging Preferred Scenario which have been completed.
2. Strategic Framework, which is currently being prepared.

In order to identify a preferred scenario, elements from each of the three scenarios were assessed against various criteria. Those elements that performed the best were combined, to produce the Emerging Preferred Scenario. Within this scenario, key character areas are identified including:

- A major urban centre;
- Local centres with high street activity;
- Clusters of urban-industry & workspaces;
- Areas for housing and workspace.

The **yet-to-be-completed Strategic Framework** will set out a high-level strategy for the sustainable development of the area, into the future.

It is important to highlight that the City Edge Project is a live project in its early stages.

Nonetheless, the general design principles of the proposed development have been aligned with the City Edge project where possible.

On foot of the Board's Opinion, the Design Team consulted the City Edge Team on three occasions in 2021 to see how the proposed development could fit into the overall objectives of the City Edge Project. This comprised two meetings on the 29th of October 2021 and 15th November 2021, and a follow-up email sent on the 29th November 2021. Minutes from these meetings have been included in the Statement of Consistency and Planning Report prepared by Hughes Planning and Development Consultants. During both meetings, the City Edge team were presented with a proposed design upon which feedback was given. The final application to An Bord Pleanála has been made in light of that feedback.

The following is a response to the concerns raised by the City Edge Team:

- Concerns were raised by the City Edge Team regarding the proposed land uses. Particularly the lack of meaningful workspaces/large scale commercial uses in the scheme.

In response to this concern, 10 no. commercial units have been included in the proposed development with 8 no. located at ground floor level and 2 no. located at 2nd floor level fronting Greenhills Road. The proposed commercial units are as follows:

- Block A has 3 no. units on the ground floor comprising 79.46 sq.m., 90.23 sq.m., and 121.39 sq.m.,
- Block B has 1 no. unit on the ground floor comprising 127.03 sq.m.,
- Block C has two units on the second floor comprising 120.85 sq.m. and 125.45 sq.m.,
- Block D has 4 no. units at the ground floor comprising 84.45 sq.m., 149.77 sq.m., 155.48 sq.m. and 275.59 sq.m.

It is considered inappropriate to place light industrial units in such proximity to residential units due to the potential for excessive noise, light and air pollution. The proposed commercial units will provide ample commercial space for employment creation on the subject site, whilst providing a mix of uses and active street frontage.

- Concerns were raised regarding consistency with Bus Connects proposals for Calmont Road.

In response to this concern, the Design Team note that the proposed development has been designed to align with the most up-to-date Bus Connects plans for the area.

- A stronger street edge is required on Greenhills Road in response to the wayleave.

The Design Team has revisited the design of the development fronting Greenhills Road to better align with the objectives of the City Edge Project. A portion of Block C fronts the road, providing 2 no. retail units and a hardstanding public plaza, providing much-needed addition to the public realm in the area. It is considered difficult to provide frontage along with the remainder of the boundary due to the location of a water main and its associated wayleave which runs along the northern boundary of the subject site.

In discussions with the design team, Irish Water has confirmed that they do not intend to relocate the water main. It was suggested that it might be moved as part of Bus Connects works in the area, but this is not the case. Therefore, no buildings can be added along much of the frontage with Greenhills Road as shown on the Site Location Map by the yellow wayleave in favour of Irish Water.

A strong street frontage will be provided along the road to the south, with the proposed creche, commercial units and residential amenity spaces in front of a newly installed footpath, cycle lane and landscaped public realm. Pedestrian access to the buildings and access through the site will also be available along both street frontages, thus improving the animation of the streets.

- The position of the public open space was queried with regards to overshadowing from the proposed tower in Block D.

The proposed public open space has been retained, however, in light of feedback received from the City Edge Team the heights of the proposed buildings have been reduced. This has improved the levels of daylight achieved in the centrally located public open space. The revised landscape plans, prepared by Park Hood Landscape Architects, provides for a courtyard to serve each block and first and second-floor levels. The courtyard style and level change will create a clear distinction between public and communal space and ensure the space is reserved for residents of the proposed development. The courtyards will be landscaped, providing high-quality amenities for residents including play areas for children. In addition, public open space will be provided in the centre of the site and will also take the form of a courtyard. The landscaped public realm will be located on the periphery of the site, providing plazas and seating as well as landscaped walkways for pedestrians traversing the site.

- The City Edge Team noted the height difference between Greenhills Road and the floor of the site. It was queried how the Design Team would address this challenging height difference.

It is noted that the level difference between Greenhills Road and the ground floor of the proposed development is significant. A section drawing has been prepared by C+W O'Brien Architects and included with this application. The section clearly shows the topography of the site and highlights the difference in the levels. Despite the level difference, the proposed development will front Greenhills Road along the northwestern boundary, providing a public plaza adjoining the road. The main vehicular and pedestrian entrance into the site via a ramp from the northeastern corner of the site from Greenhills Road. Given the proposed level changes throughout the development, it is considered that the Design Team has successfully addressed any concerns pertaining to the height difference across the site.

- Concerns were raised about the lack of permeability through the site.

The revised design has included pedestrian linkages through the site located along the eastern boundary and a central linkage through the site. There are 3 no. entrances provided along Greenhills Road which will form the principal pedestrian entrances for future residents.

It is considered that the proposed development has been designed having regard to the key design principles of the City Edge Project. The proposed development can sit comfortably into the proposed emerging scenario and has been designed to take account of changes in the road network due to Bus Connects.

Please refer to drawings prepared by C+W O'Brien Architects, the Landscape Plan prepared by Park Hood Landscape Architects, and the Statement of Consistency and Planning Report prepared by Hughes Planning and Development Consultants for further details on how the proposed development addresses concerns raised by the City Edge Team.

2.2 Item No. 2 – Density and Building Height

The Board required the following in relation to the visual impact of the development of the proposed development:

Further consideration is required of how the proposed development density and building heights up to 19 storeys align with National Planning Policy principles, including those described in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; and Urban Development and Building Heights Guidelines for Planning Authorities. Clarification is specifically required in relation to how the character of the site location and its public transport accessibility meet the criteria set out in those guidelines, both presently, and in the future context, following alterations to the frequency of bus routes serving the site. Further consideration of this matter may require an amendment to the documents and design proposals submitted.

