



ARMSTRONG FENTON

ASSOCIATES

PROJECT: Large-scale Residential Development (LRD)

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

REPORT: UNIVERSAL DESIGN STATEMENT

CLIENT: DWYER NOLAN DEVELOPMENTS LTD.

DATE: April 2024

Planning &
Development
Consultants



1.0 Scope of Report

This Report is submitted in support of a Large-scale Residential Development (hereafter “LRD”) proposed by Dwyer Nolan Developments Ltd (the Applicant) for a new mixed-use and residential development, on a site measuring approximately 1.5Ha, located at the junction of Swords Road and Santry Avenue, Santry, Dublin 9.

The Access & Use Strategy is being submitted with the LRD Planning Application to demonstrate that the proposed design is in substantial compliance with Part M (Access & Use) of the Building Regulations and that it will be possible in due course to obtain Disability Access Certificates, as necessary, for the development without giving rise to changes that would require planning permission. The design has sought to comply with the principles of Universal Design to ensure access and use of the development and its facilities for everyone.

2.0 Development Description

The proposed development can be described as follows:

Dwyer Nolan Developments Ltd. wishes to apply for permission for a Large-Scale Residential Development (LRD) on this site, c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref.s. 2713/17 (as extended under Ref. 2713/17/X1), 2737/19 & 4549/22).

The proposed development provides for 321 no. apartments, comprised of 104 no. 1 bed, 198 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to thirteen storey buildings, over basement level, with 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space (total c.1,460sq.m), all located at ground floor level, as well as a one storey residential amenity unit, facing onto Santry Avenue, located between Blocks A & D.

The proposed 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 321 no. 1, 2, & 3 bed apartments, retail units, 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 7-13 storey block consisting of 51 no. apartments comprised of 22 no. 1 bed, 23 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132sq.m & c.172sq.m 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.164sq.m) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130sq.m). 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. Adjoining same is Block D which is an 8 storey block consisting of 44 no. apartments comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed dwellings. Ground floor, community/arts & culture space (c. 583sq.m) is proposed in Blocks C & D, with refuse storage area also provided for at ground floor level.**



- Block E is an 8 storey block consisting of 49 no. apartments comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area, substation, & switchroom are also provided for at ground floor level. 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. Ground floor, community/arts & culture space (c.877sq.m) 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. 166.1sq.m) located between Blocks A & D.
- (4) Construction of basement level car park (c.5,470.8sq.m), accommodating 161 no. car parking spaces, 10 no. motorbike parking spaces & 664 no. bicycle parking spaces. 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. 33 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
- (5) Public open space of c. 1,791sq.m is provided for between Blocks C-D & E-F. Communal open space is also proposed, located between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit, totalling c.2,986 sq.m. 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.



3.0 Universal Design Statement

Based upon the drawings submitted as part of this application for permission, we confirm that all of the proposed dwellings / buildings have been designed to be compliant with Part M of the Building Regulations with regard to accessibility.

Basis of Compliance

Purpose Group	Design Guidance (Fire Safety / Access & Use)
PG 1 (c) Residential	TGD-M 2022
PG 7(b) Car Park	Centre for Excellence in Universal Design / NDA publication "Universal Design Guidelines for Homes in Ireland" NDA "Building for Everyone"

The aforementioned guidance proffers prescriptive design solutions which are considered prima facie compliance with Parts M of the Building Regulations.

The design seeks to go beyond minimum mandatory compliance and accordingly where practicable best practice and the principles of Universal Design form the basis of the design approach herein.

Regard has been had to the principles of Universal Design and the application of lifelong design thinking as set out in Section 5.5.5 "Housing for All" of the Dublin City Development Plan 2022 – 2028, which contains the following policy and objective:

Policy: QHSN22: "Adaptable and Flexible Housing - To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015".

Objective: QHSN011: "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".

We refer to 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, stating: "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."



