



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-305267-19

Strategic Housing Development

1,034 residential units (578 no. houses, 154 no. duplex / apartments and 302 no. apartments), 2 no. childcare facilities (1 temporary, 1 permanent), 1 no. retail unit, 1 no. community facility and all associated site works.

Location

Outer Ring Road / Grange Castle Road (R136), Old Nangor Road (L5254), Cherrywood Park, Kilcarbery Avenue and Corkagh Park, Townlands of Kilcarbery, Corkagh Demesne, Deansrath and Nangor, Co. Dublin.

Planning Authority

South Dublin County Council

Applicant

Adwood Limited

Prescribed Bodies

An Taisce
Irish Aviation Authority
Dept. of Culture, Heritage and the
Gaeltacht
Transport Infrastructure Ireland
National Transport Authority
Irish Water

Observers

None on file.

Date of Site Inspection

8th November 2019

Inspector

Sarah Moran

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1.0 Introduction

- 1.1. This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. The site (stated area 28.6 ha) is greenfield lands located c. 2 km west of Condalkin Village. The site area is defined by the Old Nangor Road L5254 to the north, the R136 Outer Ring Road / Grange Castle Road to the west, Corkagh Park to the south and the established residential area of Kilcarbery Avenue / Cherrywood Park to the east. The development site is the majority of the c. 35 ha of the Kilcarbery Grange Masterplan lands. Scoil Mochuda and Spina Bifida Hydrocephalus Ireland are located to the immediate north of the site, accessed via the Old Nangor Road R134 beyond. There are also several residential properties immediately adjoining the northern site boundary. There is a Part VIII housing scheme currently under construction to the immediate east of the site, with a new access from the Old Nangor Road. The Camac River is c. 100m south of the site, within Corkagh Park. The site is generally flat, with levels falling from the south western corner to the north and eastern site boundaries. There are a significant amount of mature trees and hedgerows and a series of drainage ditches within the site. The documentation on file indicates that the site has been subject to unlicensed dumping of domestic and C & D waste and there was some waste present at site inspection.

3.0 Proposed Strategic Housing Development

- 3.1. The site is entirely owned by South Dublin County Council (SDCC) and has been identified as a key strategic landbank. It has the benefit of LIHAF funding which provides €4.39 m for public infrastructure works including the spine road, a pumping station and the rising foul main to the existing foul network and a foul sewer outfall. The development is a joint venture between the applicant and South Dublin County Council. The Council is to act as a development agent and submits a Letter of Consent permitting the applicant to seek permission to develop the lands. The tender was awarded to the applicant in August 2018. The applicant has designed the

development in consultation with SDCC and is to enter into a Development Agreement with the Council, which provides that 30% of the units will be allocated for social housing. Aside from the subject proposal, the overall development of the Kilcarbery lands (35 ha), as provided for in the Kilcarbery Grange Masterplan, includes Part VII housing development to the immediate east and an educational site and a Neighbourhood Centre to the immediate north of the site, between the development and Old Nangor Road and opposite Scoil Mochuda. The Part VIII housing has been granted permission, ref. SD178/0002, and the Neighbourhood Centre and educational site are to be the subject of separate future applications.

3.2. The development involves 1,034 no. residential units as follows:

UNIT TYPE	NO. OF UNITS	%
Houses		
3 bed	449	43%
4 bed	129	12%
Total Houses	578	
Apartments and Duplex Units		
1 bed	142	14%
2 bed	224	22%
3 bed	90	9%
Total Houses and Apts / Duplex	456	

3.3. The following key points of the development are noted:

Site Area	28.6 ha
Residential density	Gross density 36 units/ha Net density 42 units/ ha
Building height	9 no. 4 – 6 storey apartment blocks 10 no. 3 – 4 storey duplex blocks 2-3 storey houses
Plot Ratio	0.4:1

Site Coverage	18.5% gross site area 21.6% net site area
Public open space	Grange Square (c. 2,606 sq.m.) Oak Green Space (c.7,453 sq.m.) Lime Green Space (c. 6,646 sq.m.)
Ancillary development	1 no. retail unit (c. 178 sq.m.) 1 no. community building (c. 785 sq.m.)
Childcare	1 no. childcare facility (c. 909 sq.m.). Also a temporary childcare facility on the ground floor of Block 7 (c. 557 sq.m.), which is to revert to 7 no. residential units on completion of the permanent childcare facility in Phase 3 of the overall scheme.
Part V	30% of residential units as part of Development Agreement, i.e. 310 units
Roads / Vehicular access	New access from Outer Ring Road R136 and 2 new vehicular accesses onto Old Nangor Road L5254. New spine road between Outer Ring Road and Old Nangor Road.
Car parking	1,510 car parking spaces
Cycle parking	1,105 covered bicycle parking spaces
Drainage and Water Supply	Connection to public mains and sewer Foul pumping station SUDS measures to attenuate runoff to greenfield rates

3.7. A 10 year permission is sought, in order to align with the timescale of the delivery of proposed infrastructure and the Development Agreement between the applicant and SDCC, in accordance with the Kilcarbery Grange Masterplan. The enabling works to be carried out in advance of the residential construction include the foul pumping station and connection to existing Irish Water sewer, also the spine road and related junctions at the Outer Ring Road and Old Nangor Road, along with associated surface water drainage infrastructure. The terms of the funding provided by the Dept. of Housing, Planning and Local Government require full completion of the Infrastructure Enabling Works before end December 2021. The residential development is to be phased as follows:

Phase	Social Units (apts and houses)	Total Apts	Total Houses	Total Units	Other Works
1A	66	67	94	161	<p>Phases 1 and 2 at the western side of the site, fronting onto the Outer Ring Road and Corkagh Park.</p> <p>Vehicular access from the Outer Ring Road.</p> <p>Foul pumping station. Wastewater drainage works as part of the spine road construction.</p> <p>Oak Green public open space and linear green buffers to the R136 and links to Corkagh Park.</p> <p>Temporary crèche (c. 557 sq.m.) in Block 7 in Phase 1</p>
1B	38	73	55	128	
2A	34	21	81	102	
2B	33	73	71	144	
3A	57	81	63	144	<p>Phase 3 at the centre of the site, north and south of the spine route with elements 3A/4, 3B/4 and 3B/5 at the eastern side of the site.</p> <p>Lime Green space and green buffer connecting it to Oak Space.</p> <p>Permanent crèche.</p> <p>Community building</p>
3B	47	105	42	147	
4A	10	4	97	101	<p>Phase 4 at the eastern side of the site, south of the spine route, with interfaces to Corkagh Park and the Part VIII scheme.</p> <p>Grange Square open space and green linear buffer connecting to Oak Green space.</p> <p>Retail unit on ground floor of Block 2</p>
4B	25	32	75	107	
Total	310	456	578	1,034	

- 3.8. The application is accompanied by an Environmental Impact Assessment Report (EIAR).

4.0 Planning History

4.1. Development Site SD03A/0070

- 4.1.1. Permission granted to construct two 38kV 12m line termination masts under the Clondalkin Saggart / Tee to Cheeverstown 38kV line, in order to underground a section of the 38kV Overhead Line. Part of this linear development traversed the subject site.

4.2. Part VIII Scheme on Adjoining Site SD178/0002

- 4.2.1. SDCC Part VIII approval for social housing on a site to the immediate east of the proposed development, adjacent to Kilcarbery Avenue. Permission granted for 109 residential units comprising 8 no. 4 bed units, 71 no. 3 bed units, 15 no. 1 bed apartments and 15 no. 2 bed apartments. The development includes an internal distributor road from Old Nangor Road; relocation of the existing bus stop on the Old Nangor Road and the 'Sycamore Green' public open space, which serves the Sycamore character area within the proposed scheme. The permitted scheme is currently under construction.

5.0 Pre-Application Consultation

5.1. Pre-Application Consultation ABP-303301-18

- 5.1.1. The pre-application consultation related to a proposal to construct 978 residential units (624 houses and 248 apartments), 2 childcare facilities, 1 retail unit, 1 community facility and all associated works, stated net density of 40 units/ ha.
- 5.1.2. A section 5 consultation meeting took place at the offices of An Bord Pleanála on 11th February 2019. Representatives of the prospective applicant, the planning authority and ABP were in attendance. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, ABP was of the opinion that the documentation submitted required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The issues raised were as follows:

1. Design, Layout and Unit Mix

Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and the Design Manual for Urban Roads and Streets. In addition to density which is addressed below, the matters of unit mix and design, the configuration of the layout and the creation of distinct character areas within the proposed development, connections to existing and proposed residential development and public open spaces should all be given further consideration and/or justification. Further justification/consideration of the development strategy as it relates to the interface of the site with the R136 to the west and Corkagh Park to the south. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Density

Further consideration/justification of the documents as they relate to the density in the proposed development and in particular that the proposed development is at a sustainable density to provide for an acceptable efficiency in serviceable land usage balanced with the requirement to respect the context within which the site is located. Particular regard should be had to the calculation of the net density area within the site boundary and compliance with Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 in this regard. A drawing detailing the calculation of net density within the site boundary which is in compliance with Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 shall be submitted. Where it is proposed to exclude certain areas with the site from the calculation of net density, a clear justification and rationale for same shall be submitted. The proposed development shall have regard to inter alia, national policy including the National Planning Framework, Urban Development and Building Heights Guidelines for Planning Authorities 2018, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and Sustainable Urban Housing: Design Standards for New Apartments March 2018, local planning policy and the sites context and locational attributes

and context. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted relating to density and layout of the proposed development.

3. Surface Water Management and Flooding

Further consideration of the documents as they relate to surface water management for the site. This further consideration should seek to maximise the SuDS measures proposed within the design of the proposed surface water management strategy. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

5.1.3. The opinion notification pursuant to article 285(5)(b) also referred to specific information that should be submitted with any application as follows:

1. A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes, openings and privacy screening, the treatment of private amenity areas, commercial facades, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development, avoiding blank facades and creating active frontages and corners. The documents should also have regard to the long term management and maintenance of the proposed development.
2. A mobility management framework and car parking rationale for the proposed development which should have regard to existing public transport which serves the area.
3. A public realm and permeability strategy which addresses connections to and from the site and in particular the treatment of the proposed interface with Corkagh Park to the south.
4. A report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units, public pathways and interfaces with the public realm.

5. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018.
6. A life cycle report shall be submitted in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).
7. A site layout that details any areas to be taken in charge by the local authority.

5.2. Applicant's Response to Pre-Application Opinion

5.2.1. The application includes a statement of response to the pre-application consultation, as provided for under section 8(1)(iv) of the Act of 2016, which may be summarised as follows.

5.2.2. Changes to Original Proposal

The applicant has made the following changes to the original proposal in response to the Opinion:

- Total no. of units increased from 978 to 1,034.
- Revised method of calculating residential density such that less open space is excluded from the net site area with a resultant net density of 42 units/ ha, or 46 units/ha if all major green spaces in Section 11 are excluded from the net site area.
- Development is divided into character areas.
- Revisions to private and communal open spaces in areas 2A/1, 1A/1, 1B/1, 2B/1, 2B/5, 4A/3, 3A/3 and 4B/1 to improve functionality and residential amenity.
- Revised bin storage locations to maximise separation from entrance doors to houses and the provision of 2m high screen walls between bin stores and adjoining houses.
- Improved connectivity and revised public realm interface with Corkagh Park.
- Clarification of connections to existing and proposed residential development and improved connections to public open spaces.
- Revised house types and unit mix, addition of Block 9 and additional units / height to Blocks 1 and 8. Dual corner units providing passive supervision of

corners and streetscapes. Provision of own door ground floor apartment type and 4 storey own door duplex over duplex blocks.

- Revised social / private housing mix.
- Revised childcare facility design.
- Increased building heights at frontages to the Outer Ring Road and to Corkagh Park. Additional 6 storey Block 9 fronting Corkagh Park. New house type A2 with 3 storey frontage facing the spine road. New 4 storey duplex over duplex blocks fronting the Outer Ring Road, Corkagh Park and spine road.

5.2.3. Design, Layout and Unit Mix

- The development now involves 14% 1 bed units, 21.5% 2 bed units, 52% 3 bed units and 12.5% 4 bed units, with a wide range of house, duplex and apartment typologies. 40% of the units are smaller typologies including own door apartments and duplex units. External 'own door' access has been provided to all ground floor apartments. The proposed House Type C (94 sq.m.) is comparable in size to a '2 bed 4 person house' identified in the Quality Housing for Sustainable Communities Guidelines. There is a generous provision of 3 and 4 bed houses for families.
- It is submitted that the development includes a good variety of house types and sizes that offers a choice to a range of different households. There is also a variety of tenures. A number of apartments will be managed by Approved Housing Bodies for social provision of smaller occupancy requirements.
- The development has been designed to integrate with the existing site characteristics and surrounding context. The character areas provide an identity and sense of place. Place-making, variety and distinctiveness are achieved through a range of urban street and space typologies. The development is based on the concept of 'biophilic design', which incorporates existing natural features of trees, hedgerows, etc. and integrates them with new green links between open spaces and to Corkagh Park, also SUDS measures and the public lighting design.
- The development has been designed to provide a robust urban edge to the western and southern site boundaries at the Outer Ring Road Park with 3-4

storey duplex and dormer buildings and 6 storey blocks marking the northern and southern ends of the development and the gateway at the junction with the spine road.

- There is a strong edge to Corkagh Park with an additional 6 storey apartment Block 9 now at this frontage, together with the 5 storey Blocks 3 and 4 at the green link gateways to the park from the development, enhancing legibility. There is also a dormer house typology, which reads as 3 storey and 4 storey duplex units fronting onto the park.
- The proposed cluster of services adjacent to the Neighbourhood Centre provides a focal point for the development and will create synergies with the future developments to the north of the site.

5.2.4. Density

- The development has a net residential density of 42 units/ha. A rationale for this calculation is provided. It is submitted that the proposed net density, based on the exclusion of the spine road, Grange Square public open space, green links to Corkagh Park and significant landscape buffers, is in accordance with the definition of net residential density provided in Appendix A of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.
- The development is located outside the M50 at the edge of the built up area of Dublin, in an area with a low density, suburban character of predominantly two storey houses. The site is served by limited public transport services. The Kilcarbery Grange Masterplan seeks to achieve a net development density of 35-50 units/ha. Development plan H8 Objective 6 also provides for densities of 35-50 units/ha, in accordance with the standard for outer suburban greenfield sites in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas. The site meets the criteria of an 'outer suburban' location.
- The Sustainable Urban Housing Design Standards for New Apartments recommend residential densities of < 45 units/ha for 'peripheral or less accessible urban locations'. The site meets the criteria for such locations.
- While the Kilcarbery Grange neighbourhood is identified as a strategic site for residential development in the RSES, high density development is to be focussed

on the SDZ areas of Clonburris and Adamstown, served by high quality commuted rail public transport. SDCC policy has identified other areas within the county for high density and increased building heights, i.e. Adamstown SDZ, Clonburris SDZ, the Cookstown / Tallaght core and Regeneration Zone and the N7 corridor inside the M50.

5.2.5. Surface Water and Flooding

- The development has been designed in consultation with SDCC Drainage and Landscape Department.
- The scheme incorporates a comprehensive SUDS strategy, which integrates a co-ordinated approach to drainage and landscaping measures. The strategy of progressive infiltration and attenuation within rain gardens, infiltration trenches, swales, open depressions and bioretention areas was agreed with the Council to reduce the need for large underground tanks with the public open spaces.
- Surface water runoff from the development is to be attenuated to greenfield rates, in accordance with best practice and the Greater Dublin Strategic Drainage Study (GSDS).
- Temporary surface water management measures are proposed for the construction phase.