2.2.1 Applicants Response to Item No. 2

In response to Item No. 2, the Design Team further considered the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; and Urban Development and Building Heights Guidelines for

Planning Authorities to assess the suitability of the proposed development in terms of height and density. The development submitted to the Board at the pre-planning stage comprised a development ranging in heights from 5 to 19 storeys and contained 702 no. apartments.

In response to the findings, the scheme has been revised and ranges in height from 5 to 12 storeys with a reduction in apartment numbers to 633 no. units. This represents a significant reduction in both height and density on the subject site and when assessed against the Urban Development and Building Heights Guidelines for Planning Authorities, was considered a suitable design and scale for this location

As per Specific Planning Policy Requirement 3 of the Urban Development and Building Heights Guidelines for Planning Authorities, the Board is permitted to allow heights in excess of the recommended heights listed in the development plan once they are satisfied the proposed height adheres to the Development Management Criteria listed in section 3.2 which states:

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- *Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*
- *In development locations in proximity to sensitive bird and/or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/or collision.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

The subject application is accompanied by the following reports, consistent with the above requirements:

- An Environmental Impact Assessment Report, inclusive of a micro-climate assessment;
- An Appropriate Assessment Screening Report, prepared by Enviroguide Ecological Consultants; and
- A Sunlight, Daylight and Shadow Assessment Report, prepared by 3D Design Bureau.

The guidelines state that applicants shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the following criteria:

We have demonstrated how the proposed development satisfies the specified criteria set out in Specific Planning Policy Requirement 3 of the Height Guidelines as follows:

Development Management Criteria		
	Assessment Criteria	Comment
At the scale of the relevant city/town	<i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i>	The subject site is suitably served by a high-frequency bus route running along Greenhills Road. Dublin Bus Services 77a and 27 provide 10-minute services connecting the site with the city centre and Tallaght. Further bus services are available near the Walkinstown Roundabout which is located c. 315m from the subject site. Furthermore, Kylemore LUAS Stop has located c. 1.6km

		<p>from the subject site or 6 minutes by bicycle and 20 minutes on foot.</p> <p>As noted in the Traffic and Transport Assessment, there is sufficient capacity to serve this development.</p>
	<p><i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect</i></p>	<p>With regards to the effects of the proposed development on the character of the surrounding area, it is noted that Greenhills Road is dominated by industrial units and warehouses and lacks any quality public realm. The stretch road abutting the northern boundary of the site contains one footpath and is not overlooked by buildings due to the topography of the sites on either side of the road. As such, there is no passive surveillance along this stretch of road and pedestrians and cyclists would be discouraged from using it in its present form.</p> <p>The proposed development seeks to transform this stretch of road by providing footpaths on the southern side of the road which will be overlooked by apartments within the development, thus providing a safer environment for pedestrians. The northwestern corner of the site will front the road directly and will contain two commercial units at street level as well as a public plaza. Together with landscaping and pedestrian and vehicular entrances into the subject site, this stretch of Greenhills Road will be greatly improved and provide a strong street front and linkage to Walkinstown.</p> <p>A Landscape Plan and Design Statement, a Visual Impact Assessment have been prepared and submitted with this application.</p> <p>The Visual Impact Assessment found that the proposed development is regarded as being permanent or long term in landscape and visual terms. The most appreciable effects relate to the scale and nature of the proposed development which will occupy the majority of the site footprint although a significant proportion is to be set out as a public open space and part of a wider landscape development proposal. While substantial, the new facades, architecture, building form, usage and enhanced urban realm will be <i>positive</i> and significant contributions to the townscape character of this area.</p> <p>Further, the active frontages at ground level will equate to a significantly improved architectural relationship with the adjacent streetscape and reinvigorate use and activity on giving it a more productive and appropriate land-use for this nodal and gateway point.</p>
	<p><i>On larger urban redevelopment sites, proposed developments should make a</i></p>	<p>The proposed development makes a positive contribution to place-making, incorporating communal open spaces and new commercial</p>

	<p><i>positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i></p>	<p>development. It is also submitted that the development in itself will make a positive contribution to place-making as the taller element of this development will act as a way-finder creating visual interest. The proposed development incorporates a public open space at the centre of the development site facilitating passive activities and providing space for people to meet and interact, incorporating designated play areas as detailed within the accompanying Landscape Masterplan and Landscape Strategy and Design Report, prepared by Park Hood.</p> <p>We note that the sites adjacent to the subject site comprise commercial warehouses/industrial buildings, thus there are no concerns for impacts on existing residential amenities. The high-quality design including a palette of simple materials will allow the scheme to successfully integrate with the surrounding area.</p> <p>The proposed buildings step towards the boundaries to provide a softer integration with adjoining buildings.</p> <p>The architectural design has ensured a variety of building materials, forms and massing to ensure visual interest from the street. The heights of the development range from 5 – 12 storeys and are composed of multiple materials such as brick, metal, and glass as shown in the Architectural Design Statement prepared by C+W O'Brien Architects.</p>
<p>At the scale of district/ neighbourhood/ street</p>	<p><i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</i></p>	<p>The proposed development greatly improves Greenhills Road by providing strong street frontage, spacious footpaths, a public plaza and commercial units fronting the road. In addition, the development increase activity along this section of road making it more user-friendly. The development also addresses the road along the southern boundary by creating a high-quality public realm with connecting streets through the development.</p> <p>The site and immediate area are characterised by its industrial setting which is mostly void of nature. The proposed development seeks to introduce parks, rain gardens, green roofs and a variety of native planting throughout the site as shown in the Landscape Plan prepared by Park Hood Landscape Architects.</p> <p>No material impacts on residential amenity will occur as a result of the proposed development, having regard to the results of the Visual Impact Assessment and Sunlight, Daylight and Shadow Assessment Report and the absence of any sensitive residential receptors in the vicinity. The high-quality materials utilised in the scheme ensures that</p>

