

**ABP-313129-22 Residential development at Former Chadwicks Site, Greenhills Road, Walkinstown, Dublin 12**

**Introduction**

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

**Summary of Key Issues Arising**

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

- Principle – Having regard to the land use zoning in the current Development Plan and the preparation stage of the City Edge project, the principle of a mixed use land use at the subject site is in accordance with the Development Plan.
- City Edge and Bus Connects – significant changes are required to address the interface with the Bus Connects corridor.
- Use – concerns regarding the functionality and scale of the commercial units
- Visual impact – further information / details to be secured via condition
- Amenity – mitigation should be provided where there is a reduced amenity for the proposed apartments, aspect of apartments is unclear
- Open Space & Public Realm – Concern at the level of functionality of the open space and levels of accessibility/ function for the public and residents.
- Transportation: concerns in relation to the suitability of the access and the detail provided in the TTA.

**Proposed Development**

The proposed development consists of:

(i) Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.;

(ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows:

- (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height.
- (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height.
- (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height.

- (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces;
- (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C;
- (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A;
- (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m;
- (vi) the construction of 3 vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road;
- (vii) provision of 424 car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle spaces at ground floor level parking area within Blocks C and D;
- (viii) provision of 1363 bicycle parking spaces comprising 1035 residents' bicycle spaces, 5 accessible bicycle spaces and 7 cargo bicycle spaces in 9 bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 visitors' bicycle spaces located externally at ground floor level throughout the development;
- (ix) provision of outdoor communal amenity space (5,020sq.m) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels; provision of a communal amenity roof garden in Block C with seating area and planting (176sq.m); and inclusion of centrally located public open space (3,380sq.m) adjacent to Blocks B and C comprising grassed areas, planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm;
- (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to facilitate the development.

This application is accompanied by an Environmental Impact Assessment Report (EIAR). The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant Development Plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes the relevant Development

Plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.

### **Procedural Background/Pre-Planning History**

**SHD1SPP011/19** Demolition of a number of existing low-rise obsolete industrial units and the construction of a residential development, comprising 7 no. 5-7 storey blocks accommodating 514 no. residential apartments, a creche, a gym, a play area, office space, laundry, car parking, secure bicycle storage for residents and public and private amenity space.

**SHD1SPP002/21** Demolition of the existing warehouse buildings and the construction of 4 blocks ranging in height from 5-12 storeys providing 645 'Build-to-Rent' apartments, a 230sqm creche, 925sqm of commercial space, a cafe/restaurant and internal communal amenity space.

**SHD2ABP-310421-21** Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m; (vi) the construction of 3 vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road;(vii) provision of 424 no. car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle

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### **Statutory Requirements of this Report**

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

1. A summary of the points raised in the submissions received by An Bord Pleanála on the application.
2. The Chief Executive's view on the effects of the proposed development on the proper planning and sustainable development of the area and on the environment, having regard to matters specified in Section 34(2) of the Planning and Development Act, 2000 (as amended) and submissions received by An Bord Pleanála on the application.
3. A summary of the views of the relevant elected members on the proposed development as expressed at a meeting of Rathfarnham/Templogue/Firhouse/Bohernabreena Area Committee held on 10<sup>th</sup> May 2022.
4. The Planning Authority's opinion as to whether the proposed strategic housing development would be consistent with the relevant objectives of the development plan or local area plan, including a statement as to whether the Planning Authority recommends to An Bord Pleanála that permission should be granted or refused, together with the reasons for its recommendation.
5. Conditions of permission
  - (i) Where the Planning Authority recommends that permission be granted or refused, the planning conditions and reasons for them that it would recommend if An Bord Pleanála grants permission.

## **Key Statistics for Proposed Development**

### **633 Residential units (all apartment):**

#### **Apartments**

- 292 one-bedroom apartments (46.1%);
- 25 two-bedroom apartments (3.9%);
- 255 two-bedroom apartments (40.3%);
- 61 three-bedroom apartments (10%)

**Site Area:** stated as 2.79ha

**Net Density:** 226.9 units ha.

**Height:** 5-12 storey.

**Dual Aspect apartments:** 47%

**Public Open Space:** 12%

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

The subject site is known as the Former Chadwicks Site which is located south of Greenhills Road, Walkinstown, Dublin 12. It is located adjacent to the Greenhill and Ballymount Industrial Estates and surrounded by industrial lands with similar style large sheds and adjacent yards for business purposes. There are existing disused industrial units on the subject site which are subject for demolition. There are also a number of existing vehicular access points to the site. There is a total change in levels of approximately 6m – the highest point on Greenhills Road sits at about 63m OD and the lowest point is towards the southern boundary road and sits at about 57m OD.- The significant majority of this fall is between the northern edge of the site and Greenhills Road.

A Quality Bus Corridor is proposed, as part of Bus Connects, to run along Greenhills Road, north of the site. This will link with Tallaght and the city centre. There are existing bus stops located on either side of the site along Greenhills Road, and along St. James Road to the south. Walkinstown Roundabout is located approximately 300-400m north east of the site which provides a number of services and amenities for the surrounding area.

#### **Site Area:**

Site area is stated as 2.79ha

#### **Site Visits:**

Various site inspections have taken place in 2021/2022.

#### **Zoning:**

The site is subject to zoning objective ‘REGEN’ – ‘*To facilitate enterprise and/or residential-led regeneration*’.

#### **SEA Sensitivity Screening:**

No overlap

### **Consultations:**

- Roads Department – No objection, subject to conditions.
- Environmental Services (Water Services) – No objection, subject to conditions.
- Parks and Landscape/Public Realm Department – No objection, subject to conditions.
- Irish Water – No report received.
- Housing Strategy - No objection, subject to conditions.

### **Representations/Submissions**

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

- Development is within the River Camac catchment. Concerns regarding AA screening - The concept or idea of the Camac River acting as a type of buffering mechanism, or part of any mitigation measures to protect the SAC or SPA would not be considered by IFI.
- If there is any potential for deleterious matter to enter the Camac or Poddle River systems during the construction phase through the surface water system or by any other means this should be acknowledged and mitigated against in a site-specific Construction Environmental Management Plan (CEMP).
- The CEMP should adopt all recommended measures contained within Chapter 17.0 included in Volume II of the EIAR along with those outlined within the CEMP.
- A comprehensive and integrated approach for achieving stream protection during construction and operation (in line with international best practice) should be implemented. Construction works must be planned in a manner which prevents extensive tracts
- Should development proceed, best practice should be always implemented in relation to any activities that may impact surface water (streams and rivers). Any indirect discharges to surface streams present on or near the site must not impact negatively on the system.
- All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.
- It is essential that the receiving foul and stormwater infrastructure has adequate capacity to accept predicted volumes from this development during construction and post-construction phases with no negative repercussions for the quality of any receiving waters.
- Ringsend WWTP is currently working at or beyond its design capacity and won't be fully upgraded until 2023. It is essential that local infrastructural capacity is available to cope with increased surface and foul water generated by the proposed development in order to protect the ecological integrity of any receiving aquatic environment.
- The Department of Housing, local Government and Heritage have recently published the following interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document which should be considered when designing drainage systems.
- Board should refuse permission that has to be made referencing the Building Height Guidelines (2018) and Apartment Guidelines (2020). These guidelines are not authorized by Section 28(1c). guidelines are also contrary to the SEA directive.
- Density materially contravenes development plan. This cannot be justified by reference to s.37(2) of the Planning and Development Act or s28 guidelines.
- Housing mix, Public open space, Building height and visual impact, car parking, childcare, architectural conservation area, materially contravene CDP and / or LAP
- Proposed development does not comply with building height guidelines.
- Board cannot grant permission under s37(2)(b) as it is not of national or strategic importance.

- Application documentation does not comply with the Planning and Development Regulations 2001 in terms of the particulars provided with the application in respect of the proposed development. Also does not comply with EIA Regulations, EIA Directive and Planning and Development Act 2000
- Application documentation has not demonstrated sufficient infrastructure for the proposed development
- Proposed development materially contravenes CDP / LAP / Masterplan / Urban Design Framework (Policy objectives SS02a and PM17). This material contravention cannot be justified in terms of s.37(2) of the Planning and Development Act 2000.
- If the Board purports to justify the non-compliance with the objectives of the LAP, CDP, masterplan and / or Urban Design Framework – same will amount to an unlawful breach of the SEA directive.
- EIA screening is deficient and does not permit an assessment of the potential environmental impacts of the proposed development.
- Due to the nature and development of the site and location of the proposed development adjacent to a protected habitat, it should have been subjected to full EIA
- Board lacks ecological and scientific expertise to examine the EIA screening as required under Article 5(3)(b) of the EIA directive.
- Insufficient information on bird and bat flight lines/collision risk for the purposes of the EIA screening report, AA screening report and the Height Guidelines – relevant assessments cannot be carried out by Board in absence of same. EIA screening does not considered impact of same on biodiversity – pursuant to Article 3 of the EIA Directive. This should address impacts on the Habitats and Birds Directive.
- EIAR does not assess cumulative impacts appropriately
- Population and Human health chapter of the EIAR is inadequate
- Impact on biodiversity and human health is inadequate and lacking detail
- EIA screening looks at an incomplete description of the proposed development
- Proposed development does not comply with BRE guidelines
- Appropriate Assessment Screening: information is insufficient and not based on appropriate scientific expertise, as such, cannot comply with habitats directive and relevant provisions of national law under the Planning and Development Act. Competent Authorities can only authorise activities on a protected site only if they have made certain that it will not adversely effect the integrity of the site.
  - o The Screening Assessment does not provide sufficient reasons, findings – the conclusions do not identify a clear methodology in respect of the protected sites ‘screened out’
  - o AA screening does not consider construction impacts
  - o Insufficient surveys have been carried out (bird collision / flight risks)
  - o AA screening fails to identify all potential impacts on bird species
  - o No regard given to cumulative impacts
  - o Insufficient site specific surveys
- Brennans Bakers are neighbours of the SHD site and the proposed development could potentially seriously injure operations at the facility, which has been operating in this location for 45 years. Bakery is a significant employer in the area, employing over 180 direct employees and engaging 170 distributors. The area proposed for redevelopment is zoned for industrial purposes primarily and it’s located in an established industrial area.

- Placing residential development in an industrial area is completely incongruous and out of keeping with the surroundings
- It is an important principle of practice to segregate uses, such as industrial, from more sensitive uses. New residents may object to established industrial uses – concerned there will be noise complaints that could lead to enforcement action on the bakery. Report from Amplitude Acoustics outlines these concerns in detail
- Transport Infrastructure Ireland: No observations to made
- National Transport Authority:
  - Bus connects – Subject site is part of corridor 9. The proposed SHD should not compromise this. In the event of a grant of permission a condition is recommended seeking liaison with NTA in this regard.
  - Access – The applicant is proposing new access off Greenhills Road in close proximity to other entrances which will be intensive in terms of vehicular trips. This has the potential to result in significant traffic increase on the Greenhills Road which could negatively impact on cycle and bus operations along this proposed core bus corridor. It is noted that a junction traffic analysis has not been provided within the applicant’s Transport Assessment for the proposed priority junction off Greenhills Road. Therefore, no evidence has been provided to demonstrate that the proposed design caters for the proposed trip generation i.e., to demonstrate that the entrance does not require a signalised junction / dedicated right-turn lane such that bus priority is not compromised. From a BusConnects perspective, it would be preferable to provide vehicular access/egress to this development from the Greenhills Industrial Estate Road. Consideration should be given to a cycling and pedestrian access only off Greenhills Road which may be more favourable in terms of providing safe access to the development for cyclists and pedestrians. In connection with the above, it is considered that a development proposal of this scale may necessitate the provision of a new Bus Stop to serve the growing population. Further consideration of safe and convenient access to public transport stops should be demonstrated including provide for a bus stop.
  - Road Widening and associated infrastructure - The Tallaght / Clondalkin CBC Scheme requires widening of the existing Greenhills Road for a length of approximately 95m at this location including a retaining wall structure north and south of the Greenhills Road. It is not clear that sufficient consideration has been given to accommodate the future widening of Greenhills Road in line with the current proposals for the Tallaght/Clondalkin to City Centre CBC scheme. Similarly, any associated retaining infrastructure required within the boundary as part of proposed the new priority junction off Greenhills Road does not appear to have been incorporated to reflect the future CBC Scheme. (See Foundations Structure and Key Plan Drawing 20189-LDE-ZZ-ZZ-DR-SC-3S01 submitted as part of the planning application). Clarification is required regarding proposed boundary treatments and the extent of proposed retaining structures. The potential impact of construction revised loading in conjunction with the BusConnects proposals over the existing 1200mm diameter watermain should also be considered.
  - Car Parking - The NTA notes the proposed provision of 398 car parking spaces plus 21 no. disabled spaces to serve the 633 residential units, giving a ratio of 0.66 per unit. While this quantum would fall within the development plan standard of a



maximum 0.75 per 1 bed unit and 1 per 2 bed unit (Zone 2), the NTA requests that An Bord Pleanála consider the appropriateness of providing such a number, in particular in the context of section 4.21 of the *Design Standards for New Apartments* guidelines which states that for proposed residential development in ‘Intermediate Urban Location’, ‘*the Planning Authority must consider a reduced overall car parking standard.*’ Given the location close to a high-frequency bus corridor in the region, and the associated low level of demand for car use anticipated, a more restrictive provision could be applied. This would also reduce the negative impact of traffic generated by the development on the surrounding road network.

- Conditions – recommended addressing concerns in event of a grant.

### **Summary of Views Expressed by the Elected Members**

A meeting of members of the Rathfarnham/Templogue/Firhouse/Bohernabreena Area Committee was held on 10th May 2022. The following comments were made by the Councillors at that meeting:

#### **Cllr. Collins:**

- Development will impact the implementation of the City Edge;
- Concern in relation to the internal amenity of the proposed units;
- Concerns in relation to the daylight and sunlight access for the open space areas and residential units;
- Impact on the community infrastructure including schools spaces and community infrastructure;
- Concerns in respect of the proposed building height, especially in respect of the Greenhills Road;
- Build to rent is unacceptable;
- Traffic impact on the surrounding area;
- Concerns in relation to the density of the proposed development;

#### **Cllr. Hagin-Meade:**

- Green infrastructure;
- An Bord Pleanála hasn’t provided the third-party submission in time to be reviewed by members, which is unacceptable;
- Impact of the proposed height on the surrounding area;
- Cycle provision is not acceptable;
- Concern in relation to the air quality, what would be done to ensure this would be acceptable;
- Concern in relation to the childcare facility;
- The provision of 3 beds is not acceptable;
- What community space is provided;

#### **Cllr. Kearns**

- An Bord Pleanála hasn’t provided the third-party submission in time to be reviewed by members, which is unacceptable;
- The development will impact the implementation of the City Edge;
- Build to rent is unacceptable;
- Concerns in relation to the density of the proposed development;
- Relationship with the adjoining industrial unit;

- Concerns in relation to access to public open spaces as access to the Tymon Park limited;
- Provision for children is not acceptable, especially in relation to the relationship with Greenhills Road;
- Provision must be made of EV parking;
- Development motivated by profit;
- Development would allow overlooking adjoining properties;

#### Cllr. Bailey

- The development is premature and will impact the implementation of the City Edge;
- Traffic impact on the surrounding area;
- Cycle provision and safety;
- Provision must be made of EV parking;
- Impact of the proposed height on the surrounding area;
- Lack of public transport access;
- The design is of a poor quality;
- The development of a very poor amenity;
- Who would be responsible for the creche and open space area;
- Part V provision and unit mix;

#### Cllr. O'Donovan

- An Bord Pleanala hasn't provided the third-party submission in time to be reviewed by members, which is unacceptable;
- Concerns in relation to the daylight and sunlight impact;
- The development is premature and will impact the implementation of the City Edge;
- People won't stay in the development long term;
- Impact on the community;
- The development would be a blight on the City Edge project;

#### Cllr. Murphy

- Impact the implementation of the City Edge;
- Relationship with Seveso Sites;
- Poor quality design;
- Inadequate bin storage provision;
- Play space provision is not adequate;
- Development is considered to be piecemeal development;

#### Cllr. Edge

- Reiterated the comments made by other councillors;
- An Bord Pleanala hasn't provided the third-party submission in time to be reviewed by members, which is unacceptable;
- Impact the implementation of the City Edge;

#### Cllr. Mc Crave

- Against the proposed development
- Reiterated the comments made by other councillors;

**Relevant Planning History:**  
**Planning History**

**Application site**

**SHD2ABP-310421-21** Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m; (vi) the construction of 3 vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road;(vii) provision of 424 no. car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle spaces at ground floor level parking area within Blocks C and D;(viii) provision of 1363 bicycle parking spaces comprising 1035 residents' bicycle spaces, 5 accessible bicycle spaces and 7 cargo bicycle spaces in 9 bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 visitors' bicycle spaces located externally at ground floor level throughout the development;(ix) provision of outdoor communal amenity space (5,020sq.m) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels; provision of a communal amenity roof garden in Block C with seating area and planting (176sq.m); and inclusion of centrally located public open space (3,380sq.m) adjacent to Blocks B and C comprising grassed areas,

planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm; (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to facilitate the development. This application is accompanied by an Environmental Impact Assessment Report (EIAR). The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant Development Plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes the relevant Development Plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.

Adjacent Site to east

SD12A/0159. Retain car dismantling facility; retain necessary sheds; retain car body crusher (some existing unauthorized sheds will be demolished); erect new entrance and road boundary fence; install CP20BP interceptor; necessary drainage and associated site works.