6.0 **Relevant Planning Policy**

6.1. **National Policy**

6.1.1. The following is a list of relevant section 28 Ministerial Guidelines:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas including the associated Urban Design Manual
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets (DMURS)
- Urban Development and Building Height Guidelines
- Childcare Facilities – Guidelines for Planning Authorities

6.2. National Planning Framework

- 6.2.1. Chapter 4 of the Framework addresses the topic of ‘making stronger urban places’ and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 13 provides that in urban areas, planning and related standards, including in particular building height and car parking, will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

6.3. Regional and Spatial Economic Strategy for the East and Midlands

- 6.3.1. The Regional Spatial and Economic Strategy (RSES) including the Dublin Metropolitan Area Strategic Plan (MASP) was adopted on 3rd May 2019.
- 6.3.2. Regional Policy Objective RPO 4.3 relating to Dublin City and Suburbs states:

Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

In this context, section 4.4 of the RSES refers to the development of strategic residential and employment corridors along key public transport corridors including the western suburbs, Adamstown and Clonburris SDZs, also Fortunestown near the emerging town of Saggart/Citywest, along with potential for significant re-intensification of employment lands including Grangeecastle in south Dublin, adjacent to the development site.

- 6.3.3. The development site is located within the Dublin Metropolitan Area, which is subject to the MASP. RSES Chapter 5 outlines the vision for the MASP area with section 5.4 relating to strategic development corridors including the South-West Corridor (Kildare line, DART expansion and Luas red line):

The consolidation of the western suburbs of Clonburris, Kilcarbery and Adamstown, linked to increased capacity and electrified services on the Kildare line, to be delivered by 2027, and at Grangeecastle supported by additional bus connections.

Brownfield regeneration lands at Naas Road and Tallaght and new residential communities at Fortunestown, supported by the LUAS redline.

RSES Table 5.1 sets out the following in relation to capacity, infrastructure and phasing for the western suburbs at the South Western Corridor:

Residential:

Western suburbs – Continued development of Adamstown SDZ and the phased development of Clonburris located strategically between the west Dublin suburbs of Lucan and Clondalkin. New residential community at Kilcarbery near Clondalkin.

Employment / Mixed Use:

Promotion of high tech, manufacturing and research and development in Grange Castle Business Park.

Phasing / Enabling Infrastructure:

Short to medium term. New roads and railway bridge, new rail station, DART expansion to Cellbridge-Hazelhatch (Adamstown, Clonburris)

Access road and waste water upgrades (Kilcarbery). Public transport and access (Grange Castle). New water network infrastructure to supply Clonburris SDZ and local network upgrades

6.4. South Dublin County Development Plan 2016-2022

- 6.4.1. The site is zoned 'Res – N', "To provide for new residential communities in accordance with approved area plans."
- 6.4.2. The development plan settlement strategy, ref. Table 1.1, designates Clondalkin including Clonburris as a Metropolitan Consolidation Town. Core Strategy (CS) Policy 2 Metropolitan Consolidation Towns is to support the sustainable long term growth of Metropolitan Consolidation Towns through consolidation and urban expansion. CS2 Objective 2 states:

To provide sufficient zoned lands to accommodate future population growth in Metropolitan Consolidation Towns.

Development plan map 1.3 identifies the subject site as a 'capacity site' for new residential development. Section 1.8.0 outlines phasing, prioritisation and infrastructure delivery. Point 1 advises:

The continued consolidation of the established urban and suburban built form is a priority during the period 2016-2022. There is significant capacity for new housing on serviced lands to the east of the M50, south of the River Dodder and in the Metropolitan Consolidation Towns.

6.4.3. Development plan Chapter 2 sets out housing policy including the housing strategy, H1 objectives 1 – 10. Housing Policy 2 Supply of Housing is to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County, also policies on sustainable neighbourhoods, density, urban design, residential density, residential building height, housing mix, residential design and layout.

6.4.4. Development plan Chapter 3 sets out policy on community infrastructure. Policy C1 is to ensure that all communities have access to multifunctional community centres that provide a focal point for community activities. Community infrastructure Policy 8 – Childcare Facilities:

Policy C8 (b) It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.

C8 Objective 2: To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.

Community Infrastructure Policy 12 Open Space:

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

6.4.5. Chapter 4 provides retail policy. Clondalkin town centre is at the third tier of the retail hierarchy. Retail Objective 2:

To direct new major retail floorspace in the County to designated centres of the appropriate level and the identified Retail Opportunity Sites, and to further direct retail development in designated centres into the Core Retail Areas and restrict retail development outside of the Core Retail Area to an appropriate level and form of retail development.

- 6.4.6. Transport policy Chapter 6. The Outer Ring Road is indicated as a 'Major Regional Route' in Fig. 6.3 'Schematic Map of County Wide Strategic Road Network.' Table 6.5 outlines a Six Year Road Programme including the New Nangor Road/ R134 Upgrade comprising the upgrade / realignment of existing road between Nangor and Ballybane to provide improved access to the Grange Castle employment lands from Clondalkin and the R120 with further links to the proposed Western Orbital Route. Transport and Mobility Policy 7 Car Parking:

It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation.

- 6.4.7. Water supply and wastewater policies set out in Chapter 7 including policies IE1 Water Supply & Wastewater; IE2 Surface Water & Groundwater; IE3 Flood Risk.
- 6.4.8. Chapter 8 Green Infrastructure. Green Infrastructure Policy G4 Public Open Space and Landscape Setting; Policy 5 Sustainable Urban Drainage Systems. Green Infrastructure Policy 6 New Development in Urban Areas:

It is the policy of the Council to support the protection and enhancement of Green Infrastructure in all new development in urban areas, to strengthen Green Infrastructure linkage across the wider urban network and to achieve the highest standards of living and working environments.

Objective 2:

To require new development to provide links into the wider Green Infrastructure network, in particular where similar features exist on adjoining sites.

Objective 3:

To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management.

6.5. Kilcarbery Grange Masterplan 2017

6.5.1. This is a non-statutory Masterplan prepared by South Dublin County Council. The plan area covers 35.36 ha of 'RES-N' and 'RES' objective lands between the Old Nangor Road to the north, the Outer Ring Road to the west, Corkagh Park to the south and established residential areas to the east. The vision for the Masterplan is stated as:

“The vision for the masterplan is to realise a distinct high quality sustainable place with a local sense of character and community, which is closely connected to its own and its surrounding landscape and provides for a range of community needs, within an attractive, permeable and connected urban structure.”

6.5.2. The Masterplan is based on the following stated key principles:

- To harness the existing positive aspects of the character of the lands and the surrounding area and larger landscape;
- To ensure a permeable and legible network of streets and spaces, with strong connections with surrounding areas and developments;
- To achieve an appropriate level of continuity and enclosure of streets and spaces;
- To develop a high quality network of green and urban spaces, which are connected to surround green spaces and features;
- To ensure the physical adaptability of the layout by providing a range of flexible and appropriately shaped and sized urban blocks;
- To ensure that opportunities for local business and services are accommodated in a new local centre;
- To provide for new educational uses in conjunction with existing and planned community and leisure facilities and
- To require a high quality of design and finish in all commercial and residential buildings.

6.5.3. The following key points of the Masterplan are noted:

- Public transport corridor along the Outer Ring Road and a green route designated at Corkagh Park / Camac Valley.
- New spine route, Grange Avenue, between the Old Nangor Road and the Outer Ring Road. Detailed guidance is provided for the design and layout of Grange Avenue.
- Neighbourhood centre (c. 1.31 ha) at the north eastern corner of the plan area, accessed via the new spine route. To include a supermarket of 1,000 – 2,500 sq.m., also smaller retail units and live-work units. An accessible urban open space is to act as the focal point for the Neighbourhood Centre.
- Educational / community site at the northern end of the plan area, fronting onto the Old Nangor Road and west of the Neighbourhood Centre (c.1.88 ha). To provide a primary school (up to 16 classrooms).
- PPP site (3.14 ha) on the eastern side of the site.
- The development site and the PPP site are to be integrated to function as three character areas – Oak to the north and west of the spine road, Lime south of the spine road and fronting onto Corkagh Park and Sycamore east of the spine road and south of the Neighbourhood Centre. Each have public open spaces.
- Detailed guidance for layouts and frontages to Grange Avenue, the Outer Ring Road and Corkagh Park.
- Landscape objectives include a green loop for pedestrian and cycle connections between the three green spaces at the Oak, Lime and Sycamore character areas. Also green edges to Outer Ring Road and at the boundary to Corkagh Park. Objectives to protect existing hedgerows, specimen trees and field drainage features. Provision of an integrated SUDS utilising the landscape network with sub-catchment areas.
- Development density of 35-50 units/ha. Higher scale and density typologies (apartments, duplexes, 3-5 storeys) to be provided at Outer Ring Road, Corkagh Park, Grange Avenue and Grange Square. Medium and lower scale density and typologies (townhouses, terraces, 2-3 storeys) to be located in local streets and spaces.

- Estimated development potential of c. 1,000 units, to accommodate c. 2,500 persons.
- Foul drainage network to follow Masterplan urban structure. Provision of a pumping station at the centre of the development site, north of the spine route.
- New water supply from existing watermain at junction of Old Nangor Road and Grange Avenue.

6.6. Applicant's Statement of Consistency

6.6.1. The applicant has submitted a Statement of Consistency as per Section 8(1)(iv) of the Act of 2016, which indicates how the proposal is consistent with the policies and objectives of section 28 guidelines, the County Development Plan, the Kilcarbery Grange Masterplan and other regional and national planning policies. The following points are noted:

- The Kilcarbery site was identified as a Major Urban Housing Delivery Site (MUHDS) under the Rebuilding Ireland – Action Plan for Housing & Homelessness. The development will provide housing under Pillar 2 – Accelerate Social Housing and Pillar 3 – Build More Houses.
- The development will support several National Policy Objectives in the NPF, ref. NPO 2a, NPO 3b, NPO 11, NPO 27, NPO 33.
- Section 5.4 of the RSES specifically refers to the Kilcarbery site in the context of the consolidation and western expansion of the city.
- The development responds to the 12 Design Criteria set out in the Urban Design Manual. A rationale is provided.
- The development has been designed to meet or exceed the standards set out in the Sustainable Urban Housing Design Standards for New Apartments with regard to apartment floor areas, dual aspect units, lift and stair cores, floor to ceiling height, private and communal open space and car parking. A Housing Quality Assessment is submitted.
- Proposed house types and room sizes meet / exceed the minimum floor area requirements set out in the Quality Housing for Sustainable Communities guidelines.

- Building heights are in accordance with SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities relating to greenfield / edge of town locations with respect to appropriate density, mix and the established character of the surrounding area. The development raises the prevailing building height in the area but respects the surrounding context and transitions appropriately from established low rise.
- The development is designed to comply with DMURS.
- The submitted Childcare Needs Assessment concludes that the proposed phased development of childcare facilities in combination with existing and projected childcare facilities and demand within the area will provide sufficient capacity to cater for the needs of the new residential neighbourhood.
- The development of 'RES-N' zoned lands is consistent with the development plan core strategy and overall settlement strategy. The proposed uses are all 'permitted in principle' or 'open for consideration' under the RES-N zoning objective. The residential density and housing mix are in accordance with development plan housing objectives H8 – Residential Densities and H10 – Mix of Dwelling Types. The public open space provision exceeds the minimum 14% standard as per development plan section 11.3.1. Adequate separation distances are also achieved as per section 11.3.1. Childcare provision is included in the development in accordance with community infrastructure objective C8 – Childcare Facilities and there is adjacent school provision as per objective C9 – Primary & Post Primary Facilities. A Childcare Needs Assessment is submitted. The development meets green infrastructure objectives set out under G2 – Green Infrastructure Network and open space provision objective G6 – New Development in Urban Areas.
- The development provides roads, pedestrian and cycle connections in accordance with development plan transport and mobility objectives TM1 – Overarching; TM3 – Walking and Cycling. Also development plan environmental objectives, ref. IE2 – Surface Water & Groundwater, IE5 – Waste Management, IE7 – Infrastructure & Environmental Quality and IE 8 – Casement Aerodrome.
- The submitted Archaeological Assessment has regard to development plan objective HCL1 – Heritage, Conservation & Landscapes and HCL8 – Views and

Prospects. The development is designed with regard to the historic demesne landscape associated with Corkagh House. A Landscape & Visual Impact Assessment is submitted.

- An Energy & Sustainability Report provides an overview of energy efficiency in accordance with objective E4 – Energy Performance in New Buildings.
- The design and layout of the scheme have been guided by the Kilcarbery Grange Masterplan. The land uses comply with Masterplan objectives including the provision of a childcare facility, community building and retail unit at suitable locations. The development does not prejudice the development potential of the adjoining educational and Neighbourhood Centre zoned sites. The proposed character areas, public open spaces, green links, SUDS measures, road, pedestrian and cycle networks and landscaping concept are all based on the Masterplan.

7.0 Third Party Submissions

7.1. There are no third party submissions on file.

8.0 Planning Authority Submission

8.1. South Dublin County Council has made a submission in accordance with the requirements of section 8(5)(a) of the Act of 2016. It summarises observer comments as per section 8(5)(a)(i) and the views of the relevant elected members of the Clondalkin Area Committee, as expressed at a meeting of members held on 18th September 2019. The planning and technical analysis in accordance with the requirements of section 8(5)(a)(ii) and 8(5)(b)(i) may be summarised as follows. The submission includes several technical reports from relevant departments of SDCC, which are incorporated into the following summary.

8.1.1. PA Comment on Principle of Development

- The site is approx. 3 km from the centre of Clondalkin and the area is characterised by low density suburban neighbourhoods. It is the policy of the Council to support the sustainable long-term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.

- The overall layout of the development including open space network, character areas, residential block arrangement and location of community and neighbourhood facilities generally conforms to that proposed in the Kilcarbery Grange Masterplan.
- The principle of residential development with ancillary facilities at the development site is in accordance with development plan zoning subject to meeting detailed policies and objectives.
- The proposed phasing of development is acceptable in principle subject to conditions.

8.1.2. PA Comment on Housing Mix and Density

- The proposed dwelling mix and housing typology, as revised subsequent to the Section 5 consultation, are satisfactory and comply with development plan policy H10 Mix of Dwelling Types.
- The applicant's rationale for the proposed net density of 42 units/ha is acceptable with regard to the provisions of Appendix A of the Sustainable Residential Development Guidelines. The applicant has increased the total no. of units and the density on foot of the ABP Opinion. The development is considered to be in accordance with development plan policy and with the Guidelines for Sustainable Residential Development in Urban Areas.

8.1.3. PA Comment on Design and Layout

- The development generally complies with the 12 criteria set out in the Urban Design Manual.
- The design has been based on the creation of distinct character areas and addresses the issue of connection to the surrounding area including Corkagh Park, in response to the Opinion issued by ABP. The development provides for an appropriate urban edge and is visually acceptable having regard to the context of the site and surrounding development.
- The applicant has made significant changes to the western frontage facing the Outer Ring Road, on foot of the ABP Opinion. The development positively

addresses the Outer Ring Road, with increased building heights in gateway buildings at key locations. The provision of open space respects the character of this area and will have a positive impact on the amenities of residences within the development.

- The planning authority is satisfied with the level of detail provided relating to private, communal and public open space.
- The proposed green link into Corkagh Park is considered desirable.
- Recommends a condition requiring dual frontage for units nos. 346 and 348 on the gable elevation facing the Old Nangor Road and revised boundary treatment to provide a more active frontage to the Old Nangor Road to provide a more active frontage with passive supervision and to limit the extent of blank walls facing the Old Nangor Road.
- Includes report of SDCC Parks & Landscape Services, dated 16th October 2019, which recommends conditions. The report highlights that further details are required with respect to the proposed landscape features and landscape areas, accessibility, pedestrian and cycle routes and play provision and recommends conditions on this basis.