		the development will make a positive contribution to the streetscape.
	<i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered.</i>	<p>We note that this high-quality scheme provides adequate relief, the blocks proposed varying in height with a maximum height of 12 no. stories have been broken up.</p> <p>A comprehensive Design Statement has been prepared by C+W O'Brien Architects 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.</p>
	<i>The 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 requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)</i>	<p>We note that the scheme will provide active surveillance of the public and communal open spaces throughout the development with the provision of own door access apartments, retail/commercial units, a creche and resident support facilities providing animated daytime uses.</p> <p>Furthermore, we submit that the scale of the development is appropriate to its location as set out within the accompanying Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants.</p> <p>We note that a Flood Risk Assessment has been carried out by Lohan & Donnelly Consulting Engineers (discussed in the Engineering Services Report) which has due regard to the Flood Risk Management Guidelines.</p>
	<i>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates cohesively.</i>	<p>The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area designated for regeneration. The provision of taller buildings at the site will facilitate wayfinding and contribute to a sense of place.</p> <p>Further to this, we note that the proposed communal open spaces within the development will contribute to the wider urban area providing additional amenities to the surrounding population as well as future residents. Footpaths on the southern side of the road will be overlooked by apartments within the development, thus providing a safer environment for pedestrians. The northwestern corner of the site will front the front directly and will contain two commercial units at street level as well as a public plaza.</p> <p>Together with landscaping and pedestrians and vehicular entrances into the subject site, this stretch of Greenhills Road will be greatly improved and provide a strong street front and linkage to Walkinstown.</p>
	<i>The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood.</i>	As set out in Section 1.0 of this report, the proposed application seeks permission for a strategic housing development comprising a mixed-use development featuring 633 no. 'build-to-rent' apartments (292 no. 1-bed, 280 no. 2-bed and 61 no. 3-bed) with ancillary

		<p>resident facilities, 1330sq.m. of commercial space and a 360sq.m. crèche. The proposed apartments comprise 80 no. apartment types across the development, all of which are accessible via wheelchair users. 10% of the units will be provided as Part V units, thus providing a diverse mix of residents in this development.</p> <p>The mix of uses proposed on the subject site will ensure the creation of a sustainable community with ease of access to services and facilities on the subject site as well as the nearby Walkinstown area.</p>
<p>At the scale of the site/building</p>	<p><i>The form, massing and height of proposed developments should be carefully modulated to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i></p>	<p>All apartments and communal/public open spaces will have adequate daylight and ventilation due to the design of the buildings and the specific location of taller elements of the development. We can confirm that the design team has taken appropriate and reasonable regard for relevant standards and this is reflected in the development.</p> <p>The location of vents has been carefully thought out to ensure apartments receive adequate fresh air and any odours being omitted from cooking etc. do not cause a negative impact.</p> <p>Please refer to the Daylight, Sunlight and Overshadowing Analysis prepared by 3D Design Bureau and the Architectural Design Statement prepared by C+W O'Brien Architects included with this application.</p> <p>In conclusion, the steps taken by the project team during design have ensured that levels of daylight and sunlight within the development have been safeguarded.</p>
	<p><i>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'</i></p>	<p>As discussed above all apartments will have adequate daylight and ventilation due to the design of the buildings and the specific location of taller elements of the development. The development has been designed to limit the effects of overshadowing on itself as well as adjoining sites, thus allowing for the future development of those sites.</p> <p>We can confirm that the design team has taken appropriate and reasonable regard for relevant standards and this is reflected in a development that is fully compliant with BRE and BS8206 guides</p> <p>The development has been assessed in accordance with BS EN 17037 and was found to be compliant.</p> <p>Please refer to the Daylight, Sunlight and Overshadowing Analysis prepared by 3D Design Bureau and included with this application.</p>
	<p><i>Where a proposal may not be able to fully meet all the requirements of the</i></p>	<p>The recommended minimum for Average Daylight Factor (ADF) is based on the</p>

	<p><i>daylight provisions above, this must be 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.</i></p>	<p>function of the room being assessed. The recommendations as per the BS8206-2:2008 are as follows: 2% for kitchens; 1.5% for living rooms; and 1% for bedrooms. BS 8206-2:2008 also recommends that where a room serves more than one purpose, such as the modern day apartment design of the living/kitchen/dining (LKD) space, the minimum average daylight factor should be taken for the room with the highest value.</p> <p>Following this advice, a target ADF value of 2.0% has been applied to LKDs within the proposed scheme, however compliance rates have also been calculated for the scheme with a reduced ADF target value for LKDs of 1.5%. This alternative compliance rate is in recognition of the primary function for LKDs being that of a living space, with the kitchens located towards the rear of the room with lower expectation of daylight.</p> <p>Where ADF compliance rates are stated, target values of 2.0% and 1.5% have been considered for LKDs. The compliance rate with and ADF target of 2.0% applied to LKDs should be viewed as the primary study.</p> <p>The compliance rate with and ADF target of 1.5% applied to LKDs should be regarded as supplementary information. Some internal spaces (e.g. studio apartments, shared communal areas etc..) can possibly be of a nature that do not have a predefined target values in the BS8206-2:2008. In such instances, 3DDB have applied a target value they deem to be appropriate. The criteria for lux levels as recommended in EN 17037 and BS EN 17037 have been calculated for the proposed habitable rooms across all floors of the proposed development, as per the BRE study, and are contained within section "6.4 Appendix Results - Alternative Daylight Standards" on page 124 of 3DDB's Daylight and Sunlight Report.</p> <p>Please refer to the accompanying daylight and sunlight report prepared by 3DDB for further information.</p>
<p>Specific Assessments</p>	<p><i>Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i></p> <p><i>In development locations in proximity to sensitive bird and/or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/or collision</i></p>	<p>A Wind and Micro-climate Report has been prepared by AWN Consulting and included under a separate leaf. The report found that mitigation measures were necessary for this instance and these have been incorporated into the proposed development.</p> <p>A bat survey has been carried out by Ash Ecology. The survey found that no bats were present at the time of surveying and no evidence of bats living in the area were found.</p> <p>Enviroguide has examined the proposed building facades to determine their suitability</p>