Grant Permission and Grant Retention

Adjacent Site to south

SD12A/0069. 4 no. 45 tonne flour silos and all ancillary works.

Grant Permission

SD11A/0159. Two no. 10,000 litre rainwater harvesting tanks.

Grant Permission

SD09A/0212. Replace 2 existing 12.5 tonne ingredient silos with 2 new 30.0 tone ingredient silos to similar design and all ancillary works.

Grant Permission

SD05A/0155. Extension to existing store and two new 12 metre high silos.

Grant Permission

SD03A/0925. (1) Alteration and conversion of silo building to rack store and first floor offices.

(2) I.B.C. storage building. (3) Switchroom extension at side of bakery.

Grant Permission

SD01A/0311. Demolition of part of building and ESB substation, construction of new gable wall and internal alterations, construction of new ESB substation, security fence and gates at Unit 11 Greenhills Industrial Estate and for new building linking Unit 11 Greenhills Industrial Estate to Brennan's Bakery

Grant Permission

S99A/0751. Two silos.

Grant Permission

**Recent Relevant Enforcement History**

**S1124 OPERATION OF A PALLET SHREDDING BUSINESS. Closed**

**Relevant Government Policy**

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

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

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

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

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

***Urban Development and Building Height Guidelines for Planning Authorities***, 2018

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Policy CS6 SLO 1*

*Policy H6 Sustainable Communities*

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

*Policy H7 Urban Design in Residential Developments*

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

*Policy H8 Residential Densities*

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

*Policy H9 Residential Building Heights*

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

*Policy H10 Mix of Dwelling Types*

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

*Section 2.3.0 Quality Residential Development*

*Policy H11 Residential Design and Layout*

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

*Policy H12 Public Open Space*

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

### *Policy H13 Private and Semi-Private Open Space*

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

### *Policy H14 Internal Residential Accommodation*

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

### *Policy H15 Privacy and Security*

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

### *Policy H16 Steep or Varying topography Sites*

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

## *Section 3.13.0 Open Space Management & Use*

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

### *Policy C12 Open Space*

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

### *Policy UC6 Building Heights*

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

## *Section 6.3.0 Walking and Cycling Policy TM3 Walking and Cycling*

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

## *Section 6.4.3 Road and Street Design Policy H12*

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

*Section 6.4.4 Car Parking Policy TM7 Car Parking*

*Section 7.1.0 Water Supply & Wastewater Policy IE1 Water & Wastewater*

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

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

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

*Section 7.3.0 Flood Risk Management Policy IE3 Flood Risk*

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

*Section 8.0 Green Infrastructure Policy G1 Overarching*

*Policy G1 Green Infrastructure Network Policy G3 Watercourses Network*

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

*Section 9.3.1 Natura 2000 Sites Policy HCL12 Natura 2000 Sites*

*Section 10.0 Energy*

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

*Section 11.2.0 Place Making and Urban Design Section 11.2.1 Design Statements*

*Section 11.2.2 Masterplans*

*Table 11.17 Masterplan Considerations*

*Section 11.2.6 Residential Communities Section 11.2.7 Building Height*

*Section 11.3.1 Residential*

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



(viii) *Clothes Drying Facilities*

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

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

*Section 11.4.2 Car Parking Standards*

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

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

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

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

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

*Section 11.7.2 Energy Performance in New Buildings*

*Section 11.8.1 Environmental Impact Assessment Section 11.8.2 Appropriate Assessment*

**An Bord Pleanála Direction**

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

1. 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;  
The treatment of the frontage to Greenhills Road in both its current and anticipated future form; and
- iv Connectivity through the site.

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

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 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 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.

### **Assessment**

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

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

- Zoning and Council Policy and Naas Road Masterplan/Framework Plan, City Edge
- Commercial units
- Density
- Building Heights
- Unit Mix
- Tenure
- Part V
- Design, Layout and Visual Amenity
  - o Road frontage / interface with Bus Connects
  - o Access points
  - o Impact on adjacent lands
  - o Visual impact
  - o Materials
- Residential Amenity
  - o Standard of Accommodation
  - o Residential amenity – Overlooking and Overbearing
  - o Residential amenity – Daylight, sunlight and overshadowing
  - o Environmental Health
- Transport, Parking and Access
- Landscaping, Open Space and Public Realm
- Drainage and Water Supply
- Archaeology
- Construction and Waste Management

- Energy and Climate Change
- Ecological Surveys
- Appropriate Assessment and Environmental Impact Assessment

### **Zoning and Principle of Development**

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

The site is subject to zoning objective 'REGEN' – 'To facilitate enterprise and / or employment-led regeneration'.

Section 1.8.0 of the Development Plan establishes phasing priorities for the delivery of development commensurate with infrastructure. In relation to REGEN lands, it states the following:

'(4) Underutilised industrial lands that are close to town centres and transport nodes are designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led regeneration). These lands are serviced and offer significant potential for more intensive employment and/or residential development and associated uses. The transition from underutilised industrial areas is likely to occur on an incremental basis and may need to be supported by an economic regeneration strategy. It is envisaged that not more than 50% of these areas will come forward for housing during the period 2016-2022.'

*Policy Objective CS6 SLO 1 provides for the following (Subject f Variation no. 3):*

'To initiate a plan-led approach to the sustainable regeneration of the brownfield lands in the Naas Road/Ballymount REGEN zoned lands. The plan-led approach will include the preparation of a masterplan in 2019 with a view to preparing a Local Area Plan or another appropriate mechanism for the Regeneration (REGEN) and Local Centre (LC) at Walkinstown zoned lands. The masterplan will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework Plan (2010).'

The proposed uses consist of residential, commercial, and childcare. The following uses are permitted in principle within the zoning:

- Childcare Facilities
- industry-Light
- Live-Work Units
- Office-Based Industry,
- Office less than 100 sq.m,
- Offices 100 sq.m –1,000 sq.m
- Offices over 1,000 sq.m (in certain circumstances)
- Residential
- Shop-Local

The following are open for consideration:

- Industry-General
- Shop-Neighbourhood

ABP Opinion requested the following additional information:

*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.*

The subject site falls within the boundary of the City Edge Project lands. The City Edge Project is a joint initiative between South Dublin County Council and Dublin City Council to create a new liveable, sustainable and climate resilient urban quarter at the western edge of the City. The project area covers 700 hectares of lands within the Naas Road, Ballymount and Park West areas and has the potential for 40,000 new homes and 75,000 jobs. This area is identified in the National Planning Framework (NPF) as a part of Dublin that is currently underutilised and has the potential to achieve Government policy in terms of compact growth, at scale.

The subject project has been awarded €920,000 in URDF funding by the Department of Housing Local Government and Heritage. On foot of this, a non-statutory Strategic Framework has been prepared jointly with Dublin City Council (DCC) to set out a high-level strategy for the regeneration of the City Edge area over the coming decades to 2070. The Framework was informed by a detailed baseline study of the area; the outcome of public consultation carried out during September/October 2021; ongoing stakeholder engagement including with landowners, businesses, State agencies and service providers; and a series of background studies including housing, transport, economy and environmental reports.

The Strategic Framework was noted at a meeting of South Dublin County Council on 9th May 2022 and will be put before the June meeting of Dublin City Council, also for noting.

The purpose of the Strategic Framework is:

- To set out a high-level strategy for the regeneration of the City Edge area including an overarching vision, strategic objectives and spatial framework;
- To plan for the delivery of strategic infrastructure including streets, parks, public transport and utilities;
- To outline a series of priority actions in the areas of legislation, policy, funding and infrastructure to facilitate the future development of the City Edge area;
- To seek the support of government departments and state agencies including alignment of relevant policies and programmes and allocation of funding in order to deliver the City Edge vision;
- To provide a context for the preparation of a statutory plan which will set out more detailed guidance for the future development of the area.

On foot of the identification of the City Edge Lands within the South-Western Development Corridor under the MASP contained in the Eastern and Midland Regional Assembly's RSES (2019), the local policy impetus to prepare the Strategic Framework arises from objective CS6 SLO 1 contained within the Core Strategy of the current South Dublin County Development Plan, 2016-2022.

The SDCC Delivery Team report on this application states that *'the Framework is a non-statutory document, the contents reflect the policies and objectives of the current Development Plan and the new Draft Development Plan 2022-2028, which will become operational later this year. The advice set out below is made in that context. The Framework will be followed by a statutory plan, which is likely to comprise a transboundary plan prepared jointly with Dublin City Council.*

*Further to the purpose of the Strategic Framework to inform a statutory plan at the next stage of the City Edge Project, it is advised that the non-statutory Strategic Framework does not comprise*

*a framework for development consent and should not be treated as such. It is important, however, that development is not deemed to be premature pending the preparation and adoption of such a statutory plan particularly with reference to the objectives and provisions contained in the South Dublin County Council Development Plan that are relevant to the City Edge Project as well as relevant regional transport policy and projects.*

*Where appropriate, the Planning Delivery Team prepares reports for the Development Management Section to inform the assessment of planning applications within the boundary of the City Edge Project Area. The Delivery Team report has regard to the considerations and context set out above including the non-statutory nature of the Strategic Framework; the fact that it reflects Development Plan policies and objectives; and ensuring development is not premature pending the preparation of a statutory plan”.*

The Delivery Team has made a number of specific comments regarding the proposal which are discussed later in this report.

Given the above and noting the site characteristics and site location in the context of the City Edge project area, the Planning Authority is of the opinion that the proposed development would not prejudice the delivery of the City Edge project in principle.

### Conclusion

Having regard to the site characteristics and site location in the context of the City Edge project area, the Planning Authority is satisfied that the proposed development will not adversely compromise the future delivery of co-ordinated cohesive redevelopment on the adjoining lands and the overall City Edge project. As such, it is considered that the principle of development is in accordance with the current statutory policy context and the development of the subject site is not considered to be premature pending a statutory plan.

### **Commercial Units**

The Delivery Team has made detailed comment of the commercial units in light of the location within the City Edge.

The proposed development includes for 10 no commercial units totalling 1,330 sq.m. with 5 no. units at ground floor level of Blocks B and D fronting the local access lane to the rear, 2 no units located at the ground flood of Block A and fronting an internal access road and 2 no. unit fronting the Greenhills Road at second floor level of Block C.

The Architectural Design Statement submitted with the subject application described these units as “Commercial/Incubator Space” to “cater for a wide variety of small businesses, from artists to upholsterers to office or technology firms”. It is further stated that “potential uses can range from mixed light industrial, storage, offices, innovation, workshops and incubator spaces which enable companies to scale and stay locally to achieve their ambitions”.

The type of uses envisaged are considered to be in keeping with the zoning objective of the application site and County Development Plan policy and objectives. The extent of commercial floorspace is considered, however, to be insufficient to facilitate enterprise and/or residential-led regeneration in the context of the quantum and the proportion of commercial floorspace compared to overall floorspace, which equates to 2% compared to 97% residential.

Furthermore, the limited size (average 130 sq.m.), depth (7 - 9 metres) and floor to ceiling height (3.6 metres) of the units proposed is not considered sufficient to cater for the suggested light

industrial, storage, innovation and workshop uses and would not offer a range of units sufficient to cater for the variety of uses suggested. It is therefore recommended that, in the event of a grant of permission, a condition be attached to require detailed approval for:

- The two adjoining commercial ground floor units in Block D to be amalgamated at ground floor level to create one commercial unit. All commercial units in this block should be increased in height by incorporating the space from the residential units immediately above and the units should be expanded to the rear into the servicing yard
- The two adjoining commercial ground floor units in Block A to be amalgamated with each other and with the three first floor apartment units above and deeper into the servicing space behind to create one commercial unit (if made two storey, as opposed to single storey or single storey with mezzanine, etc.) (these first-floor units are relatively isolated from other apartments by stair/floor voids and corridors to limit potential impacts on residential amenity at first floor level).

### **Density**

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

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

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

The Planning Authority stated the following at Stage 2 “*In the absence of the Naas Road Masterplan, the acceptability of proposed density/ intensity on this site cannot be fully assessed by the Planning Authority. The proposed density of 255.27 in its current context, without direct access to amenities, lack of open space in the area, the current uses in proximity to the site, the lack of quality connectivity with streets for pedestrians/cyclists and constrained vehicular access/egress is not considered to be appropriate in this instance*”.

As stated above, the City Edge project/ ongoing plan making has no statutory status and the Delivery Team has made no comment on the proposal in this regard.

The principle of increased density at this location is considered acceptable, subject to detailed consideration of the design of the proposed development. The Architectural Design Statement sets out the 12 principles, and these are discussed below.

Subject to the matters raised under design below, it is considered that an increased density is justifiable and in accordance with H8 Objective 2, given the location and proximate public transport routes and planned Bus Connects services.

## **Building Heights**

### **Policy H9 Residential Building Heights**

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

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

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

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

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

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

Section 5.1.5 of the Development Plan states that varied building heights are supported in urban centres and regeneration zones and will be important in creating a sense of place, urban legibility and visual diversity. Tall buildings that exceed five storeys will be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones based on approved Local Area Plans or SDZ Planning Schemes. It is noted that the subject site is not subject to an approved LAP or Planning Schemes and as such not in accordance with the locational criteria in the Development Plan for tall buildings.

The proposed development is seeking permission for buildings up to 12 storeys in height. It is noted that there has been a substantial reduction in height since the previous stage:

<b>Building</b>	<b>Previous stage</b>	<b>Current stage</b>
A	13 storeys maximum height of c40m to parapet	5-10 storeys maximum height of c30m to parapet
B	9 storeys maximum height of 27.6m to parapet.	8-10 storeys maximum height of c30m to parapet
C	19 storeys maximum height of 61.2m	8-12 storeys maximum height of c39m to parapet
D	13 storeys maximum height of c40m to parapet	6-10 maximum height of c31m to parapet

With the exception of the small 5 storey element, the proposal exceeds the prescribed tall building height as set out in Policy H9 Objective 4.

ABP opinion requested:

*‘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’.*

The Planning Authority consider that the applicant has addressed the above, through the reduction in height and the assessment in terms of the Building Height Guidelines, set out below.

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

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

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

*“In consideration of the above Specific Planning Policy Requirement, it is noted that there are a number of permitted developments within the surrounding area and in the South Dublin County Council administrative area more broadly which adopt increased building heights and densities in line with National and Regional Policy objectives. The proposed development included as part of this application ranges in height from 5 to 12 storeys in height, which is considered appropriate given the site’s surrounding context.*

*Upon review of the above guidelines, there is a strong emphasis on increasing building heights in suitable locations, such as the subject site. We also reiterate that the application site is also within close proximity to numerous high-capacity, high-frequency public transport facilities, including the Kylemore Luas Stop. Further to this, it is also noted that a number of high-frequency bus services operate along Greenhills Road and the Walkinstown Roundabout. In this context it is considered that the proposal meets the criteria for increased building heights as set out in the Building Heights Guidelines”.*

The Material Contravention Statement sets out the following:

- ***The site is well served by public transport –***  
*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 from the subject site or 6 minutes by bicycle and 20 minutes on foot.*

*As noted in the Traffic and Transport Assessment, there is sufficient capacity to serve this development.*

The Planning Authority concurs that the site is in an accessible location.

- ***Integrates into/enhances the character and public realm of the area –***

*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 was 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.*

*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 front directly and will contain two commercial units at street level as well as a public plaza. 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.*

*A Landscape Plan and Design Statement, a Visual Impact Assessment have been prepared and submitted with 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 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 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.*

The Planning Authority are of the opinion that the proposed development would significantly change the character of the area, changing it from industrial to residential. The Planning Authority is concerned regarding the interface with the Greenhills Road and that the applicant has not gone far enough in seeking integration with this road. The plaza to the north west is welcomed, but the Planning Authority are of the opinion that more innovative solutions should have been investigated, such as a light weight public open space / communal area at first floor, subject to agreement with Irish Water. A condition is recommended in the event of grant, requesting consideration of same.

- ***Positive contribution to place making (on larger sites) –***

*The proposed development makes a positive contribution to place-making, incorporating communal open spaces and new commercial 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.*

*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. The proposed buildings step towards the boundaries to provide a softer integration with adjoining buildings.*

*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.*

The Planning Authority are of the opinion that the mix of uses has not gone far enough in terms of the provision of employment space, as indicated under the comments regarding the commercial units above. The applicant highlights the 12 storey element as having a wayfinding purpose, but the Planning Authority question whether this element is in the correct location. This could potentially moved towards the north west to achieve better integration with Bus Connects and the changes that would result on Greenhills Road. Whilst the open space receives sufficient daylight, the Planning Authority believe that the 12 storey element causes undue overshadowing. It is apparent that many of the buildings have been created with awkward, unnecessary angles and the Planning Authority would welcome a more regular building form. As discussed above, there are concerns regarding the interface with Greenhills Road.

