



ARMSTRONG FENTON

ASSOCIATES

PROJECT: Large-scale Residential Development (LRD)

LOCATION: Junction of Swords Road & Santry Avenue,
Santry, Dublin 9.

REPORT: Statement of Response to Dublin City Council
LRD Opinion Ref. LRD 6044/23-S2.

CLIENT: DWYER NOLAN DEVELOPMENTS LTD.

DATE: April 2024.

Planning &
Development
Consultants



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1.0. Introduction

1.1. On 20th October 2023, Armstrong Fenton Associates, Planning Consultants, on behalf of Dwyer Nolan Developments Ltd (“The Applicant”) submitted a pre-application consultation request to Dublin City Council. The purpose of this document is to respond to the specific information requested by Dublin City Council in their Notice of Pre-Application Consultation Opinion (Ref. LRD6044/23-S2), further to a meeting held on 17th November 2023 with Dublin City Council and the Applicant/Design Team.

1.2. This Notice states that it is the opinion of the Planning Authority that the documentation submitted in accordance with Section 32B of the Planning and Development (Large-scale Residential Developments) Act 2021, requires further consideration and amendment to constitute a reasonable basis for an application for a Large-scale Residential Development (hereafter “LRD”).

1.3. The Planning Authority has set out key issues / areas that must be addressed in the application documents that could result in the proposal constituting a reasonable basis for making an application, and advised that the LRD application be accompanied by:

- *“Statement of response to the issues set out in the LRD opinion.*
- *Statement that in the applicant’s opinion the propose is consistent with the relevant objectives of the development plan for the area”.*

1.4. A response to the items raised in the Planning Authority’s Opinion is set out throughout this document. This LRD application is also accompanied by a Statement of Consistency (submitted as a separate document) which outlines the proposed development’s compliance with national, regional and local planning policy, including the relevant Dublin City Development Plan, 2022-2028.

2.0. Response to Dublin City Council LRD Opinion Ref. LRD 6044/23-S2.

2.1 Item 1. Zoning

a. *In relation to Zoning the Planning Authority the requirement for a mixed use development with sufficient commercial/retail amenities is reiterated. The reinstatement of the commercial uses (relative to the Section 147 meeting) is welcomed.*

Response:

The Applicant acknowledges that the application site is zoned “Z3” (Neighbourhood Centres) in the existing Dublin City Development Plan 2022-2028 (hereafter “CDP”) which has an objective: *“To provide for and improve neighbourhood facilities.”* The CDP notes that Z3 zoned lands generally provide for local facilities within a residential neighbourhood which can range from the traditional parade of shops to larger neighbourhood centres. The CDP goes on to state that Z3 lands: *“can form a focal point for a neighbourhood and provide a range of services to the local population. Neighbourhood centres provide an essential and sustainable amenity for residential areas and it is important that they should be maintained and strengthened, where appropriate. Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level”.*

Residential use is listed as a ‘permissible use’ under the Z3 zoning, together with, *inter alia*: community facility, cultural / recreational building and uses, medical use and related consultants, office use, open space, primary health care centres, restaurants and shops (both local and neighbourhood).

The CDP recognises the importance of Z3 lands in contributing to meeting the future housing requirements of the city. To this end, it is considered that the site represents a highly suitable location for the provision of new residential development, given its location on an established entrance route into the city, next to high frequency public transport (Swords Road QBC), and the accessibility of M50 / M1 motorways.

The objective of the Z3 zoning is to provide for and improve neighbourhood facilities. The proposed development provides for c. 1,460sq.m of community/arts & culture space, 3 no. retail units, and a medical suite / GP Practice unit, all located on the ground floor of Blocks A, B, C, D, E and F, as well as a dedicated 1 storey residential amenity use unit located between Blocks A and D. These proposed uses are all located at ground floor level providing direct frontage onto both Swords Road and Santry Avenue, as well as the internal public open space. It is considered that these non-residential uses will provide for strong active frontage at street level, bringing vibrancy to a prominent corner location, and improve the range of facilities in the area in compliance with the vision for lands contained in the CDP.

The retail units, and medical suite / GP Practice unit, and dedicated residential amenity use unit face onto Santry Avenue and Swords Road thus providing for active street frontage at an important corner location, with the proposed community/arts & culture space also extending into the site on the ground floors of Blocks C, D, E and F, with Blocks D and E also providing direct street frontage onto Santry Avenue.

The following is the proposed mix of non-residential uses:

Retail:

- Block A – 2 no. units, 132.4m² & 171.8m² respectively = 304.2m² total
- Block B – 1 no. unit, 163.9m²
- Total retail / commercial = 468.1m²

**Medical suite / GP Practice:**

- Block B - medical suite / GP Practice unit (130.4m²)

Community/arts & culture space:

- C.1,460m² laid out on ground floors of Blocks C, D, E & F.

The total floor area of proposed non-residential uses = 2,058.5m².

In addition:

Residential amenity unit:

- a 1 storey residential amenity unit (c. 166.1m²) located between Blocks A & D.

Retail Use:

The development includes 3 no. retail units located on the ground floors of Blocks A and B. These retail units have been strategically located, fronting onto both Santry Avenue and Swords Road, to cater for active frontage and bring a new vibrancy to a highly visible corner location in this urban community. The proposed retail use is also put forward in recognition of the Z3 (Neighbourhood Centres) zoning attached to the site. In accordance with the vision for Z3 lands, these uses will create a new focal point in the neighbourhood by providing a range of convenience type services to both the existing and future local population. It is also considered that these retail units compliment larger existing retail facilities in the area, particularly the Aldi supermarket to the west and the Omni Shopping Centre to the south.

It is submitted that the provision of 3 no. retail units at ground floor level, forming a strong ground floor frontage, directly addressing the adjoining streetscapes, and adjacent to an existing large urban park (Santry Demesne), will provide for an attractive new range of facilities to serve local needs in compliance with the zoning objective attached to the site.

Medical Suite / GP practice use

On the ground floor of Block B, it is proposed to accommodate a medical suite / GP use in Unit E. Under the Z3 "Neighbourhood Centres" land use zoning objective attached to the site, "medical and related consultants" is a permissible use in accordance with the CDP.

We note from the assessment of the previous SHD application (Ref. ABP-310910-21) that the Planning Authority stated that in terms of the ground floor uses that a condition should require retail / medical use of such units. The Planning Authority also noted that many observations referred to the lack of GP services in the area. We also note that in their recommendation to grant permission, the Planning Authority suggested that commercial unit E shall be provided as a medical suite/GP practice unit.

In addition, in his assessment of the previous SHD application, the An Bord Pleanála Inspector concurred with the Planning Authority and stated the following: *"In respect of the commercial units proposed on the site, I note that condition no. 4 recommended by the Chief Executive identifies uses for the commercial units, including the use of Unit E as a medical suite / GP practice. I consider this condition to be reasonable and appropriate having regard to the objectives for the Z3 zone. Such condition would also satisfactorily address observer's concerns regarding the lack of healthcare facilities in the area. In the event that the prescribed uses proved unviable, it would be open to the landowner to demonstrate same and seek a change of use at a later date. I consider that*



the condition should allow some flexibility with regard to which specific unit is used for medical / GP surgery use”.

Based upon all of the foregoing, the current proposal provides for a medical suite / GP practice unit on the ground floor of Block B, occupying a space of c. 130sq.m

Community/Arts & Culture Use

In accordance with the Z3 “*Neighbourhood Centres*” zoning attached to the site, the proposed development provides for community/arts & culture uses, totalling 1,460sq.m, which is spread across the ground floors of Blocks C-D and E-F. The submitted ground floor plan illustrates that a variety of community/arts & culture uses can be accommodated within the proposed floor area dedicated to such uses. On the ground floor of Blocks C-D, c.583sq.m of floorspace is proposed, while Blocks E-F cater for an additional c.877sq.m. Prior to the submission of this application for permissions, the Applicant engaged with Dublin City Council and Dublin Arts Office regarding the provision of the required 5% of floorspace to cater for community/arts/cultural uses. In addition, this LRD planning application is accompanied by a Cultural Infrastructure (Impact) Assessment (hereafter “CIA”) which has examined what the demand for such uses is in the local area. The CIA finds that *“the proposed space across 4 blocks (blocks C and D providing c. 583sq.m and blocks E and F providing c. 877.2 sq.m) is sufficient in scale to host multiple cultural (artist workspace, performance, rehearsal, maker or multipurpose space) and community typologies, as well as to accommodate a wide range of artforms and community uses”*. In addition, the CIA has revealed a lack of appropriate cultural infrastructure near the site and asserts that *“a shared community / music and dance or makerspace, alongside provision for artist workspace studios, would deliver a notable cultural /community asset not just to the creative and arts professionals in the area, but to the wider community of Artane-Whitehall. In addition to this, through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics”*. Based upon the findings of the CIA, the ground floor space in Blocks C-D and E-F has been designed to accommodate potential uses such as maker space, dance studios, community resource, artists studios.

The total proposed community/arts & culture uses is put forward in compliance with objective CUO25 of the CDP, which requires that for all large scale developments above 10,000sq.m in total area, that a minimum of 5% community, arts and culture spaces including exhibition, performance and artist workspaces predominantly internal floorspace is to be provided. The total floor area of the proposed development is 25,530.1m². 5% of the total proposed floor area equates to c.1,276.5m², therefore the proposed 1,460m² exceeds the minimum requirement under objective CUO25 of the CDP.

It is considered that the floor spaces proposed to be dedicated to community/arts & culture uses, dependant on the tenant(s), will provide the opportunity to implement a range of programmes and services to benefit the community and meets the demand for such uses, as identified in the submitted CIA. It is envisaged that the community/arts & culture uses will enable new and established communities in Dublin 9 to engage with each other, fostering a sense of community and increasing the social interaction.

The proposed community/arts & culture spaces fronting onto Santry Avenue in Blocks D and E have been designed as a welcoming space, with large windows maximising light and amenity use. It is considered that these spaces have the potential to cater for a number of functions such as community resource / maker space, and will offer a focal point within the scheme. To the rear of same, as one moves into Blocks C and F, larger spaces are proposed to accommodate further community/arts & culture uses, e.g. artist studios and dance studios, and through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics which provides flexibility and long term sustainability in terms of the viability of the use of these spaces. The frontage of all of these spaces onto either the public realm or open spaces will ensure that there will be a consistent level of activity in this part of the development. It is envisaged that the management of the proposed community/arts & culture spaces will be operated by a specified management



company, who may liaise with Dublin City Council and / or Dublin City Council's Arts Office and / or the Dublin City Local Community Development Committee in terms of what services the allocated floorspace caters for. It is considered that upon a grant of permission being issued for the proposed development, that the specific details of quantum and location of such floor space/uses will be agreed with the Planning Authority at compliance stage, post planning.

Residential Amenity Use

In addition to the above commercial / retail and community uses, the proposed development includes for a one storey residential amenity use unit (166.1m²) located between Blocks A & D which fronts onto Santry Avenue. It is considered that the proposed residential amenity use unit will be capable of supporting a range of services while also providing for recreation space to future residents of the development, helping to create a sense of community between residents of the proposed apartment blocks. The residential amenity use unit also provides for a focused entrance point to this new development on Santry Avenue, aiding the creation of a sense of place and identity for the development.

The proposed residential amenity use unit has been designed to provide recreation and relaxation amenity spaces to its residents close to home. Communal amenity facilities that can be accommodated in the residential amenity unit will be up to the eventual operator as to the function of the space; however, the design of this unit allows flexibility to facilitate numerous uses. Common amenity uses include:

- | | |
|-------------------------|-------------------------------|
| ▪ Gym | ▪ Cinema Room |
| ▪ TV Room | ▪ Library Area / Quiet Zone |
| ▪ Co-Working Desks | ▪ Dining / Entertainment Area |
| ▪ Conference Facilities | ▪ Concierge |

Within the stand alone residential amenity unit, flexible residential amenities are catered for, such as a residents lounge for recreation and co-working which could include work booths for individual work or two to four person meetings. The use of the co-working facilities will be managed by the Management Company. Residents can use the space to meet up and socialise or it could be used for many activities including presentations, workshops or classes. The Management Company will be responsible for managing the leasing or booking of these spaces.

The dedicated residential amenity unit fronts onto the new public realm at Santry Avenue, positioned in between the proposed retail unit at ground floor of Block A and the proposed community/arts & culture unit at ground floor of Block D. Further west, on the ground floor of Block E is an additional community/arts & culture unit, so the location of all of these units alongside each other and fronting onto the street will create a vibrancy along the new street front and provide residents with essential amenity space. It is considered that in combination these units will create a homely and welcoming atmosphere within the development.