		<p>for birds in the area. As noted in the Biodiversity Chapter, the façade has been adequately designed. In the case of the Proposed Development, the potential collision risk is considered to be significantly reduced by the location of the Proposed Development, i.e., remote from any important habitats for birds (e.g., wetlands, SPAs) within a well-lit urban centre. Please refer to the Biodiversity Chapter of the EIAR for further details.</p> <p>A Lighting Plan has been prepared by Homan O'Brien Consulting Engineers and included under a separate leaf. This plan has been reviewed by Enviroguide Ecology to ensure suitable lighting is used on the site to mitigate ecological impacts.</p>
	<i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i>	We have surveyed the site and found no telecommunication network equipment or other sensitivities. The site is therefore assessed as not material for the retention of important telecommunications channels.
	<i>An assessment that the proposal maintains safe air navigation.</i>	We have surveyed the site and found no threat to air navigation in the area. The site is therefore assessed as not material for the safe air navigation in the area.
	<i>An urban design statement including, as appropriate, impact on the historic built environment.</i>	An Urban Design Statement prepared by C+W O'Brien Architects has been submitted with the application. The industrial buildings featuring on-site currently are not considered to be of any historical or architectural merit.
	<i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i>	An Appropriate Assessment Screening Report, prepared by Enviroguide Environmental Consultants, and Environmental Impact Assessment Report, compiled by Hughes Planning and Development Consultants, are submitted with the planning application.

It is considered that Item No. 2 has been adequately addressed in this planning application and the proposed heights and density are appropriate for the site as shown in the table above which demonstrates how the proposed development satisfies the specified criteria set out in Specific Planning Policy Requirement 3 of the Height Guidelines.

2.3 Item No. 3 – Design Strategy

The Board required the following:

The prospective applicant should provide further justification and/or detail in relation to the design strategy. In particular, the prospective applicant should provide further justification and/or detail in relation to the following:

- (i) The visual impact of the development upon the surrounding area;*
- (ii) The elevational treatment of blocks;*
- (iii) The mass of development form;*
- (iv) The treatment of the frontage to Greenhills Road in both its current and anticipated future form; and*
- (v) Connectivity through the site.*

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2.3.1 Applicants Response to Item No. 3

In response to Item No. 3 (i), a Visual Impact Assessment was carried out on the development. A Landscape and Visual Impact Assessment has been prepared by Park Hood Landscape Architects and forms part of the EIAR submitted with this application. This assessment was based on Photomontage and CGI images prepared 3D Design Bureau which is provided under a separate cover in this application.

The Visual Impact Assessment found that the proposed development is regarded as being permanent or long term in landscape and visual terms. The most appreciable effects relate to the scale and nature of the proposed development which will occupy the majority of the site footprint although 12% is to be set out as public open space and part of a wider landscape development proposal. While substantial, the new facades, architecture, building form, usage and enhanced urban realm will be *positive* and significant contributions to the townscape character of this area. Further, the active frontages at ground level will equate to a significantly improved architectural relationship with the adjacent streetscape and reinvigorate use and activity on giving it a more productive and appropriate land-use for this nodal and gateway point.

In response to Item No. 3 (ii), the Design Team has provided further detail on the proposed elevational treatment of blocks throughout the development. The façades of each block will be composed of a range of high-quality materials including bricks (multiple colours), stone, glass, and metal. This will allow for a variety of facades when viewed from the street. This will enhance the existing streetscape whilst providing a visual point of interest along Greenhills Road. For details on the elevational treatment of the blocks, please refer to the architectural drawings prepared by C+W O'Brien Architects for further details.

In response to Item No. 3 (iii), it is noted that the proposed development submitted at pre-planning stages, comprised 702 no. apartments in buildings ranging in heights from 5 to 19 no. storeys. Upon review of the Board's pre-planning feedback and further review of the Urban Development and Building Heights Guidelines for Planning Authorities, the Design Team reduced the height and density of the proposed development. The height of the revised scheme ranges from 5 to 12 no. storeys and contains 633 no. apartments. This reduction in scale is significant and as a result, has also reduced the massing of the proposed development. The massing has been further broken up by using a variety of materials and design options for the facades of each block. The result is a significantly smaller development that creates visual interest along this stretch of Greenhills Road. For further details, please refer to the architectural drawings prepared by C+W O'Brien Architects and the Photomontage Booklets prepared by 3D Design Bureau.

In response to Item No. 3 (iv), the treatment of the frontage onto Greenhills Road has been carefully examined by the Design Team. As noted, a wayleave exists along a portion of the site's boundary with Greenhills Road, thus reducing the opportunity for street frontage. In response, the Design Team has revised the scheme so Block C fronts Greenhills Road in the northwestern corner of the site. Access to the apartments will be provided at this location as well as 2 no. commercial units. A public plaza will also be provided in addition to new footpaths. The proposal for this section of Greenhills Road will animate the street, with passive surveillance being provided from apartments in Block C. The proposed entrance into the site has been provided at the northeastern corner of the site and a pedestrian entrance will be placed midway along the Greenhills Road frontage.

The proposed layout as submitted in this application has the benefit of being able to work with the current and proposed road network for the area which will see Greenhills Road cease to be the main thoroughfare, being replaced by Calmont Road extension.

In response to Item No. 3 (v), concerns regarding connectivity through the site have been addressed. As noted previously, the main entrance into the site is from Greenhills Road via a ramp. This will be the only access point for vehicles entering the site and filtering traffic down the car parking areas. Pedestrians can also use this access point which will be connected to the development via footpaths and cycle lanes, allowing both pedestrians and cyclists to traverse the site from north to south via the internal road layout. A second pedestrian access point will be located on Greenhills Road and will allow pedestrians to access the ground floor level of the development via a staircase. A third route has been provided along the eastern boundary of the site and will allow north-south access. This path

will be landscaped and will contain seating areas and children's play areas. All footpaths and cycle lanes will be overlooked by apartments, thus improving security by providing passive surveillance. Please refer to the Landscape Plan prepared by Park Hood Landscape Architects for further details.