8.1.4. PA Comment on Part V

- Includes report of SDCC Housing Dept., dated 15th October 2019, which states no objection. The tenure mix will provide for 30% of the units to be allocated for social housing purposes, which will be purchased by SDCC. This will satisfy the applicant's Part V obligation.

8.1.5. PA Comment on Roads and Traffic Issues

- Includes report of SDCC Roads Dept. dated 15th October 2019, which states no objection subject to conditions.
- The development achieves good vehicular, pedestrian and cycle permeability to Corkagh Park and surrounding developments and existing cycle and footpath infrastructure.

- Recommends some minor amendments to ensure compliance with DMURS and improve emergency access at the southern end of the site.
- The proposed car parking ratio is 1.4 spaces / unit. This parking provision is considered acceptable at this location. The proposed 5% disabled parking provision and 10% charging points for electric vehicles are acceptable.
- The proposed cycle parking provision is in line with DHPLG bicycle parking guidelines.
- The Traffic and Transport Assessment indicates that increased traffic flows as a result of the development are below the 10% threshold for uncongested roads. Traffic impacts should be minimal. The Mobility Management Plan is noted.
- The submissions of NTA and TII are noted.

8.1.6. PA Comment on Site Services

- The applicant has engaged in discussions with SDCC drainage and landscape departments.
- The proposed development is considered acceptable subject to conditions.

8.1.7. PA Comment on EIAR

- Notes that the EIAR refers to previous bat activity surveys carried out in 2017, which recorded six species of bat using the development site. This 2017 survey did not identify any confirmed bat roosts in mature trees within the site or in buildings at the northern site boundary.

8.1.8. PA Conclusion

- The development is considered acceptable subject to conditions with regard to relevant local and national planning policy and permission is recommended.

9.0 **Prescribed Bodies**

9.1. **An Taisce**

9.1.1. The following points are noted:

- A condition requiring archaeological monitoring should be included with any grant of permission.

- ABP needs to determine where there is adequate public transport provision, also safe walking and cycling routes to schools and other local services.
- ABP needs to address Ireland's obligations at UN and EU level in the Climate Action and Low Carbon Development Act 2015 and in overarching government planning policy through 'DOECLG Planning Policy Guidelines', January 2015, which set out a range of considerations on climate.
- ABP to address the 49 action recommendations in the policy document 'Smarter Travel – A New Transport Policy for Ireland'.

9.2. **Irish Aviation Authority**

9.2.1. The following points are noted:

- The applicant is advised to engage with the Property Management Branch of the Dept. of Defence to consider the impact on the obstacle limitation surfaces and flight procedures for Casement Aerodrome.
- In the event of permission being granted, the applicant is advised to engage with the Property Management Branch of the Dept. of Defence and Weston Airport management to ensure that any crane operations do not impact on flight procedures.
- The applicant should notify the IAA by a minimum of 30 days of intention to commence crane operations.

9.3. **Dept. of Culture, Heritage and the Gaeltacht**

9.3.1. The following points are noted in relation to archaeological issues:

- The National Monuments Service has examined the archaeological component of the EIAR submitted. On the basis of the information in the report and the proposed archaeological mitigation, it is recommended that a planning condition pertaining to Archaeological Monitoring at construction stages be included with any grant of permission.

9.4. **Transport Infrastructure Ireland**

9.4.1. The provisions of Chapter 3 of the DoELG Spatial Planning and National Roads Guidelines are to be considered in the assessment and determination of the subject planning application.

9.5. National Transport Authority

9.5.1. The following points are noted:

- The NTA supports the development in principle as it represents a close integration of land use planning and transport planning by seeking to provide a medium density residential development within the built up area of Metropolitan Dublin. The site is located in an area that will benefit from on-going investment and significant enhancement in public transport as part of Bus Connects (which is provided for in the Transport Strategy and the National Development Plan), and where it is likely that a significant proportion of trips to places of work, retail, parks and other services will be undertaken by walking and cycling.
- ABP to consider permeability and potential for significant levels of through traffic. The development should seek to prioritise sustainable modes of transport. The principle of filtered permeability networks should be applied to this development but this has not been done.
- Concern that the proposed road layout will effectively add to the radial and orbital capacity on the regional road network by providing a means of avoiding the junction of Nangor Road and Outer Ring Road via St. Cuthbert's Road and the proposed spine road for cars travelling southbound from Clondalkin towards City West, Tallaght and the N7. It is not clear how the transport assessment accounted for this potential trip redistribution in the wider environs of the development site. It appears that a simple addition of trip demand onto existing traffic patterns was carried out. For a development of this scale (up to 3,000 persons), which provides for an additional through route for southbound traffic not associated with the development itself, the NTA is of the view that a broader and more detailed assessment would be of greater benefit.
- The NTA is of the view that the proposed configuration of the spine road and secondary roads would lead to increased trip making by private car in the local areas by providing unnecessary additional road capacity. The additional induced traffic would be attracted through the development could be potentially detrimental to the residential amenity of future residents, in particular those living in units directly fronting onto the road. The NTA considers that there is no requirement for a route for private car traffic through the development and that

the spine road and secondary roads would fulfil the function of providing access to housing in their entirety without permitting through traffic, much of which would be induced trips originating and having their destination outside the proposed development. It is noted that the provision of a new road at this location is not provided for in the South Dublin County Development Plan 2016-22.

- Recommends a condition that requires a scheme which seeks to manage through traffic throughout the development in accordance with the principles of DMURS and the Transport Strategy is prepared by the applicant and agreed with the local authority and the NTA in advance of construction.
- R136 Outer Ring Road access junction. The R136 currently functions solely as a strategic traffic route. This function will change as the area is developed, particularly at Clonburriss and Grange Castle. The road will be required to cater for significantly higher numbers of pedestrians, cyclists and buses. Concerns about the design of the R136 / spine road junction:
 - Unclear how future bus movements on the R136 have been taken into account and how vehicles would cross over the bus lane safely into the proposed development;
 - Cyclists and pedestrians travelling from north to south on the R136 would be forced to yield priority at the junction, an arrangement which is sub-optimal on this cycle route. Furthermore, the placement of the stop / yield sign beyond the pedestrian and cycle crossing gives priority to traffic exiting the development instead of pedestrians and cyclists and
 - By splitting the access and egress in an unconventional manner, pedestrians and cyclists would have to cross two roads instead of one.
- The NTA recommends a condition requiring that the details of the R136 / spine road junction are agreed between the applicant, the local authority and the NTA, due to the importance of the R136 to future strategic bus and cycle movements.
- Roads layout within the development. The National Cycle Manual has not been taken into account in the design of the spine road and the numerous junctions within the development. It seems that cyclists would in all instances be required to yield priority to vehicles entering and existing side roads. The NTA

recommends a condition requiring that details of all internal junctions be agreed with the applicant, the local authority and the NTA.

9.6. Irish Water

- 9.6.1. Based upon the details provided by the developer and the Confirmation of Feasibility issued by Irish Water, Irish Water confirms that subject to a valid connection agreement being put in place between Irish Water and the developer, the proposed connection(s) to the Irish Water network(s) can be facilitated.

10.0 Assessment

- 10.1. The following are the principal issues to be considered in this case:

- Principle of Development
- Design and Layout
- Quality of Residential Accommodation
- Traffic and Transport
- Drainage, Flood Risk and Site Services
- Aviation Safety

These matters may be considered separately as follows.

10.2. Principle of Development

10.2.1. Development of Kilcarbery Lands

The Kilcarbery lands are specifically mentioned in the context of the development of the Dublin Metropolitan Area in section 5.4 of the East and Midlands RSES, ref. Table 5.1 of same which refers to a 'new residential community at Kilcarbery near Clondalkin'. The lands are zoned for new residential development and included as a 'capacity site' in Map 1.3 of the South Dublin County Development Plan 2016-2022. They are owned by South Dublin County Council (SDCC), which has identified the development site as a Major Urban Housing Delivery Site within its landbank. The non-statutory Kilcarbery Grange Masterplan was prepared in 2017 in order to facilitate the development of the site, providing for its development within a total area of 35.36 ha of lands including the Part VIII scheme permitted under SD178/0002

(currently under construction to the east of the development site) and lands zoned for a primary school and Neighbourhood Centre to the north and east of the development site. The Masterplan is supported by LIHAF funding which provides €4.39m funding for public infrastructure works including the spine route between the Old Nangor Road and the Outer Ring Road and junction upgrade; the foul pumping station and a rising foul main to the existing foul sewer network and the foul sewer outfall. The correspondence on file from SDCC states that the site is to be developed as a joint venture with the applicant. The Council is to act as a development agent and stakeholder in the development of the site, separate to its role in the planning process. It awarded the tender for the development of the site to the applicant in August 2018. The development has been designed in consultation with SDCC and is to enter into a Development Agreement with the Council, which provides that 30% of the units will be allocated for social housing, i.e. 310 no. units. The Part V units include a mix of 3 and 4 bed houses, 1 and 2 bed duplex units and 2 bed apartments, which are dispersed throughout out the site. The application includes a Letter of Consent from SDCC, dated 26th June 2019, permitting the applicant to seek permission to develop the lands, as well as a letter dated 18th June 2019, which confirms without prejudice agreement to the proposed Part V provision. I also note the report on file of SDCC Housing Dept., which considers the Part V proposal to be acceptable.

The development is acceptable in principle in this context and is desirable as it will facilitate the delivery of several specific objectives of the Kilcarbery Grange Masterplan, including:

- Delivery of 1,034 no. residential units, ref. Masterplan section 5.2, which envisages c. 1,000 units;
- Delivery of 310 no. units under Part V;
- New spine route between Old Nangor Road and the Outer Ring Road;
- Housing mix including 29% 2 and 3 bed apartments / duplex units and 14% one bed units. Also a variety of housing typologies including external 'own door' apartments.
- Community infrastructure comprising the community building and childcare facility.

- Retail unit adjacent to the Neighbourhood Centre zoned lands to the north of the development site.
- Retention of existing trees and hedgerows and provision of 'green loop' connecting public open spaces and Corkagh Park.

10.2.2. Residential Density

The quantum of development has increased from that proposed at pre-planning stage with an additional 56 units now proposed, resulting in a total of 1,034 no. units with an increased number of apartments and a reduced number of houses. The development has a stated net density of 42 units/ha. This figure is based on a net site area of 24.4 ha, which excludes the following from the total site area:

- The spine route as a significant infrastructure corridor acting as a local distributor road between the Outer Ring Road R136 and the Old Nangor Road, which will serve the wider area;
- Non-residential buildings, i.e. the crèche and community building, which serve the wider area;
- Public amenity and green infrastructure networks comprising the public open space at Grange Square, which also serves the Neighbourhood Centre and the educational zoned lands and the wider masterplan area outside the development site, as well as nearby established residential areas;
- Public open spaces connecting Corkagh Park to pedestrian and cycle routes on the Outer Ring Road R136, which serve the wider area;
- A significant landscape buffer strip along the southern site boundary to Corkagh Park, c. 0.85 ha in area.

The net density rises to c. 45 units/ha if the Lime Green public open space and green links to Corkagh Park are excluded from the site area. It is submitted that these spaces serve the wider area due to their proximity and connection to Corkagh Park and that they enhance and add to a new greenway within the park. This point is reasonable and I am satisfied that the net density may therefore be considered as 46 units/ha. This is in accordance with the definition of net residential density as provided in Appendix A of the Section 28 'Guidelines for Planning Authorities for Sustainable Residential Development in Urban Areas', which states that the net site

density measure “includes only those areas which will be developed for housing and directly associated uses” and specifically excludes major and local distributor roads, community infrastructure, open spaces serving a wider area and significant landscape buffer strips.

Development plan residential density Objective H8 is to ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services. The Kilcarbery Grange Masterplan provides for a net residential density of 35-50 units/ ha, in accordance with the ‘Guidelines for Planning Authorities for Sustainable Residential Development in Urban Areas’, which encourage densities of 35-50 units/ha at outer suburban/greenfield sites and minimum net densities of 50 units/ha at sites with 1 km of a rail station or 500m of a bus stop. The development site is not currently served by high frequency public transport, albeit that it adjoins a proposed Bus Connects spine route. I am satisfied that it has an ‘outer suburban’ location given its position on the western edge of Clondalkin, outside the M50. I also consider that the site meets the definition of an ‘Intermediate Urban Location’ as per section 2.4 of the Sustainable Urban Housing Design Standards for New Apartments, due to its location c. 2km or ‘reasonable walking distance’ from the centre of Clondalkin, adjacent to employment lands at Grangecastle and close to ‘reasonably’ frequent urban bus services on the New Nangor Road. The Apartment Guidelines state that such locations:

... are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net)

I note that the proposed residential density is supported by SDCC in the context of the development plan housing strategy and the sequential development of other residentially zoned lands in the County including Adamstown and Clonburris SDZs. The proposed density is considered acceptable on this basis.

10.2.3. Building Height

SPPR 4 of the Urban Development and Building Height Guidelines states:

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

The proposed development, in accordance with the Kilcarbery Grange Masterplan, meets the above requirements, as discussed in section 10.2.1 above.

The development also meets the requirements of sections 3.4 to 3.6 of the Urban Development and Building Height Guidelines, which relate to building height in suburban / edge locations as follows:

3.4 Newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options ...

The applicant has increased the height of Blocks 1 and 8 on foot of the pre-application Opinion. The development now includes a mix of building heights comprising 2 – 4 storey houses and duplex units and 4 – 6 storey apartment blocks. The overall density is > 40 units/ha. The housing mix includes 29% 2 and 3 bed apartments / duplex units and 14% one bed units, as well as 43% 3 bed houses and 12% 4 bed houses. There is a tenure mix with 30% Part V provision.

3.5 The forms of development set out above can, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community

The design and layout are based on the Kilcarbery Grange Masterplan and are considered to be satisfactory and integrate a hierarchy of open spaces and roads and pedestrian / cycle links with the adjoining public road network, adjoining residential areas and Corkagh Park.

3.6 Development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets.

The development is laid out with 2 storey houses within perimeter blocks on the eastern side of the site, adjacent to the existing residential areas to the east and the Part VIII scheme currently under construction. There are also 2 storey houses at the centre of the Oak and Lime character areas, with 3 and 4 storey duplex blocks along the spine route and facing the Outer Ring Road and Corkagh Park and 5 and 6 storey apartment blocks at the community building and neighbourhood centre, facing Corkagh Park and along the Outer Ring Road. These heights are generally in accordance with the Kilcarbery Grange Masterplan, Fig. 12 of which indicates buildings of 3-5 storeys along the frontage to the Outer Ring Road, at the edge to Corkagh Park, along the spine route and at the Neighbourhood Centre. I note that the proposed 5 and 6 storey buildings have locations that correspond those indicated in Figure 12 as 'potential landmark / marker building', including at the 'gateway' to Corkagh Park, the access from the Outer Ring Road and the Nangor Road / Outer Ring Road junction.

The following points are also noted with regard to the 'Development Management Criteria' provided in section 3.2 of the Building Height Guidelines as follows.

- The Kilcarbery lands have been designated as a 'capacity site' and are zoned for new residential development.

- The site adjoins a Regional Route / proposed Bus Connects spine route and is currently served by several bus routes.
- The site layout has been designed in accordance with the Kilcarbery Grange Masterplan and provides a hierarchy of roads and well-connected public open spaces, retaining existing trees and hedgerows and providing new connections to Corkagh Park and adjacent residential and employment areas.
- The overall visual impact is assessed as 'neutral', as per the EIAR Visual Impact Assessment.
- The development is considered to make a positive contribution to the urban neighbourhood and streetscape.
- The development incorporates a variety of streets and building heights and provides new public spaces that serve the wider area, notably adjacent to the Neighbourhood Centre zoned lands and adjacent to Corkagh Park. There is a legible hierarchy of building heights with lower scale internal local roads, medium scale internal street corners and higher buildings at the spine route, edges to the Outer Ring Road and Corkagh Park and at the Neighbourhood Centre.
- The development provides a good standard of residential accommodation and the public and private open spaces generally have good access to daylight and sunlight, having regard to the assessment of same as provided in EIAR Chapters 10 and 11. While some rear gardens do not fully meet the BRE requirement, this is generally due to screening from boundary walls, which must be balanced against the desirability of achieving a satisfactory overall residential density.