2.2 Item 2. Bulk, Massing, Height and Scale and Layout of the Proposal

a. *With regard to the form of the Development, the Planning Authority notes the proposed reduction in height (relative to previous proposals). However, these reductions in one direction only, with no change to length or breadth of the blocks, have the effect of creating a blocky and inelegant corner proposal, exacerbated by the omission of the roof terrace to the corner, and the subsequent lack of design to the roof profile. Consideration should be given to revising the proportions, footprint, and roofline of this corner element, rather than the removal of several storeys from the previously submitted design. It is acknowledged that the Planning Authority recommended the reduction in height by way of condition on previous proposals, however, the opportunity to design this building from first principles, to an appropriate height, should not be ignored at this juncture. A revised updated Architectural Design Report, with text referring to the revised design, and revised photomontages, are required.*

Response:

The revised design now put forward for permission seeks to take the compressed appearance off the corner block (Block A) with the following amendments:

- Block split into 2 vertical forms to break up massing and sense of “blockiness”
- Height is increased by 1 floor to improve slenderness ratio and elegance of the corner generally
- Reintroduction of a roof terrace and point of interest at the top floor
- Create a more dynamic roof profile by stepping down the volume to the south (away from the corner)

It is considered that these moves have resulted in a more elegant and visually interesting corner block proposal with improved proportions and slenderness ratios. For further details, please refer to the submitted Architectural Design Statement prepared by Davey+Smith Architects which includes photomontages of the various heights proposed throughout the planning process associated with the subject site, i.e. previous SHD version, LRD pre-planning version and now the final LRD proposal being put forward for permission. In addition, the submitted design statement includes a proportion study and we refer the reader to same for further details.

b. *A detailed daylight and sunlight assessment of the proposed development as per discussions in the LRD meeting, in accordance with the relevant Guidelines, which will demonstrate an acceptable level of day light and sunlight for the proposed occupants of the development, and existing neighbouring properties is required.*

Response:

A Daylight and Sunlight Assessment Report has been prepared for subject application by CS Consulting and is submitted as a separate document – for further details please refer to same. The submitted assessment states that 94% of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested (97% if we include marginal results). The results as presented represent worst cast results for the two lowest floors. The average compliant areas achieving the relevant target Lx for (i) all bedrooms is 95%, (ii) all Living/Kitchen spaces 80% - both are well in excess of the required 50%.

The submitted assessment finds that for sunlight to rooms: 86% of Living rooms receive 1.5hrs of sunlight on the test day of the 21st March (this increases to 90% if marginal results are included). This is consistent with the BRE defined “careful layout design” 80% target.

For Sunlight on the Ground SOG (Shadow) 100% of the new provided communal and public amenity spaces pass the BRE requirement. There is considerable overprovision of amenity space. The tested spaces comply with the requirements of the BRE guidelines in relation to shadow. Please see Architects comments on alternative, compensatory design solutions relating to light.

The submitted assessment states that *“the application generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BR209 - 2022) when considered in terms of this infill and regeneration project in an un-developed lot”*.

The submitted assessment has also considered the impact on neighbours and finds that non-residential buildings sit to the West, North and East of the proposal and do not require testing. Phase 1 “Santry Place” sits to the South of this LRD (Phase 2) proposal. Sunlight to amenity and windows of the granted Santry Place cannot be impacted by this current proposal as it sits to the North. In relation to skylight (VSC) this LRD proposal is a mirrored development of the permitted and constructed Santry Place. Any impact along the closer facades will therefore be compliant with the guidelines. The impact of the proposed development is indistinguishable and therefore compliant with BRE guidelines.

In addition, the submitted assessment states that **100%** of the new provided communal and public amenity spaces pass the BRE requirement. There is considerable overprovision of amenity space. The tested spaces comply with the requirements of the BRE guidelines in relation to shadow.

c. *A detailed schedule of accommodation which shall indicate compliance with all relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, and in the Development Plan. Particular regard to be given to the provision of universal design apartments.*

Response:

Armstrong Fenton Associates has prepared the submitted Housing Quality Assessment (HQA) which is enclosed as a standalone document and demonstrates compliance of the proposed apartments with the standards set out in the 2023 ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’, and identifies the aspect of all units.

In addition, we refer to Objective QHSNO11 and Section 15.9.2 of the CDP which requires the following in relation to the provision of larger units and the provision of universal design units:

Objective QHSNO11

“Universal Design

To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H’s Design Manual for Quality Housing 2022 and the DHP&LG & DH’s Housing Options for Our Ageing Population Policy Statement 2019.”

Section 15.9.2

“The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%).

In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities.”



In accordance with the aforementioned requirements of the CDP, the proposed development includes 212 no. units out of a total of 321 no. which are over 10% minimum areas, which represents 66% of the overall unit provision. Of these 212 no. oversized units, some 81 no. units are designed to be universal design (which also equates to c.28% of the total units provided).

Please refer to the submitted architectural plans of the proposed dwellings (which identify the universally designed units with/by red text), and the HQA for details.

d. *Demonstration (by way of revised Visual Impact Assessment, photomontages, shadow analysis, etc) that neighbouring residential amenity and visual amenity is not unduly affected.*

Response:

This LRD application is accompanied by an Environmental Impact Assessment Report (EIAR) and contained in same, under Chapter 15 “The Landscape” is a landscape visual impact assessment, prepared by Dermot Foley Landscape Architects – please refer to same for details.

In addition, 3D Design Bureau has prepared the submitted CGI’s and verified views, which illustrate what the proposed development will look like in winter months without the benefit of full foliage on trees.

CS Consulting has also prepared the submitted daylight and sunlight assessment, including a shadow analysis of the proposed development which considered the proposed units, open spaces etc. and adjoining properties.

Please refer to each of the aforementioned documents.

We note from the assessment of the EIAR submitted with SHD Ref. ABP-310910-21, that the An Bord Pleanála Inspector noted the following in relation to the LVIA: “*The EIAR describes the sensitivity of the site and receiving environment as medium. There are no protected views or Architectural Conservation Areas (ACAs) relevant to the subject site*”. He also stated: “*I note the changing urban context in this area and do not regard the assessment of landscape and visual impacts as unreasonable. I note that the PA Conservation Officer has not raised any objections to the development in respect of impacts on St. Pappan’s Church. The impact on views from Santry Demesne is noted, however, this is not considered to have a significant negative impact, and is not out of character with other existing views on the fringes of, this regional urban park, and reflects the change in the surrounding context*”.

He concluded: “*I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Landscape would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Landscape*”. Given the proposed reduction in building heights from those previously proposed, we consider that there will be no negative visual impacts arising from the current proposal, however, we refer the reader to the updated, submitted information that forms part of the application for permission.

e. *The proposal is for 211 units per hectare, while the Development Plan sets the range for sites in the Outer Suburbs at 60-120 uph. A strong case needs to be made for the proposed density.*

**Response:**

We refer the reader to both the submitted Planning Statement and Statement of Consistency enclosed as part of this application, both of which set out the proposed density of the development and justification of same. Notwithstanding the submitted documents, the following is put forward for consideration:

The area of the application site is c.1.5 hectares (c.3.7 acres) on which it is proposed to accommodate 321 no. residential units, along with other appropriate and supporting uses. The proposed development therefore has a residential density of c. 214 units (gross and net) per hectare based upon an overall site area of 1.5 hectares.

As required by Appendix 3, Volume 2 of the CDP, based upon the proposed dwelling mix, as set out in Table 2, the proposed development is likely to accommodate 1,089 no. persons, which equates to a density of c.726 no. bedspaces per hectare.

The CDP includes the following policies, which support the attainment of greater residential densities and land-use intensities, which also accord with the overarching principles of the NPF requiring same:

Policy SC10 (Urban Density) - *“To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.”*

Policy SC11 (Compact Growth) - *“In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:*

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.”*

Policy QHSN10 (Urban Density) - *“To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”*

In accordance with the Apartment Guidelines, the site can be defined as “central and/or accessible site” given its proximity to a high frequency, high-capacity bus service (see Section 5.2.1 of the submitted Statement of Consistency for a detailed consideration of same). Such sites are considered suitable for higher density development. No density limits are set out within these guidelines. As such the proposal is broadly in line with the principles as set out in the Apartment Guidelines.

We note that Policy SC10 ‘Urban Density’ of the current CDP seeks to ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (now superseded by the 2024 Sustainable Residential Development and Compact Settlements Guidelines). Policy SC11 ‘Compact Growth’ seeks to *inter alia* promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors. Policy QHSN10 ‘Urban Density’ seeks to promote

residential development at sustainable densities in accordance with the core strategy.....having regard to the need for high standards of design...and to integrate with the character of the surrounding area.

In the context of the CDP as a whole, reference is made to meeting the density targets within the National Planning Framework and the Regional Spatial and Economic Strategy, providing opportunities for increased density in a sustainable manner whilst ensuring the highest standards of design as well as the protection of existing amenities and encouraging higher-density development along public transport routes and more intensive development on sites located adjacent to high quality public transport.

There is supporting policy within the CDP which promotes greater densities in sustainable locations such as the subject site. We note section 4.5.3 “Urban Density” of the CDP states the *“NPF recognises that there is a need to increase densities on underutilised lands within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change. It is a requirement under the NPF that at least half of all future housing and employment growth in Dublin be located within and close to the existing ‘built up’ area of the city, specifically within the canals and the M50 ring. The RSES and Dublin MASP also promotes greater densification and more intensive forms of development particularly on infill, brownfield and underutilised lands along key strategic public transport corridors. It is recognised at a national and regional policy level, that land-use and transport are critical inter-linked policy tools that need to work together to better realise economic success, environmental protection and quality of life”* [Our emphasis added].

The CDP also states that *“the objective is to provide opportunities for increased density in a sustainable manner whilst ensuring the highest standards of design as well as the protection of existing amenities and the natural and historical assets of the city. There will be continued consolidation of the city to optimise the efficient use of urban land. Higher densities will be promoted in the city centre, within KUVs, certain SDRAs and within the catchment of high capacity public transport”*. This is supported by the aforementioned policy of the Council: SC10: Urban Density.

In relation to Policy SC10 of the CDP, it could be argued that the proposed development contravenes this element of the Development Plan in light of a reference to an upper density limit of 120 units/ha on lands in the Outer Suburbs (as Table 1 of Appendix 3 of the CDP refers). However, it is put forward that the general thrust of the Development Plan, which seeks to provide for higher densities at appropriate locations, in particular on sites well served by public transport, and seeks to apply performance criteria to determine appropriate densities for individual sites, and in determining the acceptability of the density proposed for the subject site, this Statement of Consistency has clearly considered the proposed development in light of these performance criteria (in preceding sections of this Statement), and demonstrates that the proposed development generally complies with same, and therefore the proposed density is in compliance with the CDP, and does not materially contravene same.

Under the previous SHD application for the subject site for 350 no. dwellings and a resultant density of 233 units/ha, the Planning Authority assessed that application against the provisions of the previous City Development Plan (2016-2022) and stated the following: *“With regard to the proposed density, the proposed figure of 233 units per hectare (plus commercial development at ground floor) is high. The planning authority does not have any objection in principle to a high-density development on this site, given its close proximity to a high frequency public transport corridor. The changing character of the area is taken into account, and it is noted that permission has been granted by ABP for a Strategic Housing Development at lands to the north-east of the Omni Shopping with a density of 250 residential units per hectare plus an aparthotel and a density of 250 residential units plus ground floor commercial at the former Swiss Cottage site on the opposite side of Swords Road. The density proposed in this proposal is comparable to these recently permitted developments which have proven acceptable to An Bord Pleanála”*. We note that the Planning Authority did not consider the proposed density a material contravention of the previous Development Plan, notwithstanding similar references to the Sustainable Residential Development Guidelines in Policy QH1, Policy SN4, and within Section 16.4 ‘Density Standards’ of the previous Development Plan (2016-2022).

Section 15.5 of the current CDP states that *“Development proposals should make the most efficient use of land by delivering an optimum density and scale of development for the site having regard to its location within the city. Certain areas of the city, such as those located adjacent to high quality public transport will lend themselves to a more intensive form of development. Similarly, brownfield and infill sites can also achieve greater densities subject to the location and proximity to other services. Appendix 3 of the plan sets out guidance regarding density and building height in the city in order to achieve sustainable compact growth”* [Our emphasis added].