At the scale of district/neighbourhood/street:

- ***Responds to its overall natural and built environment and makes positive contribution to the urban neighbourhood and streetscape.***

*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. 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.*

*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 the development will make a positive contribution to the streetscape.*

The Planning Authority believe the proposal makes a positive contribution to streetscape, however, as discussed above, there are particular concerns regarding the Greenhills Road frontage. The Planning Authority also have concerns regarding the access road from Greenhills Road. It is acknowledged that there is a change in levels and wayleave, however, the Planning Authority is of the opinion that the streetscape in this area could be improved. It is further noted that the existing northern boundary of the site, which incorporates the retaining wall for the Greenhills Road is currently overgrown and unkept. This wall is to be retained and would be a highly visible feature of the redeveloped site,

should planning permission be granted. It is considered vital that the landscaping scheme for the subject site, takes account of this element and provides a detailed design for the greening of this area. It is recommended that this should be secured by planning condition

- ***The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered –***  
*We note that this high-quality scheme provides adequate relief, the blocks proposed varying in height with a maximum height of 12 no. stories have been broken up. 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.*

The Planning Authority is of the opinion that the proposal is not substantially monolithic but are concerned that the design response since the previous stage has not evolved sufficiently.

- ***Proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the flood risk requirements –***  
*We note that the scheme will provide active surveillance of the 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.*  
*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.*  
*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.*

The Planning Authority notes the flood risk assessment.

- ***Makes a positive contribution to the wider improvement of legibility through the site or wider urban area within which the development is situated and integrated in a cohesive manner –***  
*The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area designated for regeneration. The provision of taller buildings at the site will facilitate wayfinding and contribute to a sense of place.*  
*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.*  
*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.*

The proposed development cannot immediately integrate with the surrounding development, due to the existing industrial uses. The Planning Authority has already set out its concerns regarding the wayfinding 12 storey element and interface with Greenhills Road. Noted that there is a good degree of overlooking.

- ***The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood –***

*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 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.*

*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.*

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

At the scale of the site/building:

- ***The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. –***

*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 a development. 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.*

*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.*

*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.*

The applicant has undertaken the relevant technical assessments. It is noted that the applicant states all apartments receive adequate daylight – it is noted from the assessment that not all rooms meet the required standard.

- ***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'***

*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.*

*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*

*The development has been assessed in accordance with BS EN 17037 and was found to be compliant.*

*Please refer to the Daylight, Sunlight and Overshadowing Analysis prepared by 3D Design Bureau and included with this application.*

The applicant has undertaken the relevant technical assessments.

- ***Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.***

*The recommended minimum for Average Daylight Factor (ADF) is based on the 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.*

*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.*

*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.*

*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.*

*Please refer to the accompanying daylight and sunlight report prepared by 3DDB for further information.*

The Planning Authority note the deviation from the standard. No rationale has been provided for this or compensatory measures. The proposal is entirely new build and further design solutions should have been investigated.

In terms of specific assessments:

- *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.*
- *A bat survey has been carried out by Enviroguide Environmental Consultants in preparing the Biodiversity Chapter of the EIAR. The survey found that no bats were present at the time of surveying and no evidence of bats living in the area were found.*
- *Enviroguide has examined the proposed building facades to determine their suitability 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.*
- *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.*
- *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.*
- *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.*
- *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.*
- *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.*

### Conclusion

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

### **Unit Mix**

At the previous stage, the Planning Authority was of the opinion that “*The mix of the apartments is heavily weighted in favour of one and two bed apartment units*”.

Section 11.3.1(i) of the CDP states that the mix of dwellings should contribute to the overall dwelling mix in the locality and that with the exception of student accommodation proposals that include a high proportion of one-bedroom dwellings (over 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area.

The proposed mix is:

- 292 one-bedroom apartments (46.1%);
- 25 two-bedroom apartments (3.9%);
- 255 two-bedroom apartments (40.3%);
- 61 three-bedroom apartments (10%)

This is a significant change from the previous stage, which proposed 52.3% 1bed units and 46.7% 2bed units.

In accordance with SPPR 8 of the Apartment Guidelines:

*“proposals that qualify as specific BTR development in accordance with SPPR 7: (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise”*

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

### **Tenure**

The proposed development comprises 10% units for social housing (Part V) and 90% Built-to-Rent units.

### Specific Planning Policy Requirement 7

*BTR development must be:*

*(a) Described in the public notices associated with a planning application specifically as a ‘Build-To-Rent’ housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;*

*(b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*

*(i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.*

*(ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.*

In relation to point A, the public notices for this application have identified the development as ‘Build-to-Rent’ development and a draft legal agreement has been submitted with the application. This agreement states that the development will be owned and operated by the Applicant for a minimum period of 15 years and during that time no units will be sold or rented separately during that time.

In relation to point B the development has been designed to include resident support facilities and resident services and amenities (totalling 1293sq.m.), including a co-working space, work space, W.C. at ground floor of Block A; gym, resident’s lounge, studio, work space, multi-function space at ground floor of Block B; games room, media room, co-working space, resident’s lounge, management office, W.C., parcel room at ground floor of Block C; creche facility; and landscaped courtyards including children's play spaces.

It is noted that the applicant has also provided a BTR justification report, which looks at the location / accessibility of the site, population / demand forecast, market analysis, zoning and housing policy, BTR market and various costs.

The Planning Authority is satisfied that the requirements of SPPR 7 have been met.



SPPR 8 states:

*For proposals that qualify as specific BTR development in accordance with SPPR 7:*

- i. No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
- ii. Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*
- iii. There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*
- iv. The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- v. The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.*

Part (i) has been addressed under housing mix above. The remainder of the criteria are addressed under 'Residential Amenity' below.

## **Part V**

The applicants propose to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for 10% of the housing units pursuant to Section 96(3) paragraph (b)(iv) of the Act.

Housing strategy has stated:

*"The Part V submission lodged with this planning application is noted, the developer intends on fulfilling its Part V obligation by providing, 64 no. Part V units – 33 x 1 bed, 23 x 2 bed and 8 x 3 bed apartments. It is South Dublin County Councils preference to **acquire** a mixture of units on site in line with the ratio of units proposed in the development. Further proposals are subject to review and consideration by the Housing Department, subject to planning approval.*

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

*South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage. Please note that the Council would require a fully completed Part V submission prior to commenting on costs".*

Part V condition is recommended in the event of grant.

## **Design, Layout and Visual Amenity**

ABP opinion requested the following additional information:

*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.*

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

#### Section 2.3.0 Quality of Residential Development

##### Policy H11 Residential Design and Layout

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

#### Section 2.2.0 Sustainable Neighbourhoods

##### Policy H6 Sustainable Communities

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

##### Policy H7 Urban Design in Residential Developments

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

Taking the above into consideration, the Planning Authority has the following comments to make

#### General

It is apparent that the applicant has altered the proposed layout, which is welcomed. The Planning Authority is concerned regarding the irregular building shapes and questions the necessity for this.

#### Road frontage / interface with Bus Connects

It is noted that there is a significant wayleave in place and that the proposed development cannot have a direct road frontage along Greenhills Road for the most part. Notwithstanding this, the Planning Authority is of the opinion that the proposal has not gone far enough to address this road frontage, in particular the Planning Authority is concerned regarding Block C and the access ramp to the undercroft car park.

The Planning Authority is of the opinion that, if the proposed building is retained in situ, then a raised platform above the access to the undercroft, providing a public space should be provided.

Notwithstanding the above, both the NTA and the Delivery Team have raised concerns regarding the interface with the Greenhills Road and the impact on Bus Connects.

The NTA has stated that it is not clear that sufficient consideration has been given to accommodate the future widening of Greenhills Road in line with the current proposals for the Tallaght/Clondalkin to City Centre CBC scheme. Similarly, any associated retaining infrastructure required within the boundary as part of proposed the new priority junction off Greenhills Road do not appear to have been incorporated to reflect the future CBC Scheme.

Clarification is also requested regarding proposed boundary treatments and the extent of proposed retaining structures. The potential impact of construction revised loading in conjunction with the BusConnects proposals over the existing 1200mm diameter watermain should also be considered.

The Delivery Team has stated:

*“The section of the Greenhills Road that forms the northern boundary of the application site is designated as part a 6-year road proposal under the South Dublin County Council Development Plan (2016 – 2022) and the Draft South Dublin County Council Development Plan 2022 – 2028 (July 2019) and will help form a strategic street network within the City Edge Area.*

*The subject road proposal is potentially significant in terms of creating a network of permeable streets that can be incorporated into a statutory plan under the City Edge Project and can improve connections between Tallaght, City Edge, Walkinstown and the City Centre for walking, cycling, public transport and traffic movement... the NTA have identified a Preferred route for a Greenhills to City Centre Core Bus Corridor that would close the Greenhills Road along the northern boundary of the application site at its western end and involve a new road extension that connects Calmount Road to Greenhills Road.*

*A Preliminary Design is yet to be completed and submitted to An Bord Pleanála by the NTA. The precise boundary of the proposed Core Bus Corridor Route is therefore yet to be finalised and the proposed development has the potential to prejudice such by reason that it would interface with and tie in with the Greenhills Road with significant elements that includes an 8 - 12 storeys residential block with commercial units, basement and undercroft parking below as well as vehicular, pedestrian and cyclist access arrangement, landscaping and a utility structure. The relatively narrow strip of land that is proposed to be taken in charge along the existing Greenhills Road is not considered to offer sufficient flexibility (when compared to recent CPO Mapping for Bus Connects Corridor Schemes submitted to An Bord Pleanála) to accommodate a future preliminary design”.*

The Delivery Team has requested that in the event of a grant, imposes conditions that:

- Omits Block C including its undercroft parking and basement parking and all ancillary elements including its entrance plaza and access ramp, etc. by reason of prematurity pending the determination by the planning authority/road authority of a road layout for the area and to ensure the design and delivery of a better connection and a larger area of public space between a new building in this location and the edge of the road.
- Clarifies that all access, ancillary, utility and landscaping elements to the east of proposed Block C and close to the Greenhills Road boundary of the application site will be temporary in nature until such time as a preliminary design of the Greenhills to City Centre Core Bus Corridor Route has been approved and agreement has been reached with the planning authority to replace such with revised proposals that also include a pedestrian entrance plaza that seeks to tie in with BusConnects. The following elements should be considered to be temporary in nature until such agreement has been reached:
  - o Vehicular and cycle entrance, ramp and bike path from Greenhills Road
  - o o Pedestrian entrances (X 4) along Greenhills Road
  - o o ESB Substation and switch room adjacent to Greenhills Road.
- Requires the developer to lodge cash deposit, bond or other security that is acceptable for a significant amount to be released following the completion of revised proposals that replace the temporary landscaping and access elements along the Greenhills Road as well as the provision of a pedestrian entrance plaza that seeks to tie in with BusConnects.

The Planning Authority is of the opinion that the Bus Connects scheme should not be adversely impacted by the proposal and that appropriate conditions, including the removal of Block C, should be added in the event of grant of permission. If Block C is omitted, then the Planning Authority would welcome pre planning and a future separate planning application for this area.

#### Access points

The Roads Department has not raised any objections to the proposed vehicular access to the site, however, the NTA has raised concerns regarding the impact on Bus Connects.

*“The applicant is proposing a new access off Greenhills Road in close proximity to other entrances which will be intensive in terms of vehicular trips. This has the potential to result in significant traffic increase on the Greenhills Road which could negatively impact on cycle and bus operations along this proposed core bus corridor.*

*It is noted that a junction traffic analysis has not been provided within the applicants Transport Assessment for the proposed priority junction off Greenhills Road. Therefore, no evidence has been provided to demonstrate that the proposed design caters for the proposed trip generation i.e., to demonstrate that the entrance does not require a signalised junction / dedicated right-turn lane such that bus priority is not compromised.*

*From a BusConnects perspective, it would be preferable to provide vehicular access/egress to this development from the Greenhills Industrial Estate Road. Consideration should be given to a cycling and pedestrian access only off Greenhills Road which may be more favourable in terms of providing safe access to the development for cyclists and pedestrians”.*

The Planning Authority is concerned that the access has not been adequately justified by the applicant. A condition is recommended in the event of grant, seeking further assessment and scope to amend by compliance.

#### Connectivity through site

ABP requested further information on connectivity through the site. The applicant states that 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. All footpaths and cycle lanes will be overlooked by apartments. None of these connections are integrated with the new public space off Greenhills and should be to create a clear route.

#### Impact on adjacent lands

As stated above, the proposal is not considered to be premature to the development of the City Edge Framework. To the east, the proposed development is approx. 7.8m from the boundary. To the south, this distance is approx. 7.9m (and there is also a road between adjacent lands). To the west, the distance is approx. 6.3m at the closet point. These distances are considered acceptable.

#### Visual impact

In response to ABP 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.

The overall approach to the layout has changed from the previous SHD stage and the Planning Authority welcome the revised layout in general. However, there are still some concerns, namely:

- 12 storey element – the Planning Authority believe that this would provide a better wayfinding function if moved and steps integrated with the public space at this location

- Block form – the Planning Authority question the need for more irregular block forms and would welcome less angled buildings

The applicant has provided photomontages indicating the site before and after development, as well as CGIs of the site. The Planning Authority is concerned that, in some instances, these visuals do not indicate a significant change from the previous stage, save for the reduction in height:

- VP2 Greenhills Road – materials and form are the same, except the obvious reduction in height
- VP3 Greenhills Road (SW of Walkinstown Roundabout) – materials and form are the same, except the obvious reduction in height
- VP4 Greenhills Road (NE of Walkinstown Roundabout) – materials and form are the same, except the obvious reduction in height

The above views are some of the most significant for the site and the Planning Authority would welcome more visual interest.

A condition is recommended in the event of grant, seeking final details to be agreed in writing with the Planning Authority.

*Urban Design*

*Urban Design Manual – A Best Practice Guide 2009*

<b>Urban Design Criteria</b>	<b>Assessment – Applicant</b>	<b>Assessment – Planning Authority</b>
<i>I. Context: How does the development respond to its surroundings?</i>	<p>The proposed mixed-use scheme responds sympathetically to its surrounding context, resulting in an appropriate site layout which does not create an adverse impact on nearby established uses or amenities. The current site is a vacant brown field site and is presently occupied by a number of derelict warehouses. The proposed site is currently zoned by South Dublin County Council as a ‘REGEN’ zoning objective, to facilitate enterprise and residential-led regeneration.</p> <p>The development will respond to the primary route of Greenhills Road and the future proposed connection to Calmount Road. In addition the sites location on the periphery of Walkinstown Roundabout is recognised with an appropriate design response to create a landmark to identify the Greenhills area. The building heights strategy ranging from 5 to 12 storeys responds to the sites location.</p> <p>While acknowledging the proposed site sits within existing industrial lands, the SDCC ‘REGEN’ land zoning combined with the developing ‘City Edge’ project aspirations set out a framework for the redevelopment of the area. We believe this proposed residential led development on the subject site is an appropriate solution for this site re-enforced by the sites proximity to</p>	<p>The existing site buildings are subject to demolition. The surrounding buildings are industrial in nature. The proposal is not strictly bound by the emerging City Edge plan due to the stage of preparation, however, due consideration is required of the main emerging factors that could impact the development of this site.</p> <p>The Planning Authority still has concerns regarding how the proposal addresses the Greenhills Road.</p> <p>It is not apparent that the proposal has addressed the main issues and a condition is recommended in event of grant.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
	Walkinstown Roundabout hub and the proposed improved bus routes connecting Tallaght and the city centre.	
2. <i>Connections: How well is the new neighbourhood / site connected?</i>	<p>The design approach of the proposed development ensures the passive surveillance of all pedestrian footpaths within the site which stimulates connectivity with potential adjoining developments and future infrastructure works proposed.</p> <p>The design solution is to upgrade the adjoining footpaths and public realm improvements to the south of the site including cycle lane and appropriate landscape enhancements with space provided within the subject site for the future widening of the road to the south.</p> <p>The design also facilitates future road connections to the north of the site between Calmount road and the Greenhills road.</p> <p>Currently the No 27 Bus runs East and West on Greenhills Road. There are currently 2 bus stops approx 25m to the north.</p> <p>Greenhills Road forms part of the Bus Connects plans with the D2 and D4 Spine/Branches running past the site which will further enhance public transport connections.</p>	<p>The site is located within an industrial area and is surrounded by industrial type uses. The site links to the Greenhills Road, which currently has no footpath on the southern side in a western and south-western direction. There are footpaths on both sides of the Greenhills Road connecting the site towards the Walkinstown Roundabout. On-road cycle lanes are in place and share the road with other traffic. The Greenhills Road is extremely busy and fast moving, especially where there is not footpath. It is noted that a separate cycle path has been provided connecting to the site boundary to the north, along the access road and also along the southern boundary. Noted that the applicant can only provide infrastructure on lands within their control / redline. The applicant is therefore reliant on the Bus Connects scheme, however, it is not considered that the applicant has gone far enough to integrate with this in this instance. A more significant public space should be provided on Greenhills Road to integrate with bus Connects and should provide new stepped access down into the site and through it from this space</p>
3. <i>Inclusivity: How easily can people use and access the development?</i>	<p>The design of the proposed blocks react to the primary route of Greenhills Road with active frontage were appropriate at the same level as the Greenhills road which will enable easy access by all. The scheme will include a central public open space and facilities for children of different ages, parents and the elderly.</p> <p>The landscape composition, including streets and footpaths, provides for movement by any person with mobility impairment. The goal is to create a location that people in the local community and residents will use for leisure. This will be achieved by creating spaces that people can pass through but also where they may wish to stop for a time to reflect. A number of connectivity routes through the site is provided to achieve these goals.</p> <p>The layout and landscape will comprise with roll-over kerbs and level access of all streets which will comply with the requirements of Part M of the Building Regulations– Access for People with Disabilities.</p>	<p>At the previous stage, the Planning Authority stated “<i>In its current capacity the site is not fully accessible. The primary and initial accessibility to and from the site will be via the Greenhills Road, this is until the full build out of the Masterplan lands takes place. In this regards the development must address the Greenhill Road fully and provide for a full street frontage that helps support the expansion of the local centre outwards from the Walkinstown Roundabout (notwithstanding the wayleave that runs through the site). Any proposals should create a strong streetscape directly adjoining the Greenhills Road, to help strengthen the direct use and accessibility of the site from the area. Design solutions to address both the creation of the street and to protect the wayleave should be investigated as part of a full redesign for the area, and subject to the Masterplan. Measures to build up and over the wayleave should be investigated and proposed</i>”. It is not apparent that this has been addressed / achieved.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
	<p>The scheme will be accessed by pedestrians from the Greenhills Road and southern access road with vehicular access provided from the North off Greenhills road. Emergency/Services connections are provided to the southern access road. Car parking is provided within undercroft car parking areas for residents with visitor and drop off spaces being located on-grade.</p>	
<p><i>4. Variety: How does the development promote a good mix of activities?</i></p>	<p>The development seeks to balance the provision of a residential apartment scheme complimented with residential BTR amenity spaces and commercial spaces. The substantial internal amenity spaces are sufficiently sized to be flexible with many providing multi-functional spaces to meet the varying requirements of the future residents.</p> <p>The proposed development provides for a mix of One, Two and Three bed apartments which vary in size and orientation in order to ensure a mix of tenures across the scheme.</p> <p>The external communal open space also contributes to a rich and diverse public open space. These external landscaped spaces include pedestrian routes through a variety of soft landscape treatments dispersed with seating areas, play areas and plazas.</p> <p>The scheme includes for creche and associated children’s play area to provide facilities to attract new families and provide childcare facilities to the wider community.</p> <p>All of the above combined with the proximity to both Walkinstown and Tallaght town centre create a sustainable development in a district location.</p>	<p>The development is build-to-rent, with a number of communal use spaces and a creche. Commercial development is now provided along the southern road. The Planning Authority would welcome larger commercial units. The Planning Authority question whether the commercial units, located on the north-south street, are in the correct location. A <u>condition</u> would be welcomed seeking reorganisation of these.</p>