It is considered that the proposed development has been reviewed to fully address the concerns raised by the Board. For further details, please refer to the architectural drawings prepared by C+W O'Brien Architects, the Statement of Consistency and Planning Report prepared by Hughes Planning and Development Consultants, the Landscape Plan prepared by Park Hood Landscape Architects, and the Photomontage Booklet prepared by 3D Design Bureau.

3.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

3.1 Consideration of potential impacts upon future residential populations of the site.

1. *Consideration is required of potential impacts upon future residential populations of the site, resulting from the existing uses. Any mitigation should be clearly described alongside any measures to preserve mitigation features.*

As noted, the proposed development is located in an area dominated by lower-order industrial units and warehouses. The area is set to be transformed under the City Edge project with the proposed development set to be one of the first new developments under this plan. However, it is noted that each new development containing a residential element will need to mitigate against the potential nuisance issues that may arise with industrial development such as light and noise pollution, odours, and heavy goods traffic.

As such, an EIAR has been prepared and submitted under a separate cover and assessed the *potential impacts upon future residential populations of the site* and is included under a separate leaf. The EIAR has assessed the impacts of noise, air quality and landscape.

The Noise Vibration Chapter concludes by stating:

*The predicted change noise levels associated with additional traffic is predicted to be of imperceptible impact along the existing road network. In the context of the existing noise environment, the contribution of induced traffic on the Greenhills Road is considered to be of **neutral, imperceptible** and **permanent** impact to nearby residential locations.*

*Noise levels associated with operational plant are expected to be well within the adopted day and night-time noise limits at the nearest noise sensitive properties taking into account the site layout, the nature and type of units proposed and distances to nearest residences. Assuming the operational noise levels do not exceed the adopted design goals, the resultant residual noise impact from this source will be of **negative, imperceptible, permanent** impact.*

The Air Quality and Climate Chapter concludes as follows:

An adverse impact due to air quality in either the construction or operational phase has the potential to cause human health and dust nuisance issues. The mitigation measures that will be put in place at the proposed development will ensure that the impact complies with all ambient air quality legislative limits and, therefore, that the predicted residual impact is short-term, negative and imperceptible during the construction phase, and long-term, neutral and imperceptible during the operational phase.

Interactions between air quality and traffic can be significant. With increased traffic movements and reduced engine efficiency, i.e. due to congestion, the emissions of

vehicles increase. The impacts of the proposed development on air quality are assessed by reviewing the change in AADT on roads close to the site. In this assessment, the impact of the interactions between traffic and air quality during both construction and operational phases, are considered to be imperceptible.

With the appropriate mitigation measures to prevent fugitive dust emissions (refer to Appendix 9.2), it is predicted that there will be no significant interaction between air quality and land and soils.

As discussed above, climate change has the potential to increase flood risk over time. However, adequate attenuation and drainage have been provided for to account for increased rainfall in future years, as part of the design of the proposed development, and it has been concluded that the associated impact will be long-term, localised, neutral and imperceptible.

No other noteworthy interactions with air quality and climate have been identified.

It is submitted that the proposed development will not result in any negative impacts on future residents. For further details, please refer to the EIAR which accompanies this application.

3.2 Material Contravention Statement

The application is accompanied by a Statement of Material Contravention, prepared by Hughes Planning and Development Consultants, which justifies the proposed building height in the context of the provisions of Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

3.3 Provide Landscape drawings clarifying the quantum, functionality, and overall quality of public open space proposed.

A Landscape Plan and Landscape Design Statement have been prepared by Park Hood Landscape Architects and included with this application. The Design Statement provides details on the quantum, functionality and quality of public open space. Please refer to the Landscape Plan and Design Statement for further details.

3.4 Provision of Landscape plan clearly delineating communal and private spaces. Requiring consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children and security of access to communal amenity space.

A Landscape Plan and Design Statement have been prepared by Park Hood Landscape Architects and included with this application. The landscape design aims to create a sense of connectivity between spaces and promotes a sense of place and well-being within the development. This will be achieved through the use of high-quality materials and the establishment of a carefully considered planting scheme.

A coherent pedestrian footpath network ensures residents and guests can navigate around the site easily. This aims to encourage residents to interact and use the public open space created within the landscape design. The main public open space incorporates play spaces to ensure the landscape is interactive for children of all ages. Communal open space is provided at podium level and includes areas of hard landscape, tree planting, lawns, ornamental planting including seating / passive amenity areas, and areas for communal garden and outdoor working.

Tree and hedge planting help create areas of seclusion and privacy for the residents. The planting scheme uses a mix of native and ornamental tree and shrub species to create a seasonal landscape that is functional, whilst also being sympathetic to the surrounding environment.

Overall, the design will create high quality public open space including areas of the public realm, pocket parks, play facilities, areas for passive and active recreation and social/community interaction. Selected roof terrace gardens are included in selected areas to ensure that residents at all levels readily have access