Section 15.5.1 of the CDP refers to brownfield, regeneration and large comprehensive sites. The subject site is considered to be a brownfield site, which was acknowledged by the An Bord Pleanála Inspector under the previous SHD application (Ref. ABP-310910-21), where he stated that *“The proposal for 350 no. residential units on the site equates to a density of approx. 233 / ha. Having regard to the central / accessible urban location and **brownfield** nature of the site, proximity to services and amenities and public transport services, such densities are regarded as acceptable and in accordance with national, regional and local planning policy. I also note the objectives of recent Government Policy set out in Housing for All which identifies the need for construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning. The consolidation of existing built-up areas in the manner proposed will be an important contributor to the achievement of such targets in a more sustainable manner”*. The CDP states that *“brownfield sites are generally referred to as previously developed lands that are not currently in use. Quite often these brownfield sites are located in areas in need of regeneration. These sites often contain derelict or vacant buildings which are underutilised and in need of redevelopment. Brownfield lands have the ability to regenerate and rejuvenate large portions of the city through redevelopment”*.

Section 15.5.5 of the CDP “Density” states that *“Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities. New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods”*.

The proposed density is put forward with regard to the guidance set out in the recently published SCS Guidelines which sets out the density ranges for Dublin and Cork, given their overall size and scale. Under Table 3.1 of the new Guidelines, “Areas and Density Ranges Dublin and Cork City and Suburbs”, the subject site can be described as “City – Urban Neighbourhoods”: *“The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area.** These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork”* [Our emphasis added].

We note that Section 3.4 “Refining Density” refers to the application of density in the consideration of individual planning applications, and states that *“the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport”*. The first step is to consider the proximity and accessibility to services and public transport. The SCS Guidelines state that *“while densities within the ranges set out will be acceptable, **planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area**”* [Our emphasis added]. Table 3.8 “Accessibility” of the SCS Guidelines provides definitions for terms used to define accessibility to allow for consistent application, while the SCS Guidelines also states that *“The*

approach to refining density should be informed by the capacity and wider network accessibility of public transport services at a node or interchange (number of options, capacity and peak hour frequency) and the journey time to significant destinations (e.g. city centre or significant employment location)”.

The necessary definitions are provided in Table 3.8, including the term ‘High Capacity Public Transport Node or Interchange’, which is defined as including lands within 1500 metre walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop. The proposed development site is within the Metropolitan Area of Dublin City, along a prominent public transport route into the city, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned along this route. The subject site has good, proximate access to a wide range of services, facilities, employment and education opportunities, and amenities, and therefore the scale and quantum of development proposed for the subject site achieves compact growth. The development provides for a density of c. 214 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including being located along a public transport corridor and having access to proximate public transport links, that the proposed density on site is appropriate in this instance, and accords with the guidance set out in the SCS Guidelines.

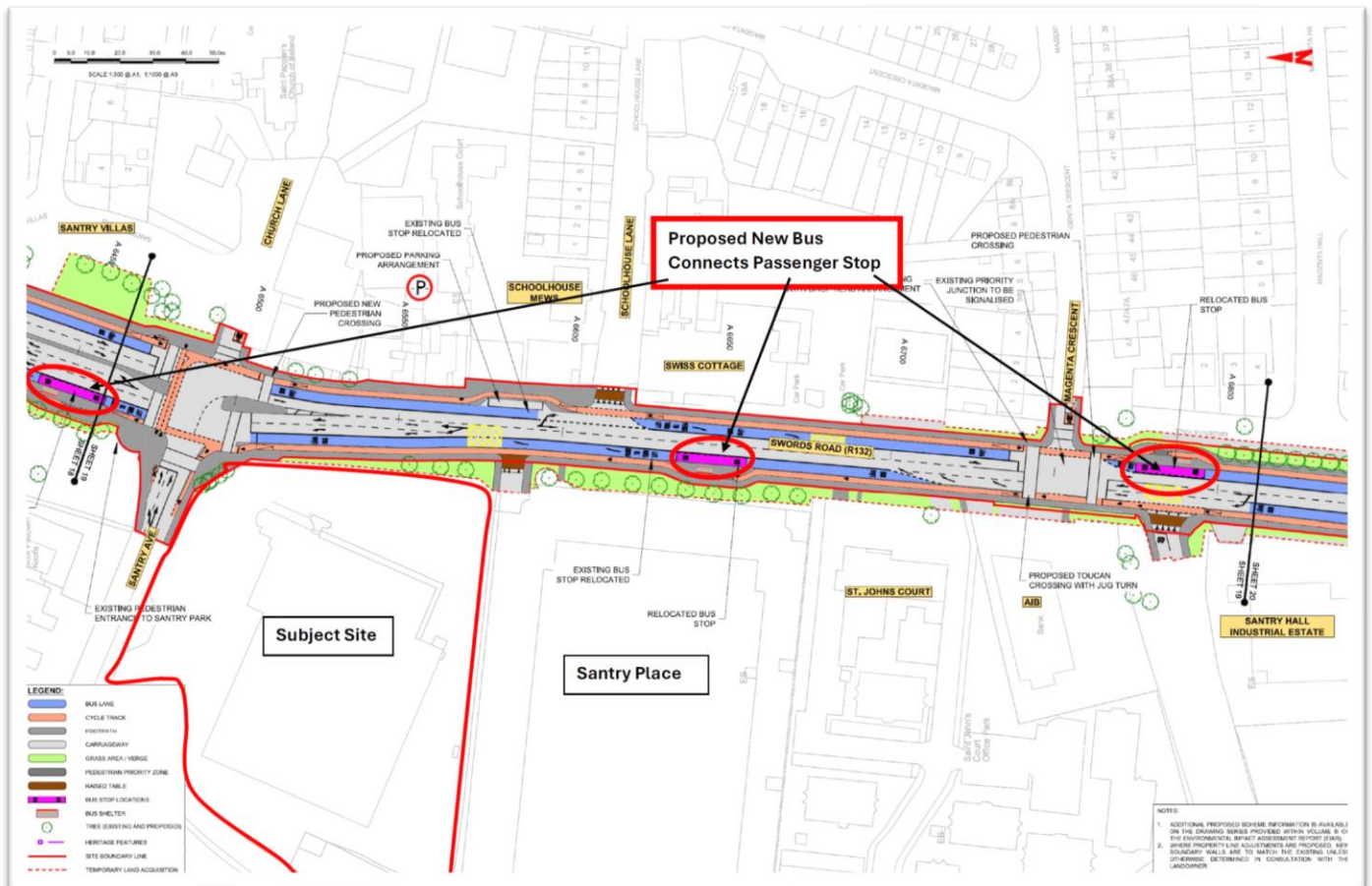


Figure 1 – Extract from Swords to City Centre Core Bus Corridor Scheme General Arrangement Drawings, May 2023 (Drawing no. BCIDB-JAC-GEO_GA-002_XX_00-DR-CR-0019 by Jacobs for NTA). Subject site is identified, indicatively outlined in red with 3 no. proposed bus stops on the Swords Road Core Bus Corridor identified in close proximity to the subject site i.e. within c.65m.

We note from the previous/current SHD proposals for 350 no. dwellings (Ref.s ABP-310910-21 & ABP-314019-22 respectively), which equated to a density of 233 units per hectare that the Planning Authority stated the following in relation to same (under both applications): “with regard to the proposed density, the proposed figure of 233 units



per hectare (plus commercial development at ground floor) is high. The planning authority does not have any objection in principle to a high density development on this site, given its close proximity to a high frequency public transport corridor. The changing character of the area is taken into account and it is noted that permission has been granted by ABP for a Strategic Housing Development at lands to the north-east of the Omni Shopping with a density of 250 residential units per hectare plus an aparthotel and a density of 250 residential units plus ground floor commercial at the former Swiss Cottage site on the opposite side of Swords Road. The density proposed in this proposal is comparable to these recently permitted developments which have proven acceptable to An Bord Pleanála”.

Furthermore, the An Bord Pleanála Inspector in his report under SHD planning ref. ABP-310910-21 also stated *“The proposal for 350 no. residential units on the site equates to a density of approx. 233 / ha. Having regard to the central / accessible urban location and brownfield nature of the site, proximity to services and amenities and public transport services, **such densities are regarded as acceptable** and in accordance with national, regional and local planning policy. I also note the objectives of recent Government Policy set out in Housing for All which identifies the need for construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning. The consolidation of existing built-up areas in the manner proposed will be an important contributor to the achievement of such targets in a more sustainable manner”.* [Our emphasis added].

It is put forward that national planning policy focuses on the provision of sustainable residential development, including the promotion of layouts that prioritise sustainable transport modes by reducing car use and are universally accessible and legible for ease of movement. In this regard, the development is considered to be highly accessible for future occupants, as well as the existing community, with a permeable layout, both internally and externally as new linkages are provided to surrounding land uses, and is therefore compliant with national planning policy. The submitted TTA provides details of the existing and planned public transport infrastructure to serve the site with adequate capacity within same to cater for the proposed development, which further reinforces that the proposed development is acceptable and accords with national planning policy which seeks to increase densities and compact forms of development in existing urban areas.

The proposed density is also put forward with consideration to the guidance set out in the National Planning Framework (NPF), the Urban Urban Development and Building Heights Guidelines (UD&BHG), the Apartment Guidelines, all of which promote compact development in existing urban areas by increasing building heights, densities and compact forms for development in order to accelerate housing supply. In particular Objective 35 of the NPF which states the need to: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”*

With regard to the sequential approach to development, it is notable that the subject site is located in a built up, urban area with mixed land uses and existing developments surrounding the site to the north, south, east and west. The site is zoned Z3 “Neighbourhood Centres” in the existing CDP. The proposed development is therefore considered to be in compliance with the sequential approach to the development of land and makes efficient use of available lands at a prominent location that is well served by existing and planned public transport and local services.

The proposed development is also considered to be making the most efficient use of the lands available, increasing residential development in an existing urban area and providing for high density residential development in a key location, alongside non-residential uses that are employment generating and appropriate for community/cultural uses, which will also serve the needs of future residents on site.

Sustainable neighbourhoods require a range of community facilities, while each neighbourhood needs to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The site is well served by existing infrastructure available in the Santry area, as detailed in

the Social Infrastructure Assessment which accompanies this submission as a separate, standalone document.

Appendix 3 of the CDP “Height Strategy” refers to density, stating “*Appropriate densities are essential to ensure the efficient and effective use of land. It is important to make the best use of the city’s limited land supply in order to meet the need for new homes, jobs and infrastructure required by the city’s growing population. More compact forms of development, ensuring a mix of uses, the containment of ‘urban sprawl’ and achieving social and economic diversity and vitality are critical for the future of the city and addressing climate change*”. The CDP also states: “*Appropriate higher density schemes are considered to be ones that combine mixed tenure homes, public space and community infrastructure. This can often be achieved by using building forms of 4 to 8 storeys and in this regard*”.

Appendix 3, section 3.2 “Density” of the CDP also asserts that “*The strategic approach is that the highest densities should be located at the most accessible and sustainable locations. Sustainable densities in accordance with the standards set out in the Guidelines on Sustainable Residential Development in Urban Areas 2009 will be supported*”, and “*The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities*” [Our emphasis added].

It is considered that the subject site is wholly suitable to providing higher density residential accommodation in proximity to high frequency public transport, employment locations, services and facilities, which can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in Dublin. In addition, the provision of community/arts/cultural space, retail units and a GP/medical practice will significantly enhance the provision of community facilities and social infrastructure in the wider area. The opening up of the site to the public, through the creation of a new urban quarter at this prominent junction location and assimilating with the adjoining Santry Place development, as well as creating new public open spaces will also significantly enhance the local area. Therefore, the proposed development will contribute to healthy place making and will improve the liveability and identity of the area.

Appendix 3, section 3.2 “Density” of the CDP contains Table 1 “Density Ranges” (refer to Fig. 2 below) states, that **as a general rule**, the following density ranges will be supported in the city: [Our emphasis added]

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

Figure 2 – Copy of Table 1: Density Ranges from Appendix 3 of CDP

It is acknowledged that the subject site is located in the Outer Suburbs as per Table 1, of Appendix 3, and that the density range for the ‘Outer Suburb’ is 60 to 120 units/ha. However, it is considered that these density ranges set out in the CDP are a generality, and where higher densities are proposed, that are denser than the surrounding area, as is the case in this proposed development, the performance criteria in Table 3 of Appendix 3 shall apply.



Full details of the proposed development's compliance with Table 3 of Appendix 3 of the CDP are set out in section 7.1.7 (Table 8) of the submitted Statement of Consistency and also in section 8 (Table 10) of the submitted Planning Statement.