Having regard to the above, it is considered that the proposed building heights are acceptable and that the development is in accordance with the Urban Development and Building Height Guidelines.

10.2.4. Non Residential Development

The development includes a temporary crèche in Phase 1 (c. 557 sq.m.), to be accommodated in lieu of 7 no. proposed apartments on the ground floor of Block 7, located at the western site entrance from the Outer Ring Road. Phase 3 of the development includes a permanent crèche located adjacent to the community building and Educational Campus (c. 909 sq.m.). The applicant proposes that the

temporary crèche be converted to 7 no. apartments when the permanent crèche is constructed in Phase 3.

The 'Guidelines for Planning Authorities on Childcare Facilities' recommend the provision of a childcare facility with 20 places for each 75 no. dwellings. Section 4.7 of the Apartment Guidelines states in relation to childcare facilities:

“ ... the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”

The application includes a Childcare Needs Assessment, which considers potential childcare demand associated with the development in the context of existing and permitted childcare in the area and local demographic trends and the above policy provisions. This states that the initial phases of the development will generate an estimated demand of 181 no. childcare spaces. The temporary childcare facility to be provided in Phase 1 of the development provides c. 90 childcare places. The completed development is estimated to generate a total of 238 no. childcare places. The permanent childcare facility to be delivered in Phase 3 will provide c. 160 no. childcare spaces. There are 15 no. existing childcare facilities (c. 660 no. childcare places) within 1.5 km of the site. There is an estimated capacity of c 11 no. childcare spaces within these existing childcare facilities. At least 45-55 no. childcare spaces will become available in September 2019. While I note that there is some additional childcare availability in the wider area, I consider that the above provision represents a significant deficiency in both the temporary and permanent provision, given the scale of the proposed development and with regard to the national policy provisions. The proposed two storey crèche building could easily be enlarged without any significant adverse impact on adjacent residential or visual amenities. I therefore recommend that a condition be imposed requiring a larger crèche that can provide 238 no. childcare places, to cater for the need identified in the Childcare Needs Assessment.

I note the submitted Educational Needs Assessment, which considers existing schools provision in the area and concludes that existing primary schools in the area have capacity for the population growth generated by the development. The proposed community building and retail unit meet objectives of the Kilcarbery Grange Masterplan and complement the adjacent land use zonings for a primary school and Neighbourhood Centre. Details of the ongoing management and maintenance of the community building may be agreed with the planning authority by condition.

10.2.5. Principle of Development Conclusion

To conclude, the proposed density, housing mix, childcare facility, retail and community building are considered to be acceptable in the context of the location of the site within the Kilcarbery Grange Masterplan lands and in accordance with the Masterplan, development plan and national policies and with the requirements of the site specific zoning objective.

10.3. **Design and Layout**

- 10.3.1. The overall layout of the development reflects the block layout and building form guidance of the Kilcarbery Grange Masterplan, which is framed around the spine route between the Old Nangor Road and the Outer Ring Road, as well as the retention of as much as possible of the existing trees, hedgerows and drainage features at the site. The two main vehicular accesses are at both ends of the spine route, which acts as the distributor road through the site. It is 6m wide with a formal avenue layout with verges, cycle and pedestrian infrastructure on each side and avenues of trees. The edge of the spine route is predominantly characterised by 3 storey houses and duplex blocks. There is a cluster of 4, 5, and 6 storey duplex block and apartment Blocks 1 and 2 on both sides of the spine route, providing legibility adjacent to the Neighbourhood Centre at the northern end of the site. These form an edge to a public open space, 'Grange Square', at the northern gateway to the site, between the educational site and the Neighbourhood Centre (both outside the site boundary and to be part of separate future applications) and bisected by the spine road. This area is to act as a focal point at the entrance to the development and to provide a context for the Neighbourhood Centre. The Grange Square open space is laid out with a combination of hard and soft landscaping. The proposed

community infrastructure is also located in this part of the site, complementing the Neighbourhood Centre. The community building (within the proposed development) faces the square from the opposite side of the spine road, with the two storey crèche beyond to the west, adjacent to the educational site. The community building is to include a community café, exhibitions and other visible uses. The retail unit on the ground floor of Block 2 also faces Grange Square and will provide a further active frontage at this location. At the western end of the spine route, apartment Blocks 6 and 7 (6 storey) provide landmarks at the gateway from the Outer Ring Road. A public open space to the south and east of Block 7 allows for the retention of an existing hedgerow and drainage feature at this location and forms part of a series of 'green links' connecting public open spaces within the development to Corkagh Park.

10.3.2. The other primary 'urban edges' of the development are the frontage to the Outer Ring Road to the west and Corkagh Park to the south. The development has a robust frontage to the Outer Ring Road, primarily defined by 4 storey frontages with higher blocks at key locations. The 6 storey Blocks 6 and 7 provide a gateway on either side of the access to the spine route from the Outer Ring Road; Block 8 (6 storey) provides a landmark at the north western corner of the site and Block 5 (also 6 storey) marks the southern end of the development at Corkagh Park. The remainder of the frontage to the Outer Ring Road is laid out as 3-4 storey duplex blocks and houses. There is a setback at the Outer Ring Road frontage including an area outside the red line site boundary where there are existing drainage services, pedestrian and cycle facilities. The Landscape Masterplan includes a formal layout at this frontage, which incorporates the existing drainage infrastructure and pedestrian / cycle route, in accordance with the detailed guidance provided in the Kilcarbery Grange Masterplan. The interaction with Corkagh Park is also well considered with a landscape buffer retaining existing trees and hedgerows and smaller landscaped spaces at entrance nodes, as provided for in the Masterplan. There is a strong urban edge to the rear of the landscaped buffer. Blocks 3 and 4 (5 storey) frame the gateway to Corkagh Park from the development and Block 9 (6 storey) marks a smaller access node at the Corkagh Park boundary to the west. There are primarily 3-4 storey frontages along the remainder of the Corkagh Park interface. The landscaping plan indicates detailed treatments for the main access to Corkagh Park and at the smaller pedestrian connections to the east and west.

10.3.3. I am satisfied that the development will interact well with the Outer Ring Road and Corkagh Park and that the spine route will provide an attractive and legible route through the development and a successful contribution to the wider urban realm. The edge to the Old Nangor Road is less successful, partially because the site is fragmented at this location by the presence of the educational site and the Neighbourhood Centre site between the northern site boundary and the Old Nangor Road frontage. There are three vehicular accesses at the Old Nangor Road frontage, i.e. (i) the existing entrance serving the Part VIII scheme, which will also serve the Neighbourhood Centre and the proposed development; (ii) the junction with the spine route and (iii) a secondary vehicular access at the western end of the development, which also serves the educational site. These accesses further fragment the frontage at this location. I also note that the northern edge of the development shares a boundary with two pairs of semi-detached houses on the Old Nangor Road which are listed on the NIAH (ref. 11209002-005) but are not listed in the Record of Protected Structures. The two and three storey houses within the Oak character area of the proposed development are all well set back from the adjacent residential properties on Old Nangor Road and I am satisfied that there will be no significant adverse impact on residential or visual amenities. Apartment Block 8 (6 storey) is further to the west and, given the intervening distance and the presence of mature vegetation, I am also satisfied that there will be no adverse impacts on residential amenities at this location.

10.3.4. Having regard to the above, I am concerned that the development may present a disjointed aspect to the Old Nangor Road. Presumably this will be resolved in time with the build out of the zoned lands at the educational site and the Neighbourhood Centre as both of those developments present opportunities for place making at this location. However, I do consider that there is some scope for improvement within the proposed scheme at the north eastern corner of the site, which currently presents two storey gable ends and a two storey house frontage. The planning authority submission also comments on this part of the development, recommending that units nos. 346 and 348 be amended to provide a dual frontage with a revised boundary treatment to the Old Nangor Road frontage. I consider that a higher 4 storey duplex or apartment block could be introduced at this location to replace houses nos. 345-348 (all private housing units), providing a stronger presence at the eastern edge of

the site and marking the frontage of the development to the Old Nangor Road, along with revised boundary treatments, as recommended by the planning authority.

Further to the west, houses nos. 46 (type C) and 89 (type B) present blank gables to the Old Nangor Road. These could be amended to present a more active façade to the road frontage. These amendments could be required by condition.

10.3.5. Within the urban edges, the development is laid out in the 'Oak', 'Lime' and 'Sycamore' character areas to the north and south of the spine route. The proposed planting and external finishes are designed to create an individual character for each area with specific tree and shrub planting, boundaries and hard landscaping. The large public open spaces in each character area serve specific functions. The Oak open space is the main central open space of the development and is to serve as a congregation space with an amphitheatre and natural play spaces. The Lime Green space serves as a kickabout area. The Sycamore open space is located within the Part V development but will also serve the proposed development and provides a seating area and natural play area. I note that the development provides a cumulative total of c. 4.55 ha of public open space within the site, which exceeds the minimum 14% of the total site area as required by the RES-N land use zoning objective. The layout of the character areas is framed around the retention of as much of existing trees and hedgerows as possible and the provision of a 'green loop' connecting the Oak Green, Lime Green and Sycamore open spaces with Corkagh Park. This will act as an amenity that will also serve the wider area, in accordance with the Kilcarbery Grange Masterplan. The 'green loop' is to be supplemented by 'green streets' within the individual character areas that have planted areas in the middle of the street space. This is described as a 'biophilic' design concept where buildings are fitted into the existing natural landscape with the retention and enhancement of existing landscape and drainage features as biodiversity corridors and amenity spaces and streets fitted into the natural landscape. The landscaping is complemented by a public lighting design that is included in landscaping layouts, which is designed to avoid disturbance to natural habitats.

10.3.6. There is a hierarchy of streets within the character areas with a roads layout based on perimeter blocks without cul-de-sacs and the provision of active frontages to streets and public open spaces. Local and subsidiary streets have a width of 4.8 m and primarily 2-3 storey frontages. The frontages are indented to create interest.

Street corners are addressed with higher 3 storey houses / duplex blocks with active frontages to both sides to provide passive surveillance. Communal parking areas are provided at the street edge with a 2.1m landscaped privacy strip between the footpath and building facades. Parking provision is generally on-street, either parallel or perpendicular to the carriageway, with no in-curtilage parking. Blocks of parking are broken up by landscaping and street trees. Parking is provided off-street within a small number of blocks. The streets layout incorporates SUDS features.

10.3.7. I am satisfied that the character areas are in accordance with the Kilcarbery Grange Masterplan and that they will provide for a high standard of public realm within the scheme. The design and layout of the character areas are well considered. They build on the guidance provided in the Masterplan and achieve a tight urban grain. There is a good mix of house types, apartment and duplex blocks, which creates variety and interest. The local streets generally have active frontages and open spaces are well overlooked. The use of higher elements at street corners improves legibility. There are more abrupt transitions in height at certain locations, e.g. to the east of Block 5 (6 storey), however there are intervening communal open spaces and the higher blocks are necessary to achieve a satisfactory urban edge and sustainable residential density. The 'green loop' and the provision of large, central public open spaces serving a variety of functions are attractive elements of the scheme that will also serve the wider area. The development will connect seamlessly with the Part VIII scheme under construction and the Part V units are well dispersed through the overall layout. There are primarily two storey frontages along the north eastern corner of the scheme, which fronts onto Kilcarbery Avenue. It appears from the contextual elevations and sections of this part of the site that there will be no hard boundary to Kilcarbery Avenue and that the development will present a new landscaped frontage at this location, including the frontage to Sycamore Green. This will enhance the public realm at Kilcarbery Avenue and I am satisfied that the development will not have any significant adverse impacts on visual or residential amenities on the existing adjacent residential properties to the east of the development site. The overall design and layout are coherent and successfully integrate roads requirements and the retention of existing trees and natural features along with detailed landscaping proposals, SUDS measures and public lighting

design to create attractive and functional urban and residential spaces and a positive contribution to the wider urban realm.

10.3.8. To conclude, I consider that the design and layout of the development are generally satisfactory with regard to national and development plan guidance for residential development and to the provisions of the Kilcarbery Grange Masterplan.

10.4. **Quality of Residential Accommodation**

10.4.1. The application includes a Housing Quality Assessment. The apartments are designed to meet or exceed the requirements of the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities, including the minimum floor areas for apartment units and the quantitative floor area requirements set out in Appendix 1 of the Guidelines. The vast majority of the apartment units will be at least 10% greater than the minimum size required, exceeding the requirements of SPPR 3 and section 3.8 of the Apartment Guidelines. The floor plans of individual apartment blocks indicate that there are between 2 -8 no. units per lift and stair core, i.e. less than the maximum of 12 units per core specific in SPPR 6. All ground floor units have a floor to ceiling height in excess of the minimum 2.7m specified in SPPR 5. Ground floor units also have 'own door access' from the street to terraces, well as access from the central core. Approx. 59% of the apartments are dual or triple aspect, which is well in excess of the minimum 50% requirement for suburban or intermediate locations as stated in SPPR 4 of the Apartment Guidelines. There are no single aspect north facing units. I note that there are 8 no. north east orientated single aspect two bed units in Blocks nos. 3 and 4, however they overlook public / communal open spaces and are therefore acceptable. EIAR Chapter 12 considers external noise impacts and states that upgraded glazing and ventilation will be fitted to facades along the Outer Ring Road, where external traffic noise levels are highest, which is expected to reduce internal noise levels to the standards set out in BS8233:2014. I note that the apartment and duplex blocks have render finishes to some facades (generally to the side or rear), which may not weather well. A more durable external finish may be required by condition, subject to the agreement of the planning authority.

10.4.2. All apartments have private open spaces in the form of balconies and terraces, which exceed the minimum dimensions set out in Appendix 1 of the Apartment

Guidelines and the minimum width of 1.5m. The apartment and duplex blocks have communal amenity spaces in the form of courtyards to the side / rear of each block, along with enclosed bin storage and cycle parking areas. The application presents an aggregate figure of c. 6,157 sq.m. of communal amenity space which, it is submitted, well exceeds the minimum of c. 3,088 sq.m. required to meet the minimum communal areas set out in Appendix 1 of the Apartment Guidelines. The individual communal areas of the apartment and duplex blocks also all well exceed the quantitative standard. Having regard to the detailed design and layout, to the submitted landscaping scheme and to the overall provision of public open space within the scheme, I am satisfied that the proposed apartments all have access to high quality public and communal spaces. Having regard to the detailed site layout of apartment Block 7 and duplex Block 5, I consider that the adjoining individual communal spaces of these blocks should be amalgamated to provide a more rational layout that would serve a total of 45 units in both blocks, this could be required by condition. Communal waste storage areas are provided for terraced houses, duplex blocks and apartment blocks, also the crèche, community building and retail unit. These are acceptable with regard to the guidance provided in sections 4.8 and 4.9 of the Apartment Guidelines and to the submitted Operational Waste Management Plan. The submitted Taking in Charge layout excludes communal areas serving individual apartment blocks. The application includes a Building Lifecycle Report, as required by the Apartment Guidelines, which states that a property management company will be established in accordance with the Multi-Unit Developments Act 2011.