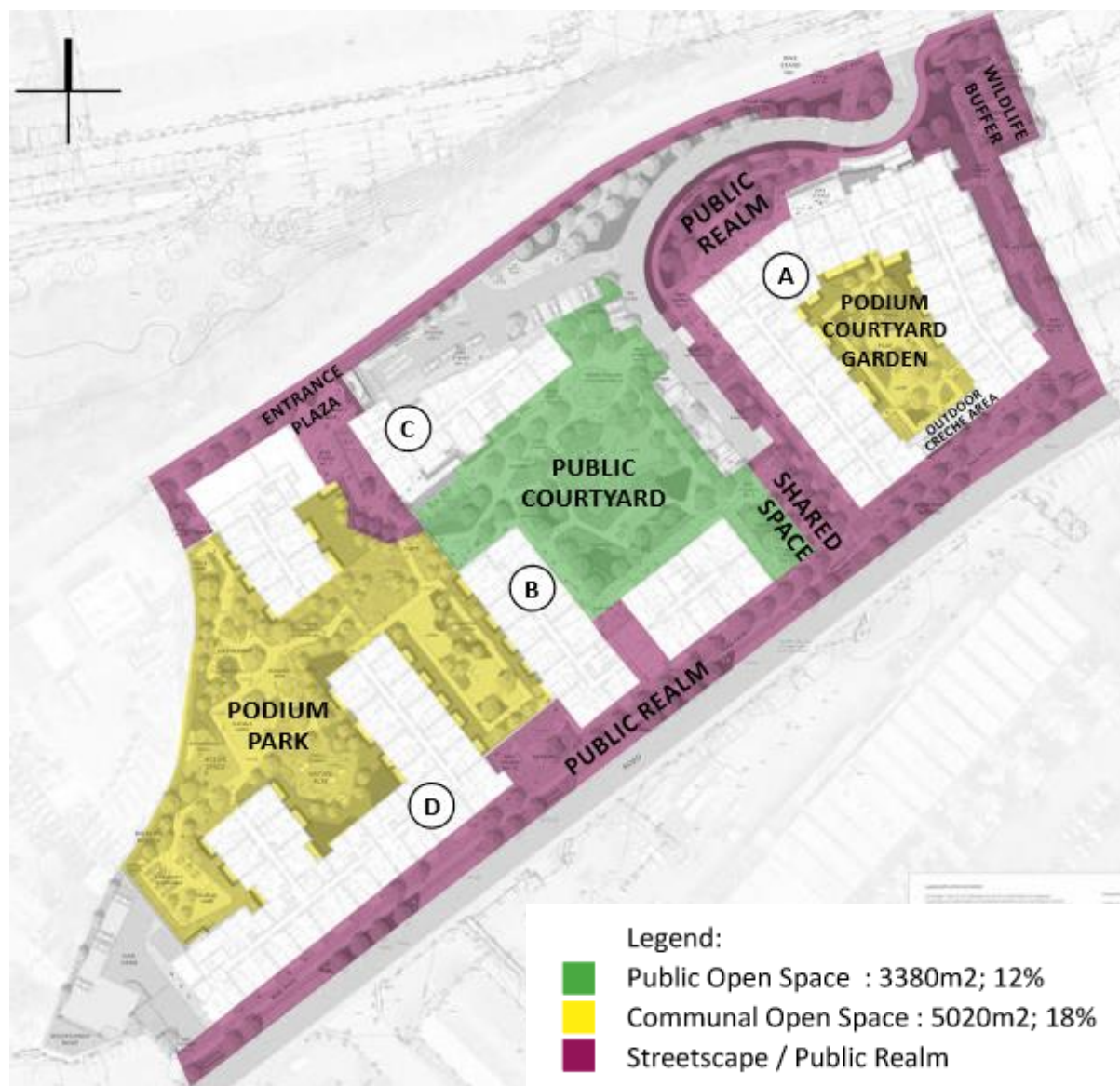


Figure 2.0 Extract from the Landscape Plan Design Statement showing the public open space, communal open space and public realm