It is put forward that the CDP policy clearly states, in relation to Table 1, that *"as a general rule, the following density ranges will be supported in the city"*. In this regard the density ranges indicated are not hard limits, whereby all proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3, Appendix 2 of the CDP (Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale). The CDP also refers to plot ratio as measures that can be considered in terms of assessment of density. In this case the plot ratio and site coverage are within the indicative ranges identified for the Outer Employment and Residential Area (1:7 and 33.5% respectively). In the case of open space, the development provides over the required 10% of public open space required by the Z3 zoning, in addition to communal open spaces on site. The performance criteria under Table 3 "Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale" from Appendix 3 of the CDP are elements that are fully addressed in the section 7.1.7 (refer to Table 7) of the submitted Statement of Consistency, and under section 8 (refer to Table 10) of the submitted Planning Statement, and given the proposed development's compliance with same, the density proposed is considered acceptable.

The subject site is located on the western side of the Swords Road and the southern side of Santry Avenue, at the junction of these two roads, with frontage onto both. The Outer City (Suburbs) is recognised as being outside of the canal ring where heights of 3 to 4 storeys will be promoted as the minimum, and greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity etc. It is considered that the size and location of the site, being adjacent to good public transport services, employment and a wide range of amenities and services, provides an opportunity for a high density scheme at this location. In addition, the approach to the distribution of scale and massing, distribution of building height across the scheme and the assimilation of the proposed scheme with the adjoining Santry Place development is also considered appropriate.

Through the assessment of the previous SHD application for the subject site (Ref. ABP-310910-21), the site has been acknowledged as being a "public transport corridor". Therefore, in light of same, the current CDP also acknowledges that there is recognised scope for the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including *inter alia* Bus connects/Core Bus Corridors (CBC's), and that locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, with the subject site being adjacent to an existing public transport corridor (Swords Road QBC), which is also a proposed BusConnects Core Bus Corridor. The existing QBC running along Swords Road is utilised by Dublin Bus routes 16, 33, 41, 41b, and 41c. The aforementioned bus routes travel along the Swords Road corridor which lies to the immediate east of the subject site. Bus route numbers 16, 16c, 49, 54a and 9 are highly accessible being within c.65 metres walking distance from the subject site (being directly adjacent to the adjoining Santry Place development). All the aforementioned Dublin Bus operated bus services operate on a daily basis and offer relatively frequent schedules – ranging from every 10-15 mins and every 20-25 mins.

It is put forward that the Planning Authority actively encourages higher densities on appropriate sites across the city, accompanying highest quality of urban design on accessible, connected sites. This is reinforced by **Policy SC10 Urban Density**: *To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.*

It is considered that the subject site is suitable site for increased densities based on both national and local planning policy, and it is respectfully put forward that there is no reason to consider that the proposed density is

excessive. The proposed development in this location does not, in our opinion, contradict density standards contained in the current CDP which advocates an approach of consolidation and densification in the city, while the proposed density also complies with Government policy to increase densities on underutilised lands, within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change.

Taking into account all of the foregoing information regarding national planning policy, the planning history and context of the subject site, the proximity of the site to a wide range of services and amenities and its immediate proximity to public transport services, it is considered that the proposed residential density of 214 no. dwellings per hectare is appropriate and ought to be granted permission. It is put forward that the proposed development is in full compliance with national planning guidance and policy regarding residential density. Furthermore, it is put forward that the proposed development complies with the CDP's requirements regarding density which consistently refers to higher densities being promoted within the catchment of high-capacity public transport services, and also states that *"Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas"*. In line with same, it is also put forward that the proposed development complies with Appendix 3, section 3.2 "Density" of the CDP and its Table 1 "Density Ranges" which states, that its density ranges will be supported **as a general rule** [Our emphasis added]. In addition, the proposed development fully complies with the performance criteria under Table 3 "Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale" from Appendix 3 of the CDP, which are elements that are fully addressed in the section 7.1.7 (refer to Table 7) of the enclosed/submitted Statement of Consistency, and given the proposed development's compliance with same, the density proposed is considered acceptable. The submitted Statement of Consistency (section 7.1.6) and Planning Statement (section 6.2) clearly set out (a) how the proposed development fully complies with national planning policy regarding density and (b) how the proposed development results in an appropriate form of residential density that accords with the CDP, and therefore the permission being sought can be granted by the Planning Authority in full compliance with their Development Plan.

Taking all of the foregoing into account, it is considered that the proposed density of 214 no. units per hectare is appropriate and in compliance with the relevant planning policy and guidance for density as set out in the CDP.

2.3 Item 3. 5% Community, Arts and Cultural spaces i.e. Objective CU025

a. *Further consideration should be given to the proposed uses of the spaces proposed and their proposed end users, in conjunction with the Dublin City Arts Office and local stakeholders*

Response:

In accordance with the Z3 "Neighbourhood Centres" zoning attached to the site, the proposed development provides for community/arts & culture uses, totalling 1,460sq.m, which is spread across the ground floors of Blocks C-D and E-F. The submitted ground floor plan illustrates that a variety of community/arts & culture uses can be accommodated within the proposed floor area dedicated to such uses. On the ground floor of Blocks C-D, c.583sq.m of floorspace is proposed, while Blocks E-F cater for an additional c.877sq.m. Prior to the submission of this application for permissions, the Applicant engaged with Dublin City Council and Dublin Arts Office regarding the provision of the required 5% of floorspace to cater for community/arts/cultural uses. In addition, this LRD planning application is accompanied by a Cultural Infrastructure (Impact) Assessment (hereafter "CIA") prepared by Turley which has examined what the demand for such uses is in the local area. The CIA finds that *"the proposed space across 4 blocks (blocks C and D providing c. 583sq.m and blocks E and F providing c. 877.2 sq.m) is sufficient in scale to host multiple cultural (artist workspace, performance, rehearsal, maker or multipurpose space) and community typologies, as well as to accommodate a wide range of artforms and community uses"*. In addition, the CIA has revealed a lack of appropriate cultural infrastructure near the site

and asserts that “a shared community / music and dance or makerspace, alongside provision for artist workspace studios, would deliver a notable cultural /community asset not just to the creative and arts professionals in the area, but to the wider community of Artane-Whitehall. In addition to this, through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics”. Based upon the findings of the CIA, the ground floor space in Blocks C-D and E-F has been designed to accommodate potential uses such as maker space, dance studios, community resource, artists studios.

The total proposed community/arts & culture uses is put forward in compliance with objective CUO25 of the CDP, which requires that for all large scale developments above 10,000sq.m in total area, that a minimum of 5% community, arts and culture spaces including exhibition, performance and artist workspaces predominantly internal floorspace is to be provided. The total floor area of the proposed development is 25,530.1m². 5% of the total proposed floor area equates to c.1,276.5m², therefore the proposed 1,460m² exceeds the minimum requirement under objective CUO25 of the CDP.

It is considered that the floor spaces proposed to be dedicated to community/arts & culture uses, dependant on the tenant(s), will provide the opportunity to implement a range of programmes and services to benefit the community and meets the demand for such uses, as identified in the submitted CIA. It is envisaged that the community/arts & culture uses will enable new and established communities in Dublin 9 to engage with each other, fostering a sense of community and increasing the social interaction.

The proposed community/arts & culture spaces fronting onto Santry Avenue in Blocks D and E have been designed as a welcoming space, with large windows maximising light and amenity use. It is considered that these spaces have the potential to cater for a number of functions such as community resource / maker space, and will offer a focal point within the scheme. To the rear of same, as one moves into Blocks C and F, larger spaces are proposed to accommodate further community/arts & culture uses, e.g. artist studios and dance studios, and through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics which provides flexibility and long term sustainability in terms of the viability of the use of these spaces. The frontage of all of these spaces onto either the public realm or open spaces will ensure that there will be a consistent level of activity in this part of the development. It is envisaged that the management of the proposed community/arts & culture spaces will be operated by a specified management company, who may liaise with Dublin City Council and / or Dublin City Council's Arts Office and / or the Dublin City Local Community Development Committee in terms of what services the allocated floorspace caters for. It is considered that upon a grant of permission being issued for the proposed development, that the specific details of quantum and location of such floor space/uses will be agreed with the Planning Authority at compliance stage, post planning.

2.4 Item 4. Conservation Issues

a. A conservation expert (a Grade 1 or 2 Conservation Architect) with proven and appropriate expertise shall be employed to complete an Architectural Heritage Impact Assessment of the extant principal Heiton and Buckley building, setting out its history, its architect and identifying all significant interior and exterior features, said AHIA to be submitted with the application.

b. The AHIA shall include a comprehensive and detailed photographic record cross referenced against a detailed drawn record (1:100 plans, sections and elevations) of the building including the exterior and interior, with all 20th Century fabric, materials, features and fixtures identified.

c. Where architectural features / fixtures / fittings are noted, the applicant shall submit a salvage strategy for the careful recording, lifting and storing of these elements to allow for reuse in the future.

Response:

On behalf of the Applicant, Dermot Nolan, Conservation Architect has prepared the enclosed Architectural Heritage Impact Assessment (AHIA) in light of the industrial building on site and due to Santry's long history as a location for commercial and industrial purposes in Dublin. Please refer to the same for full details which includes a photographic record cross referenced against a detailed drawn record of the building including the exterior and interior, with all 20th Century fabric, materials, features and fixtures identified.

2.5 Item 5. Transportation Issues

a) There are discrepancies in submitted documentation regarding quantum of bicycle parking, as well as the proposed works to the public realm which differs on varying drawings (e.g. Road Layout Plan still identifies the provision of a set down area to the north of the site which has been removed in the Proposed Site Layout Plan). The final application submission should be consistent.

Response:

This has been noted and addressed in the updated final planning documentation.

b) Cycle parking proposals requires review.

i. Security for cycle parking at basement level requires revision. Where a rationale for reduced quantum of car parking is proposed, alternative high quality sustainable transport options should be provided. All cycle parking at present is proposed to be left unsecured in an open basement car park. Consideration should be given to providing additional security measures (e.g. segregated cages, store rooms etc) for bicycles. Detailed drawings should be submitted for each bicycle parking area clearly identify the quantum of bicycle parking in that area the type of standard to be use and clearly identifying adequate separation distances have been provided for ease of access and functionality. The applicant is referred to the National Cycle Design Manual (2023) in relation to the required separation distances for varying types of bicycle parking facilities.

Response:

The vast majority of cycle parking at basement level is now proposed to be located within four secure cage / compounds as detailed further in the submitted Traffic and Transportation Assessment (DBFL Report No. 230146-X-90-X-XXX-RP-DBFL-CE-0001). The security measures and the quantum of bicycle parking within each secured cage / compound of the four cycle parking compounds in the basement are illustrated in Davey + Smith Architect Basement Level Drawing No. D1809.P05 (Refer to Figure 3 overleaf).

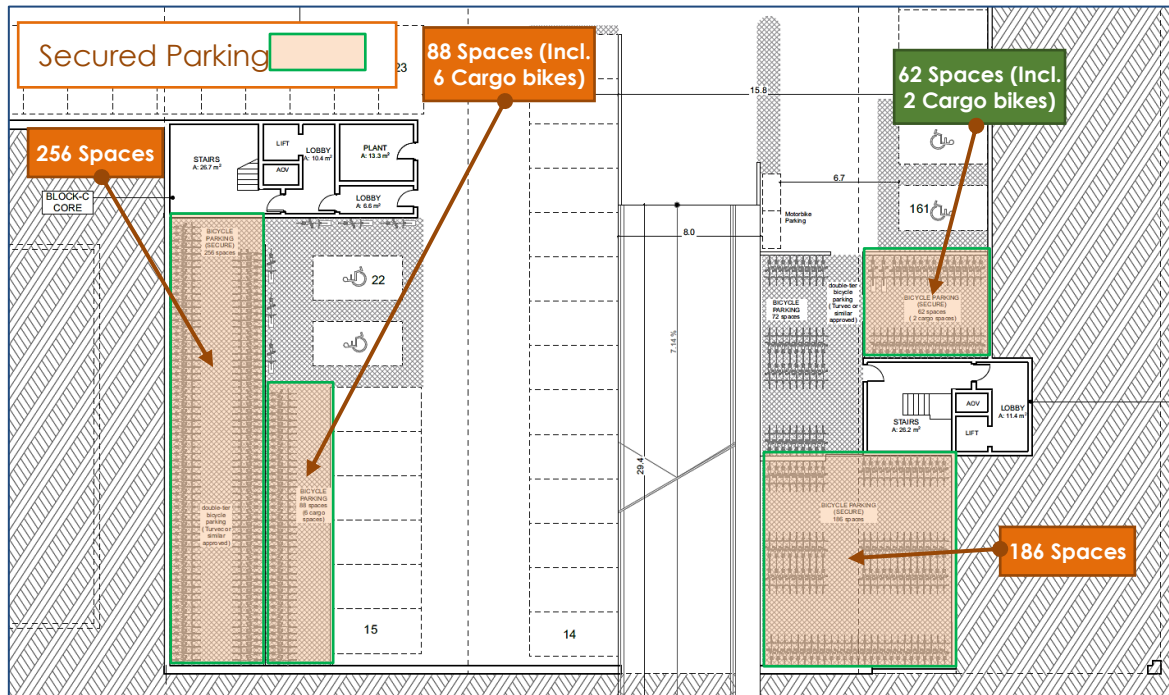


Figure 3: Secured Cycle Parking Proposed at Basement Level

Cycle parking at the basement level would be provided in the form of two-tier racks. The racks will be similar in nature to the racks as illustrated in Figure 4 as supplied by Turvec. The proposals will meet Turvec's separation distances to provide easy access and functionality and adheres to the accessibility requirements (2.0m width) stated within the Cycle Design Manual (2023).