- 10.4.3. All houses within the development exceed the minimum floor area requirements set out in the document Quality Housing for Sustainable Communities. I am satisfied that the individual house types and associated private open spaces provide a high quality of residential accommodation in a variety of typologies that meet the needs of a wide range of households.
- 10.4.4. To conclude, I consider that the development provides a satisfactory standard of residential accommodation for future occupants of the scheme, in accordance with local and national planning policy guidance.

10.5. Traffic and Transport

10.5.1. Existing and Proposed Roads Infrastructure

The site has two road frontages, i.e. to the Old Nangor Road L5124 at the northern site boundary and the Outer Ring Road R136 at the western site boundary. The Old Nangor Road is within the 50 kph zone and currently terminates at a cul-de-sac that serves one off houses at the northern site boundary. It currently has limited pedestrian facilities and is poorly surfaced west of Scoil Mochuda. The New Nangor Road R134, further to the north, functions as a local distributor road and provides a direct route to the centre of Clondalkin, c. 2km to the east. The Outer Ring Road to the west of the site is a dual carriageway that was constructed to facilitate the new town of Adamstown. It runs from the N4 in Lucan to the N81 at Tallaght, bypassing west of Clondalkin and crossing the N7 near Citywest. It is subject to an 80 kph speed limit at this location. The site frontage to the Outer Ring Road is set back from the road frontage with pedestrian and cycle facilities along the intervening strip. While the eastern site boundary adjoins a local access road, Kilcarbery Avenue, this is separated from the development by a palisade fence and there is no interaction with the proposed roads layout.

The site is served by local bus routes to the city centre which stop at the New Nangor Road and the wider area is served by various routes, several of which are to be consolidated under the Bus Connects proposals that are currently subject to a second round of public consultation until December 2019. The Outer Ring Road is to function as part of a new orbital bus route W4 between Blanchardstown and Tallaght and the proposed spine route D1 from Grange Castle Business Park to the city centre runs along the New Nangor Road. According to the submitted Traffic and Transport Assessment (TTA), the existing bus routes in the area have limited frequency. The Clondalkin Fontill rail station is c. 2.5 km north of the site, this is served by commuter services to the city centre. There is also an existing rail station at Kilsogue, which is to serve the Clonburris SDZ. It is not in operation at present and its opening date has not been confirmed by the NTA. The nearest Luas stop is c. 4 km away at Cheeverstown, served by the red line route to the city centre.

The proposed spine route through the development is 20m wide (carriageway 6m) and is to function as an arterial link route in the wider road network, providing a new

connection between the residential areas north and east of the site and the Outer Ring Road. The boulevard layout includes pedestrian footpaths and cycle tracks on both sides, in accordance with DMURS standards and the Kilcarbery Grange Masterplan. The route will create two new junctions at the Old Nangor Road and the Outer Ring Road. The Old Nangor Road access will form the 4th arm of an existing junction between the Old Nangor Road and St. Cuthbert's Road, a local road that connects residential areas north of the site to the New Nangor Road and continues northwards. This will function as a priority controlled junction with the site access and St. Cuthbert's Road to be given priority. The western end of the spine route will create a new junction to the Outer Ring Road, which is to operate as a 'left in – left out' priority controlled junction. The development will also be served by the existing road access from the Old Nangor Road to the adjoining Part VIII scheme on the eastern side of the site and by a secondary vehicular access from Old Nangor Road west of the educational site. These accesses to the development are generally acceptable subject to conditions. I note that the NTA submission requires clarity on provisions for future bus movements, pedestrian and cyclist movements along the Outer Ring Road at this access. A detailed layout to be agreed with the NTA and with South Dublin County Council may be required by condition

The development has been laid out with a high degree of pedestrian and cycle permeability, in accordance with the principles of DMURS. The pedestrian and cycle infrastructure along the spine route will connect to the existing pedestrian and cycle routes along the Outer Ring Road and will therefore make a significant contribution to pedestrian and cycle connectivity in the wider area, particularly in view of the Bus Connects proposals for the Outer Ring Road. However, there is limited existing pedestrian or cycle infrastructure at the Old Nangor Road at the northern end of the spine route. The development will connect to an existing footpath on the southern side of the Old Nangor Road to the east of the new 4 arm junction with St. Cuthbert's Road but there is no existing footpath to the west, along the frontage of the educational site, and therefore no footpath connection to the secondary vehicular access to Old Nangor Road at the western end of the site. The existing footpath on the opposite (northern) side of the Old Nangor Road only runs as far as Scoil Mochuda and the road surface is substandard beyond the school access. This is a concern. The intervening stretch of Old Nangor Road will need to be upgraded to

facilitate the new vehicular access west of the educational site and a condition could be imposed requiring pedestrian facilities at this location, to the satisfaction of South Dublin County Council.

The internal roads layout has been designed to meet DMURS standards with tight corner radii and a reduction of vehicular speed by design measures such as good legibility, a strong sense of enclosure, passive surveillance and raised tables at road junctions providing informal pedestrian crossings, to create a 'self-regulating' environment. Cyclists share surfaces at the local roads and 'green loop', which are designed to facilitate pedestrian and cycle desire lines and minimise vehicle / pedestrian conflict. They provide a high degree of pedestrian and cycle permeability overall and create new connections to Corkagh Park to the south. I note that, aside from the green area at the north eastern corner of the site, there are no direct pedestrian connections to Kilcarbery Avenue to the immediate east of the site and there is no indication that the existing palisade fence along the shared boundary is to be removed. The Part VIII scheme includes a new concrete post and panel fence inside the fence along its eastern boundary but does indicate a 'possible future connection' to the east. The creation of additional pedestrian and cycle connections to the residential areas to the east of the development site would significantly improve permeability and connections in the area and the current lack of same represents a missed opportunity. However, I am satisfied that the detailed design of local streets, as described in section 10.2.10 above, provides an integrated approach to vehicle, cycle and pedestrian access, parking provision, drainage infrastructure and hard and soft landscaping and is satisfactory. Permission should be subject to a condition that the detailed layout complies with the standards of the National Cycle Manual. SDCC Roads Dept. recommends several minor amendments at specific locations within the overall roads layout, as well as an increase in width of local streets with perpendicular parking to 6m, in order to allow safe access and egress from parking spaces. The detailed roads design may be agreed by condition, to the standards required for Taking in Charge.

10.5.2. Parking Provision

Grouped communal car parking is provided parallel and perpendicular to the streets with no 'in curtilage' parking for individual houses. There is a total of 1,510 no. car parking spaces for the overall development, of which 1,478 no. spaces are to serve

the residential units, an average of 1.4 spaces per unit. This is c. 14% below the maximum development plan standard as per Table 4.1 of the TTA. The TTA justifies this provision in the context of Census data on car ownership rates in the area. The proposed car parking provision for the retail unit and childcare facility meet development plan requirements. Section 4.18 of the Apartment Guidelines states that planning authorities may consider a reduced overall car parking standard at 'intermediate urban locations' close to town centres or employment areas, particularly for housing schemes with net densities > 45 units/ha. The proposed car parking provision is acceptable in this context. The submitted Mobility Management Plan is also noted in this regard. The development will include a 5% disabled parking provision and 10% electric vehicle parking provision, in accordance with development plan policy.

There is a total of 1,105 no. cycle parking spaces in enclosed cycle stores for the apartments / duplex units with ample space for cycle parking within individual house curtilages (251 no. short term spaces and 854 no. long term spaces). I am satisfied that the proposed cycle stores comply with the requirements of section 4.26 of the Apartment Guidelines. TTA Table 4.4 and EIAR Table 14.4 compare the proposed cycle parking provision to the cycle parking requirements of development plan policy and section 4.17 of the Apartment Guidelines. The short and long term stay provision exceed development plan standards but fall short of the Apartment Guidelines as follows:

	Development Plan	Apartment Guidelines	Proposed Provision
Short Stay	82	262	251
Long Stay	105	871	854
Total	187	1136	1105

I note that SDCC considers the proposed car and cycle parking provision to be acceptable. However, having regard to the cycle parking requirements of the Apartment Guidelines and given that there is ample scope within the communal areas associated with individual apartment and duplex blocks to accommodate additional cycle parking, I consider that a condition should be imposed requiring

additional cycle parking provision to meet the requirements of the Apartment Guidelines.

10.5.3. Traffic Impacts

The TTA is based on an audit of the local road network, transport conditions and vehicle movement patterns across the existing network, including pedestrian and cycle catchments and existing / proposed public transport services. The assessment includes traffic surveys carried out during AM and PM peak hours at 7 no. junctions in the area (see table below). Trip rates were generated for an opening year of 2020 (178 no. units) and future years of 2025 and 2035 (entire development), using the TRICS database and census data on travel modes in the area. The analysis considers trips generated by the development including cumulative impacts from the permitted Part VIII scheme. It is also based on assumptions that (i) 25% of the traffic generation to and from the crèche will originate from the local road network outside the development, the remainder being internal trips and (ii) the retail unit and community centre will solely serve residents of the development and will not generate any additional vehicle trips on the local road network. Trip distribution is based on the traffic surveys. Traffic growth forecasts for the Dublin area from the TII Project Appraisal Guidelines are applied for the medium growth rate for an Opening Year of 2020 and Future Design Years of 2025 and 2035. Two scenarios are assessed, i.e. (i) Do Nothing or base traffic and (ii) Do Something or post development, which considers traffic generated by the development in addition to existing flows.

The TTA provides the following % increases for the junctions assessed:

Junction	Projected % Increase 2035	
	AM	PM
A - R136 Outer Ring Road / New Nangor Road;	1.8%	2.7%
B – St Cuthbert’s Road / New Nangor Road;	6.0%	8.4%
C – Old Nangor Road / St. Cuthbert’s Road / Upper Nangor Road;	69.3%	8.4%
D – New Nangor Road / Fonthill Road;	3.1%	4.2%

E – Old Nangor Road / Fonthill Road;	2.0%	3.6%
F – R136 Outer Ring Road / N7 Slip Lane / Green Isle Road / New Nangor Road;	1.2%	1.6%
G – R135 Outer Ring Road / N7 Slip Lane / Old Naas Road.	1.2%	1.3%

Aside from Junction C Old Nangor Road / St. Cuthbert’s Road / Upper Nangor Road junction, the projected increases at all other junctions were below the 10% threshold for uncongested roads as per the NRA Traffic and Transport Assessment Guidelines 2014. Traffic simulation models were carried out for Junction C and for the Outer Ring Road R136 / Site Access junction. The analysis finds Ratio to Flow Capacity (RFC) values well below the 85% standard generally accepted as approaching capacity for the future years of 2025 and 2035 for both junctions at AM and PM peaks. It concludes that traffic impacts on surrounding road networks will be minimal.

The NTA submission states concern that the proposed spine route would create a short cut to avoid the New Nangor Road / Outer Ring Road junction via St. Cuthbert’s Road and would lead to increased trip making by private cars in the local area by providing unnecessary additional road capacity. The NTA also notes that it is unclear if the TTA accounts for this potential trip redistribution in the wider area as it appears that trip demand was simply added to existing traffic patterns. The NTA is of the view that a broader and more detailed assessment would be of greater benefit in assessing the application. It considers that the spine route and secondary roads in the development could provide access to housing without permitting through traffic, much of which would originate from outside the development.

The spine route is a central objective of the Kilcarbery Grange Masterplan and has the benefit of LIHAF funding. The Masterplan includes a Traffic and Transport Scoping Study. Section 2.1 of the scoping study states:

“The Council recognises that new development, both residential and commercial, permitted in line with this Plan will lead to additional trips being generated. The Council will work with the relevant agencies to seek to ensure that as high a proportion as possible would be conducted by sustainable means. However it is

accepted that a residual proportion of the trips generated will be taken by private vehicle. This has the potential to add to existing levels of congestion or saturation on the road network.”

The Scoping Report examines the ‘carrying capacity’ of existing roads in the area, i.e. the New Nangor Road, the Outer Ring Road, the R113 and the N7, also development plan roads objectives and existing pedestrian, cycle and public transport facilities. I note that the submitted TTA does not include traffic surveys for all of the junctions recommended in the Scoping Report. Section 3.49 of the Scoping Report states the following in relation to trip distribution:

“Traffic will be assigned to the network in line with existing flow proportions recorded as part of the traffic turning counts. Traffic flows will be assigned to the junctions in the weekday and weekend day morning and evening peak hour.”

I accept the concerns of the NTA regarding the lack of consideration in the TTA of the traffic impacts of creating a new ‘short cut’ at this location, however the submitted TTA has based the projected figures on current traffic patterns as per the scoping document, albeit based on more limited survey information. Given that the SHD process does not provide for a further information request, there is no scope to seek further traffic analysis in advance of a decision in this instance. The subject site is identified as a ‘capacity site’ for new residential development under the South Dublin County Development Plan, which has been subject to the SEA process. The proposed development of residentially zoned lands will achieve the delivery of a large, plan led, residential scheme in accordance with national and local planning policy and is generally considered to be acceptable in terms of road safety, DMURS and the provision of pedestrian and cycle infrastructure. There is already extensive, recently constructed roads infrastructure in place to serve the development at the Outer Ring Road and the New Nangor Road and additional public transport infrastructure is proposed for the area. While I agree that the submitted TTA has certain shortcomings, as identified by the NTA, I note that the NTA do not recommend refusal on traffic grounds but instead recommend a condition which states that a scheme which seeks to manage through traffic throughout the proposed development in accordance with the principles of DMURS and the Transport Strategy for the Greater Dublin Area 2016-2035 is prepared by the applicant and agreed with the local authority and the NTA in advance of construction commencing

I consider that the outstanding roads issues may be resolved by condition, as recommended by the NTA.

10.5.4. Construction Traffic

A 10 year permission is sought and thus there is potential for significant construction traffic impacts. I note that the spine route is to be constructed prior to the first phase of development, which will improve local traffic circulation. The Construction and Environmental Waste Management Plan submitted includes construction traffic management measures. Section 5.9 of the TTA considers construction traffic impacts. Proposed traffic mitigation measures include an appropriate HGV routing strategy and the provision of on-site parking for construction workers and other vehicles. This is acceptable and I am satisfied that the development will not have any significant adverse construction traffic impacts.

10.6. **Drainage, Flood Risk and Site Services**

10.6.1. The site is flat and currently contains a series of drainage ditches. The nearest watercourse is the Camac River, which runs in an easterly direction through Corkagh Park to the south of the site. The development is to discharge to two separate points. Lands at the northern half of the site, together with a portion of the runoff from the spine road, will be directed to an existing 450mm diameter drain within the Old Nangor Road at the junction of Kilcarbery Avenue. The remainder of the site is to be directed to an agreed outfall drain in Cherrywood Crescent that ultimately discharges to the Camac River downstream. Surface water runoff is to be attenuated to greenfield rates (surface water calculations include a 10% rainfall increase as a result of climate change). The development includes the following SUDS and surface water management measures, which are to be provided in tandem with landscaping and are integrated into the proposed Landscaping Masterplan:

- At source measures in housing and apartment blocks. Rain gardens, biofilter planting, rainwater harvesting tanks.
- At source measures in the road network and parking areas. Biophilic streets incorporating large green areas and tree planting with tree pit drainage. Infiltration trenches below on-street parking bays, to manage run off from roads, pavements and parking areas. Swales in linear green spaces alongside roads and streets.

- Strategic flow controls at exit from the site. Wiers and control penstocks for extreme rainfall events up to the 1 in 30 year return period. Vortex flow controls at management points. Light liquid interceptors at exit from site.
- Bioretention areas in public open spaces and at site boundaries, soaks to underlying geology.
- Sub-surface attenuation systems at key locations for functional spaces and to compliment above ground bioretention areas. These have been minimised to avoid impact on large open green areas as agreed with SDCC Parks Dept.
- Above ground detention areas for site wide management of surface water run-off in extreme rainfall events. These are to naturally soak to underground geology.