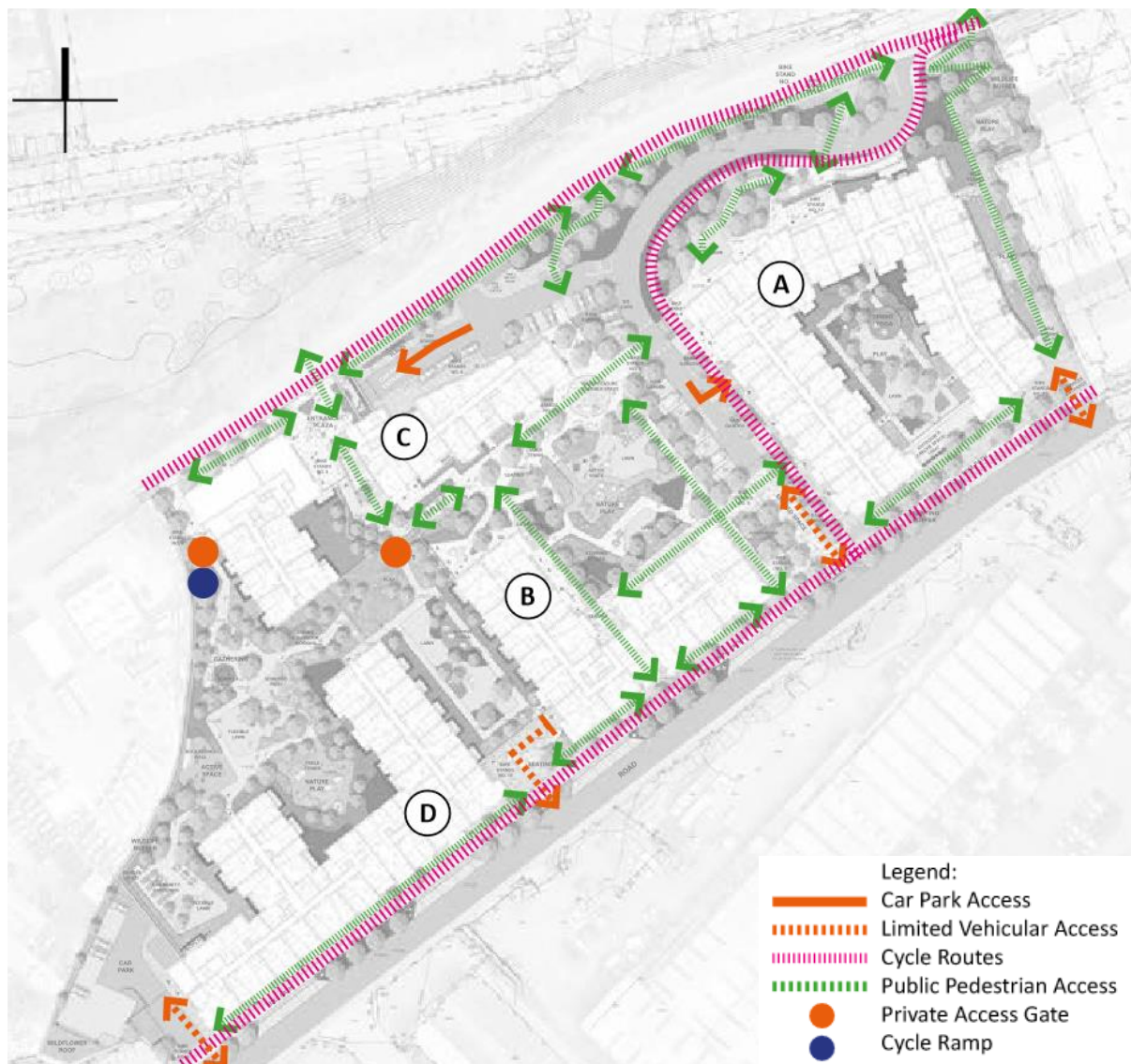


Figure 3.0 Extract from the Landscape Plan Design Statement showing the accessibility across the site

3.5 Provide cross-sections of the development detailing the change in levels from the site to surrounding areas and how this will be addressed in both the existing and future conditions.

The application is accompanied by a set of section drawings prepared by C+W O'Brien Architects which details the change in levels in both the existing and proposed scenarios. Please refer to Drawing Nos. PE18001-CWO-ZZ-ZZ-DR-A-001301, PE18001-CWO-ZZ-ZZ-DR-A-001300, PE18001-CWO-ZZ-ZZ-DR-A-001200, and PE18001-CWO-ZZ-ZZ-DR-A-001300 for further details.

3.6 The relationship of the proposed development with the development potential of surrounding lands as envisaged as part of the City Edge Project should be described.

The proposed development has been set back from the eastern, southern and western boundaries of the site to protect the development potential of the adjoining sites. Adequate setbacks from each block to the site boundary has also been provided to limit opportunities for overlooking and overshadowing any future developments to the east, south and west.

It is important to note that the City Edge Project is in its early stages and no master plan for the areas has been prepared. In the absence of a master plan, C+W O'Brien Architects has prepared a master

plan concept to see how this development would fit into the area whilst accommodating other developments in the area. A 3-dimensional model of the masterplan has also been prepared and included with this application.

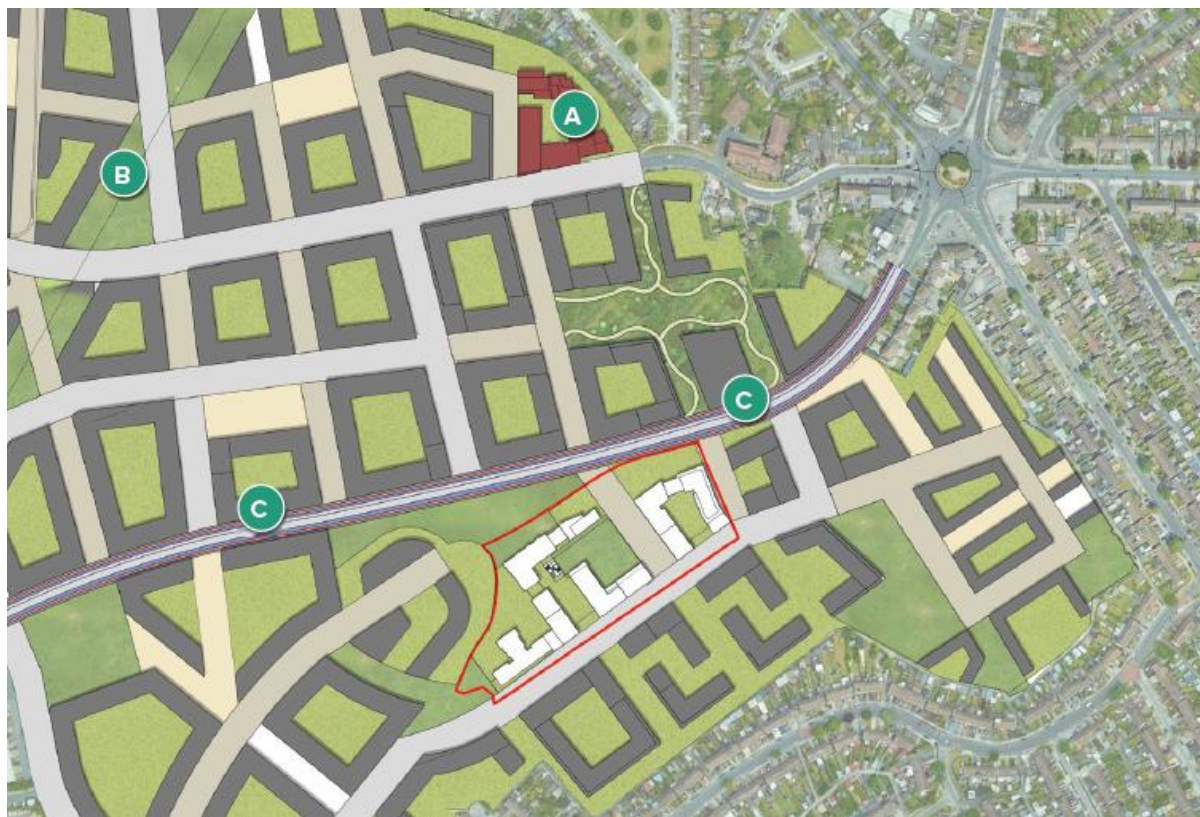


Figure 4.0 Masterplan for the area as prepared by C+W O'Brien Architects



Figure 5.0 3D model masterplan for the area as prepared by C+W O'Brien Architects



Figure 6.0 3D model masterplan for the area as prepared by C+W O'Brien Architects

The application is accompanied by an Architectural Design Statement prepared by C+W O'Brien Architects, and a Landscape Plan prepared by Park Hood Landscape Architects. Both documents describe the relationship of the proposed development with the development potential of the surrounding lands as envisaged as part of the City Edge Project.