<b>Urban Design Criteria</b>	<b>Assessment – Applicant</b>	<b>Assessment – Planning Authority</b>
<p><i>5. Efficiency: How does the development make appropriate use of resources, including land?</i></p>	<p>The higher density of the proposed scheme makes efficient use of these valuable ‘regen’ zoned lands in close proximity to Walkinstown centre and includes an appropriate high quality public open space which is centrally located within the scheme to provide an enhanced external amenity for the future residents and surrounding community.</p> <p>The apartment units are suitable to accommodate a range of home types for a variety of age demographics and families. They are designed to ensure there is adequate space and generously sized communal and private open space available within the development.</p> <p>The scheme has been designed to provide commercial uses for employment spaces. These uses are located at ground level to provide active frontages and are located in the following locations:</p> <ul style="list-style-type: none"> <li>• Fronting onto Greenhills road to the north west of the site.</li> <li>• Opposite the central public open space</li> <li>• Fronting onto the southern access road along the southern south boundary.</li> </ul>	<p>The reduced density is welcomed. However, a further reduction in the tall building would help to reduce the density further</p>
<p><i>6. Distinctiveness: How do the proposals create a sense of place?</i></p>	<p>The proposed scheme will create a distinctive residential neighbourhood and is of a density and character that embrace to its location and provide a critical mass to ensure the timely delivery.</p> <p>The proposed layout of the streetscape and carefully considered building design will create a high quality mixed use environment, which will in turn contribute to aesthetically pleasing landmarks within the development. The proposed layout also creates flexible internal and external communal open spaces for use by all residents.</p> <p>The design of the apartment blocks creates a distinct language for the scheme with variety in facade design and materiality applied throughout the scheme which offers a unique language to each block while also being consistent with an overall high quality facade design language. This overall language utilises a complementary material palette which creates a symbiosis through the scheme.</p>	<p>The 12 storey element will provide wayfinding and the Planning Authority are concerned that it has not been positioned correctly within the development. The Planning Authority are also concerned that the design response, since the previous stage, has not gone far enough, particularly when viewed from the Walkinstown Roundabout. The Planning Authority would welcome a reduction in the building.</p> <p>More importantly this tall building does not meet the ground well. It lands in a service yard which detracts from its potential wayfinding ability. The location and design of the building needs to change so that the tall building acts as the marker for the new space on Greenhills Road. also the building shape is compromised with an irregular shape and basic elevation treatment and materials.</p>



<b>Urban Design Criteria</b>	<b>Assessment – Applicant</b>	<b>Assessment – Planning Authority</b>
<p>7. <i>Layout: How does the proposal create people-friendly streets and spaces?</i></p>	<p>The proposed site layout creates a series of blocks ranging in height and form which are set within a series of separate public and communal open green open spaces. The layout has been developed as a result of the collaborative work of the design team. The carefully curated design considered the following:</p> <ul style="list-style-type: none"> <li>• An improved and attractive public realm to encourage people to enter and engage with the open spaces creating activity.</li> <li>• Permeable connectivity through the site which also responds to the challenging level changes of the surrounding context.</li> <li>• Purposeful screening where deemed appropriate creating attractive landscape features to any retaining boundary conditions and creating privacy between the site and adjacent spaces as appropriate.</li> <li>• Minimal vehicular routes and parking on grade to provide enhanced landscaping.</li> </ul> <p>The buildings are pulled back at the North West corner to create a buffer zone to the commercial frontage onto Greenhills Road. The layout responds to the existing site constraints while appropriately connecting back to the wider community and associated amenities. The site layout strategy is based on best practice urban design principles.</p>	<p>The Planning Authority welcome the overall changes to the layout. However, there are some concerns, as detailed in the other sections.</p> <p>The major concern is the size and treatment of the public space onto Greenhills Road.</p> <ul style="list-style-type: none"> <li>- This space needs to be larger and there are ways to achieve this including for example making the space larger to the south and/or providing a light weight deck to extend over some of the water-main wayleave (retaining access underneath)</li> <li>- The form and function of this space needs to be clearer including how it is better integrated with Bus Connects including bus stops and appropriate land uses around the space</li> <li>- the stepped access into the site, should have been co-located with this new space so as to provide a legible and clear route from the Greenhills Road, Bus Connects and down into the site</li> <li>- the tall building to the west should be meet the ground at the building space (instead of into the service yard)</li> </ul>
<p>8. <i>Public realm: How safe, secure, and enjoyable are the public areas?</i></p>	<p>The site layout proposes to maximise the permeability and connectivity to and through the site prioritizing the quality of open space within the development. The site layout creates a central high quality public open space which provides c.3380 sqm in one large space. (12% of the site area). This public open space provides a valuable amenity resource and is complemented by generous public realm streets, plazas and routes through the site. The scheme also provides c.5020sqm of Communal Open Space for residents of the scheme. The scheme also allows for space provided within the subject site for the future widening of the road to the south. The buildings have been set back along the southern boundary to allow for enhanced public realm along this frontage which includes; commercial/BTR amenity/creche frontages to provide active street frontage and</p>	<p>The areas of public realm have changed as a result of changes to the layout. There are concerns regarding the impact of the tall buildings on the central open space, in terms of how enjoyable that space will be for the residents. Relocation of the 12 storey element would help alleviate these concerns.</p>

<b>Urban Design Criteria</b>	<b>Assessment – Applicant</b>	<b>Assessment – Planning Authority</b>
	<p>passive surveillance, pedestrian footpaths/plaza rest spaces, dedicated cycle lane and also car parking lay-bys to serve the development.</p> <p>These public realm enhancements have been designed holistically within the overall landscape strategy to create safe, secure and enjoyable spaces for the public and residents.</p>	
<p><i>9. Adaptability: How will the buildings cope with change?</i></p>	<p>The development provides a mix of units which can be reconfigured to adapt to the changing life cycles and personal needs of residents.</p> <p>Also, the apartments either meet or exceed the minimum standard for unit size and can be adapt to follow the needs of the future residents.</p> <p>The architectural style is contemporary and reflects the modern requirements to balance lighter, elevations with the need to satisfy energy reducing objectives.</p> <p>Section 9 of this document sets out the principles that the Design Team have incorporated to date with this same principles guiding future decision making as the development proceeds to tender and construction phases.</p>	<p>Increased size/depth and floor to ceiling heights for the commerical units would make these spaces more attractive to end future users. In their current design these units will likely be unattractive to workspace users</p>
<p><i>10. Privacy / amenity: How do the buildings provide a decent standard of amenity?</i></p>	<p>All the residential units have an area of usable communal open space and private open space in balconies/private terrace. All the proposed balconies are in compliance with the minimum size and depth of 1.5 meters as per Sustainable Urban Housing - Design Standards for New Apartments (Dec 2020). The proposed design considers the orientation of the development in order to maximise the solar gain and natural light aspect of each apartment, 47% of the apartments are dual aspect.</p> <p>Communal open space consists of wide meandering footpaths forming pedestrian avenues and informal gathering spaces, generously landscaped podium gardens and public plazas linking with commercial units to enable accessible and active areas for all users.</p> <p>Privacy and overlooking has been at the forefront in the design of the apartments and the positioning of balconies. The design ensures that people can seek privacy within their own dwellings while still having a connection to the outside.</p> <p>The effects of noise and air pollution have</p>	<p>The potential overlooking between blocks has been considered.</p> <p>The Planning Authority are concerned regarding what apartments are dual aspect and what are single, as it has not been indicated clearly. The Planning Authority are concerned that angled buildings may be used to ensure north facing single aspect apartments are located at an angle.</p>

Urban Design Criteria	Assessment – Applicant	Assessment – Planning Authority
	<p>also been considered within the design of the scheme and the building fabric will be detailed further at detail design stage so that the noise mitigation measures as recommended in Chapter 8 of the EIAR will be implemented. Air Quality and Climate mitigation measures are outlined in Chapter 9 of the EIAR and will be implemented to ensure acceptable environmental standards are achieved. Please see accompanying EIAR for further detail.</p>	
<p><i>11. Parking: How will the parking be secure and attractive?</i></p>	<p>The development has a low-car-traffic street design and has been designed to promote activity with pedestrian and bicycle friendly elements. A total of 439 no. car parking spaces are provided which includes:</p> <ul style="list-style-type: none"> <li>• 21 no. disabled car parking spaces</li> <li>• 5 no. Car-Share parking spaces</li> <li>• 15 Indented Car Parking Spaces as parallel parking bay spaces along the southern boundary</li> </ul> <p>In addition to the above there are 4 no. dedicated resident motorbike spaces provided in the undercroft car parking area. The majority of the car parking is located within podium undercroft areas which enhances the landscape and car-free zone on grade.</p> <p>A total of 1035 bicycle parking spaces are provided within the development for the residents. These bicycle parking spaces are covered and secure as required by the Sustainable Urban Housing - Design Standards for New Apartments (Dec 2020).</p> <p>In addition to the above there are:</p> <ul style="list-style-type: none"> <li>• 5 no. resident accessible cycle spaces provided.</li> <li>• 7 no. resident cargo cycle spaces provided.</li> <li>• A total of 316 bicycle parking spaces are integrated within the landscape strategy for use by visitors to the development.</li> </ul>	<p>Parking predominantly located underground, with podium above. Surface car parking appears to be broken with landscaping.</p>

<b>Urban Design Criteria</b>	<b>Assessment – Applicant</b>	<b>Assessment – Planning Authority</b>
<p><i>12. Detailed design: How well thought through is the building and landscape design?</i></p>	<p>The design has been subject to pre-planning and additionally pre-application and subsequent local authority consultations between the design team and South Dublin County Council. The design team also engaged with the City Edge design team to review the scheme in terms of the developing aspirations of the City Edge project. The proposed development represents a high-quality design whilst optimizing the appropriate use of the site which will help meet the ever-increasing demand for residential accommodation. The design has evolved from careful consideration and incorporation of a strong urban design rationale from the outset. The design treatment incorporates the latest technologies to achieve the highest standards in energy efficiency, also the selected brick finishes, fenestration design and commercial frontage design will provide a new contemporary and high quality expression for the evolving regeneration area. The drawings, reports and other supporting documents submitted as part of this application contain the detail design information of this planning application. The principle points are summarised in Section 12 of this report. Please refer to the relevant documents for greater detail.</p>	<p>The Planning Authority would welcome further consideration of the detailed design, as set out previously.</p>

### Materials

In response to ABP Item No. 3 (ii), the applicant 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.

A condition is recommended in the event of a grant, recommending agreement of final materials.

### Conclusion

Overall, the Planning Authority still has some concerns regarding urban design in particular the treatment of Greenhills Road and how the buildings meet this important route and space provided.

### **Residential Amenity Standard of Accommodation**

#### *Apartment standards*

SPPR 7 allows for flexibility in the following matters:

- *Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units, and in relation to the provision of all of the*

*communal amenity space, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development.*

- *The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- *The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.*

Specific Planning Policy Requirement 4 (SPPR 4) states:

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

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

The proposed dual aspect is as follows:

Dual – 43%

Single (south, east, west) – no breakdown provided

Single (north) – no breakdown provided

Paragraph 3.18 states “*North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature. Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings*”. It is apparent from the information submitted, that single aspect, north facing, apartments are proposed, although these are angled.

### Aspect

The aspect of all units has been considered carefully to optimise the orientation of the site and surmise light to apartment units. See chapter 1.3 'Compliance with development standards' of the accompanying Housing Quality Assessment for further information regarding unit orientation.



The above floor plan indicates that single aspect north facing apartment are proposed in Blocks A and C – it is not considered that the locations overlook substantial areas of amenity. The Statement of Consistency states “*the proposed single aspect apartment units have been orientated to face in a southern, eastern or western direction and towards the large central courtyards to allow for maximum light exposure for each individual apartment throughout long periods of the daylight hours. This is consistence with the 2020 Guidelines which recommend, in Section 3.18, that single aspect apartments be orientated to face south, east or west, to allow for maximum sunlight exposure*”.

Notwithstanding the requirement to remove / redesign Block C, the Planning Authority is of the opinion that all single aspect north facing apartments should be removed/ redesigned via condition.

In terms of quantitative analysis, the Architectural Design Statement, Housing Quality Assessment sets out that the proposed development meets the minimum requirements of the Apartment Guidelines.

The 2020 Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. The proposal complies with the Guidelines in this regard.

### Residential amenity – Overlooking and Overbearing

With regards to separation distances Section 11.3.1 (v) states that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. The separation distances are generally compliant except for Block A and B, where the separation distance falls below 22m to 20.39m. This minor deviation is considered acceptable.

The Planning Authority has no concerns regarding overbearing impacts.

## Residential amenity – Daylight, sunlight and overshadowing

### *Residential amenity – Daylight, sunlight and overshadowing*

3D Design Bureau has prepared a Daylight and Sunlight assessment.

The following daylight and sunlight assessments have been carried out for the proposed development:

- The levels of sunlight to the proposed amenity spaces, as identified by the architect.
- Access to daylight (ADF) in the habitable rooms of the proposed units within the development.

No impact assessment was carried out on the basis that the surrounding context is in industrial use.

### Scheme Performance Results Overview:

Sun On Ground (SOG) in proposed gardens / amenity areas:

- Areas Assessed: 4 Meeting the guidelines: 4

Average Daylight Factor (ADF) of Residential Rooms Within the Proposed Development:

- Residential Rooms assessed: 1665

(With ADF target value of 2.0% applied to LKDs:

- Rooms meeting the guidelines: 1539
- Rooms not meeting the guidelines: 126
- Compliance rate: ~92%

With ADF target value of 1.5% applied to LKDs:

- Rooms meeting the guidelines: 1614
- Rooms not meeting the guidelines: 51
- Compliance rate: ~97%

Average Daylight Factor (ADF) of Non-residential Rooms Within the Proposed Development:

- Non-residential Rooms assessed: 21 Rooms meeting the assigned target value: 20  
Rooms not meeting the assigned target value: 1

It is noted that the areas that do not perform well are grouped together, e.g. inward facing units on Block A, west facing units on Block A (owing to the depth of the LKD). The main issues are on the lower floors, with light increasing further up the development.

### Conclusion

Not all rooms meet the required minimum standard. Where there do not, the Planning Authority considers that the justification and mitigation is very limited. It is considered that mitigation should be in place where prescribed standards cannot be met. The Planning Authority notes that the application site is surrounded by low-level industrial buildings and therefore is not considered to be a constrained site. Accordingly, the proposed non-compliances are a direct result of the impact of the proposed development upon itself on account of the proposed design. This is not optimal design and consideration should be given to changing the layout/amalgamating apartments to resolve daylight issues.

In the absence of sufficient justification and/or mitigation, in event of a grant of permission, a number of units require redesign/ amalgamation to increase the ADF and provide a minimum standard. Given the rate of compliance in the overall scheme, on balance, this is not considered to warrant a recommendation of refusal.

## Environmental Health

The EHO has raised no objections, subject to conditions. The impact is therefore considered acceptable in terms of adjacent uses.

### *Childcare*

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

Having regard to the above, it is noted that the proposed development provides for a total of 341 two and three bedroom apartment units (excluding one bedroom units as per the guidance above). The above guidelines recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.

The applicant's Design Statement states "*Based off of 341 units the proposed development should include a creche for approx. 47 Children. The proposed development contains a dedicated childcare facility with an internal floor area of approximately 360m<sup>2</sup> and an additional 180m<sup>2</sup> of external play space. The proposed creche is more than suitably sized in order to meet demand of the development*".