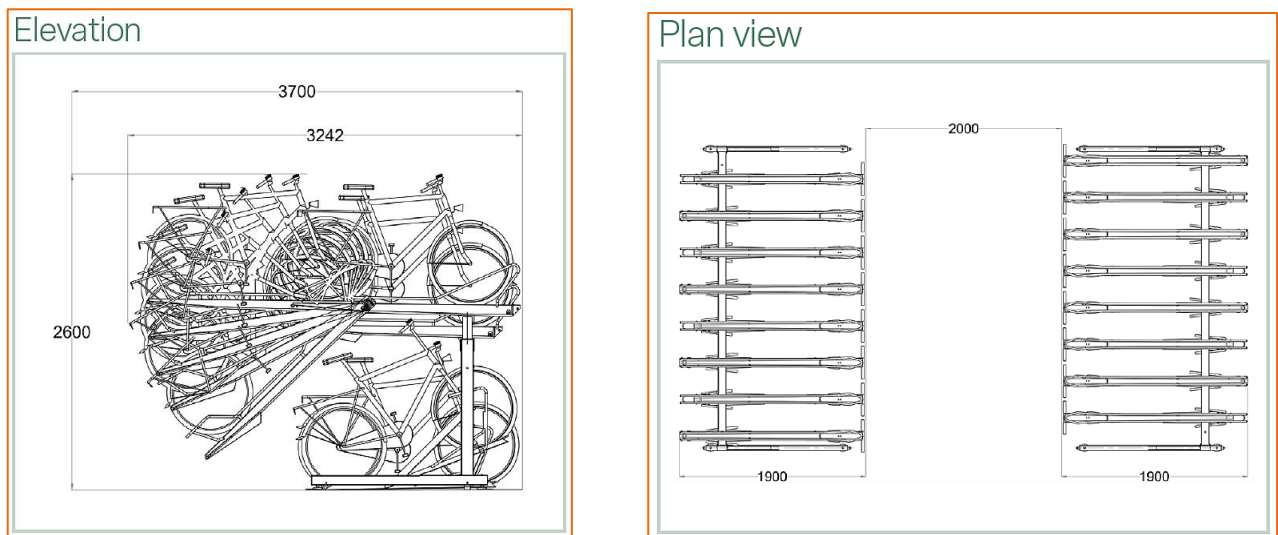


Figure 4(a): Two-Tier Bike Rack Dimensions and Specifications (Extract: Turvec)

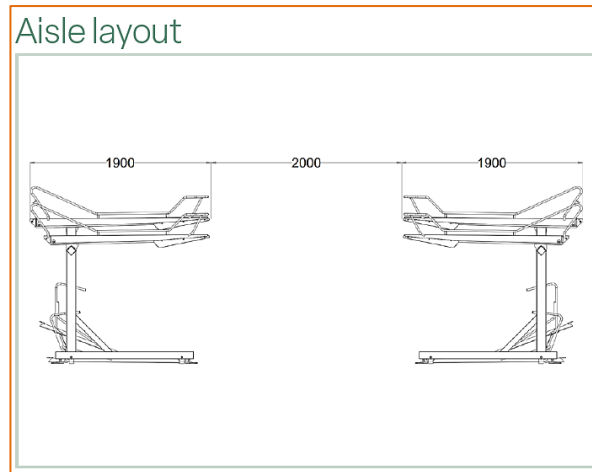


Figure 4(b): Two-Tier Bike Rack Dimensions and Specifications (Extract: Turvec)

Cargo bike spaces will be provided by stands which will be similar in nature to the Citihoop Cargo Bike Stand as detailed in Figure 5.



Figure 5: Citihoop Cargo Bike Stand (Extract: Bellsure)

ii. Section 3.2 of Appendix 5 of the City Development Plan 2022-2028 outlines provisions for shower/changing facilities for employees of commercial developments. Applicant should clarify compliance where applicable and identity the locations of same for future employees of the non-residential elements of the development

Response:

The scheme now complies with Section 3.2 of Appendix 5 of the City Development Plan 2022-2028 in regard to the inclusion of suitable shower and changing for employees of the proposed retail units within the development. A total of three shower/changing rooms will be provided within the retail unit at ground floor level at Blocks A and B as illustrated in Figure 6 overleaf.

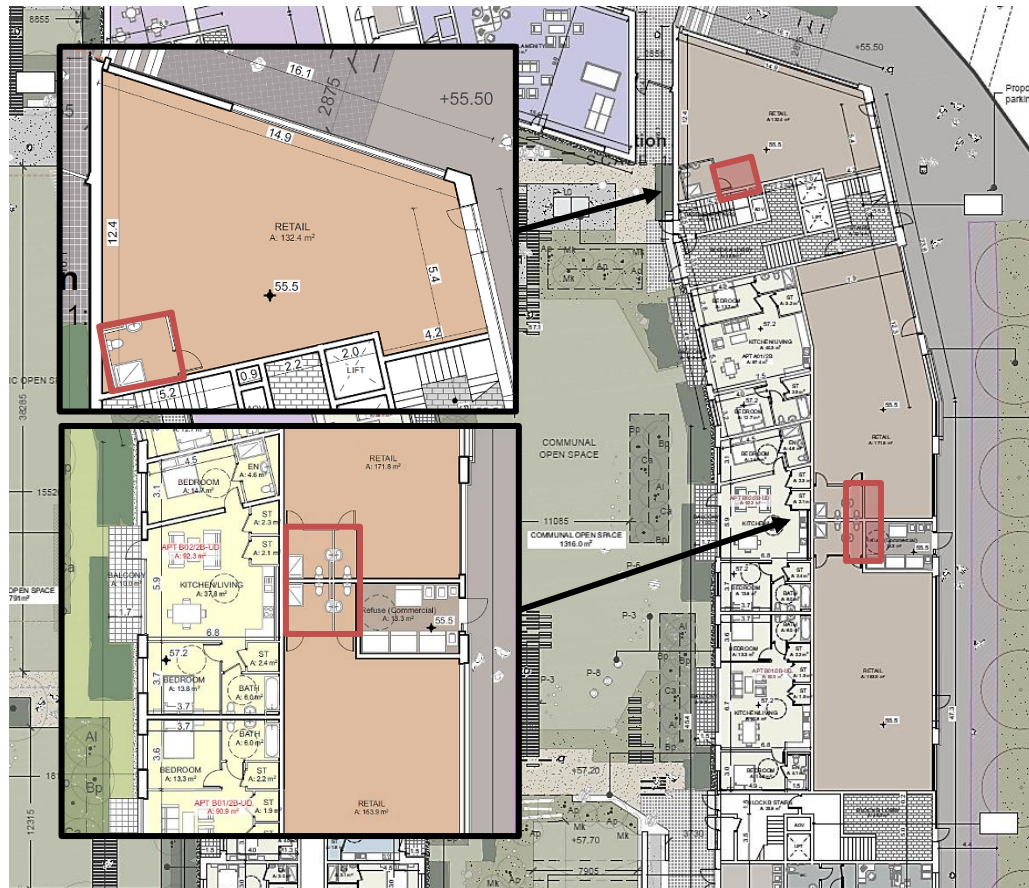


Figure 6: Proposed Shower/Changing Rooms at Retail Units at Blocks A and B

c) Works to Public Realm/Road requires review:

i. A Stage 1 Road Safety Audit should be provided which examines the proposed access. Issue have previously been raised in applications on the site for minor amendments to be made to the footpaths, junctions and access ways that should be clarified.

Response:

A Stage 1 Road Safety Audit (RSA) Report has been compiled by Bruton Consulting Engineers. The Report has been submitted as a standalone document as part of the planning application documentation – please refer to same.

ii. In the north-eastern corner of the site on the public footpath, there appears to be conflict with proposed landscaping and providing a free flowing public footpath as pinch points are created as a result of the street infrastructure. Applicant should revisit the landscaping proposal in this area

Response:

The proposed landscaping and public footpath to the north-east has been redesigned to eliminate pinch points and ensure pedestrian accessibility is clear and unobstructed (refer to Figure 7 below) and the available widths complies with DMURS guidance. The placement and design of the landscaping features in this area has been

revisited to ensure both the landscaping is incorporated efficiently within the footpath layout and respects key pedestrian desire lines. This involved the repositioning of a wayfinding totem and other landscape elements to optimize space utilization and minimize any potential conflicts.

The footpath at the northern boundary has a maximum width of 2.9m and extends beyond 6m to allow pedestrian safety and convenience, thereby providing ample space for individuals to traverse the area to the north-east comfortably.

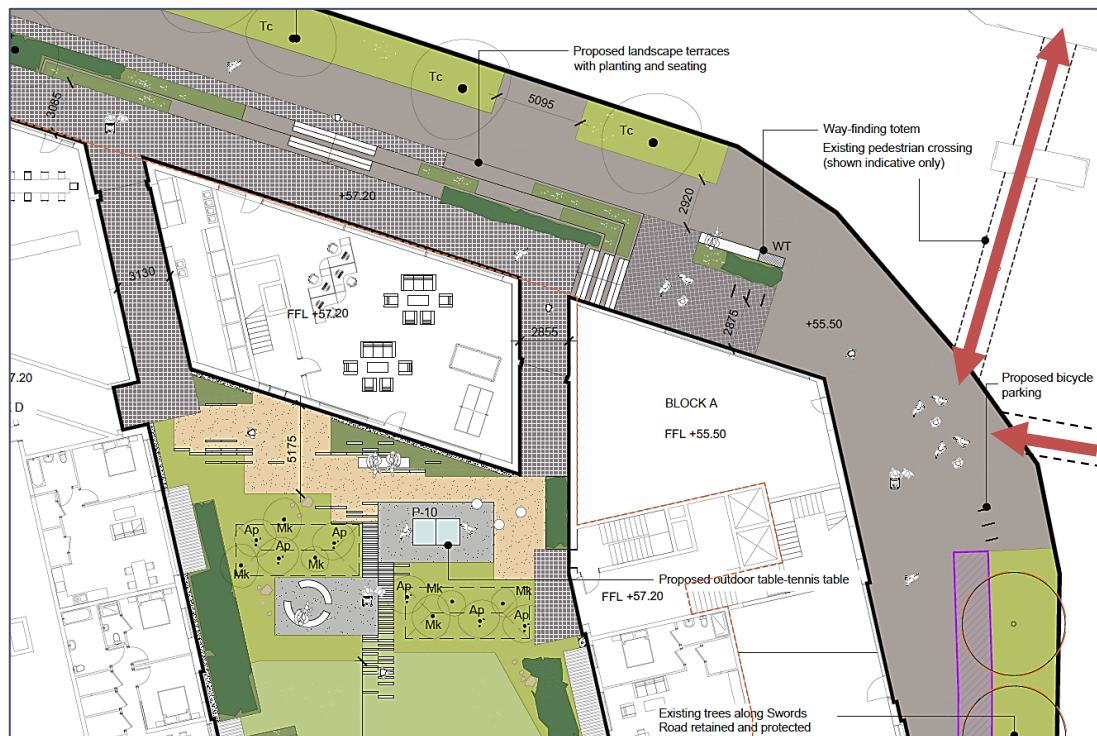


Figure 7: Proposed Landscaping and Footpath to the North-East of Subject Site

d) Servicing and Delivery Strategy

Details should be provided on the operational servicing and delivery strategy for the site taking into consideration the location of the set down areas in close proximity to the access junction on the Swords Road and the increase in non-residential development proposed as part of this application.