3.7 Provide drawing/plan annotating separation distances between all windows and balconies terrace areas, to surrounding areas.

The application is accompanied by drawings and/or plans that annotate the separation distances between all windows and balconies/terrace areas to the surrounding areas, prepared by C+W O'Brien Architects. Please refer to Drawing No. PE18001-CWO-ZZ-ZZ-DR-A-001020 for further details on separation distances between all windows and balconies terrace areas, to surrounding areas.

3.8 Daylight, Sunlight, and Overshadowing Assessment

The application is accompanied by a Daylight and Sunlight Report, prepared by 3D Design Bureau. This report includes a sunlight/daylight/overshadowing assessment of the proposed development as well as the potential impact on surrounding properties. The Assessment concludes as follows:

This assessment has determined that the external amenity spaces of the proposed development would be capable of receiving adequate levels of sunlight.

Finally, future occupants will enjoy good levels of daylight within the vast majority of the proposed residential units with access to well lit, shared internal amenity areas.

3.9 Details of all materials proposed for buildings, open spaces, paved areas, boundary and landscaped areas.

The Architectural Report and the sections and elevations included in C+W O'Brien Architects architectural drawing set indicate the materials and finishes proposed for the buildings and boundary treatments. Details of materials proposed for open spaces, paved areas and landscaped areas, are included in the Landscape Report and associated plans, prepared by Park Hood Landscape Architects.

3.10 Details of waste storage and collection.

The application is accompanied by an Operational Waste Management Report (OWMP), prepared by AWN Consulting. The location of waste collection facilities within the development is also included in the architectural drawings prepared by C+W O'Brien Architects.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed residential development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations ¹, *Environmental Protection Agency Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*' ⁴, The South Dublin County Council (SDCC) *South Dublin County Council Household & Commercial Waste Bye-Laws (2018)* ⁵. In particular, this OWMP aims to provide a robust strategy for storing, handling, collection and transport of the wastes generated at the site.

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

The South Dublin County Council Roads Department raised several concerns in their report to An Bord Pleanála as follows:

- Masterplan required to ensure development fits in with future development
 - Location of access road from Greenhills Road should be cognisant of Bus Connects proposals for the area
 - Clarify vehicular access via southern road
 - Alignment of access to the southern road in the western part of the site should be refined
 - Recommendation of undercroft or underground parking
 - Swept path analysis should be prepared
 - Show loading bays, set down spaces for commercial units
 - 10% of spaces should be electric
 - Provide a taking in charge map
-
- A masterplan has been prepared by C+W O'Brien Architects.
 - The proposed entrance has been designed with Bus Connects in mind and will not hinder any Bus Connects plans for the area.
 - Two vehicular access points on the southern boundary are for emergency vehicles only.
 - Majority of parking is found in undercroft parking areas.
 - Swept path analysis has been prepared by Lohan and Donnelly Consulting Engineers.
 - 10% of spaces have been provided as EV charging spaces.

For further details, please refer to the drawing pack prepared by Lohan and Donnelly Consulting engineers as well as the Traffic and Transport Assessment Report, Parking and Mobility Management Plan and DMURS Statement all of which have been prepared by Lohan and Donnelly Consulting Engineers as well as the Statement of Consistency and Planning Report prepared by Hughes Planning and Development Consultants.

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

With regards to Flood Risk, the following items have been addressed by Lohan and Donnelly Consulting Engineers:

- The Developer shall ensure that there are 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.

The issues raised by the Water Services / Drainage Division at the Planning Authority in the Planning Authority's Opinion on the development have been addressed in the Infrastructural Design prepared by Lohan and Donnelly Consulting Engineers. Further details of the Water Services / Drainage Division's request can be found in Appendix 1 of the Planning Authority's Opinion. In summary, they related to the use of petrol interceptors and the Qbar or greenfield run-off rate calculations and SAAR and soil value for the site.

3.13 Additional details and/or revised proposals in relation to comments from the Parks & Landscape Services / Public Realm Department at the Planning Authority.

The issues raised by the Parks Division at the Planning Authority have been addressed in the Landscape Plan and Landscape Design Statement prepared by Park Hood Landscape Architects. Further details of the Parks and Landscape Services request can be found in Appendix 1 of the Planning Authority's Opinion. In summary, they related to the following:

- Access to public open space from Greenhills Road
- More detail is required on the landscape plan
- Details of play provision required
- Details of SUDS features required
- overshadowing of the courtyard open space in blocks A1 & A2 and Block D & D1 - A microclimate the assessment shall be provided for all open spaces.
- The layout needs to clarify the type of open space and access
- routes (defined as public or communal for residents) and shall be designed accordingly. The applicant
- shall provide further details in this regard.
- All access points are required to have active frontage throughout and passive surveillance to provide
- welcoming functioning access routes.
- A Universal Accessibility Map shall be submitted to demonstrate that the development is inclusive to
- people of all abilities. This shall be accompanied by a movement strategy plan for cyclists and
- pedestrians.

3.14 Provision of Housing Quality Assessment

A Housing Quality Assessment has been prepared by C+W O'Brien Architects and included with this application. The proposed development complies, and indeed exceeds, with all the required standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

4.0 Conclusion

This report sets out how the various issues raised by An Bord Pleanála, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed Build-to-Rent residential development on the Former Chadwick's Site, Greenhills Road, Walkinstown, Dublin 12.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality residential development will be provided.

The proposed development has decreased in scale significantly since the pre-planning meeting with An Bord Pleanála. The proposed development now comprises 633 no. units, down from 704 no., while the maximum height on site has decreased to 12 no. storeys from 19 no. storeys. This reduction in unit and heights has resulted in a reduced massing and is considered to align with the objectives of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; and Urban Development and Building Heights Guidelines for Planning Authorities.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



Kevin Hughes MIPI
MRTPI Director
for HPDC.