I am satisfied that the development includes an integrated and comprehensive surface water drainage system that has been prepared in consultation with South Dublin County Council.

10.6.2. The surface water network, attenuation storage and site levels are designed to accommodate a 100-year critical storm event (1% AEP). The development includes overland flood routes for storms in excess of the 100 year return period, which direct flow towards open space areas and adjacent public roads. A Site Specific Flood Risk Assessment (SSFRA) is submitted. There is no history of flood events in the immediate vicinity of the site with regard to OPW National Flood Hazard Mapping. The site is located well above the predicted 1% AEP and 0.1% AEP fluvial flood levels indicated in CFRAM mapping. No fluvial flooding is indicated in the vicinity of the site, due to distance from the Camac River. The proposed surface water drainage management system obviates pluvial flood risk. However, the site could be vulnerable to waterlogging during high rainfall events due to low soil permeability. The site is considered to be located in Flood Zone C as defined by The Planning System and Flood Risk Management Guidelines for Planning Authorities and the related Technical Appendices. A Justification Test is therefore not required. The Strategic Flood Risk Assessment of the Kilcarbery Grange Masterplan is also noted in this regard.

10.6.3. A temporary surface water management system is proposed for the construction phase with temporary attenuation areas in the permanent locations as part of the overall site works, also a temporary drainage network of ditches and land drains, to

be directed to the attenuation areas. Other proposed surface water management measures for the construction phase include sedimentation ponds and holding lagoons for silt management.

10.6.4. LIHAF funding is to provide foul drainage infrastructure for the site in advance of the development including a sewer connection to an existing 750mm Irish Water foul sewer along the southern boundary of the site; a pumping station accommodating 18 hours storage, to serve the northern portion of the site; a rising main from the pumping station and discharge manhole downstream, to connect to the main gravity network for the southern portion of the site and a main gravity connector section up to the proposed outfall point from the rising main. The proposed design has been agreed with Irish Water and the above elements of the foul network will be taken in charge by Irish Water in advance of house building. The remainder of the wastewater drainage network is to be constructed in tandem with the development. Detailed calculations are submitted.

10.6.5. There are an existing public watermain along the Old Nangor Road to the north of the site and at Kilcarbery Avenue to the east. There is also an existing public watermain along the New Nangor Road, c. 200m beyond the northern site boundary. Irish Water currently has a project on investment plan to provide c. 118m of gravity main to supply the site from the existing watermain on the New Nangor Road. The project is scheduled to be completed Q4 2021. I note the submission of Irish Water, which states that the proposed connection can be facilitated subject to a valid connection agreement.

10.6.6. The proposed foul drainage and water supply arrangements are satisfactory subject to conditions. I am also satisfied that the development is not at any significant risk of flooding and will not add to flood risk in the area.

10.7. **Aviation Safety**

10.7.1. The site is c. 1.5 km north east of Casement Aerodrome, Baldonnel, which is the only fully equipped military airbase in the state and is in continuous use for military training and operational aircraft movements. The application was referred to the Dept. of Defence, however no response was received. The submission of the Irish Aviation Authority (IAA), as summarised in section 9.2 above, is noted.

10.7.2. Development plan policy in relation to Casement Aerodrome, ref. Policy IE8, is to prohibit and restrict development in the environs of the Aerodrome. Development plan section 11.6.6 sets out guidance for developments in the vicinity of Aerodromes with regard to the 'Obstacle Limitation Surface' for Casement Aerodrome, as informed by the IAA Guidance Material on Aerodrome Annex 14 Surfaces, 2015, and the established requirements of the Dept. of Defence for Casement Aerodrome. Development plan policy also seeks to restrict development in the following areas around aerodromes:

- Public Safety Zones, i.e. areas of land at the end of runways established to control the number of people on the ground at risk in the unlikely event of an aircraft accident on take-off or landing. No development permitted within these zones.
- Inner Approach Area. Development prohibited, save for whereby development could not reasonably expect to increase the number of people working or congregating in or at the property.
- Outer Approach Area (outside the Inner Approach Area but within the approach funnels), graded heights of development below the Obstacle Limitation Surfaces of the runways may be permitted, subject to demonstration that the development is not an obstacle to the operation of the runway.

The development plan also notes Dept. of Defence restrictions at the Inner Zone and Security Zone associated with Casement Aerodrome. The development site is located outside, the Dept. of Defence Inner Zone and the Inner Approach Area.

10.7.3. The submitted Aviation Compliance Report assesses the relationship of the development with flight paths to Casement Aerodrome. It notes that the site is aligned with operational runway 05-23 and considers the development with regard to the Obstacle Limitation Surfaces and Obstacle Free Zone associated with the Aerodrome. It includes a cross section of the development in the context of flight paths associated with the Aerodrome, as required by development plan policy. The following points are noted:

- The minimum elevation of the Obstacle Free Zone (OFZ) above the development site is 140m AOD based on the surface slope of the runway at 3.33% grade commencing 60m beyond the end of the runway (threshold).

- The development is 1,489m from the southern boundary of the runway (1,429m from threshold).
- The highest element of the development, Block 6, has a maximum elevation of 94.65m AOD. It therefore has no impact on the aerodrome operations and meets development plan requirements.
- The report also considers more onerous OFZ standards used by the IAA, European Aviation Safety Agency and the International Civil Aviation Organisation. The development also below the relevant AOD in each case.
- The development will comply with the requirements of the Irish Aviation Authority Act (1993) during the construction phase.

10.7.4. EIAR section 12.5.1.2 considers noise impacts from Casement Aerodrome on the proposed development. The EIAR finds that standard building construction would provide adequate sound insulation of any aircraft noise without mitigation measures.

10.7.5. Having regard to the above and to the submitted Aviation Compliance Report, I am satisfied that the development will not have any significant adverse impact on the operations of Casement Aerodrome and that it complies with relevant development plan policy as per section 11.6.6 of the South Dublin County Development Plan 2016-2022 and relevant aviation standards. The submission of the IAA, which states no objection to the development, is also noted in this regard.

10.8. **Planning Assessment Conclusion**

10.8.1. Having regard to the above assessment, I conclude that permission should be granted for the proposed development subject to the conditions set out below.

11.0 **Environmental Impact Assessment**

11.1. **Introduction**

This application was submitted to the Board after 1st September 2018 and therefore after the commencement of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which transpose the requirements of Directive 2014/52/EU into Irish planning law.

The application is accompanied by an Environmental Impact Assessment Report (EIAR), which is mandatory for the development in accordance with the provisions of Part X of the Planning and Development Act 2000 (as amended) and Schedule 5 of the Planning and Development Regulations 2001-2015. Item 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and section 172(1)(a) of the Planning and Development Act 2000 (as amended) provide that an EIA is required for infrastructure developments comprising of urban development which would exceed:

- 500 dwellings
- an area of 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere.

The development proposes 1,034 no. residential units and has a stated area of c. 28.6 hectares. It therefore exceeds the above thresholds and requires mandatory EIA.

The EIAR contains two volumes:

- Volume 1: Written Statement, including Non-Technical Summary
- Volume 2: Written Statement – Appendices

Chapters 1 - 4 inclusive set out an introduction to the development, background to proposed development, description of the proposed development, alternatives considered, methodology used and non-technical summary. The strategic need for the development is outlined in the context of the zoning of the site and national and local planning policy including the Kilcarbery Masterplan.

The likely significant direct and indirect effects of the development are considered in the remaining chapters which collectively address the following headings, as set out in Article 3 of the EIA Directive 2014/52/EU:

- Population & Human Health
- Biodiversity
- Land, Soils and Geology
- Water

- Climate (Air Quality and Climate Change)
- Climate (Sunlight)
- Climate (Daylight)
- Air (Noise & Vibration)
- Landscape and Visual Impact
- Material Assets (Transportation)
- Material Assets (Waste)
- Archaeological, Architectural and Cultural Heritage
- Summary of Mitigation Measures
- Summary of Residual Impacts
- Summary of Cumulative Impacts and Interactions

EIAR Table 1.1 sets out the relevant experts involved in the preparation of each chapter of the EIAR. No specific difficulties are stated to have been encountered in compiling the required information or in carrying out the assessment. I am satisfied that the information contained in the EIAR has been prepared by competent experts and complies with article 94 of the Planning and Development Regulations 2000, as amended, and the provisions of Article 5 of the EIA Directive 2014.

I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application. A summary of the results of the submissions made by the Planning Authority and prescribed bodies, has been set out at Sections 8 and 9 of this report. This EIA has had regard to the application documentation, including the EIAR, the observations received and the planning assessment completed in section 10 above. I am satisfied that the participation of the public has been effective and the application has been made accessible to the public by electronic and hard copy means with adequate timelines afforded for submissions.

11.2. **Vulnerability of Project to Major Accidents and / or Disaster**

The requirements of Article 3(2) of the Directive include the expected effect deriving from the vulnerability of the project to risks of major accidents and/or disaster that

are relevant to the project concerned. The EIAR does not specifically address this issue which is considered a deficit in the assessment. I note however, that the development site is not regulated or connected to or close to any site regulated under the Control of Major Accident Hazards Involving Dangerous Substances Regulations i.e. SEVESO and so there is no potential for impacts from this source.

11.3. **Alternatives**

Article 5(1)(d) of the 2014 EIA Directive requires a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment. Chapter 4 of the EIAR deals with alternatives and sets out a rationale for the development. Alternative sites were not considered due to the location of the site within the Kilcarbery Grange Masterplan, which underwent SEA and is supported at strategic regional planning policy level in the RSES and MASP. The development has been designed with regard to the Masterplan and development plan policies and standards, as well as pre-application discussions and key environmental and practical considerations as set out in the EIAR, including the achievement of appropriate residential density and site constraints including the retention of significant landscape buffers. A 'do nothing' scenario and details of alternative development options considered during the design process are provided. I consider that the matter of the examination of alternatives has been satisfactorily addressed.

11.4. **Likely Significant Direct and Indirect Effects**

11.4.1. Population & Human Health

The assessment considers the existing health status in areas close to the development and examines the health impacts of the development associated with matters considered in detail in other sections of the EIAR, i.e. air quality, noise and vibration, traffic, townscape and visual. Health and safety matters are addressed with regard to relevant legislation. Mitigation measures are considered, as set out in the relevant chapters. The development is expected to have a neutral, long-term and imperceptible impact on the human health of the local population.

I note the guidance provided in the EPA document 'Environmental Impact Assessment Reports | Draft Guidelines' (August 2017), which advises that the

'Population & Human Health' topic should include assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc. and states that the legislation does not generally require assessment of land-use planning, demographic issues or detailed socio-economic analysis. This chapter of the EIAR is considered satisfactory with regard to this guidance.

I have considered all of the written submissions made in relation to population and human health. I am satisfied that no significant adverse direct, indirect or cumulative effects on population and human health are likely to arise.

11.4.2. Biodiversity

EIAR Chapter 6 evaluates impacts on habitats, flora and fauna on a study area comprising the development site. It is based on habitat surveys carried out at the site in May, August and September 2017 to inform the Kilcarbery Grange Masterplan, as well as update surveys carried out on 29th November 2018. Fauna surveys were carried out between May and July 2016 and May and October 2018 to inform the Kilcarbery Grange Masterplan including mammal surveys, bird surveys and bat surveys including the identification of potential bat roosts, bat foraging surveys and automatic static bat detector surveys. Update mammal surveys were carried out on 29th November 2018, including assessment of trees within the site for suitability for roosting bats.

The nearest nationally designated site is the Grand Canal pNHA, located c. 1.2 km north of the subject site. There is no hydrological connectivity.

The predominant habitats present at the site are dry meadow, mature hedgerows and treelines and drainage ditches. The development will retain c. 58% of existing treelines and hedgerows within the site. Japanese Knotweed was recorded c. 50m north of the development site at the Nangor Road but not within the site.

EIAR Table 6.2 identifies features within the site that have bat roost potential. Treelines and hedgerows within the site are considered to be of high value for foraging and commuting bats. Previous bat activity surveys carried out in 2017 recorded six species of bat using the development site including Leisler's Bat, Soprano Pipistrelle, Common Pipistrelle and Brown Long-eared Bat. Surveys did not identify any confirmed bat roosts in trees within the site or in buildings at the northern

site boundary. A total of 4 of the trees identified as potential bat roosts will be removed, as recommended by the arborist. In addition, tree management will result in the removal of potential roost features (PRFs). Of the PRFs identified, none will be considered suitable to accommodate large numbers of roosting bats. The removal of c. 42% of hedgerows and treelines at the site will have an adverse impact on foraging and commuting bats. Additional planting will maintain some connectivity between the site and surrounding areas but long-term displacement of bats may occur. Artificial lighting at the site may result in a permanent significant impact on foraging and / or commuting bats.

Winter bird surveys recorded a total of 1 Red-listed bird, 3 amber-listed birds and 15 Green-listed birds. A total of 11 of these species are considered to breed within the site. The development will result in temporary displacement of birds during construction and some permanent displacement due to habitat loss and disturbance impacts.

There are several large green spaces adjacent to the site that may provide long term alternative habitat for displaced fauna, i.e. Corkagh Park to the south and Grange Castle Golf Course to the west, both of which are zoned as open space under the development plan. Proposed mitigation measures include tree and root protection during construction; an Invasive Species Management Plan; inspection for bat roosts prior to tree felling; suitable public lighting in accordance with bat protection guidance; construction outside the nesting season and installation of bird boxes. A Habitat Management Plan is to be implemented. The residual habitat impacts are identified as permanent and significant at a local level. The residual impacts on breeding birds and on the local bat population would be temporary displacement during the construction stage and permanent habitat loss, which are considered to be significant at a local level.

The Camac River is hydrologically connected to the development site. There is potential for contamination during the construction stage and contaminated surface water run-off from the completed development. There is potential for cumulative impacts associated with run-off from other developments. Water protection measures are to be implemented during construction and the development includes detailed surface water management measures. No significant residual impacts on the Camac River are identified.

The EIAR does not identify any significant cumulative impacts on biodiversity.

I have considered all of the written submissions made in relation to biodiversity. I am satisfied that the identified impacts on biodiversity would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of biodiversity.

11.4.3. Land, Soils and Geology

The site is located on the Lucan limestone formation. There are no identified outcrops at the site. Site investigations indicate that rock was encountered between 2 to 4 m below ground level. The site is within a Locally Important Aquifer – Bedrock, which is Moderately Productive only in Local Zones. There are a number of recorded groundwater borehole and spring type wells within 2 km of the site, details of same are provided. There are no groundwater drinking protection areas or recorded geological heritage features in the vicinity. According to the Geological Survey of Ireland (GSI), soils within the site are generally tills derived from limestone composed of gravelly sandy clay. Topsoils are generally poorly drained. Given the current agricultural land use, it is unlikely that soils are contaminated, however there is evidence of fly tipping at the site. Assessment of underlying soils as part of an intrusive site investigation in late 2018 did not show any signs of significant contamination.

Potential impacts relate to the stripping of topsoil and subsoil during construction. Approx. 4,075 cu.m. of bedrock will also be removed. Table 7.1 provides figures of estimated soil volumes to be excavated. It is anticipated that the majority of excavated soil will be re-distributed within the site but there will be a slight shortfall (c. 361 cu.m.) in general fill requirements, which will need to be imported, in addition to base material for roads, hardcore and engineering capping. Table 7.2 provides details of fill requirements. Excavated bedrock will be reused within the site. Potential impacts during construction associated with contamination due to spillage, etc., are to be mitigated by construction management measures. Potential ongoing impacts associated with surface water run-off are to be mitigated by surface water management measures. No significant residual or cumulative impacts are identified.

I have considered all of the written submissions made in relation to land and soil. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of land and soils.