Response:

A Delivery & Servicing Plan has been compiled by DBFL Consulting Engineers (Report No. 230146-X-90-X-XXX-RP-DBFL-CE-0004 submitted as part of the planning application documentation) which outlines a strategy for managing deliveries and servicing activities at the proposed development, considering the proximity of the surface level waste transfer areas to the adjoining internal carriageway areas.

The report specifies the locations of the proposed (i) loading bay (ii) two set-down areas and (iii) waste transfer / staging areas with all bin collection being undertaken from the initial on-site carriageway and no longer from Santry Avenue or Swords Road. This arrangement seeks to minimize congestion and optimize accessibility for delivery vehicles. Additionally, the plan includes measures to minimize disruptions, such as scheduling deliveries



during off-peak hours and promoting efficient vehicle delivery / servicing options and consolidate deliveries / collection.

2.6 Item 6. Drainage Issues

- a. *Green roof coverage of 60% seems to include podiums – consideration needs to be given to provision of blue roofs*

Response:

The proposed development provides for green and blue roof coverage which is greater than the required 60% - please refer to the submitted DBFL drawing no. 230146-X-91-X-DTM-CE-1001 Surface Water Layout and also to section 3.3 "SuDS" of the submitted DBFL Engineering Services Report for full details of the proposed green and blue roof provision.

It should be noted that the majority of the apartment roof and podium areas are incorporated Blue and Green Roof systems, accounting for a significant portion of the onsite SUDS strategy as well as the first part of the treatment train for the managing of onsite surface water. Green Roof systems will capture surface water runoff from apartment roofs prior to being routed to the piped surface water drainage network. This strategy also provides biodiversity benefits. DBFL Consulting Engineers assert that the sites surface water management infrastructure has been designed in accordance with DCC's Development Plan 2022-2028 Appendix 11 (Blue/ Green Roof Guide) Appendix 12 (SUDS Design & Evaluation Guide) and Appendix 13 (Surface Water Management Guide).

The incorporation of the Blue/ Green systems aligns with the above mentioned DCC'S Development Plan 2022-2028 Appendix 11 (Blue/ Green Roof Guide), Section 2.2, as summarized below:

- Total Roof Area = 4,934m².
- Blueroof Area = 1,775m².
- Greenroof Area = 2,098m².
- Total Green/Blueroof area provide at roof level is 78% (this is greater than DCC's minimum coverage of 70%)
- Additionally, the total area of podium level suitable for the Blueroof system is 2,338m².

Please refer to Appendix G of the submitted DBFL Engineering Services Report for the breakdown of each of the individual Green/ Blueroofs and the Podium level Blueroofs.

- b. *Greater clarity is required regarding the provision of green and blue roofs throughout the scheme. In accordance with current policy, storage should be provided within each sub catchment.*

Response:

We refer to the response under 6(a) above and also to the submitted DBFL Engineering Services Report for extensive breakdown of Blue and Green roof provisions throughout the site.

c. DCC is not in favour of underground attenuation tanks. Further consideration should be given to green-blue roof strategy.

i. Review green/blue roof guide.

ii. The proposed storage tank should be reduced as much as possible, ideally completely removed, with all drainage managed using nature-based SuDS measures.

Response:

This statement is noted, with extensive Green and Blue Roofs proposed (as outlined under (a) above) and we refer the reader to the submitted DBFL drawing no. 230146-X-91-X-DTM-CE-1001 Surface Water Layout and also to section 3.3 of the submitted DBFL Engineering Services Report. The surface water attenuation tank has been reduced as much as is feasible given the provision of Blue and Green Roofs throughout the site.

d. Interception volume needs to be assessed for each sub-catchment within the site, not one storage volume calculated on overall site area.

Response:

There are 3 no. Green roofs and 7 no. Blue roofs proposed in total, which are incorporated within the Surface Water Strategy. Please refer to Appendix G of the submitted DBFL Engineering Services Report for further information, however, a portion of the sites overall attenuation is provided by the Blue/ Green Roof system as designed by ABG Geosynthetics and the table overleaf is an extract from Engineering Services Report (section 3.3.5) which provides a breakdown off each Blue/Green Roof system – refer to Fig. 8 below:

Catchment					
Roof area	Roof type	Area (m ²)	Volume provided (m ³)	System	Discharge (L/Sec)
Podium 1	Blue Podium	734	71.1	E108	0.62
Podium 2	Blue Podium	1369	132.7	E108	1.14
Block A	Blue Roof	299	29	E108	0.36
Block B	Green Roof	249	28.3	EP72	0.25
Block B	Blue Roof	299	29	E108	0.36
Block C	Green Roof	688	78.4	EP72	0.56
Block D	Blue Roof	330	32	E108	0.36
Block E	Blue Roof	365	35.4	E108	0.37
Block F	Green Roof	766	87.3	EP72	0.57
Block G	Blue Roof	341	33	E108	0.37

Fig. 8 – Taken from Table 1.1 Area breakdown by BGY Systems from submitted Engineering Services Report

e. SuDS should be incorporated into the management of runoff from roads. Consideration should be given to a bioretention area. Can permeable paving in parking spaces and SuDS tree pits be used to take some of the road runoff?

Response:

SuDS have been incorporated into the surface runoff management strategy throughout the site, the road along the south of the site has already been constructed as part of the mixed-use development “Santry Place” under the Planning Ref.s: 2713/17 & 2737/19 and is a permeable surface. All parking bays and the proposed road along the west of the site is also a permeable surface. Please refer to the submitted DBFL drawing no. 230146-X-91-X-DTM-CE-1001 Surface Water Layout for further information.

f. Taking in charge arrangements need to be clarified, particularly at public realm interface i.e. Swords Road and Santry Avenue. The delineation between public and private space needs to be clarified. Are there any other areas within the development proposed to be taken in charge?

i. Taking in charge drawing is required.

ii. Gullies shown within area that may be taken in charge in the north-west.

Response:

- (i) Please refer to the submitted Davey+Smith drawing no. D1809.P04 “Site Layout – Taking in Charge” which illustrates that only the parts of the site in the public realm along Swords Road and Santry Avenue are proposed to be taken in charge. The remainder (vast majority) of the proposed development will be subject to a Management Company.
- (ii) The proposed levels fall into the site in this location (interface of Santry Road and Santry Avenue). The gullies have been placed here to take any incidental run-off. Surface / Storm water will fall to the permeable paving build up on the western road.

g. A Basement Impact Assessment will be required as part of the planning application.

Response:

A Basement Impact Assessment (hereafter “BIA”) has been prepared by Ayesa and is included as part of this LRD planning application – please refer to same for full details. The submitted BIA was completed by analysing the ground conditions and hydrogeology of the site and subsequently modelling the basement. The assessment included a damage impact assessment on the nearby buildings based on empirical ground movement curves from CIRIA C760 6.15 A & B guidance, assumed ground conditions and adjacent foundation details.

The BIA asserts that it is expected that most of the proposed basement will be excavated using open cut excavation techniques where there is adequate clearance between the basement edge and the property boundary line. At some local areas, where the basement is close to the boundary line, an embedded retaining wall will likely be required to facilitate the basement excavations. These have been accounted for in the ground movement and damage assessment carried out as part of the BIA.

The ground movement analysis has concluded that the predicted damage to the neighbouring properties would be deemed negligible.

The BIA states that *“the predictions of ground movements given are considered preliminary based on the information provided. Based on the clearances outlined, an open-cut excavation should be feasible with adequate clearance to the adjacent existing structures. Should the clearance be less than indicated and to avoid excessive damage to the existing structures, an embedded retaining wall may be required in localised areas. This requirement shall be reviewed during the construction stage by the design team”*.

2.7 Item 7. Parks, Biodiversity and Landscape Issues

a. Public Open Space(POS):

The provision layout is similar to the previous applications for this site. There is a 10% of site area (1.5ha) provision requirement or approximately 1,500m² and a stated 1,915m² provision (although this has been inaccurately measured). Provision appears adequate nonetheless.

Response:

The site area of the proposed development is 1.5Ha, the 10% public open space requirement for same equates to 1,500sq.m. The central area of open space on the site, located between Blocks C-D and E-F, is dedicated as the public open space to serve the proposed development and provides for 1,791sq.m, which equates to c.12% of the site and therefore exceeds the minimum 10% requirement. We confirm this has been adequately and appropriately measured.

b. A key plan showing open space areas and respective calculations of provision shall be provided in the landscape submission. For calculation, all POS boundaries shall be set back from building facades by a 1.5m privacy/security buffer. A drawing showing the quantum of public open space and communal open space shall be submitted, and the figure recalculated accurately.

Response:

Please refer to the submitted Davey+Smith Architects drawing no. D1809.P31 “Site Layout – Open Space” which provides a detailed breakdown of all open spaces, i.e. public and communal open spaces, proposed as part of the overall development. The appropriate measures have been calculated, as well as taking into account / providing the necessary setbacks / privacy/security buffers.

- The total public open space provision is 1,791sq.m.
- The total communal open space provision is 2,986.1sq.m

c. North/South connectivity – allow pedestrian crossing at vehicular entrance (at north-west corner of site, within site) to facilitate pedestrian movement westwards to the pedestrian crossing to the west on Santry Avenue, to facilitate pedestrian access to Santry Park.

Response:

Please refer to the submitted Site Layout Plan (Davey+Smith drawing no. D1809.P03) which illustrates that to the west of the vehicular entrance to the site off Santry Avenue (north-west corner of the site) there is an existing



pedestrian crossing that allows access to the north side of Santry Avenue and thus further on into Santry Park/Demesne, and that the proposed development allows for pedestrian access from same to this existing crossing.

d. Wayfinding proposals shall be included to guide public access through the scheme and connect to external open-spaces/parks/attractions.

Response:

Wayfinding has been considered as part of the proposals with wayfinding totems located at the north-eastern and north-western corners of the site. They invite users to meander through the development as a car-free alternative to the footpath along Swords Road. As a similar strategy, the free-standing entrance canopy of the existing industrial building on site is proposed to be retained, protected, and re-located to the south, to act as a landmark within the public open space. Please refer to the submitted landscape proposals/design for the proposed development that have been prepared by Dermot Foley Landscape Architects for details.

e. POS boundary design with building facades should reflect ground floor building uses: ground-level residential facades with private open spaces should include railings for privacy/security. Internal public/community uses (Cultural/arts) may wish to expand out to use the open space (e.g. stage/amphitheater) or create public entrances to these facilities.

Response:

Please refer to the submitted landscape drawing no. 03-DR-2003 Rev A “Boundary Treatments” which provides details of all of the proposed boundary treatments within the overall development but please also note that at ground floor outside the private dwelling units that a 1.5m privacy/security buffer is proposed between private units and the public open space which will include a hedge.

f. The boundary plan shall include this approach.

Response:

Please refer to the submitted landscape drawing no. 03-DR-2003 Rev A “Boundary Treatments” prepared by Dermot Foley Landscape Architects.

g. The Public Open Space will not be taken in charge by DCC Park Services.

Response:

Please refer to the submitted Taking-In-Charge drawing no. D1809.P04 “Site Layout – Taking in Charge” prepared by Davey+Smith Architects which identifies that the proposed public open space will not be proposed to be taken in charge and will be privately managed.



h. Communal Open Space (COS): The proposed area provision is stated at 2751m², which meets the apartment guideline requirement of 2047m². The provision is at ground level and roof-top. Ground level provision shall include boundaries to control access for residents only.

Response:

The proposed development provides communal open space as follows:

- At ground floor, between Blocks A-B & C-D - c. 1,316sq.m:
- At ground floor, between Blocks E- F, & G - c. 556sq.m:
- In the form of roof gardens located on:
 - Block A (c.154.7 sq.m)
 - Block C (c. 418.6 sq.m)
 - Block F (c. 436.1 sq.m)
 - on the proposed residential amenity use unit (c. 104.6 sq.m).

Therefore, in totality, the proposed communal open space provision for the development equates to c. 2,986.1m².

In total, 2,986.1m² of communal open space is provided to cater for 321 no. apartments. In accordance with the standards of the Apartment Guidelines, approx. 2,071m² of communal open space is required as per Table 10 below:

Unit Type	No. of Units	Individual Communal Open Space required m ²	Total Communal Open Space Required
1 bed	104	5	520
2 bed / 3 person	6	6	36
2 bed / 4 person	192	7	1,344
3 bed	19	9	171
Total	321		2,071m²

Table 10 – Quantum of Communal Open Space Required

We note that section 15.9.9 “Roof Terraces” of the CDP states that “roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the Development Standards primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space. The provision of roof terraces does not circumvent the need to provide an adequate accessible ground floor residential amenity that achieves adequate sunlight and daylight levels throughout the day unless exceptional site-specific conditions prevail”.