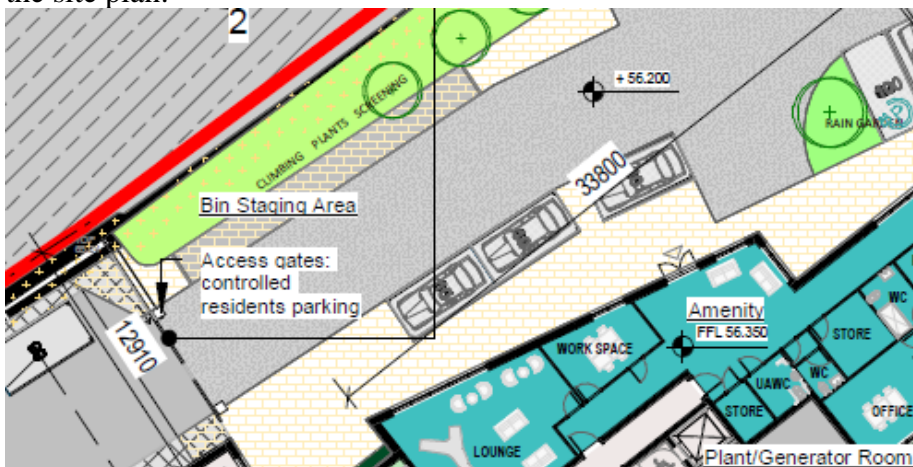
### *Waste Management*

An operational waste management plan has been provided.

6 no. dedicated shared Waste Storage Areas (WSAs) have been allocated within the development design for the residential units in the apartment. These shared residential WSAs are located on the ground floor and are in close proximity to the access cores.

3 no. dedicated WSAs have been allocated within the development design for the commercial units. The shared commercial WSAs are located on the ground floor.

The report indicates that there are several bin staging areas, but only a single area is apparent on the site plan:



The Planning Authority is concerned that the above location conflicts with Bus Connects. A condition is recommended in the event of grant, requiring details of bin staging areas to be agreed in writing with the Planning Authority.



## Conclusion

Further detail is needed regarding waste collection points

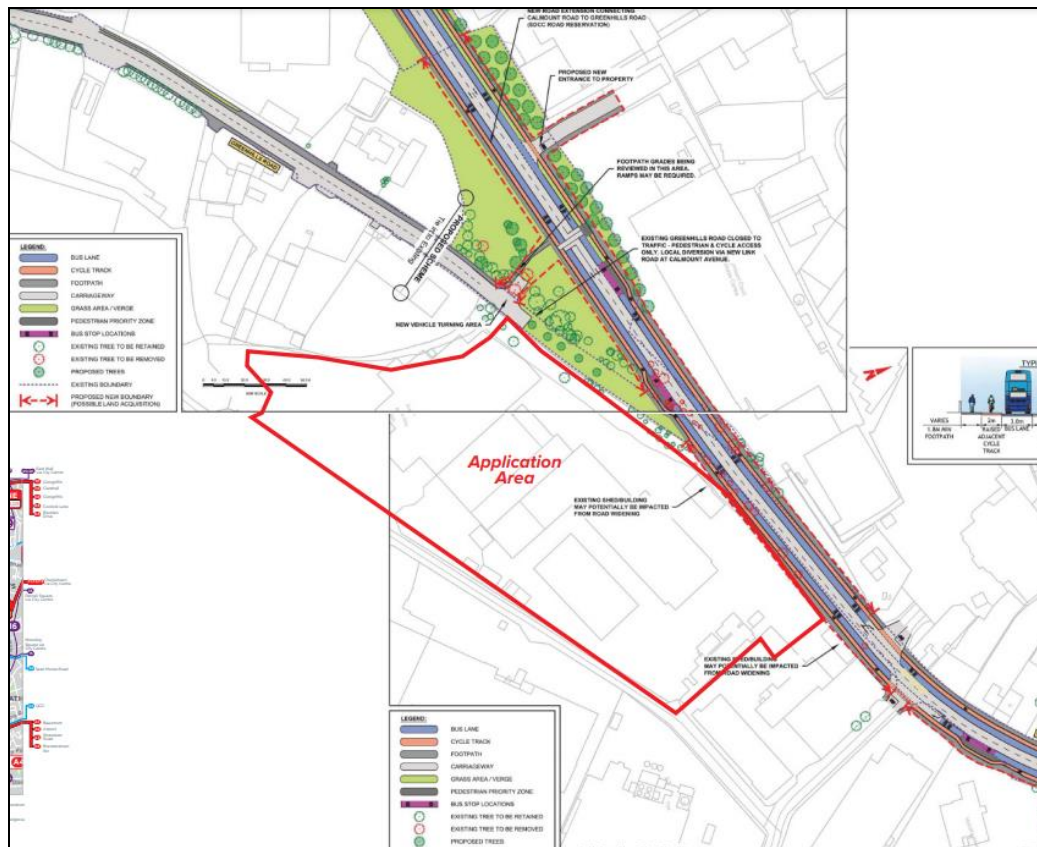
## Transport, Parking and Access

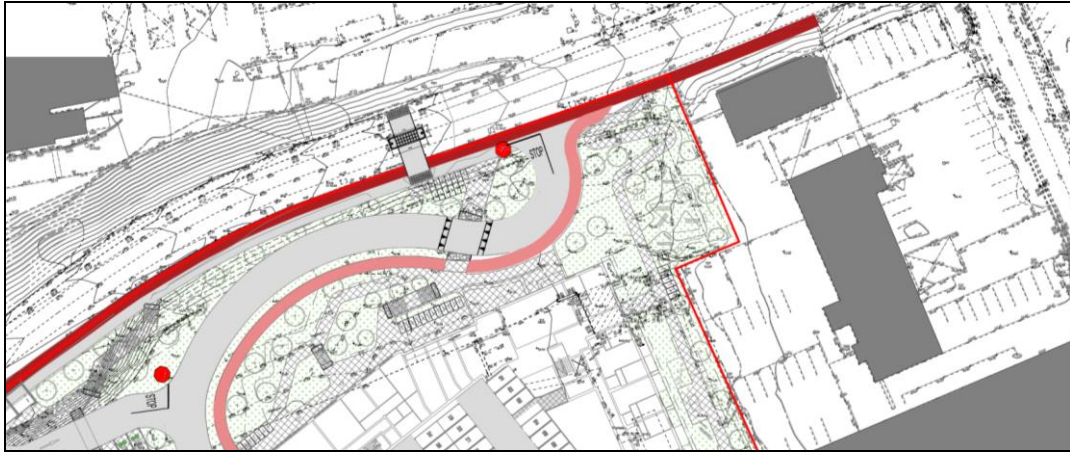
The applicant has submitted a Parking and Mobility Management Plan, Stage 1 Road Safety Audit, Traffic and Transport Assessment and various drawings in support of the proposal.

The Roads Department has stated:

### 1. "Access

*The primary vehicular access will be provided off Greenhills Road to the northeast, and secondary access for emergency vehicles and services will be provided off the road to the south of the subject site via newly created vehicular entrances.*





*The proposed entrance from Greenhills Road has been designed with Bus Connects in mind and should not hinder any Bus Connects plans for the area. A sightline of 45m at a setback of 2.4m can be achieved at this junction.*

*Two vehicular access points on the southern boundary are for emergency vehicles only.*



*It is not clear whether the developer intends to upgrade the existing southern link road (unnamed). The existing southern link road currently of substandard quality.*

*SDCC is happy with the proposed cycling and pedestrian permeability of the development.*

*Following the construction stage; the applicant will be required to submit a pavement condition survey, to assess the condition of the surrounding roads prior and post construction, the applicant will be required to reinstate the roads to an acceptable standard.*

*The applicant will be required to maintain the road pavement at the accesses and along existing road to a 6.0m width.*

## *2. Traffic and Transport Assessment (TTA)*

*The following conclusions were made in the TTA:*

- 1. The subject site is highly accessible to pedestrians and cyclists in the vicinity of Greenhills Road and its environs, with excellent pedestrian connectivity from the proposed development eastwards towards the Walkinstown Roundabout junction.*
- 2. Future proposals as stated within the GDA Cycle Network Plan include a secondary cycle route planned along Greenhills Road.*
- 3. The site is well served by public transport, with the 27 and 77A bus services nearby along Greenhills Road.*
- 4. The network analysis within the TTA indicates that the 2 No. existing junctions in the vicinity of the proposed development presently work within / at capacity.*
- 5. It is demonstrated that in 2024, the projected year of opening of the proposal, the junctions analysed will be at or just over capacity during certain time intervals during the peak periods, predominantly due to predicted network increases.*

*The TTA did not give a detailed analysis of Noyek's Roundabout as the generated flow from the proposed development was less than 1%. The Roads Department is concerned that this does not take into account that the Calmount Road link, once opened, will carry traffic towards this junction and remove the majority of traffic from this section of the Greenhills Road.*

*A revised TTA should be submitted to reflect this future traffic pattern.*

## *3. Internal Road Layout:*

*All roads are 6.0m wide on the drawings submitted. This allows turning room in front of perpendicular parking bays. There are 2 No. raised tables at pedestrian crossing points to promote lower speeds within the development in accordance with DMURS.*

*Footpaths and Cycle paths are 2.0m wide throughout the development. SDCC is satisfied with the proposed internal cycling and pedestrian facilities in the development.*

*Autotrack analyses have been carried out for Fire tender/ Refuse Vehicles access.*

## *4. Car Parking:*

*Car parking and bicycle parking will be provided at street level and in 2 no. undercroft parking areas located within the blocks. The first is located within Block A and is accessible via Greenhills Road. The second is a two-storey parking area located within Blocks B, C and D. Primary access will be provided via Greenhills Road with a secondary emergency access off the road to the south of the development.*

*The proposed car parking provision from the Traffic and Transport Assessment report has been calculated assuming Zone 2 allocation due to location of site within 400 metres of high frequency bus route (Route 27).*

*The Roads Department is satisfied that the development can be considered within Zone 2 due to the proximity of an existing high frequency bus route along with proposed public transport and cycle infrastructure upgrades.*

Development type	Area / units	Maximum car parking standards	Maximum parking required
Apartments 1-bed	292 No.	0.75 per unit	219
Apartments 2-bed	280 No.	1.00 per unit	280
Apartments 3-bed	61 No.	1.25 per unit	76
<b>TOTAL</b>			<b>575</b>

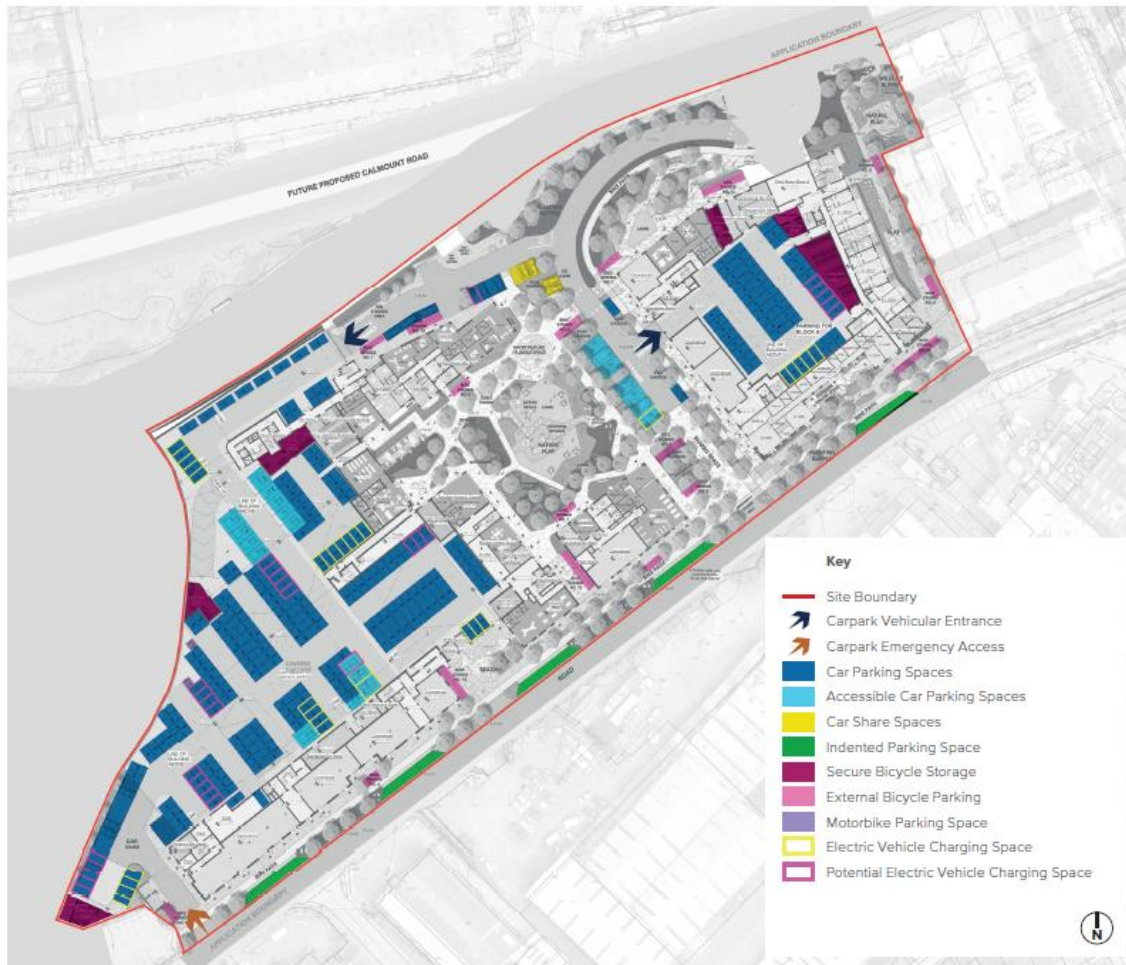
Development type	Area / units	Maximum car parking standards	Parking required
Commercial	1330 m <sup>2</sup>	1 per 75 m <sup>2</sup>	18
Crèche	360 m <sup>2</sup>	0.5 per classroom (10 No. classrooms assumed)	5
<b>TOTAL</b>			<b>23</b>

*The calculated maximum car parking provision is 598 No. car parking spaces*

*It is proposed to provide 398 No. car parking spaces plus 21 No. disabled spaces for the residential component, equating to 0.66 car spaces per residential unit.*

*It is proposed to provide 15 No. Indented Car Parking Spaces as parallel parking bay spaces along the southern boundary for the commercial component, 65% of the requirement as detailed within the Development Plan.*

*The applicant has provided a bin staging area to the North of Block C.*



Ground Floor Plan: Car and Cycle Parking

a. *EV Parking*

*The proposed development comprises 44 No. electric charging points which exceeds the County Development Plan target of 10% of the total car parking spaces. The plans also confirm that an additional 42 spaces (10%) can be upgraded to accommodate electric vehicles if required.*

*The proposed development shall make provision of future charging points for electric vehicles. In the case of surface car parking spaces and basement car parking spaces, 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport.*

b. *Mobility Impaired parking*

*It is proposed to provide 21 No. disabled spaces for the residential parking component which equates to 5% of the overall vehicular parking spaces for mobility impaired users. The applicant should provide 1 No. disabled parking space for the commercial parking component to comply with the minimum rate of 5% of the overall vehicular parking spaces for mobility impaired users.*

#### 5. *Bicycle Parking:*

*The applicant intends to provide 1363 No. cycle parking spaces for residents and 316 No. for visitors, along with 5no. accessible bicycle spaces and 7no. cargo bicycle spaces. This is well above the minimum bicycle parking rates within the County Development Plan.*

*The National Cycle Manual, referred to within the 2020 New Apartment Guidelines, requires 1 space per bedroom plus 0.5 spaces per unit for visitors for the residential component. This would result in a requirement of 1352 No. spaces.*

*SDCC road department is happy with the cycling parking provision. All external bicycle parking spaces shall be covered.*

#### 6. *Public Lighting:*

*The applicant has submitted a public lighting design for the proposed development.*

*Prior to commencement the Public Lighting Design for the development must be agreed by the Public Lighting team of SDCC.*

#### 8. *Mobility Management Plan*

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

#### 9. *Construction and Demolition Waste Management Plan*

*The applicant has submitted a Construction and Demolition Waste Management Plan for the proposed development but has not provided details of specific haul routes and the daily volumes of materials. Prior to commencement of development the applicant shall submit a developed Construction and Demolition Waste Management Plan which will have to be agreed with SDCC.*

#### 10. *Taking In Charge:*

*The applicant has submitted a plan identifying the areas to be taken in charge by the local authority. There are also details of the road construction and specification. Prior to commencement the applicant shall submit a construction detail drawing to taking in charge standards as per SDCC TIC standards Appendix 6”.*

Observations are made and conditions are recommended in event of grant.

In addition to the report from the Roads Department, the NTA have made a submission, which highlights a number of issues, in addition to those surrounding Bus Connects.

#### Access to the development

The Greenhills Road bounds the proposed development along its northern boundary with the main access provided by a proposed new priority junction arrangement approximately 80m west of the existing access road to Greenhills Industrial Estate.

- The applicant is proposing a new access off Greenhills Road in close proximity to other entrances which will be intensive in terms of vehicular trips. This has the potential to

result in significant traffic increase on the Greenhills Road which could negatively impact on cycle and bus operations along this proposed core bus corridor.