11.4.4. Water

The Camac River is the main receiving watercourse for surface water run-off from the development. The Camac River runs for c. 10 km from the site before discharging to the River Liffey at Heuston Station. It forms part of the River Liffey and Dublin Bay Water Framework Directive (WFD) catchment, which forms part of the Eastern River Basin District. The water quality of both the Camac River and the River Liffey are continuously monitored by the EPA. The River Liffey is classified as a 'Good' River Waterbody under WFD Status 2010-2015. The Camac River is classified as 'Moderate' at the Baldonnell House Station (1km upstream) and 'Poor' at the Riversdale Station (2km downstream). Details of ongoing monitoring of the River Camac are provided. The groundwater in the area is recorded as being part of the Dublin groundwater and is classified as a 'Good' Ground Waterbody based on the WFD Status 2010-2015 and is further classified as 'not at risk' or retaining good status.

The proposed surface water attenuation system, SUDS measures, flood risk, foul network and water supply are discussed in section 10.6 above.

There is potential for contaminated surface water run-off during construction. Contaminated water could also reach the groundwater receptor. Controlled dewatering will take place if groundwater is encountered during construction. Potential surface water impacts after construction are unlikely however there is ongoing flood risk, which is assessed in the SSFRA. Detailed water management measures are proposed during construction including temporary holding ponds. Residual impacts are assessed as neutral. No significant cumulative impacts are identified.

I have considered all of the written submissions made in relation to water. I am satisfied that the identified impacts would be avoided, managed and mitigated by the

measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of water.

11.4.5. Climate (Air Quality and Climate Change)

A local air quality assessment was carried out in accordance with EPA guidance and using a phased approach as recommended by the UK DEFRA. Metrological data from Casement Aerodrome was used to establish prevailing wind conditions for the area. Information on baseline air quality is drawn from EPA monitoring data.

Potential air quality impacts during construction primarily relate to fugitive dust emissions. A dust minimisation plan is to be implemented. Residual impacts are assessed as not significant. There are potential climate impacts due to emissions from construction vehicles and machinery. Potential long term impacts are associated with emissions from changed traffic flows in the area. Climate impacts are assessed as imperceptible in the short and long term. Potential vehicular emissions are modelled using projected traffic flows from the TTA, with cumulative impacts assessed using the methodology of the UK DEFRA. The results for all potential traffic-derived pollutants were within limit values. Impacts are assessed as negligible and imperceptible. No significant cumulative impacts are identified.

I have considered all of the written submissions made in relation to air quality and climate. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of air quality and climate.

11.4.6. Climate (Sunlight and Daylight)

EIAR Chapter 10 considers sunlight impacts to proposed amenity spaces within the development including back gardens, apartment and duplex balconies and public open spaces. Section 10.4.2 notes that adjoining residential areas at the Part VIII scheme, Cherrywood Park and at Kilcarbery Avenue do not have amenity spaces adjacent to the development and therefore there are no possible impacts at these locations. This is considered reasonable. The assessment methodology is based on

the Building Research Establishment (BRE) guidelines on Site Layout Planning for Daylight and Sunlight (the BRE Guide), which recommends that for an amenity space to appear adequately sunlit throughout the year, at least half of the space should receive two hours of sunlight on March 21st. A 3D model was constructed for the entire development and adjacent amenity spaces. The layout has been designed in accordance with the Kilcarbery Grange Masterplan and north facing amenity spaces have been minimised. A total of 82% of private amenity areas meet the BRE standard. Those that fall slightly short are predominantly north orientated spaces. All communal open spaces meet or exceed the standard. It is noted that the BRE Guidelines allow for a degree of flexibility, also that sunlight access will improve beyond March 21st with excellent access to sunlight across the scheme during the summer months when amenity spaces would be predominantly used.

EIAR Chapter 11 considers daylight impacts of the development, i.e. overshadowing, with regard to the BRE Guidelines and British Standard BS 8206: Part 2 (BS8206-10), which uses Average Daylight Factor (ADF) to measure the overall amount of daylight and provides standards for various room types. Sensitive receptors are identified as windows to habitable rooms facing the development and gardens and open spaces in adjacent properties. All houses, duplex units and apartments within the development exceed the minimum ADF requirements. The assessment considers adjacent residential properties at Cherrywood Park, Kilcarbery Avenue and the Part VIII scheme. The proposed development falls beneath a 25° angle taken from a point 1.6 m above ground level from these adjacent properties, as per the relevant BRE criteria, therefore no further analysis is required in relation to potential daylight impacts as adequate daylight will be available.

I have considered all of the written submissions made in relation to daylight and sunlight. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of material assets (Daylight and Sunlight).

11.4.7. Air (Noise & Vibration)

Baseline noise monitoring was carried out at four locations on and around the northern end of the development site at daytime on 4th December 2018 and night time on 25th – 26th February 2019. The nearest noise sensitive locations are the residential properties to the north and east of the site. British Standard BS 5228-1: 2009 + A1:2014 sets out guidance on permissible noise levels relative to the existing noise environment and provides values which, if exceeded, signify a significant effect at the facades of residential receptors. The baseline monitoring indicates that 'Category A' values apply at the development site, i.e. 65 dB at daytime and Saturdays, 55 dB at evenings and weekends and 45 dB at night time. The assessment also notes guidance provided in the Dublin Agglomeration Environmental Noise Action Plan with regard to external noise levels and BS8233:2014 with regard to indoor ambient noise levels and noise levels in external amenity areas.

Potential noise impacts generally relate to construction works at the development site (including construction traffic), as well as traffic associated with the development. Best practice noise and vibration control measures will be implemented during construction. Predicted construction noise impacts, assuming a combination of plant items operating simultaneously, will operate within the above limits and regular noise monitoring will be undertaken. No significant vibration impacts are anticipated. Potential operational traffic noise is evaluated using projected traffic flows from the TTA. The predicted increase in traffic noise levels associated with the development is < 3dB in the vicinity of the majority of the roads for both the opening and design years. This is assessed as barely perceptible and a negligible impact. No significant cumulative impacts are identified.

There is also potential for traffic and aircraft noise in the area to impact on the proposed development. Predicted internal noise levels take account of sound insulation provided by the standard of construction, e.g. glazing. Upgraded glazing and ventilation is proposed for facades facing the Outer Ring Road, where external traffic noise levels are highest. This is expected to reduce internal noise levels to the standards set out in BS8233:2014.

I have considered all of the written submission made in relation to noise and vibration. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of noise or vibration.

11.4.8. Landscape and Visual Impact

The site is located in a low lying area with an open character of large field patterns with tree belts and hedges. Corkagh Park, to the immediate south of the site, is an important amenity with historical and recreational value. The area around the site has been developed with a range of land uses including housing developments to the north and east, business parks to the north west and west and a golf course to the west, beyond the Outer Ring Road.

The proposed development has a 'biophilic' design concept that will retain much of the existing native trees and hedgerows. It includes landscaping to a very high standard with green areas, paths, play areas and extensive tree planting with tree and hedgerow buffers. The soft landscaping is designed to tie in with the existing and surrounding landscape, including semi-mature trees and shrub planting. There may be some moderate to significant temporary visual impacts at construction stage. However, the development is expected to be perceived as an integrated extension of the Clondalkin settlement over time, with landscape integration a defining characteristic. The long term impact on the existing landscape character is described as neutral / positive. No significant cumulative impacts are identified.

The Visual Impact Assessment considers a total of 17 no. viewpoints in the immediate vicinity of the development and the surrounding area and within Corkagh Park. Aside from the north eastern corner of the development, which is considered further below, I am satisfied that the viewpoints chosen allow for a comprehensive consideration of overall visual impacts. Photomontages are provided. Impacts are assessed overall as neutral or moderate. Having inspected the site and viewed it from a variety of locations in the vicinity, I concur with this assessment. I note that the VIA does not include any vantage points from Kilcarbery Avenue to the immediate east. However, having regard to the design of this part of the

development, which includes two storey houses, landscaping and a public open space, I do not consider that there would be any adverse impacts on visual or residential amenities in the adjacent residential properties.

I have considered all of the written submissions made in relation to landscape and visual impact. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect landscape and visual impacts.

11.4.9. Material Assets (Transportation)

The Board is referred to section 10.5 above in respect of traffic and transportation. The above discussion concludes that there are some shortcomings in the submitted TTA, primarily that it does not consider the impact of creating a 'short cut' between the New Nangor Road and the Outer Ring Road via St. Cuthbert's Road, which may lead to increased trip making by private cars in the local area by providing unnecessary additional road capacity and could result in the spine route being heavily used by traffic generated outside the development, with a consequent impact on traffic patterns in the wider area. However, the above assessment concludes that the development would not have such a significant adverse impact on traffic and transport in the area as would warrant a refusal of permission and that issues identified in the submissions of the National Transport Authority and South Dublin County Council may be dealt with by condition.

I have considered all of the written submissions made in relation to traffic and transport. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of material assets.

11.4.10. Material Assets (Waste)

Construction waste will arise during the excavation, demolition and construction phases. No excavated materials are to be removed from the site as waste. EIAR Table 15.1 presents estimated waste volumes. A Construction Waste Management

Plan is to be implemented to ensure that waste generation is minimised and opportunities for re-use and recycling are maximised; waste materials are to be removed from the site by appropriately permitted waste haulage contractors and disposed of at approved and licensed facilities in compliance with the Waste Management Act 1996 and all associated Waste Management Regulations. The completed development is to be taken in charge. A Waste Generation Model is used to predict waste types, weights and volumes from the completed development, based on the predicted occupancy of the units. Waste generated from the occupation and maintenance of the development will be removed and managed by the local authority or private waste management contractors. An operational waste management plan is submitted. No significant cumulative or residual impacts are predicted.

I have considered all of the written submissions made in relation to waste management. I am satisfied that no significant adverse direct, indirect or cumulative effects in relation to waste are likely to arise.

11.4.11. Archaeological, Architectural and Cultural Heritage

There are no recorded monuments within the development area. There are 16 no. recorded monuments within a 1 km study area, the closest being the site of Nangor Castle (RMP DU017-037), c. 200m to the north west. All buildings at that site have been demolished. A geophysical survey of the Kilcarbery lands carried out in May 2017 identified a possible former field system in the south of the site. Archaeological testing carried out across the site in November to December 2017 identified a total of nine potential archaeological features in the southern half of the site, which were excavated in March to April 2018. The features excavated represented activity dating from the Bronze Age to the post-mediaeval period. Due to the excavation of these features, there will be no known archaeological features within the development site when ground works commence.

There are no protected structures within or in the immediate vicinity of the development site. The closest is Deansrath House (RPS 142), located c. 290m to the north. An area at the south eastern corner of the site was within Corkagh Demesne in the 19th century, associated with Corkagh House, which is now demolished. A bridge and several of the outbuildings associated with the house

remain and are now protected structures, located within Corkagh Park (RPS 176, 179, 181), also several recorded monuments (Corkagh Castle DU021-011001, the moated site DU021-011002 and a mill DU021-011030). Two pairs of semi-detached early 20th century cottages on the Old Nangor Road, to the immediate north of the site, are listed on the National Inventory of Architectural Heritage (NIAH), ref. 11209003 - 005. While extant, they are not in good condition.

No significant impacts on archaeology or cultural heritage are identified for the construction or operational stages. Archaeological monitoring is recommended.

I have considered all of the written submissions made in relation to archaeology, architecture and cultural heritage. I note that no significant impacts are identified. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of archaeology, architecture and cultural heritage.

11.4.12. Significant Interactions

EIAR Chapter 19 provides a summary of principal interactions and inter-relationships, which have been discussed in the preceding chapters. I have considered the interrelationships between factors and whether these might as a whole affect the environment, even though the effects may be acceptable on an individual basis. In conclusion, I am generally satisfied that effects arising can be avoided, managed and mitigated by the measures which form part of the proposed development, mitigation measures, and suitable conditions.

11.5. **Reasoned Conclusion on the Significant Effects**

11.5.1. Having regard to the examination of environmental information contained above, and in particular to the EIAR including Chapter 17 Summary of Mitigation Measures, Chapter 18 Summary of Residual Impacts; to supplementary information provided by the developer, and the submissions from the planning authority and prescribed bodies in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Traffic and transportation impacts, which will be mitigated by construction traffic management; a Mobility Management Plan and by the provision of pedestrian and cycle facilities.

- Water impacts, which will be mitigated by construction management measures, SUDS measures, surface water management and monitoring.
- Landscape and visual impacts, which will be mitigated by construction management measures and by the retention and enhancement of existing trees and hedgerows and new landscaping.
- Biodiversity impacts, which will be mitigated by tree and root protection during construction, an Invasive Species Management Plan; inspection and monitoring of potential bat roosts during construction; landscaping or replacement of native hedgerow with native, naturalised or indigenous species; implementation of a Habitat Management Plan; measures to avoid disturbance to animals during construction; lighting control measures and post construction monitoring.
- Land and soils impacts, to be mitigated by reuse of material in the development and by construction management measures and waste management.

11.5.2. Having regard to the above, it is my view that the environmental effects arising as a consequence of the proposed development have been satisfactorily identified and assessed. I consider that the EIAR is compliant with Article 94 of the Planning and Development Regulations, 2001, as amended.

12.0 **Appropriate Assessment**

12.1. An Appropriate Assessment, Stage 1 Screening Report is submitted with the application. It lists all European Sites within 15 km of the development site. There are 9 no. European Sites within the 15 km radius, with the nearest being Rye Water Valley / Carton SAC (site code 001398), c. 6.7 km northwest of the development. The attention of the Bord is drawn to Table 2 of the submitted AA Screening Report for a list of the relevant sites and their Qualifying Interests/Conservation Objectives.

12.2. The AA Screening Report notes that the development site is a greenfield site which contains no watercourses, however there are numerous drainage ditches contained within field boundary hedgerows and treelines. The Camac River is c. 100m south of the site. The site does not overlap or adjoin any European Sites and is dominated by habitats that are not listed in Annex I of the Habitats Directive. These habitats are not

directly or indirectly connected with any habitats within European Sites. No mobile fauna species for which European Sites are designated are known to use the habitats within the development site. Black-headed gull were recorded using ponds within Corkagh Park, however these habitats will not be altered or lost as a result of the development. Therefore, there is no potential for cumulative effects relating to habitat loss nor will there be any fragmentation of any designated site.

12.3. Surface waters arising from the development will ultimately discharge to Dublin Bay, c. 13.5 km north east of the development site, via the local surface water drainage network and Camac and Liffey rivers. The AA Screening Report refers to a 'Hydrological Risk Assessment' carried out by DBFL Consulting Engineers in relation to the development site. There is no such document on file, however there are details of the proposed surface water management system and a Site Specific Flood Risk Assessment. The management of surface water for the development has been designed to comply with the policies and guidelines outlined in the Greater Dublin Strategic Drainage Study (GDSDS) and with the requirements of South Dublin County Council. The development is designed in accordance with the principles of Sustainable Urban Drainage Systems (SUDS). I therefore accept the conclusion of the AA Screening Report that there is no resultant source pathway receptor linkage between the development and open water in Dublin Bay which could result in any significant change to the current water regime (water quality or quantity) or water body status in Dublin Bay (as defined within the Water Framework Directive). As a result there is no possibility for significant effects on European Sites in Dublin Bay as a result of surface water run-off from the development during either construction or operation phases, including in combination with other plans or projects.