It is obvious from the submitted proposals that the overall communal open space provision complies with and exceeds the minimum standards for same and is provided for as a mix of ground floor communal spaces and roof terraces.

The proposed development provides c.1,872m² of communal open space at surface level, which represents c.12% of the application site area and c.63% of the overall communal open space provision, and also represents 90% of the communal open space requirements as per the Apartment Guidelines. In addition, 1,114.1m² of communal space is provided for at upper levels of Blocks A, C and F, and on the roof terrace of the residential amenity building, thus ensuring that high quality communal open space is provided for future tenants. It is evident that the proposed communal open space significantly exceeds the minimum communal amenity space standards as required.

It is noted that the CDP states that “...roof terraces will not be permitted as the primary form of communal amenity spaces”, however, the CDP also states that “roof terraces may be provided in certain circumstances”. The Design Team wish to assert that the proposed communal terraces at the upper level have been designed to be of a high quality and given the limited size of the application site, it is considered that the proposed communal open spaces are appropriate for the subject site. The proposed development has been assessed in terms of daylight/sunlight in amenity spaces and in terms of microclimate impacts, all of which confirm that the proposed development is acceptable.

i. Boundaries: Boundary to Swords Road - Boundary Type F (at southern end of Block B) as shown in section on drawing Dw.03-DR-2003). Coordinate this section with the Master Landscape Plan (MLP). The planter buffer strip shown on the left hand side of that section drawing, is not illustrated on the MLP. The ground level is not flat, but slopes up to the site from the road and the section will be adjusted to illustrate this. Tree root protection for the existing trees is the important issue on this boundary. Planted roadside margins will be in grass as per existing.

Response:

Please refer to the submitted landscape drawings prepared by Dermot Foley Landscape Architects for full details.

j. Recreation & Play areas: A schedule of provision and requirements in accordance with the apartment guidelines shall be included (85-100m² for younger children, plus 200-400m² for older children/teenagers). This will include the total area provided, the complete range of equipment to be provided and associated surfaces to allow for critical fall heights.

Response:

A schedule of play equipment is outlined as part of the submitted Dermot Foley Landscape Architects Drawing no. 2001 Landscape Plan and Drawing no. 2002 Roof Terrace Plan, prepared by DFLA and included in this planning application. In addition, their submitted Design Rationale (section 3.5) provides details of the proposed play – please refer to same.

k. More active facilities shall be provided for older children, e.g. half-basketball court & external gym units.

Response:

A schedule of play equipment is outlined as part of the submitted Dermot Foley Landscape Architects Drawing no. 2001 Landscape Plan and Drawing no. 2002 Roof Terrace Plan, prepared by DFLA and included in this planning application. In addition, their submitted Design Rationale (section 3.5) provides details of the proposed play – please refer to same, which asserts that youth-focused spaces are also proposed including two table tennis tables and sports equipment with flexible uses catering for various forms of exercise. A large climbing structure is proposed in the central public open space which can accommodate many children playing at the same time within a flowing play rhythm. This piece of play equipment not only allows children to climb with their hands and feet and experience height, but also provides seating opportunities for older children to relax, converse and observe.

l. Biodiversity: an updated Appropriate Assessment screening report is required, & Biodiversity Enhancement Plan detailing measures proposed within the architecture and landscape architecture of the scheme to encourage urban biodiversity (e.g. lighting control for bats, habitat planting, bird & bat boxes etc.).

**Response:**

Enviroguide Consulting has prepared the submitted Appropriate Assessment Screening Report and Biodiversity Enhancement Plan, both of which are enclosed as separate documents – please refer to both for further details.

m. Green Roofs: A green roof plan shall be included with reference to the requirements of the DCC Green & Blue Roof Guide.

Response:

The proposed development provides for green and blue roof coverage which equates to 78% - please refer to the submitted DBFL drawing no. 230146-X-91-X-DTM-CE-1001 Surface Water Layout and also to section 3.3 “SuDS” of the submitted DBFL Engineering Services Report for full details of the proposed green and blue roof provision.

It should be noted that the majority of the apartment roof and podium areas are incorporated Blue and Green Roof systems, accounting for a significant portion of the onsite SUDS strategy as well as the first part of the treatment train for the managing of onsite surface water. Green Roof systems will capture surface water runoff from apartment roofs prior to being routed to the piped surface water drainage network. This strategy also provides biodiversity benefits. DBFL Consulting Engineers assert that the sites surface water management infrastructure has been designed in accordance with DCC’s Development Plan 2022-2028 Appendix 11 (Blue/ Green Roof Guide) Appendix 12 (SUDS Design & Evaluation Guide) and Appendix 13 (Surface Water Management Guide).

n. CGIs: A repeat of views from Santry Park to the proposed development showing amendments of building block height/design shall be included.

Response:

Please refer to the submitted CGI’s and verified views of the proposed development, prepared by 3D Design Bureau.

o. Materials: The MLP shall include 50% of all external seats/benches with arm and back-rests. 50% of all external bicycle stands shall have weather covers.

Response:

Please refer to the submitted Dermot Foley Landscape Architects Design Rationale (section 5) which provides details of the proposed materials as well as their submitted play Drawing no. 2001 Landscape Plan for details.

2.8 Item 8. Ecological Impact Assessment and Appropriate Assessment

Screening documents for Ecological Impact Assessment and Appropriate Assessment are both required.

Response:

This application is accompanied by an EIAR, and Chapter 5 “Biodiversity” of same provides an ecological impact assessment of the proposed development, prepared by Enviroguide Consulting – please refer to same for details.

Enviroguide Consulting has also prepared the submitted Appropriate Assessment Screening Report – please refer to same.

2.9 Item 9. Archaeology

a. *An updated, detailed, project-specific desktop Archaeological Assessment is required. This should be carried out in consultation with the City Archaeologist. In the event of a grant of permission, the removal of the ground slab should be monitored under licence and post-demolition archaeological testing should be carried out at a pre-construction stage.*

Response:

This application is accompanied by an EIAR, and Chapter 14 “Archaeology & Cultural Heritage” of same provides an archaeological impact assessment of the proposed development, prepared by Archaeology Plan – please refer to same for details.

We note that the enclosed EIAR includes the following recommendations:

“In the event of a grant of planning permission. it is recommended that the removal of the concrete slab be monitored under licence and, after the demolition of the existing structure, a programme of archaeological testing be carried out across the site prior to any further groundworks on site.

Time should be allowed between the monitoring works and any construction or service laying in case archaeological features are uncovered. These recommendations have been made in consultation with the Archaeology, Conservation & Heritage Department of Dublin City Council.

A report on the results of the monitoring programme should be submitted to the City Archaeologist and the National Monuments Service following the completion of the works. All recommendations are subject to the approval of the City Archaeologist and the National Monuments Service”.



Figure 8 - Summary of the findings of the assessment and recommendation for monitoring of concrete slab removal within the entire footprint of the site (highlighted in blue)

2.10 Item 10. Other

The applicant should satisfy themselves that they have submitted all required material as set out in Table 15-1 of the Development Plan (not reiterated here) for a development of this size and nature.

Response:

Having regard to the requirements sets out in Table 15-1 of the Development Plan, we confirm that the following relevant reports / documentation is included as part of this LRD planning application:

- Architectural Design Statement, prepared by Davey+Smith Architects.
- Housing Quality Assessment, prepared by Armstrong Fenton Associates.
- Landscape Design Report, prepared by Dermot Foley, Landscape Architects.
- Planning Report / Statement, prepared by Armstrong Fenton Associates.
- Daylight and Sunlight Assessment, prepared by CS Consulting.
- Community and Social Audit – refer to the submitted Social Infrastructure Assessment prepared by Armstrong Fenton Associates.
- Lifecycle Report – refer to the submitted Building Life Cycle Report prepared by Armstrong Fenton Associates.
- Community Safety Strategy, prepared by Armstrong Fenton Associates.
- Operational Management Statement – refer to the submitted Property Management Strategy Report prepared by Armstrong Fenton Associates.
- Traffic and Transport Assessment, prepared by DBFL Consulting Engineers.
- Mobility Management Plan / Travel Plan, prepared by DBFL Consulting Engineers and is enclosed.
- A Stage 1 Road Safety Audit, prepared by Bruton Consulting Engineers.



- Service Delivery and Access Strategy, refer to the submitted report “Delivery and Servicing Plan” prepared by DBFL Consulting Engineers.
- Engineering Services Report (Civil and Structural), prepared by DBFL Consulting Engineers.
- Construction Management Plan – refer to the enclosed Outline Construction Management Plan prepared by the applicant, Dwyer Nolan Developments Ltd and the Construction and Environmental Management Plan prepared by DBFL Consulting Engineers.
- Construction Demolition Waste Management Plan – prepared by AWN Consulting, and enclosed as Appendix 13.1 of Chapter 13 “Material Assets: Resource and Waste Management” of the enclosed Environmental Impact Assessment Report (EIAR).
- Operational Waste Management Plan - prepared by AWN Consulting, and enclosed as Appendix 13.2 of Chapter 13 “Material Assets: Resource and Waste Management” of the enclosed Environmental Impact Assessment Report (EIAR).
- Basement Impact Assessment, prepared by Ayesa.
- Energy Statement prepared by Morley Walsh.
- Surface Water Management Plan, prepared by DBFL Consulting Engineers.
- Noise Assessment - prepared by AWN Consulting, and enclosed as Chapter 10 “Noise” of the enclosed Environmental Impact Assessment Report (EIAR).
- Site Specific Flood Risk Assessment, prepared by DBFL Consulting Engineers.
- Site Investigation Report, this is referenced in the submitted Basement Impact Assessment
- Conservation Report, refer to the enclosed Architectural Heritage Impact Assessment (AHIA), prepared by Dermot Nolan, Conservation Architect.
- Ecological Impact Assessment - prepared by Enviroguide Consulting, and enclosed as Chapter 5 “Biodiversity” of the enclosed Environmental Impact Assessment Report (EIAR).
- Appropriate Assessment Screening and NIS – refer to the enclosed Appropriate Assessment Screening Report prepared by Enviroguide Consulting, there is no NIS enclosed, as it has been deemed not necessary.
- Environmental Impact Assessment – refer to the enclosed Environmental Impact Assessment Report (EIAR).

The below documents are also required.

Response:

We confirm that the following required documents are also enclosed as part of this LRD planning application:

Item Required	Method of Response
Landscape Design Report	Please refer to the submitted Landscape Design Report prepared by Dermot Foley Landscape Architects.
Noise Assessment	Please refer to Chapter 10 “Noise” of the enclosed Environmental Impact Assessment (EIAR) which provides a noise assessment of the proposed development, and which has been prepared by AWN Consulting.
Wind Microclimate Report	B-Fluid has prepared the enclosed Wind Microclimate Modelling report.
Arboricultural Assessment	The Tree File has prepared the enclosed Tree Protection Plan.



Verified Photomontages and Landscape and Visual Impact Assessment, showing views inter alia from Griffith Park, and from St Pappan's Church environs. Winter views should be provided.	3D Design Bureau has prepared the submitted verified views / photomontages. Please refer to Chapter 15 "The Landscape" of the enclosed Environmental Impact Assessment (EIAR) which provides a Landscape and Visual Impact Assessment of the proposed development, and which has been prepared by Dermot Foley Landscape Architects.
Public Lighting Report	Please refer to the enclosed public lighting details prepared by Sabre Electrical.
Bat Activity Report	Please refer to Chapter 5 "Biodiversity" of the enclosed Environmental Impact Assessment (EIAR) which provides details of bat activity on the subject site, and which has been prepared by Enviroguide Consulting Ecologists.



3.0 Conclusion

3.1 It is considered that the LRD planning application now submitted to Dublin City Council for assessment appropriately addresses all the issues raised in the DCC LRD Opinion (Ref. LRD 6044/23-S2) and contains all of the requested items of specific information as appropriate.

3.2 Having regard to relevant national, regional, and local planning policy, the zoning objective attached to the site, the contextual location of the site and its planning history, the development now put forward for permission is considered to represent a sustainable development and efficient use of a zoned, urban, brownfield site for new residential development, and therefore we request that the permission being sought is granted.

Yours sincerely,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Managing Director
Armstrong Fenton Associates.



APPENDIX

Copy of Dublin City Council's LRD Opinion (Ref. LRD6044/23-S2)

Planning and Development Act 2000, as amended

Planning and development (Large Scale Residential Developments) Act 2021

Notice of LRD Opinion

Planning Authority Reference No: LRD6044/23-S2

Location: Junction of Swords Road & Santry Avenue, Santry, Dublin 9, on the Site of Chadwicks Builders Providers

Description: The development consists of the following:

(1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).