- It is noted that a junction traffic analysis has not been provided within the applicants Transport Assessment for the proposed priority junction off Greenhills Road. Therefore, no evidence has been provided to demonstrate that the proposed design caters for the proposed trip generation i.e., to demonstrate that the entrance does not require a signalised junction / dedicated right-turn lane such that bus priority is not compromised.
- From a BusConnects perspective, it would be preferable to provide vehicular access/egress to this development from the Greenhills Industrial Estate Road. Consideration should be given to a cycling and pedestrian access only off Greenhills Road which may be more favourable in terms of providing safe access to the development for cyclists and pedestrians.

In connection with the above, it is considered that a development proposal of this scale may necessitate provision of a new Bus Stop to serve the growing population. Further consideration of safe and convenient access to public transport stops should be demonstrated including providing for a bus stop.

### Car Parking

The NTA notes the proposed provision of 398 car parking spaces plus 21 no. disabled spaces to serve the 633 residential units, giving a ratio of 0.66 per unit. While this quantum would fall within the development plan standard of a maximum 0.75 per 1 bed unit and 1 per 2 bed unit (Zone 2), the NTA requests that An Bord Pleanála consider the appropriateness of providing such a number, in particular in the context of section 4.21 of the *Design Standards for New Apartments* guidelines which states that for proposed residential development in 'Intermediate Urban Location', '*the Planning Authority must consider a reduced overall car parking standard.*' Given the location close to a high frequency bus corridor in the region, and the associated low level of demand for car use anticipated, a more restrictive provision could be applied. This would also reduce the negative impact of traffic generated by the development on the surrounding road network.

Conditions are recommended in the event of grant.

### **Landscaping, Open Space and Public Realm**

The applicant has submitted a landscape Design and Access Statement, landscape management and mitigation plan and various landscape plans in support of the proposal.

The Parks Department has raised the following main concerns:

### **Main Concerns:**

- *Greater level of detailed required regarding proposed play provision to be provided within the development.*
- *Greater level of detailed required regarding the tree pits and SUDS features to be provided within the development.*
- *Greater level of detailed required in relation to the proposed Entrance Plaza located in the north western corner of the development – greater detailed in required in terms of proposed materials, lighting, furniture, planting, levels and access.*
- *overshadowing of the courtyard open space in block A1 & A2 and Block D & D1 - A microclimate assessment shall be provided for all open spaces.*
- *There is a need for a strong and legible hierarchy in the open spaces provided as part of this proposed development, with different types of open space provided for in accordance with*

policies H12, objective 2 of the CDP 2016-2022. 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 with a movement strategy plan for cyclists and pedestrians.
- Lacks a comprehensive and detailed SUDS strategy for the entire development which details the implementation, maintenance and of future management of the proposed SUDS Strategy.
- Detailed Planting Plan required for the entire development which clearly details planting sizes and proposed numbers/densities.
- Taking in Charge Drawing Required.

Conditions are recommended in the event of grant.

### **Drainage and Water Supply**

The Water Services Department has made the following observations and recommended conditions:

*“The applicant must clarify that there is clear separation of surface water and foul water on site. The drawings submitted show storm water entering the foul water network at FW09 and at FW14. Prior to commencement of development the applicant must submit a revised drawing showing complete separation of foul and surface water drainage systems.*

*Prior to commencement of development the applicant must also submit a revised drawing showing that the petrol interceptors are installed up stream of the proposed attenuation system. All surface water on site must pass through both the petrol interceptor and the attenuation system”.*

### **Archaeology**

At the previous stage, the Planning Authority stated *“The applicant has not submitted an Archaeological Impact Assessment. It is recommended that this report should be completed prior to a full submission to identify the archaeological potential of the site. This should also include recommendations regarding proposed groundworks, and undertaking surveys and test trenching if required”.*

The applicant has assessed archaeology as part of the EIAR (Chapter 14).

### **Construction and Waste Management**

Inland fisheries Ireland has requested a number of conditions. Conditions regarding construction and waste management are also required in the event of grant.

### **Energy and Climate Change**

At the previous stage, the Planning Authority stated *“The applicant is encouraged to explore opportunities for enhanced green energy technologies on site”.*

The applicant has submitted an Energy/Part L compliance statement.

There are five main criteria that the report aims to demonstrate compliance with

- Building Energy Rating
- Energy Performance Coefficient (EPC)
- Carbon Performance Coefficient (CPC)



- Renewable contribution
- Maximum elemental U-Values

The report concludes “*Having identified heat pump technology as the preferred option for onsite renewable energy generation, site specific mechanisms for incorporating these technologies were evaluated and determined as outlined in Section 4 of this report*”.

The Planning Authority considers that future proofing for District Heating should be incorporated as this area is a strategic regeneration area with the potential to develop a feasible district level heat network. A condition is recommended by the Planning Authority.

### **Ecological Surveys**

Enviroguide consulting was engaged to assess biodiversity as part of the EIAR.

The objectives of the study were to:

- Undertake baseline ecological surveys and evaluate the nature conservation importance of the site of the proposed development;
- Identify and assess the direct, indirect, and cumulative ecological implications or impacts of the Proposed Development during its lifetime;
- Where possible, propose mitigation measures to remove or reduce those impacts at the appropriate stage of development;
- Achieve the best possible biodiversity outcome from a change in current land use.

A desktop study was carried out to collate and review available information, datasets and documentation sources pertaining to the site’s natural environment.

A habitat survey was carried out at the Site on the 23rd April 2021.

A bat survey of the Site of the Proposed Development was undertaken by Ash Ecology & Environmental Ltd (AEE) on the 21st April 2021, with a further bat habitat assessment carried out on the 1st of March 2022. A general bat activity survey was undertaken on the 21st April 2021 from 20.00 to 22.00 (sunset was 20.38) by walking the Site boundary and around all structures onsite. All buildings were assessed externally and internally, where accessible, during April 2021 and a follow-up external and internal inspection was again carried out March 1st 2022.

Enviroguide completed a breeding bird survey of the Site on 21st April 2021.

Mammal surveys of the Site were carried out in conjunction with the habitat survey.

The Site was assessed for the presence of invasive plant species during the habitat survey undertaken.

The EIAR recommends a number of mitigation measures. A condition is recommended in the event of grant of permission to secure these

### **Energy and Climate Change**

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

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

**Appropriate Assessment and Environmental Impact Assessment**

A Screening Report for Appropriate Assessment was carried out by Enviroguide Consulting. The report concludes “*On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required*”.

An Bord Pleanala is the competent authority in this regard.

An EIA Report has been submitted. An Bord Pleanala is the competent authority in this regard.

**Development Contributions**

The following is assessable for development contributions purposes:

- 633 residential units stated as 41,715.m (net residential)
- Commercial – 1,330sq.m
- Creche 360sq.m

***SEA Monitoring***

<b>SEA Monitoring Information</b>	
<b>Building Use Type Proposed</b>	<b>Floor Area (sq.m.)</b>
Residential, communal amenity with plant rooms etc, commercial, creche	72,924.m
<b>Land Type</b>	<b>Site Area (Ha.)</b>
Brownfield	2.61Ha

**Conclusion, Recommendation and Statement:**

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

There have been some amendments to the proposal since Stage 2 and the applicant has undertaken a number of additional studies in order to support the proposal. However, it is not considered that the applicant has considered certain matters adequately.

The proposed strategic housing development is generally in accordance with the Core Strategy of the SDCC Development Plan. The Planning Authority considers that the proposal meets the criteria of SPPR 3 of the Urban Development and Building Height Guidelines.

Notwithstanding this, the Planning Authority has concerns regarding the development, namely:

- The interface with Bus connects and the Greenhills Road in terms of the public space, alignment of the buildings, and the tall building location and design
- The overall design approach
- The aspect of the units and daylight received in some instances

The Planning Authority is of the opinion that amendments to the scheme are required and this may occur by way of a new application following a refusal of permission or by conditions. On balance, the Planning Authority slightly sides with a grant of permission with amendment conditions. The conditions recommended omit Block C, redesign of interface with Bus Connects, amendments to the commercial units, analysis and amendment of junction design and floor layout amendments to improve daylight.

Appendix I details the list of conditions recommended by the Planning Authority.

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**Colm Harte**  
**Senior Executive Planner**



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**Eoin Burke,**  
**Senior Planner**

**Date:**

19/5/22



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**Mick Mulhern,**  
**Director of Land Use, Planning and**  
**Transportation**

## Appendix 1: Strategic Housing Development table of Recommended Conditions

No	Condition	Reason
1	<p><b>Effective control on development as approved</b> The development shall be carried out and fully completed in its entirety in accordance with the plans, particulars and specifications lodged with this planning application, save as may be required by the other conditions attached hereto.</p>	To ensure that the development shall be in accordance with the permission, and that effective control be maintained.
2	<p><b>Materials</b> Prior to the commencement of development, the applicant shall provide revised details of materials and elevational treatments for all buildings, as visible from Greenhills Road / Walkinstown Roundabout. The applicant shall liaise with the Planning Authority prior to the submission of these details.</p>	In the interests of visual amenity
3	<p><b>Commercial Units.</b> Prior to the commencement of development, the applicant shall submit plans, sections and elevations, which indicate the following for the written agreement of the Planning Authority:</p> <ul style="list-style-type: none"> <li>• The two adjoining commercial ground floor units in Block D to be amalgamated at ground floor level, to include space from the residential units above and to be made deeper; and</li> <li>• The two adjoining commercial ground floor units in Block A to be amalgamated with each other and with the three first floor apartment units above to create one commercial unit to measure approx. 460sq.m (if made two storey, as opposed to single storey or single storey with mezzanine, etc.)</li> </ul>	In the interests of providing adequate commercial space for the proposed development.
4	<p><b>Interface with Greenhills Road – Option A (preferred)</b> (a) Block C, including its undercroft parking and basement parking and all ancillary elements including its entrance plaza and access ramp, etc. shall be omitted from the proposed development and the area/ footprint be subject to a future planning application.</p> <p><b>Interface with Greenhills Road – Option B</b> Prior to the commencement of development, the applicant shall submit revised plans sections and elevations, which indicate the following, for the written agreement of the Planning Authority:</p> <ul style="list-style-type: none"> <li>• Public open / communal space to the front of Block C, at an elevated position above the access road to interface with Greenhills Road, with a revised approach to the building line, tall building, open space and connection down into the site .</li> </ul> <p>The applicant is requested to liaise with Irish Water and secure agreement regarding same.</p>	In the interests of visual amenity

<p><b>5</b></p>	<p><b>Bus Connects - Road Widening and associated infrastructure</b></p> <p>(a) Prior to the commencement of development, the applicant shall submit revised plans for the written agreement of the Planning Authority that indicate that the Bus Connects scheme at this location has been fully taken into consideration and that the areas required for widening shall not provide any form of development or landscaping. The applicant shall liaise with the NTA in this regard. The following elements should be considered to be temporary in nature until such agreement has been reached:</p> <ul style="list-style-type: none"> <li>○ Vehicular and cycle entrance, ramp and bike path from Greenhills Road</li> <li>○ Pedestrian entrances (X 4) along Greenhills Road</li> <li>○ ESB Substation and switch room adjacent to Greenhills Road.</li> </ul> <p>The applicant shall submit revised details for the above features, as necessary.</p> <p>(b) The applicant shall provide full details of the proposed boundary treatments along the Greenhills Road and the extent of proposed retaining structures. The applicant shall liaise with the NTA regarding the potential impact of construction revised loading in conjunction with the Bus Connects.</p> <p>(c) The applicant shall provide revised landscape details for the extent of the areas impacted by Bus Connects.</p> <p>(d) The applicant shall lodge a cash deposit, bond or other security that is acceptable to the Planning Authority for a significant amount to be released following the completion of revised proposals that replace the temporary landscaping and access elements along the Greenhills Road as well as the provision of a pedestrian entrance plaza that seeks to tie in with Bus Connects.</p>	<p>In the interests of visual amenity and sustainable transport.</p>
<p><b>6</b></p>	<p><b>Junction.</b></p> <p>(a) Prior to the commencement of development, the applicant shall provide a revised Transport Assessment that sets out a junction traffic analysis for the proposed priority junction off Greenhills Road and a revised design of the junction for the written agreement of the Planning Authority. This shall demonstrate that the proposed/ amendment design caters for the proposed trip generation i.e., to demonstrate that the entrance does not require a signalised junction / dedicated right-turn lane such that bus priority is not compromised.</p> <p>(b) The applicant shall provide an assessment detailing the routes of safe and convenient access to public transport stop. This report shall support the location of an additional bus stop if required. The applicant shall submit details of the bus stop or as otherwise agreed for the written agreement of the Planning Authority. Details of same should be agreed with the NTA prior to lodgement with the Planning Authority.</p>	<p>In the interests of sustainable transport.</p>

7	<p><b>Roads</b></p> <ol style="list-style-type: none"> <li>1. The applicant shall be required to upgrade the surface course of the existing Southern link road (unnamed) along the entire southern boundary of the development.</li> <li>2. The proposed development shall make provision for the charging of electric vehicles. In the case of on-surface parking, 100% of spaces must be provided with electrical connections, to allow for the provision of future charging points. In the case of surface car parking spaces and basement car parking spaces, 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points, and 10% of surface car parking spaces must be provided with electric vehicle charging points initially. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport.</li> <li>3. The applicant should provide 1 No. disabled parking space for the commercial parking component to comply with the minimum rate of 5% of the overall vehicular parking spaces for mobility impaired users.</li> <li>4. SDCC road department is happy with the cycling parking provision. All external bicycle parking spaces shall be covered.</li> <li>5. A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file.</li> <li>6. Prior to commencement the Public Lighting Design for the development must be agreed by the Public Lighting team of SDCC.</li> <li>7. Any utility poles to be relocated to rear of verge. Cost of such relocation to be borne solely by the applicant.</li> <li>8. Prior to commencement of any works the relocation of the traffic signs outside of the property is to be agreed with the roads department. Cost of such relocation to be borne solely by the applicant.</li> </ol>	In the interests of sustainable transport.
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	<p>9. Prior to commencement of development, the applicant shall submit a revised Construction &amp; Demolition Waste Management Plan (C&amp;DWMP) for the written agreement of the Planning Authority showing number of loads, haulage routes, times of works, etc.. The agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file.</p> <p>10. Prior to commencement of development, the applicant shall submit the Construction Traffic Management Plan for the written agreement of the Planning Authority.</p>	
<p><b>8</b></p>	<p><b>Aspect and Daylight</b></p> <p>(a) Prior to the commencement of development, the applicant shall submit, for the written agreement of the Planning Authority, a schedule indicating of the orientation of each individual apartment. No north facing single aspect apartments shall be provided, unless clearly justified in terms of paragraph 3.18 of the Apartment Guidelines. Should elevational changes be required as a result of this, then details of same, including separation distances of any new windows, shall be submitted to and agreed in writing by the Planning Authority.</p> <p>(b) Prior to the commencement of development the applicant shall submit redesign floor layouts to the Planning Authority for written agreement, including potential reduction in unit numbers to ensure that the following apartments meet minimum daylight standards for Kitchen /Living/Dining areas, unless otherwise agreed in writing.</p> <p>Block A  Unit Number Room  A1-0112  A1-0109  A1-0110  A2-0104  A1-0212  A2-0204  A1-0311  A1-0411  Block B  B2-0105  B2-0110  B2-0211  B2-0311  B2-0411  B2-0611  Block C  C2-0104  Block D</p>	<p>In the interests of residential amenity.</p>

	D1-0213 D2-0213 D2-0214 D1-0313 D2-0314 D1-0413 D2-0414 D2-0514	
<b>9</b>	<b>Bins.</b> Prior to the commencement of development, the applicant shall submit details of all bin staging areas for the written agreement of the Planning Authority.	
<b>11</b>	<b>Sample External Material finishes</b> (a) Prior to the commencement of construction of any road, pavement, cycleway, on-street parking bays or other hard landscaped areas within the development hereby approved, sample panels of 3m x 3m of the materials shall be erected on site at an accessible location. Subsequently the Planning Authority shall be notified in writing of the presence and location of the sample panels for inspection and once approved by the Planning Authority, the sample panels shall be retained in good condition for the duration of development for quality control purposes. The development as approved shall be carried out in accordance with the approved samples.	In the interest of visual amenity, environmental quality and effective control of the development as approved.
<b>12</b>	<b>No sub-division</b> Each proposed residential unit shall be used and occupied as a single dwelling unit for residential purposes and shall not be subdivided or used for any commercial purposes, (including short-term letting).	To prevent unauthorised development.
<b>13</b>	<b>Under-ground Public Services</b> All public services to the proposed development, including electrical, information and communications technology (ICT) telephone and street lighting cables and equipment shall be located underground throughout the entire site. There shall also be provision for broadband throughout the site in accordance with the Planning Authority's policy and requirements.	In the interests of the visual amenities of the area, the proper planning and sustainable development of the area and compliance with the Council's Development Plan.
<b>14</b>	<b>Occupancy and Services</b> No dwelling unit shall be occupied until all the services (drainage, water supply, electricity and or other energy supply, public lighting and roads) for each dwelling unit have been completed thereto and are operational.	In the interest of the proper planning and sustainable development of the area.