The proposed development includes 212 no. units out of a total of 321 no. which are over the 10% minimum area, which represents 66% of the overall unit provision. Of these 212 no. oversized units, some 81 no. units are specifically designed to be universal design (which also equates to c.25% of the total units provided). Please refer to the submitted architectural plans of the proposed dwellings and the Housing Quality Assessment (HQA) for details. The aforementioned universally designed units have been designed in accordance with the guidance in 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.

4.0. Access & Use Strategy

4.1. External Access Routes

The external site landscape will be designed to achieve best practice, including accessible access routes to serve each of the residential cores. In order to ensure universal access will be provided for all; access routes will include level approach routes. Each of the residential cores will be provided with an accessible entrance to facilitate wheelchair/disabled access.

Car parking will be provided with a minimum of 5% designated accessible car parking spaces as per TGD-M 2022. The internal height of the circulation in the car park ensures adequate circulation for all persons as per TGD-M. In total 18 no. accessible parking spaces shall be provided (12 no. at basement level and 6 no. at surface level). This will ensure level access routes are provided from the designated parking spaces to each core. Transfer from the basement car parking is provided to all apartments by way of passenger lifts and ambulant stairs.

4.2. Residential and Commercial Amenities / Facilities

The proposed retail units, GP Practice / medical suite, residential amenity unit and community/arts/cultural use spaces will be designed to achieve universal access for residents and staff.

4.3. Circulation within Buildings

Corridors and passageways shall be designed to be wheelchair accessible in accordance with TGD M 2022 and have passing places achieving 1,800mm by 1,800mm at the end of corridors where applicable.

The upper floors to each of the residential cores and basement level will be served via accessible passenger lifts and an ambulant disabled stair designed in accordance with TGD-M / BS 8300 / UK ADM, including the following:

- The stairs shall achieve a minimum clear width of 1,200mm, with a maximum height of each flight of 1,800mm.
- The accessible passenger lift shall achieve the required 1,100mm wide by 1,400mm deep.



4.4. Sanitary Facilities

All residential units will be provided with visitable wc's in line with TGD M 2022.

The residential and commercial amenities / facilities shall be provided with an appropriate accessible WC in accordance with Diagram 15(a) of TGD M 2022.

4.5. Residential Units

The internal layout of the residential units will be designed in accordance with TGD-M 2022 such to include accessible entrance doors, accessible WCs and habitable rooms.

5.0. Summary

Cognizance has been paid to the guidance 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. The site layout plan and landscaping proposals have also taken into consideration the need for ease of movement through the development. The main features of the proposed development are therefore as follows:

- All built blocks and units have level access delivering ease of access for all. The public realm is designed to ensure accessibility on equal terms for people of a range of ages and physical mobility.
- A range of unit types have been proposed in terms of both size and design meeting the aspirations of a range of people and households. These range in gross floor area from 45.3m² (1 bed apartment) to 116.5 (3 bedroom apartment) with a variety of 1, 2, and 3 bedroom dwelling types proposed. In terms of universally designed apartments included within the proposed development, the smallest apartment size has a gross floor area of 52.5m² and the largest apartment size gross floor area of 116.5m².
- The proposed development presents a welcoming and positive aspect to passers-by, creating a new accessible urban, public realm and allowing for direct connectivity to open spaces and adjoining lands, thus avoiding unnecessary physical and visual barriers.
- Connectivity to adjoining lands has been incorporated into the design of the layout. The network of paths and cycle routes ensure full permeability throughout the scheme and ensures connectivity from the subject site to the surrounding area and local facilities beyond.
- Falls and gradients have been minimized wherever possible on site and level access will be provided at all parking locations. All units within the development will meet the requirements of Part M of the Technical Guidance Documents where accessibility is concerned.
- Public spaces, streets and parks, are all designed so that every member of society can use them. Dwellings address these spaces so that they are passively supervised, creating safe spaces for everyone to use. The activity generated here enhances the open space realm.