(2) Construction of 317 no. 1, 2, & 3 bed apartments, retail / commercial, medical suite / GP Practice, community/arts & culture space, and a one storey residential amenity unit in 4 no. buildings that are subdivided into Blocks A-G as follows:

- Block A is a 7 to 11 storey block consisting of 47 no. apartments comprised of 20 no. 1 bed, 21 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132.4m² and c.144m² respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. retail unit (c.212m²) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130m²). Refuse storage areas are also provided for at ground floor level.

- Block C is a 7 storey block consisting of 53 no. apartments comprised of 14 no. 1 bed & 39 no. 2 bed dwellings. Refuse storage areas are provided for at ground floor level. Adjoining same is Block D which is a 7 to 8 storey block consisting of 44 no. apartments comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed dwellings. Circa 612m² of ground floor, community/arts & culture space is proposed in Blocks C & D, with refuse storage area also provided for at ground floor level.

- Block E is a 7 to 8 storey block consisting of 49 no. apartments comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. Adjoining same is Block F which is a 7 storey block consisting of 52 no. apartments comprised of 13 no. 1 bed & 39 no. 2 bed dwellings. Circa 877m² of ground floor, community/arts & culture space is proposed in Blocks E & F. A refuse storage area, bicycle storage area, substation, & switchroom are also provided for at ground floor level of Blocks E & F.

- Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.

(3) Construction of a 1 storey residential amenity unit (c. 187.9m²) located between Blocks A & D.

(4) Construction of basement level, accommodating car & bicycle parking with internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. Car & bicycle parking is also provided for within the site at surface level.

(5) Public open space of c. 1,915m² is provided for between Blocks C, D, E, & F. Communal open space between (i) Blocks E, F, & G, (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens is also proposed. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.

(6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).

(7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

Applicant: Dwyer Nolan Developments Ltd

The Planning Authority refers to your request pursuant to section 32 of the Planning and development (Large Scale Residential Developments) Act 2021. Section 32D of the Act provides that the planning authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the LDR meeting the Planning Authority is of the opinion that the documentation submitted **of the opinion that the documentation submitted in accordance with Section 32B of the 2021 Act requires further**

consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development.

Furthermore pursuant to article 16A of the Planning and Development (Large-scale Residential Development) Regulations 2021 the applicant is hereby notified that, in addition to the requirements of section 32D, notify the prospective LRD applicant that specified information in addition to the requirements of article 23, the following specific information should be submitted with any LRD application for permission for the proposed development:

In the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by

- Statement of response to the issues set out in the LRD opinion.
- Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.

Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the applicant is hereby notified that the documents submitted in relation to the following issues do not constitute a reasonable basis on which to make an application. The applicant is advised that these issues or areas must be addressed in any documents submitted in a future planning application, in order to constitute a reasonable basis on which to make an application.

1. Zoning – Development Plan Requirements

- a. In relation to Zoning the Planning Authority the requirement for a mixed use development with sufficient commercial/retail amenities is reiterated. The reinstatement of the commercial uses (relative to the Section 147 meeting) is welcomed.

2. Bulk, Massing, Height and Scale and layout of proposal

- a. With regard to the form of the Development, the Planning Authority notes the proposed reduction in height (relative to previous proposals). However, these reductions in one direction only, with no change to length or breadth of the blocks, have the effect of creating a blocky and inelegant corner proposal, exacerbated by the omission of the roof terrace to the corner, and the subsequent lack of design to the roof profile. Consideration should be given to revising the proportions, footprint, and roofline of this corner element, rather than the removal of several storeys from the previously submitted design. It is acknowledged that the Planning Authority recommended the reduction in height by way of condition on previous proposals, however, the opportunity to design this building from first principles, to an appropriate height, should not be ignored at this juncture. A revised updated Architectural Design Report,

with text referring to the revised design, and revised photomontages, are required.

- b. A detailed daylight and sunlight assessment of the proposed development as per discussions in the LRD meeting, in accordance with the relevant Guidelines, which will demonstrate an acceptable level of day light and sunlight for the proposed occupants of the development, and existing neighbouring properties is required.
- c. A detailed schedule of accommodation which shall indicate compliance with all relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, and in the Development Plan. Particular regard to be given to the provision of universal design apartments.
- d. Demonstration (by way of revised Visual Impact Assessment, photomontages, shadow analysis, etc) that neighbouring residential amenity and visual amenity is not unduly affected.
- e. The proposal is for 211 units per hectare, while the Development Plan sets the range for sites in the Outer Suburbs at 60-120 uph. A strong case needs to be made for the proposed density.

3. 5% Community, Arts and Cultural spaces i.e. Objective CU025

- a. Further consideration should be given to the proposed uses of the spaces proposed and their proposed end users, in conjunction with the Dublin City Arts Office and local stakeholders.

4. Conservation Issues

- a) A conservation expert (a Grade 1 or 2 Conservation Architect) with proven and appropriate expertise shall be employed to complete an Architectural Heritage Impact Assessment of the extant principal Heiton and Buckley building, setting out its history, its architect and identifying all significant interior and exterior features, said AHIA to be submitted with the application.



- b) The AHIA shall include a comprehensive and detailed photographic record cross referenced against a detailed drawn record (1:100 plans, sections and elevations) of the building including the exterior and interior, with all 20th Century fabric, materials, features and fixtures identified.
- c) Where architectural features / fixtures / fittings are noted, the applicant shall submit a salvage strategy for the careful recording, lifting and storing of these elements to allow for reuse in the future.

5. Transportation Issues

- a) There are discrepancies in submitted documentation regarding quantum of bicycle parking, as well as the proposed works to the public realm which differs on varying drawings (e.g. Road Layout Plan still identifies the provision of a set down area to the north of the site which has been removed in the Proposed Site Layout Plan). The final application submission should be consistent.
- b) Cycle parking proposals requires review.
 - i. Security for cycle parking at basement level requires revision. Where a rationale for reduced quantum of car parking is proposed, alternative high quality sustainable transport options should be provided. All cycle parking at present is proposed to be left unsecured in an open basement car park. Consideration should be given to providing additional security measures (e.g. segregated cages, store rooms etc) for bicycles. Detailed drawings should be submitted for each bicycle parking area clearly identify the quantum of bicycle parking in that area the type of standard to be use and clearly identifying adequate separation distances have been provided for ease of access and functionality. The applicant is referred to the National Cycle Design Manual (2023) in relation to the required separation distances for varying types of bicycle parking facilities.
 - ii. Section 3.2 of Appendix 5 of the City Development Plan 2022-2028 outlines provisions for shower/changing facilities for employees of commercial developments. Applicant should clarify compliance where applicable and identity the locations of same for future employees of the non-residential elements of the development.
- c) Works to Public Realm/Road requires review:
 - i. A Stage 1 Road Safety Audit should be provided which examines the proposed access. Issue have previously been raised in applications on the site for minor

amendments to be made to the footpaths, junctions and access ways that should be clarified.

- ii. In the north-eastern corner of the site on the public footpath, there appears to be conflict with proposed landscaping and providing a free flowing public footpath as pinch points are created as a result of the street infrastructure. Applicant should revisit the landscaping proposal in this area.

d) Servicing and Delivery Strategy

Details should be provided on the operational servicing and delivery strategy for the site taking into consideration the location of the set down areas in close proximity to the access junction on the Swords Road and the increase in non –residential development proposed as part of this application.

6. Drainage Issues

- a. Green roof coverage of 60% seems to include podiums – consideration needs to be given to provision of blue roofs.
- b. Greater clarity is required regarding the provision of green and blue roofs throughout the scheme. In accordance with current policy, storage should be provided within each sub catchment.
- c. DCC is not in favour of underground attenuation tanks. Further consideration should be given to green-blue roof strategy.
 - i. Review green/blue roof guide.
 - ii. The proposed storage tank should be reduced as much as possible, ideally completely removed, with all drainage managed using nature-based SuDS measures.
- d. Interception volume needs to be assessed for each sub-catchment within the site, not one storage volume calculated on overall site area.
- e. SuDS should be incorporated into the management of runoff from roads. Consideration should be given to a bioretention area. Can permeable paving in parking spaces and SuDS tree pits be used to take some of the road runoff?
- f. Taking in charge arrangements need to be clarified, particularly at public realm interface i.e. Swords Road and Santry Avenue. The delineation between public and private space needs to be clarified. Are there any other areas within the development proposed to be taken in charge?



- i. Taking in charge drawing is required.
- ii. Gullies shown within area that may be taken in charge in the north-west.
- g. A Basement Impact Assessment will be required as part of the planning application.

7. Parks, Biodiversity and Landscape Issues

a. Public Open Space(POS):

The provision layout is similar to the previous applications for this site. There is a 10% of site area (1.5ha) provision requirement or approximately 1,500m² and a stated 1,915m² provision (although this has been inaccurately measured). Provision appears adequate nonetheless.

- b. A key plan showing open space areas and respective calculations of provision shall be provided in the landscape submission. For calculation, all POS boundaries shall be set back from building facades by a 1.5m privacy/security buffer. A drawing showing the quantum of public open space and communal open space shall be submitted, and the figure recalculated accurately.
- c. North/South connectivity – allow pedestrian crossing at vehicular entrance (at north-west corner of site, within site) to facilitate pedestrian movement westwards to the pedestrian crossing to the west on Santry Avenue, to facilitate pedestrian access to Santry Park.
- d. Wayfinding proposals shall be included to guide public access through the scheme and connect to external open-spaces/parks/attractions.
- e. POS boundary design with building facades should reflect ground floor building uses: ground-level residential facades with private open spaces should include railings for privacy/security. Internal public/community uses (Cultural/arts) may wish to expand out to use the open space (e.g. stage/amphitheater) or create public entrances to these facilities.
- f. The boundary plan shall include this approach.

- g. The Public Open Space will not be taken in charge by DCC Park Services.
- h. Communal Open Space (COS): The proposed area provision is stated at 2751m², which meets the apartment guideline requirement of 2047m². The provision is at ground level and roof-top. Ground level provision shall include boundaries to control access for residents only.
- i. Boundaries: Boundary to Swords Road - Boundary Type F (at southern end of Block B) as shown in section on drawing Dw.03-DR-2003). Coordinate this section with the Master Landscape Plan (MLP). The planter buffer strip shown on the left hand side of that section drawing, is not illustrated on the MLP. The ground level is not flat, but slopes up to the site from the road and the section will be adjusted to illustrate this. Tree root protection for the existing trees is the important issue on this boundary. Planted roadside margins will be in grass as per existing.
- j. Recreation & Play areas: A schedule of provision and requirements in accordance with the apartment guidelines shall be included (85-100m² for younger children, plus 200-400m² for older children/teenagers). This will include the total area provided, the complete range of equipment to be provided and associated surfaces to allow for critical fall heights.
- k. More active facilities shall be provided for older children, e.g. half-basketball court & external gym units.
- l. Biodiversity: an updated Appropriate Assessment screening report is required, & Biodiversity Enhancement Plan detailing measures proposed within the architecture and landscape architecture of the scheme to encourage urban biodiversity (e.g. lighting control for bats, habitat planting, bird & bat boxes etc.).
- m. Green Roofs: A green roof plan shall be included with reference to the requirements of the DCC Green & Blue Roof Guide.
- n. CGIs: A repeat of views from Santry Park to the proposed development showing amendments of building block height/design shall be included.



- o. Materials: The MLP shall include 50% of all external seats/benches with arm and back-rests. 50% of all external bicycle stands shall have weather covers.

8. Ecological Impact Assessment and Appropriate Assessment

Screening documents for Ecological Impact Assessment and Appropriate Assessment are both required.

9. Archaeology

- a. An updated, detailed, project-specific desktop Archaeological Assessment is required. This should be carried out in consultation with the City Archaeologist. In the event of a grant of permission, the removal of the ground slab should be monitored under licence and post-demolition archaeological testing should be carried out at a pre-construction stage.

10. Other

The applicant should satisfy themselves that they have submitted all required material as set out in Table 15-1 of the Development Plan (not reiterated here) for a development of this size and nature. The below documents are also required.

- Landscape Design Report
- Noise Assessment
- Wind Microclimate Report
- Arboricultural Assessment
- Verified Photomontages and Landscape and Visual Impact Assessment, showing views inter alia from Griffith Park, and from St Pappan's Church environs. Winter views should be provided.
- Public Lighting Report
- Bat Activity Report

Please Note:

Under section 32E of the Act of 2021 neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its



functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Emer Uí Fhátharta

Deputy City Planner