<p><b>15</b></p>	<p><b>Street Names and Dwelling numbers</b>  Prior to the date of any Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of any works on site the applicant, owner or developer shall lodge with the Planning Authority:  (i) A street naming and dwelling/unit numbering scheme, for the development as approved that is in accordance with the Planning Authority’s policy and requirements for such schemes, along with associated proposed signage for the scheme, and  (ii) This has been acknowledged in writing and confirmed in writing as acceptable by the Planning Authority.  Following receipt of written acknowledgement that the proposed scheme is acceptable, the agreed number shall be placed on each house upon completion so as to be clearly legible from the proposed access road or the public realm, and the agreed street name in both Irish and English, or Irish only shall be erected at the beginning of each street in a manner to be clearly legible, and in accordance with Council requirements.  The development name shall;  1. Avoid any duplication within the county of existing names, and  2. Reflect the local and historical context of the approved development, and  3. Comply with;  (a) Development Plan policy, and  (b) The guidelines on naming and numbering of the Department of the Environment, Heritage and Local Government, and  (c) Have regard to the Guidelines issued by the Place Names Commission (An Coimisiún Logainmneacha) and  Preferably make exclusive use of the Irish language.</p>	<p>In the interest of the proper planning and sustainable development of the area and compliance with the South Dublin County Council's Development Plan.</p>
<p><b>16</b></p>	<p><b>Irish Water.</b>  The applicant shall liaise with Irish Water regarding the proposed development and submit details for the written agreement of the Planning Authority indicating the requirements of Irish Water and providing details of same.</p>	<p>In the interest of public health and to ensure adequate water/wastewater facilities.</p>
<p><b>17</b></p>	<p><b>Surface Water.</b>  (a) Prior to the commencement of development, the applicant shall provide a revised plan that indicated there is clear separation of surface water and foul water on site.  (b) Prior to commencement of development the applicant shall submit a revised drawing showing that the petrol interceptors are installed up stream of the proposed attenuation system. All surface water on site must pass through both the petrol interceptor and the attenuation system.</p>	<p>In the interest of public health and to ensure adequate surface water and foul drainage</p>
<p><b>18</b></p>	<p><b>Flood Risk</b>  (a) The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use.  (b) All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.</p>	<p>In the interest of public health</p>

	(c) All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works	
<b>18</b>	<p><b><u>Landscape Design Proposals</u></b></p> <p>Prior to the commencement of development on site, the following landscaping, open space and ecology details shall be submitted to and agreed in writing with the planning authority:</p> <p>a) The site shall be landscaped and earthworks carried out in accordance with the detailed comprehensive scheme of landscaping, including the Landscape Design Rationale, which accompanied the application, unless otherwise agreed in writing with the planning authority.</p> <p>b) Details of hard landscaping materials, including materials for the pedestrian and cycle routes and public open space.</p> <p>c) Further details of the play spaces and associated features assigned for children of all ages.</p> <p>d) details in relation to public furniture/benches;</p> <p>e) proposed locations of trees at appropriate intervals and other landscape planting in the development, including details of the size, species and location of all vegetation, including biodiversity enhancement measures;</p>	<p>In the interest of amenity, ecology and sustainable development and To assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.</p>
<b>20</b>	<p><b><u>Landscape Management and Maintenance</u></b></p> <p>A Landscape Management and Maintenance Plan of both communal residential and publicly accessible areas shall be submitted to, and agreed in writing with, the planning authority prior to occupation of the development. This Landscape Management and Maintenance Plan shall cover a period of at least three years and shall include details of the arrangements for its implementation. Details of a to be implemented during operation of the development. All planting shall be adequately protected from damage until established and maintained thereafter. Any plants which die, are removed or become seriously damaged or diseased in the first 5 years of planting, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p>	<p>To provide for the satisfactory future maintenance of this development in the interest of visual amenity.</p>
<b>21</b>	<p><b><u>Taking in Charge</u></b></p> <p>(a) All areas not intended to be taken in charge by the local authority, shall be maintained by a legally constituted management company.</p> <p>(b) A map delineating those areas to be taken in charge by the Local Authority and details of the legally constituted management company contract, and drawings/particulars describing the parts of the development for which the legally-constituted management company would have responsibility shall be submitted to, and agreed in writing with, the planning authority before any of the residential or commercial units are made available for occupation.</p>	<p>To provide for the satisfactory future maintenance of this development in the interest of residential amenity</p>

	The management scheme shall provide adequate measures for the future maintenance of public open spaces, roads and communal areas.	
23	<p><b><u>Play Provision</u></b></p> <p>Prior to the commencement of development, the applicant shall provide clarification as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development. The applicant shall provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. This shall be submitted for the written agreement of the Planning Authority.</p>	To uphold the policies of the South Dublin County Council Development Plan 2016-2022 relating to Children's play, and to provide for the proper planning and sustainable development of the area.
24	<p><b><u>SUDS</u></b></p> <p>Prior to the commencement of development, the applicant shall submit, for the written agreement of the Planning Authority, a comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:</p> <ul style="list-style-type: none"> <li>• Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.</li> <li>• Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same.</li> <li>• The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat</li> </ul>	To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

	<p>and attenuate water coming from hard landscaping areas.</p> <ul style="list-style-type: none"> <li>• Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives.</li> <li>• Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to refer to the recently published ‘SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022’ for acceptable SUDS tree pit details</li> </ul>	
25	<p><b><u>Environmental Impact Assessment Report</u></b></p> <p>The recommendations and mitigation measures contained within the Environmental Impact Assessment Report shall be implemented in full by the applicant. In relation to Bats and Birds some of the mitigation measures to be Implemented include:</p> <p><b><u>Bats</u></b></p> <ol style="list-style-type: none"> <li>a) Planting of shrub and tree species to take place as part of project design.</li> <li>b) Bat sensitive lighting measures incorporated into the public lighting design.</li> <li>c) Placement and maintenance of bat boxes (minimum 5) on trees along the Site boundary.</li> </ol> <p><b><u>Birds</u></b></p> <ol style="list-style-type: none"> <li>a) Planting of shrub and tree species to take place as part of project design. No removal of vegetation to</li> <li>b) take place during the nesting season.</li> <li>c) Construction related noise control/minimisation measures to be implemented</li> <li>d) It is recommended that Swift Boxes or Bricks are incorporated into the Proposed Development where possible</li> </ol>	<p>To protect and enhance areas of biodiversity, in accordance with policies IE7 Objective 5, G3 Objective 2, G4 Objective 2, HCL15 Objective 3, and other policies relating to Biodiversity within the CDP 2016-2022.</p>
26	<p><b><u>Arboricultural Impact</u></b></p> <p>Prior to the commencement of development, the applicant shall submit, for the written agreement of the Planning Authority, a comprehensive Tree Report for the proposed development sit. This shall comprise; a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, <u>BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations</u>. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:</p> <ul style="list-style-type: none"> <li>• <u>Tree Survey Plan</u>: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site</li> <li>• <u>Tree Survey Schedule</u>: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.</li> </ul>	<p>To provide for the retention and protection of existing trees in the interests of visual amenity and biodiversity, in accordance with policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.</p>

	<ul style="list-style-type: none"> <li>• <u>Arboricultural Impact Assessment</u>: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).</li> <li>• <u>Design Iteration- Adjustments, Revisions to Proposed Site Layout</u>: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate</li> <li>• <u>Tree Constraints Plan</u>: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.</li> <li>• <u>Tree Protection Plan</u>: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.</li> <li>• <u>Arboricultural Method Statement</u>: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.</li> <li>• <u>Summary Table</u>: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.</li> <li>• <u>Pre Development Photo's</u>: Prior to the commencement of works the applicant shall submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This shall include a location map of where each picture was taken from.</li> <li>• Arborist's name, arboricultural qualifications and contact details.</li> <li>• Date that the survey was carried out (surveys &gt; 12 months are unacceptable).</li> </ul>	
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27	<p><b><u>Invasive Flora</u></b></p> <p>As recommended in the submitted in the Environmental Impact Assessment Report to prevent the spread of Butterfly Bush within and outside the Site boundary the following management measures for its removal are to be implemented below:</p> <ul style="list-style-type: none"> <li>• Management methods such as digging it out are applicable only to minor infestations at the initial stage of invasion. Hand-picking of young plants is feasible but should be undertaken with care to avoid soil disturbance which can give rise to a flush of new seedling. Grubbing of mature stands as a sole attempt at control is not recommended for the same reason. After uprooting, it is essential to plant the ground in order to prevent a flush of new seedling growth. When it is cut, Buddleia grows back from the stump very vigorously. Mowing of young plants does not provide control as they re-sprout with vigour. Where removal of mature plants is not feasible in the short term, the flower heads should be cut off in June before seed set. Chemical control recommended practice for the application of herbicides requires cutting back of plants to a basal stump during active growth (late spring to early summer) which is then treated (brushed on) immediately with a systemic weed killer mix (Starr et al, 2003). Foliar application of approved herbicides may be adequate for limited infestations of younger plants, but should be followed up at 6 monthly intervals.</li> </ul>	<p>prevent to prevent the spread of invasive plant species during the construction and operation of the proposed development and ultimately seek its eradication, in accordance with policies G2 Objective 12 and G2 Objective 13 of CDP 2016-2022.</p>
29	<p><b>Environmental health</b></p> <p><b>Noise</b></p> <p>1. During demolition and construction phase to control, limit and prevent the generation of Environmental Noise Pollution from occurring the Environmental Health Department of South Dublin County Council, hereby informs you that :</p> <p>The use of machinery, plant, or equipment (which includes pneumatic drills, generators and the movement on and off the site of construction vehicles) is NOT PERMITTED outside the following hours</p> <ul style="list-style-type: none"> <li>• Before 07.00 hours on weekdays, Monday to Friday</li> <li>• Before 09.00 hours on Saturdays.</li> <li>• After 19.00 hours on weekdays, Monday to Friday.</li> <li>• After 13.00 hours on Saturdays.</li> <li>• Not permitted at any time on Sundays, Bank Holidays or Public Holidays.</li> </ul> <p><b>Air Quality</b></p> <p>2. During the construction phase of the development, Best Practicable Means shall be employed to minimise air blown dust being emitted from the site. This shall include covering skips and slack-heaps, netting of scaffolding, daily washing down of pavements or other public areas, and any other precautions necessary to prevent dust nuisances.</p>	<p>In the interests of public health</p>

	<p><b>Bin storage</b></p> <p>3. Bin storage facilities should be adequately serviced with a water supply, drainage and ventilation.</p> <p><b>Fumes &amp; Noise from Commercial Units</b></p> <p>4</p> <p>(a) The ventilation system shall be adequately filtered and externally vented so as not to cause a nuisance to neighbouring properties.</p> <p>(b) Any fumes emitted from the premises shall be minimised and if necessary treated using the Best Available Technology and emitted to the outer air.</p> <p>(c) The noise from the operation of the ventilation system shall be attenuated so as not to cause a noise nuisance to nearby residential properties.</p> <p>(d) Details to demonstrate compliance with above shall be submitted for the written agreement of the Planning Authority prior to the commencement of any development.</p> <p><b>General Impact</b></p> <p>5. The development shall be so operated that there will be no emissions of malodours, gas, dust, fumes or other deleterious materials, no noise or noise vibration on site as would give reasonable cause for annoyance to any person in any residence, adjoining premises or public place in the vicinity.</p>	
30	<p><b>Irish Fisheries</b></p> <p>The proposed development is within the River Camac catchment which is a recognised salmonid system, under significant ecological pressure predominately due to urbanisation. Although considerable sections of main channel are culverted, sections that remain on the surface invariably support self-sustaining populations of Brown trout (<i>Salmo trutta</i>). The river also supports populations of migratory Sea trout (<i>Salmo trutta</i>) in the lower reaches. Other species include the protected European eel, Freshwater Crayfish (<i>Austropotamobius pallipes</i>) and Lamprey (<i>Lampetra</i> sp.) species, listed under Annex II of the EU Habitats Directive.</p> <p>In the <b>AA Screening Report</b>, Section 3.5 Assessment of Likely Significant Effects, it is stated that “<i>The potential for surface water generated at the Site of the Proposed Development to reach European Sites within Dublin Bay and cause significant effects, during both the Construction and Operational Phase, is negligible due to:</i></p> <ul style="list-style-type: none"> <li>• <i>The distance and consequent potential for dilution in the River Camac, River Liffey and Dublin Bay. Surface water discharges would have to travel almost 13km within the surface water network and along the River Camac and River Liffey before discharging into Dublin Bay.</i></li> </ul>	In the interests of protecting the environment and water quality

• *The potential for dilution in the surface water network during heavy rainfall events.*

IFI would view the Camac River and the South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA and North Bull Island SPA as being inter dependent on one another to maintain a healthy and sustainable environment throughout.

The concept or idea of the Camac River acting as a type of buffering mechanism, or part of any mitigation measures to protect the SAC or SPA would not be considered by IFI. There should be nothing other than clean water entering the surface water sewer system and any mitigation measures to protect the aquatic environment should be solely designed and implemented within the proposed development to ensure there is no negative impact within any of the receiving environments. IIE Baile Átha Cliath, 3044 Céide an Locha, Campas Gnó Larthar Na Cathrach, Baile Átha Cliath 24, D24 Y265 IFI Dublin, 3044 Lake Drive, Citywest Business Campus, Dublin 24, D24 Y265 +353(0)1 8842 600 - [dublin@fisheriesireland.ie](mailto:dublin@fisheriesireland.ie) - [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

(a) Prior to the commencement of development, the applicant shall submit a Construction Environment Management Plan (CEMP) for the written agreement of the Planning Authority.

- This shall detail whether there is any potential for deleterious matter to enter the Camac or Poddle River systems during the construction phase through the surface water system or by any other means this should be acknowledged and mitigated against in the document
- The CEMP should detail and ensure Best Construction Practices including measures to prevent and control the introduction of pollutants and deleterious matter to surface water either directly or indirectly through the storm water drainage network and measures to minimise the generation of sediment and silt.
- Ground preparation and associated construction works, including large-scale topographic alteration, the creation of roads, buildings and footpaths, have significant potential to cause the release of sediments and various pollutants into surrounding watercourses. Pollution of the adjacent freshwaters (Camac/Poddle Rivers) from poor on-site construction practices could have a significantly negative impact on the fauna and flora of this surface water system. A comprehensive and integrated approach for achieving stream protection during construction and operation (in line with international best practice) should be implemented. Construction works must be planned in a manner which prevents extensive tracts of soils from being exposed at any time and arrangements must be made for the control and management of any contaminated water resulting from construction.



(b) The **EIAR** identifies that there is potential impacts to the receiving environment through increased sediment loading in run-off and Potential Contamination of Local Water Courses and outlines measures to mitigate against such possibilities and states that “monitoring commitments detailed within the EIAR have been included in a separate compendium and are presented in Chapter 17.0 included in Volume II of the EIAR. Further to those outlined in the EIAR, a Construction Management Plan (CMP) will be agreed with the Planning Authority, prior to the commencement of construction activities on the site, and will incorporate provision for the primary construction mitigation measures”

The CEMP should adopt all recommended measures contained within Chapter 17.0 included in Volume II of the EIAR along with those outlined within the CEMP.

(c) Best practice should be always implemented in relation to any activities that may impact on surface water (stream and river). Any indirect discharges to surface streams present on or near the site must not impact negatively on the system. Prior to the commencement of development, the applicant shall submit comprehensive surface water management measures must be implemented at the construction and operational stage to prevent any pollution of local surface waters, for the written agreement of the Planning Authority

(d) All discharges must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

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(e) Prior to the commencement of development, the applicant shall submit details for the written agreement of the Planning Authority indicating that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development during construction and post construction phases with no negative repercussions for the quality of any receiving waters.

(f) Prior to the commencement of development, the applicant shall submit details for the written agreement of the Planning Authority, indicating how The Department of Housing, local Government and Heritage’s recently published interim guidance document on Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document has been considered when designing drainage systems.

	<a href="https://www.gov.ie/en/publication/10d7c-nature-based-solutions-to-the-management-of-rainwater-and-surface-water-runoff-in-urban-areas-best-practice-interim-guidance-document/">https://www.gov.ie/en/publication/10d7c-nature-based-solutions-to-the-management-of-rainwater-and-surface-water-runoff-in-urban-areas-best-practice-interim-guidance-document/</a>	
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<p><b>22</b></p>	<p><b>Part V Social Housing</b></p> <p>That the applicant, owner or developer, or any other person with an interest in the land to which the development as approved relates shall, prior to the lodgement of a commencement notice within the meaning of Part II of the Building Control Regulations 1997:</p> <p>(i) enter into an agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 (as amended) as referred to in the South Dublin County Council Development Plan 2016-2022, providing, in accordance with that section, for the matters referred to in paragraph (a) or (b) of subsection (3) of section 96, and</p> <p>(ii) when the agreement with the Housing Authority for compliance with the Part V of the Planning and Development Act 2000 is finalised to the satisfaction of the Housing Authority, a certified copy of the agreement shall be lodged with the Planning Authority.</p> <p>REASON: To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan 2016-2022.</p> <p>REASON: To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan 2016-2022.</p>	<p>To promote social integration consistent with policies/objectives of the Councils Housing Strategy as contained in the South Dublin County Council Development Plan 2016-2022.</p>
<p><b>25</b></p>	<p>The development hereby permitted shall be for Build to Rent units which shall operate in accordance with the definition of Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2020 and be used for long term rentals only. No portion of this development shall be used for short term lettings.</p>	<p>Reason: In the interest of the proper planning and sustainable development of the area and in the interest of clarity.</p>
<p><b>26</b></p>	<p>Prior to the commencement of development, the owner shall submit, for the written consent of the planning authority, details of a proposed covenant or legal agreement which confirms that the development hereby permitted shall remain owned and operated by an institutional entity for a minimum period of not less than 15 years and where no individual residential units shall be sold separately for that period. The period of 15 years shall be from the date of occupation of the first residential unit within the scheme.</p>	<p>Reason: In the interests of proper planning and sustainable development of the area.</p>

<b>27</b>	Prior to expiration of the 15 year period referred to in the covenant, the owner shall submit for the written agreement of the planning authority, ownership details and management structures proposed for the continued operation of the entire development as a Build to Rent scheme. Any proposed amendment or deviation from the Build to Rent model as authorised in this permission shall be subject to a separate planning application.	Reason: In the interests of orderly development and clarity.
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## SOUTH DUBLIN COUNTY COUNCIL



### INTERNAL MEMORANDUM

#### PUBLIC REALM PLANNING REPORT

**Development:** Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and

toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m; (vi) the construction of 3 vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road;(vii) provision of 424 no. car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle spaces at ground floor level parking area within Blocks C and D;(viii) provision of 1363 bicycle parking spaces comprising 1035 residents' bicycle spaces, 5 accessible bicycle spaces and 7 cargo bicycle spaces in 9 bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 visitors' bicycle spaces located externally at ground floor level throughout the development;(ix) provision of outdoor communal amenity space (5,020sq.m) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels; provision of a communal amenity roof garden in Block C with seating area and planting (176sq.m); and inclusion of centrally located public open space (3,380sq.m) adjacent to Blocks B and C comprising grassed areas, planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm; (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to

facilitate the development. This application is accompanied by an Environmental Impact Assessment Report (EIAR). The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant Development Plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes the relevant Development Plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.