12.4. Foul waters generated by the development will discharge to the existing public sewer and be treated in Ringsend Waste Water Treatment Plant (WWTP) prior to discharge into Dublin Bay. This WWTP is required to operate under an EPA licence (D0034-01) and to meet environmental legislative requirements. Further upgrade of the WWTP is currently in planning. Hydrodynamic and chemical modelling within Dublin Bay has shown that there is significant dilution available for contaminants of concern (Dissolved Inorganic Nitrogen (DIN) and Molybdate Reactive Phosphorus (MRP)) quite close to the outfall for the treatment plant (DCC 2012 and Irish Water 2018). Recent water quality assessment of Dublin Bay also shows that Dublin Bay on the

whole, currently has an 'Unpolluted' water quality status (EPA, 2018). The Screening Report concludes that effluent discharge from the development would not impact on the overall water quality within Dublin Bay. I also note that water quality is not listed as a conservation objective for these designated sites within Dublin Bay. Significant effects are not likely to arise, either alone or in combination with other plans or developments that would result in significant effects on the integrity of the Natura 2000 network.

- 12.5. Based on all of the information before me and having regard to the nature and scale of the proposed development and/or the nature of the receiving environment and/or proximity to the nearest European site, no appropriate assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or developments on a European site.

13.0 Conclusion

- 13.1. The development is acceptable in principle with regard to the zoning of the site under the South Dublin County Development Plan 2016-2022 and to the provisions of the Kilcarbery Grange Masterplan 2017. The housing density and mix are acceptable with regard to national and local planning policy and to the location of the site close to the centre of Clondalkin and adjacent to several bus routes. The development is to be facilitated by enabling roads and drainage infrastructure using LIHAF funding. The proposed residential design and layout are in accordance with relevant national and local policies on residential development and will provide a satisfactory standard of residential accommodation, while achieving a residential density reflecting the strategic nature of the site and the importance of sustainable development of zoned and serviced lands. I am satisfied that the development would not have any significant adverse impacts on visual or residential amenities or on cultural heritage. With regard to the submitted Traffic and Transport Assessment and Mobility Management Plan, it is considered that the development will not result in undue adverse traffic impacts and would have moderate traffic impact on the local road network overall.

14.0 Recommendation

14.1. Having regard to the above assessment, I recommend that section 9(4)(c) of the Act of 2016 be applied and that permission is GRANTED for the development as proposed for the reasons and considerations and subject to the conditions set out below.

15.0 Reasons and Considerations

15.1. Having regard to the following:

- (a) the location of the site on lands with a zoning objective for new residential development under the South Dublin County Development Plan 2016-2022 and within the boundary of the Kilcarbery Grange Masterplan 2017;
- (b) the nature, scale and design of the proposed development which is consistent with the provisions of the South Dublin County Development Plan 2016-2022 and the Kilcarbery Grange Masterplan 2017;
- (c) the Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- (d) the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009;
- (e) the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities issued by the Department of the Housing, Planning and Local Government in March 2018;
- (f) the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2013;
- (g) the nature, scale and design of the proposed development;
- (h) the availability in the area of a wide range of social and transport infrastructure;
- (i) the pattern of existing and permitted development in the area, and
- (j) submissions and observations received,

It is considered that, subject to compliance with the conditions set out below that the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

16.0 Recommended Board Order

Planning and Development Acts 2000 to 2019

Planning Authority: South Dublin County Council

Application for permission under section 4 of the Planning and Development (Housing) and residential Tenancies Act 2016, in accordance with plans and particulars, lodged with An Bord Pleanála on the 26th day of August 2019 by Adwood Limited care of Stephen Little & Associates, Upper Pembroke Street, Dublin 2.

Proposed Development:

A planning permission for a strategic housing development on site at Outer Ring Road/ Grange Castle Road (R136), Old Nangor Road (L5254), Cherrywood Park, Kilcarbery Avenue and Corkagh Park, Townlands of Kilcarbery, Corkagh Demesne, Deansrath and Nangor, Co. Dublin.

The proposed development will consist of:

- 1) 1,034 residential units (578 no. houses, 154 no. duplex / apartments and 302 no. apartments) ranging from 2 to 6 storeys, ancillary uses including the provision of 1 no. ground floor retail unit (c. 178 sq.m. gfa) and community facility (c. 785 sq.m. gfa).
- 2) Provision of 2 no. childcare facilities – 1 no. temporary and 1 no. permanent. This includes the adaption of 7 no. proposed ground floor apartment units in Block 7, Phase 1, for use as temporary childcare facility (c. 557 sq.m. gfa) pending construction of a permanent childcare facility in Phase 3 (c. 909 sq.m. gfa).
- 3) New vehicular access from Outer Ring Road / Grange Castle Road (R136) to the west using 'left in and left out' layout and 2 no. new vehicular access points onto Old Nangor Road (L5124) to the north and associated re-alignment of existing roadways.

- 4) New street network, including spine road (c. 6m in width) extending from Outer Ring Road / Grange Castle Road (R136) to the west onto Old Nangor Road (L5254) to the north.
- 5) New pedestrian and cycle path network, provision of Public Open Space (c. 4.6 ha) including Oak Green Space (c. 7,453 sq.m.), Lime Green Space (c. 6,646 sq.m.) and Grange Square (c. 2,606 sq.m.). Provision of surface water attenuation features (SUDS).
- 6) Provision of wastewater pumping station including 18hr storage tank and associated infrastructure, 1,510 no. car parking spaces, 1,105 no. covered bicycle parking spaces.
- 7) Communal bin storage for all terraced houses, duplex / apartment and apartment blocks, all associated and ancillary site development, infrastructural, landscaping and boundary treatment works.

Decision

Grant permission for the above proposed development in accordance with the said plans and particulars based on the reasons and considerations under and subject to the conditions set out below.

Matters Considered

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

Reasons and Considerations

In coming to its decision, the Board had regard to the following:

- (a) the location of the site on lands with a zoning objective for new residential development under the South Dublin County Development Plan 2016-2022 and within the boundary of the Kilcarbery Grange Masterplan 2017;
- (b) the nature, scale and design of the proposed development which is consistent with the provisions of the South Dublin County Development Plan 2016-2022 and the Kilcarbery Grange Masterplan 2017;
- (c) the Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- (d) the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009;
- (e) the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities issued by the Department of the Housing, Planning and Local Government in March 2018;
- (f) the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2013;
- (g) the nature, scale and design of the proposed development;
- (h) the availability in the area of a wide range of social and transport infrastructure;
- (i) the pattern of existing and permitted development in the area, and

(j) submissions and observations received,

It is considered that, subject to compliance with the conditions set out below that the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Appropriate Assessment Screening

The Board completed an Appropriate Assessment screening exercise in relation to the potential effects of the proposed development on designated European sites, taking into account the nature, scale and location of the proposed development within a zoned and serviced urban area, the Appropriate Assessment Screening Report submitted with the application, the Inspector's report and submissions on file. In completing the screening exercise, the Board adopted the report of the Inspector and concluded that, by itself or in combination with other development in the vicinity, the proposed development would not be likely to have a significant effect on any European site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required.

Environmental Impact Assessment

The Board completed an environmental impact assessment of the proposed development, taking into account:

- (a) The nature, scale and extent of the proposed development;
- (b) The environmental impact assessment report and associated documentation submitted in support of the planning application;
- (c) The submissions from the planning authority, the observers and the prescribed bodies in the course of the application; and
- (d) The Inspector's report.

The Board considered that the environmental impact assessment report, supported by the documentation submitted by the applicant, adequately identifies and describes the direct, indirect, secondary and cumulative effects of the proposed development on the environment.

The Board agreed with the examination, set out in the Inspector's report, of the information contained in the environmental impact assessment report and associated documentation submitted by the applicant and submissions made in the course of the planning application.

The Board considered and agreed with the Inspector's reasoned conclusions, that the main significant direct and indirect effects of the proposed development on the environment are, and would be mitigated, as follows:

- Traffic and transportation impacts, which will be mitigated by construction traffic management; a Mobility Management Plan and by the provision of pedestrian and cycle facilities.
- Water impacts, which will be mitigated by construction management measures, SUDS measures, surface water management and monitoring.
- Landscape and visual impacts, which will be mitigated by construction management measures and by the retention and enhancement of existing trees and hedgerows and new landscaping.
- Biodiversity impacts, which will be mitigated by tree and root protection during construction, an Invasive Species Management Plan; inspection and monitoring of potential bat roosts during construction; landscaping or replacement of native hedgerow with native, naturalised or indigenous species; implementation of a Habitat Management Plan; measures to avoid disturbance to animals during construction; lighting control measures and post construction monitoring.
- Land and soils impacts, to be mitigated by reuse of material in the development and by construction management measures and waste management.

The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the

mitigation measures set out in the environmental impact assessment report, and subject to compliance with the conditions set out below, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable. In doing so, the Board adopted the report and conclusions of the Inspector.

Conclusions on Proper Planning and Sustainable Development

The Board considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable residential density in this suburban location, would not seriously injure the residential or visual of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. Mitigation and monitoring measures outlined in the plans and particulars, including the environmental impact assessment, submitted with this application as set out in Chapter 17 of the EIAR “Summary of Mitigation Measures”, shall be carried out in full, except where otherwise required by conditions attached to this permission.

Reason: In the interest of protecting the environment and in the interest of public health.

3. The period during with the development hereby permitted may be carried out shall be 10 years from the date of this Order.

Reason: In the interests of proper planning and sustainable development.

4. The development shall be carried out on a phased basis, in accordance with a phasing scheme which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of any development.

Reason: To ensure the timely provision of services, for the benefit of the occupants of the proposed dwellings.

5. The proposed development shall be amended as follows:

- (a) The permanent childcare facility to be delivered in Phase 3 of the development shall be enlarged such that it can accommodate 238 no. childcare spaces.
- (b) House units nos. 345, 346, 347 and 348 shall be replaced by a 4 storey apartment or duplex block with associated communal open space, car and cycle parking, refuse storage area and boundary treatments, all designed to address the Old Nangor Road.
- (c) House units nos. 46 and 89 shall be amended such that they present active frontages to Old Nangor Road.

- (d) The proposed render finishes to the apartments and duplex blocks shall be replaced by a more durable finish.
- (e) The individual communal open spaces to the rear of apartment Block 7 and duplex Block 5 shall be amalgamated to provide a single communal space to serve all 45 units in both blocks, with associated communal open space, car and cycle parking, refuse storage area and boundary treatments.

Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. In default of agreement, the matter(s) in dispute shall be referred to An Bord Pleanála for determination.

Reason: In order to comply with national policy on childcare provision for residential development. In order to provide a satisfactory frontage to Old Nangor Road. in the interests of visual amenities. In order to provide a more rational and usable communal space for apartment Block 7 and duplex Block 5.

- 6. The following requirements in terms of traffic, transportation and mobility shall be incorporated, and where required revised drawings/reports showing compliance with these requirements shall be submitted to and agreed in writing with the planning authority prior to commencement of development:
 - (a) The stretch of Old Nangor Road L5254 between the new junction with St. Cuthbert's Road and the western site access shall be upgraded to provide pedestrian facilities on the southern side of the road.
 - (b) Details of:
 - i. the layout of the site access from the Outer Ring Road R136 and
 - ii. the management of through traffic throughout the proposed development in accordance with the principles of DMURS and the Transport Strategy for the Greater Dublin Area 2016-2035shall be agreed with the planning authority and the National Transport Authority prior to the commencement of development.

- (c) The roads and traffic arrangements serving the site, including signage, shall be in accordance with the detailed requirements of the planning authority for such works and shall be carried out at the developer's expense.
- (d) The materials used in any roads / footpaths provided by the developer shall comply with the detailed standards of the planning authority for such road works.
- (e) All works to public roads/footpaths shall be completed to taking in charge standards and shall be to the satisfaction of the planning authority.
- (f) The roads layout shall comply with the requirements of the Design Manual for Urban Roads and Streets, in particular carriageway widths and corner radii.
- (g) Where perpendicular parking is located on 'Local Streets' the width of the carriageway should be increased to 6.0m to allow safe access and egress from parking spaces.
- (h) Cycle tracks within the development shall be in accordance with the guidance provided in the National Cycle Manual.
- (i) Additional covered cycle parking shall be provided for the apartments and duplex units such that the development meets the standards for cycle parking set out in section 4.17 of the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments, 2018.
- (j) One car parking space per ten residential units shall have a functional electric vehicle charging point.
- (k) The developer shall carry out a Stage 3 Road Safety Audit of the constructed development on completion of the works and submit to the planning authority for approval and shall carry out and cover all costs of all agreed recommendations contained in the audit.
- (l) A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for

construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.

In default of agreement, the matter(s) in dispute shall be referred to An Board Pleanala for determination.

Reason: In the interests of traffic, cyclist and pedestrian safety and to protect residential amenity

7. The developer shall enter into water and/or waste water connection agreement(s) with Irish Water, prior to commencement of development.

Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services and all surface water shall be treated within the site.

Reason: In the interest of public health.

8. The site shall be landscaped in accordance with the submitted scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The developer shall retain the services of a suitably qualified Landscape Architect throughout the life of the site development works. The approved landscaping scheme shall be implemented fully in the first planting season following completion of the development or each phase of the development and any plant materials that die or are removed within three years of planting shall be replaced in the first planting season thereafter.

Reason: In the interest of residential and visual amenity.

9. Details and samples of the materials, colours and textures of all the external finishes to the proposed development including pavement finishes shall be

submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of the visual amenities of the area.

10. Proposals for an estate/street name, unit numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all estate and street signs, and house/apartment numbers, shall be provided in accordance with the agreed scheme. The proposed name(s) shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority. No advertisements/marketing signage relating to the name(s) of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name(s).

Reason: In the interest of urban legibility and to ensure the use of locally appropriate place names for new residential areas.

11. Prior to commencement of development, the developer shall submit to and agree in writing with the planning authority a properly constituted Owners' Management Company. This shall include a layout map of the permitted development showing the areas to be taken in charge and those areas to be maintained by the Owners' Management Company. Membership of this company shall be compulsory for all purchasers of property in the development. Confirmation that this company has been set up shall be submitted to the planning authority prior to the occupation of the first residential unit.

Reason: To provide for the satisfactory completion and maintenance of the development in the interest of residential amenity.

12. Prior to the occupation of the development hereby permitted, the applicant shall prepare a Community Facility Strategy for the written agreement of the planning authority. The Strategy shall set out how the community building hereby

permitted will be managed. The applicant shall liaise with South Dublin County Council prior to the preparation of the Community Facility Strategy.

Reason: To ensure the appropriate provision of social and community infrastructure.

13. Public lighting shall be provided in accordance with a scheme, which shall include lighting along pedestrian routes through open spaces, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Such lighting shall be provided prior to the making available for occupation of any house.

Reason: In the interests of amenity and public safety.

14. All service cables associated with the proposed development, such as electrical, communal television, telephone and public lighting cables, shall be run underground within the site. In this regard, ducting shall be provided to facilitate the provision of broadband infrastructure within the proposed development.

Reason: In the interests of orderly development and the visual amenities of the area.

15. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the "Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects", published by the Department of the Environment, Heritage and Local Government in July 2006.

Reason: In the interest of sustainable waste management.

16. A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the

waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.

17. Prior to the commencement of any works on site, the applicant shall ascertain and comply with all requirements of the Irish Aviation Authority in relation to this development.

Reason: In the interest of safety.

18. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall -

- (a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development,
- (b) employ a suitably-qualified archaeologist who shall monitor all site investigations and other excavation works, and
- (c) provide arrangements, acceptable to the planning authority, for the recording and for the removal of any archaeological material which the authority considers appropriate to remove.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

19. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, between 0800 to 1700 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the residential amenities of property in the vicinity

20. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

21. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may be referred by the planning authority or any other prospective party to the agreement to An Bord Pleanála for determination.

Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.

22. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other

security to secure the provision and satisfactory completion and maintenance until taken in charge by the local authority of roads, footpaths, watermains, drains, public open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion or maintenance of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure the satisfactory completion and maintenance of the development until taken in charge.

23. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

Sarah Moran
Senior Planning Inspector

21st November 2019