**Location:** Former Chadwicks Site, Greenhills Road, Walkinstown, Dublin 12

**Applicant:** Steeplefield Limited

**Reg. Ref:** SHD3ABP-313129-22

**Report Date:** 05/05/2022

**Main Concerns:**

- Greater level of detail required regarding proposed play provision to be provided within the development.
- Greater level of detail required regarding the tree pits and SUDS features to be provided within the development.
- Greater level of detail required in relation to the proposed Entrance Plaza located in the north western corner of the development – greater detail required in terms of proposed materials, lighting, furniture, planting, levels and access.
- overshadowing of the courtyard open space in block A1 & A2 and Block D & D1 - A microclimate assessment shall be provided for all open spaces.
- There is a need for a strong and legible hierarchy in the open spaces provided as part of this proposed development, with different types of open space provided for in accordance with policies H12, objective 2 of the CDP 2016-2022. 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 with a movement strategy plan for cyclists and pedestrians.
- Lacks a comprehensive and detailed SUDS strategy for the entire development which details the implementation, maintenance and of future management of the proposed SUDS Strategy.
- Detailed Planting Plan required for the entire development which clearly details planting sizes and proposed numbers/densities.
- Taking in Charge Drawing Required.

### **Site Area**

**2.79 Ha**

### **Zoning**

The proposed site is zoned REGEN - to facilitate enterprise and/or residential led regeneration

### **Open Space Provision**

Proposed Public Space = 3,380 sq.m (12% of the site)

Communal Open Space = 5, 020 sq. m

### **Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:**

#### **DP 2016-22 Section 8.3.0 Public Open Space Hierarchy and Landscape Setting**

It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.

**G4 Objective 1:** To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.

**G4 Objective 2:** To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

#### **DP 2016-22 Section 8.1.0 Green Infrastructure Network**

**G2 Objective 1:** To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network



**G2 Objective 2:** To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

**G2 Objective 5:** To integrate Green Infrastructure as an essential component of all new developments.

**G2 Objective 9:** To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

**G2 objective 11:** To incorporate appropriate elements of Green Infrastructure e.g. new tree planting etc. into existing areas of hard infrastructure wherever possible.

**G2 Objective 13:** To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

#### **DP 2016-22 Section 8.5.0 Green Infrastructure within Urban Areas**

**G6 Objective 1:** To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

#### **DP 2016-22 Section 9 Heritage Conservation and Landscapes**

**HCL15 Objective 3:** To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

#### **DP 2016-22 Section 8.4.0 Sustainable Urban Drainage Systems**

Sustainable Urban Drainage Systems (SUDS) drain surface water in an environmentally friendly way by replicating natural systems in managed environments. SUDS systems seek to collect, store and clean surface water using natural systems and to release it back into the environment in a slow and controlled way, thereby reducing the risk of fluvial and pluvial flooding. Key features, such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins are easy to manage, environmentally friendly and aesthetically attractive.

**G5 Objective 1:** To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems

**G5 Objective 2:** To promote the provision of Green Roofs and/or Living Walls in developments where expansive roofs are proposed such as industrial, retail and civic developments

**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:**

**1. Landscape Design Proposals**

Prior to the commencement of development on site, the following landscaping, open space and ecology details shall be submitted to and agreed in writing with the planning authority:

- a) The site shall be landscaped and earthworks carried out in accordance with the detailed comprehensive scheme of landscaping, including the Landscape Design Rationale, which accompanied the application, unless otherwise agreed in writing with the planning authority.
- b) Details of hard landscaping materials, including materials for the pedestrian and cycle routes and public open space.
- c) Further details of the play spaces and associated features assigned for children of all ages.
- d) details in relation to public furniture/benches;
- e) proposed locations of trees at appropriate intervals and other landscape planting in the development, including details of the size, species and location of all vegetation, including biodiversity enhancement measures;

**REASON: In the interest of amenity, ecology and sustainable development and To assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.**

**2. Landscape Management and Maintenance**

A Landscape Management and Maintenance Plan of both communal residential and publicly accessible areas shall be submitted to, and agreed in writing with, the planning authority prior to occupation of the development. This Landscape Management and Maintenance Plan shall cover a period of at least three years and shall include details of the arrangements for its implementation. Details of a to be implemented during operation of the development. All planting shall be adequately protected from damage until established and maintained thereafter. Any plants which die, are removed or become seriously damaged or diseased in the first 5 years of planting, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

**REASON: To provide for the satisfactory future maintenance of this development in the interest of visual amenity.**

### **3. Taking in Charge**

(a) All areas not intended to be taken in charge by the local authority, shall be maintained by a legally constituted management company.

(b) A map delineating those areas to be taken in charge by the Local Authority and details of the legally constituted management company contract, and drawings/particulars describing the parts of the development for which the legally-constituted management company would have responsibility shall be submitted to, and agreed in writing with, the planning authority before any of the residential or commercial units are made available for occupation. The management scheme shall provide adequate measures for the future maintenance of public open spaces, roads and communal areas.

**REASON: To provide for the satisfactory future maintenance of this development in the interest of residential amenity**

### **4. Open Space Provision**

Justification of hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan Standards and location of underground attenuation tanks and storage systems under public open space, as part of SuDS solution.

**REASON: To assimilate the development into its surroundings, in accordance with the policies and objectives contained within Section 8.3.0 Public Open Space Hierarchy and Landscape Setting and policies HCL7 Objective 1 and HCL7 Objective 2 of the CDP 2016-2022.**

### **5. Play Provision**

Clarification shall be provided as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development. The applicant shall provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. **CONDITION**

**REASON: To uphold the policies of the South Dublin County Council Development Plan 2016-2022 relating to Children's play, and to provide for the proper planning and sustainable development of the area.**

## **6. SUDS**

A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate the treatment train, biodiversity value and amenity value of the SUDS proposals for the catchment in the residential areas.
- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development including drainage / attenuation calculations for same.
- The applicant shall show further proposed SuDS features for the development such as green roofs, grass areas, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Bio retention tree pits should be designed so that they enable tree pits to both support healthy tree growth while at the same time to help treat and attenuate water coming from hard landscaping areas.
- Natural Suds measures should be detailed to remove/ reduce the requirement for underground attenuation tanks in line with the development plan objectives.
- Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

**REASON:** To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies under Section 8.4.0 Sustainable Urban Drainage Systems of the CDP 2016-22 in particular G5 Objective 1 and G5 Objective 2.

## **7. Environmental Impact Assessment Report**

The recommendations and mitigation measures contained within the Environmental Impact Assessment Report shall be implemented in full by the applicant. In relation to Bats and Birds some of the mitigation measures to be Implemented include:

### **Bats**

- a) Planting of shrub and tree species to take place as part of project design.

- b) Bat sensitive lighting measures incorporated into the public lighting design.
- c) Placement and maintenance of bat boxes (minimum 5) on trees along the Site boundary.

#### **Birds**

- a) Planting of shrub and tree species to take place as part of project design. No removal of vegetation to
- b) take place during the nesting season.
- c) Construction related noise control/minimisation measures to be implemented
- d) It is recommended that Swift Boxes or Bricks are incorporated into the Proposed Development where possible

**REASON: To protect and enhance areas of biodiversity, in accordance with policies IE7 Objective 5, G3 Objective 2, G4 Objective 2, HCL15 Objective 3, and other policies relating to Biodiversity within the CDP 2016-2022.**

#### **8. Arboricultural Impact**

There are concerns with the lack of information submitted in relation to the existing trees and vegetation on site especially with regard to those trees along the northern boundary of the proposed development site and the potential negative impact the proposed development will have on this existing vegetation.

The applicant shall submit a comprehensive Tree Report for the proposed development sit. This shall comprise; a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
- Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant’s design team [especially arborist, consulting

architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate

- Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.
- Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
- Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- Pre Development Photo's: Prior to the commencement of works the applicant shall submit pictures of the existing trees/hedgerows before works commence with the tree protective fencing. This shall include a location map of where each picture was taken from.
- Arborist's name, arboricultural qualifications and contact details.
- Date that the survey was carried out (surveys > 12 months are unacceptable).

**REASON: To provide for the retention and protection of existing trees in the interests of visual amenity and biodiversity, in accordance with policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 of the CDP 2016-2022.**

## **9. Invasive Flora**

As recommended in the submitted in the Environmental Impact Assessment Report to prevent the spread of Butterfly Bush within and outside the Site boundary the following management measures for its removal are to be implemented below:

- Management methods such as digging it out are applicable only to minor infestations at the initial stage of invasion. Hand-picking of young plants is feasible but should be undertaken with care to avoid soil disturbance which can give rise to a flush of new seedling. Grubbing of mature stands as a sole attempt at control is not recommended for the same reason. After

uprooting, it is essential to plant the ground in order to prevent a flush of new seedling growth. When it is cut, Buddleia grows back from the stump very vigorously. Mowing of young plants does not provide control as they re-sprout with vigour. Where removal of mature plants is not feasible in the short term, the flower heads should be cut off in June before seed set. Chemical control recommended practice for the application of herbicides requires cutting back of plants to a basal stump during active growth (late spring to early summer) which is then treated (brushed on) immediately with a systemic weed killer mix (Starr et al, 2003). Foliar application of approved herbicides may be adequate for limited infestations of younger plants, but should be followed up at 6 monthly intervals.

**REASON: To prevent to prevent the spread of invasive plant species during the construction and operation of the proposed development and ultimately seek its eradication, in accordance with policies G2 Objective 12 and G2 Objective 13 of CDP 2016-2022.**

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**Oisín Egan**

**Executive Parks Superintendent**

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**Laurence Colleran**

**Senior Executive Parks Superintendent**

# Water Services Planning Report

**Register Reference No.:** *SHD3ABP-313129-22*

**Development:** Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m; (vi) the construction of 3 vehicular entrances;



## **Water Services Planning Report**

a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road;(vii) provision of 424 no. car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle spaces at ground floor level parking area within Blocks C and D;(viii) provision of 1363 bicycle parking spaces comprising 1035 residents' bicycle spaces, 5 accessible bicycle spaces and 7 cargo bicycle spaces in 9 bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 visitors' bicycle spaces located externally at ground floor level throughout the development;(ix) provision of outdoor communal amenity space (5,020sq.m) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels; provision of a communal amenity roof garden in Block C with seating area and planting (176sq.m); and inclusion of centrally located public open space (3,380sq.m) adjacent to Blocks B and C comprising grassed areas, planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm; (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to facilitate the development. This application is accompanied by an Environmental Impact Assessment Report (EIAR). The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant Development Plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes the relevant Development Plan other than in relation to the zoning of the land. An Environmental Impact Assessment

# Water Services Planning Report

Report has been prepared in respect of the proposed development.

Location: Former Chadwicks Site, Greenhills Road, Walkinstown,  
Dublin 12  
Report Date : 06<sup>th</sup> May 2022

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## Surface Water Report:

## **Observations:**

- 1.1 The applicant must clarify that there is clear separation of surface water and foul water on site. The drawings submitted show storm water entering the foul water network at FW09 and at FW14.  
Prior to commencement of development the applicant must submit a revised drawing showing complete separation of foul and surface water drainage systems.
- 1.2 Prior to commencement of development the applicant must also submit a revised drawing showing that the petrol interceptors are installed up stream of the proposed attenuation system. All surface water on site must pass through both the petrol interceptor and the attenuation system.

## Flood Risk Report:

## **No Objection:**

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

Date: \_\_\_\_\_

# SOUTH DUBLIN COUNTY COUNCIL



## INTERNAL MEMORANDUM

### HOUSING DEPARTMENT

11<sup>th</sup> April 2022

*Michael Mulhern*

*Director of Land Use, Planning and Transportation*

*Dept. of Development, Economic & Transport Planning*

**FAO: Brian Connolly**

**Location:** Former Chadwicks Site, Greenhills Road

**Applicant:** Steeplefield Ltd

**Reg Ref:** SHD3ABP-313129-22.

**Development:** *Demolition of the former Chadwicks Builders Merchant development comprising 1 two storey office building and 9 storage/warehouse buildings ranging in height from 3m - 9.9 m as follows: Building A (8,764sq.m), Building B (1,293sq.m), Building C (two-storey office building) (527sq.m), Building D (47sq.m), Building E (29sq.m), Building F (207sq.m), Building G (101sq.m), Building H (80sq.m), Building I (28sq.m), and Building J (44sq.m), in total comprising 11,120sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 build-to-rent apartment units (292 one-beds, 280 two-beds and 61 three-beds), 1 childcare facility and 10 commercial units in 4 blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 apartments (102 one bed-units, 106 two bed units and 1 three bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 one bed-units, 45 two bed-units and 23 three bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 apartments (38 one bed units, 71 two bed units and 21 three bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 apartments (99 one bed-units, 58 two bed-units and 16 three bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 commercial units at ground floor level of Blocks A, B and D, and 2 commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 units at ground floor comprising 79.46sq.m., 90.23sq.m., and 121.39sq.m., Block B has 1 unit at ground floor comprising 127.03sq.m., Block C has two units at second floor comprising 120.85sq.m. and 125.45sq.m, and Block D has 4 units at ground floor comprising 84.45sq.m, 149.77sq.m, 155.48sq.m and 275.59sq.m; (vi) the construction of 3 vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road; (vii) provision of 424 no. car parking spaces comprising 398 standard spaces, 21 mobility spaces and 5 car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and*

*on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 dedicated motorcycle spaces at ground floor level parking area within Blocks C and D;(viii) provision of 1363 bicycle parking spaces comprising 1035 residents' bicycle spaces, 5 accessible bicycle spaces and 7 cargo bicycle spaces in 9 bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 visitors' bicycle spaces located externally at ground floor level throughout the development;(ix) provision of outdoor communal amenity space (5,020sq.m) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels; provision of a communal amenity roof garden in Block C with seating area and planting (176sq.m); and inclusion of centrally located public open space (3,380sq.m) adjacent to Blocks B and C comprising grassed areas, planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm; (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to facilitate the development. This application is accompanied by an Environmental Impact Assessment Report (EIAR). The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant Development Plan. The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes the relevant Development Plan other than in relation to the zoning of the land. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.*

I refer to the above application for planning permission, Reg. Ref. **SHD3ABP-313129-22** and I wish to advise that a Part V condition should be attached to any grant of permission for the current application.

The Part V submission lodged with this planning application is noted, the developer intends on fulfilling its Part V obligation by providing, 64 no. Part V units – 33 x 1 bed, 23 x 2 bed and 8 x 3 bed apartments. It is South Dublin County Councils preference to **acquire** a mixture of units on site in line with the ratio of units proposed in the development. Further proposals are subject to review and consideration by the Housing Department, subject to planning approval.

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

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage. Please note that the Council would require a fully completed Part V submission prior to commenting on costs.

**Rachel Jackson**  
**Administrative Officer**  
**Part V**  
**Housing Department**  
**South Dublin County Council**

# SOUTH DUBLIN COUNTY COUNCIL



## INTERNAL MEMORANDUM

### HOUSING DEPARTMENT

11<sup>th</sup> April 2022

*Michael Mulhern*

*Director of Land Use, Planning and Transportation*

*Dept. of Development, Economic & Transport Planning*

**FAO: Brian Connolly**

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I refer to the above application for planning permission, Reg. Ref. **SHD3ABP-313129-22** and I wish to advise that a Part V condition should be attached to any grant of permission for the current application.

The Part V submission lodged with this planning application is noted, the developer intends on fulfilling its Part V obligation by providing, 64 no. Part V units – 33 x 1 bed, 23 x 2 bed and 8 x 3 bed apartments. It is South Dublin County Councils preference to **acquire** a mixture of units on site in line with the ratio of units proposed in the development. Further proposals are subject to review and consideration by the Housing Department, subject to planning approval.

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

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage. Please note that the Council would require a fully completed Part V submission prior to commenting on costs.

**Rachel Jackson**  
**Administrative Officer**  
**Part V**  
**Housing Department**  
**South Dublin County Council**