

Job Number: 23020
Letter Reference: 110324
Date: 11 March 2024

An Bord Pleanála
Metrolink Oral Hearing
Reference: ABP-314724-22
Client: Lidl Ireland GmbH
Lands: Northwood Station.
Module 2
Submission No: 169

AN BORD PLEANÁLA

11 MAR 2024

LTR DATED FROM

LDG-

ABP-

314724-22



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Introduction

The purpose of this statement is to outline the policy imperatives for the future development of the subject site. It demonstrates the need for high-density, mixed-use, development having regard to national, regional and local policy objectives. In particular it notes the objectives to maximise development on the subject site given its specific location at the proposed Metrolink station and BusConnects stops at Northwood.

This submission, alongside the emerging plans prepared by MCA, and the information provided by Punch Consulting on revised loadings and other associated technical points, illustrate how overstated development can be achieved in accordance with prevailing policy objectives that seek to marry high density development with public transport interchanges and nodes.

National Planning Framework (NPF)

The NPF prioritises compact growth, particularly focusing on Dublin and the surrounding areas. It emphasises renewing existing settlements rather than continuing urban sprawl to mitigate negative impacts on people, the economy, and the environment.

1. **Development Priorities:** There is a focus on activating strategic areas within urban settlements for development, with an emphasis on effective density and consolidation rather than urban sprawl.
2. **Density Guidelines:** The 2024 Sustainable Residential Development and Compact Settlement Guidelines provide density ranges for different urban neighborhoods, particularly those around high-capacity public transport nodes or interchanges. These

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PLANNING APPLICATIONS SECTION 5 APPLICATIONS EXEMPT DEVELOPMENT ENFORCEMENT
EXPERT WITNESS LOCAL AREA PLANS APPEALS PORTFOLIO MANAGEMENT COMMUNITY
CONSULTATION ENVIRONMENTAL IMPACT RETAIL IMPACT

Guidelines point to the need for the highest density on the subject site given its location at a planned high capacity, urban, public, transport interchange with the BusConnects Ballymun (Finglas) to city centre route, commencing at the entrance to Northwood.

3. **Transport-Oriented Development (TOD)**¹: TOD is emphasised as a means to achieve compact and sustainable growth, maximising development near high-quality transport services such as MetroLink, DART, and BusConnects. The subject site is part of an area identified for high density development based on its proximity to Metrolink and BusConnects.
4. **Regional Strategy**: The Regional Spatial and Economic Strategy (RSES) emphasises compact growth, urban regeneration, and infill development within existing settlements as well as integrated transport and land use, and increased employment density in strategic locations.
5. **Transport Strategy**: The GDA Transport Strategy highlights the importance of transport interchanges and the role they play in facilitating enhanced public transport services and improving the pedestrian environment.

Fingal County Development Plan 2023-2027

The Core Strategy outlined in the Fingal County Development Plan 2023-2027 sets out several policies and objectives aimed at promoting compact and sustainable, urban, growth, within the **Dublin City and Suburbs** area:

1. **Settlement Hierarchy**: Santry, including Ballymun, is situated within the "**Dublin City and Suburbs**" area.
2. **Compact Growth Policy**: Policy CSP19 emphasises promoting compact, sequential, and sustainable urban growth, with targets for the majority of new homes to be built within or contiguous to the existing built-up area of **Dublin city and suburbs**.
3. **Promotion of Higher Densities**: Objective CS021 aims to promote higher densities (50+ units per hectare) at appropriate locations, particularly in urban built-up areas near high-capacity public transport nodes.
4. **Subject Site Zoning**: The subject lands are zoned "MRE" (Metro and Rail Economic Corridor) to facilitate high-density, mixed-use development, including residential, commercial, and employment-generating activities, focusing on MetroLink, rail, or light rail stations.
5. **Connectivity and Movement**: The plan emphasises aligning land-use and transport planning to support sustainable growth, particularly along high-capacity public transport corridors, such as MetroLink, LUAS, and DART+ proposals.
6. **Transit-Oriented Development (TOD)**: There is a focus on Transit-Oriented Development, consolidating development around existing or planned public transport corridors to reduce the need for travel and encourage a shift towards sustainable modes of transport.

¹ In December 2021 the Department of Housing, Local Government and Heritage¹ (DHLGH) and the Department of Transport² (DOT) jointly established a working group to consider opportunities for Transport Orientated Development (TOD) in major urban centres.

The Core Strategy aims to guide development in Fingal towards compact, sustainable, and transit-oriented patterns, with a focus on promoting higher densities in appropriate locations and integrating land use with high-quality public transport infrastructure.

Overall, this submission demonstrates there are national, regional and local planning policy objectives which support and require high density, over-station, development at this location which aligns with objectives to maximise the development of the site.

In considering this application for approval of the proposed Railway Order, the Board is obliged to have regard to the national policy objectives under the NPF and the objectives of the Core Strategy of the FCC Development Plan as well as Section 28 Guidelines issued by the Minister. We have prepared a scheme which gives effect to these objectives to enable the Board to determine how its decision on this Railway Order application can best ensure that the objectives of the NPF and the Development Plan are fulfilled for this strategically important site.

The TII has accepted over station development in item 1 of the Response table but as the MCA and Punch Consulting documents illustrate, the recently published "*Draft Guidance Note for Developers*" (dated May 2023) would prevent high density development on a large portion of our client's site.

The team's submission illustrates that over-station development is appropriate, desirable and achievable in this location.

Subject Site

The subject site, which has a stated area of circa 0.8ha, is located south of the M50 and east of the R108. The appeal site is currently vacant and is approximately rectangular in shape. The site is bounded by the R108 to the west and the old Ballymun Road along its eastern boundary. The south of the site is bounded by Northwood Avenue which leads east to Gulliver's Retail Park. Immediately to the north of the subject site is a vacant site.

The Emerging Development on the Subject Site

MCA Architects have prepared an emerging proposal for the subject site which can be accommodated over the station at Northwood. The MCA plans and the evidence from Punch Consulting will assist the Board's understanding of the site's potential for high density development aligned with the Metrolink infrastructure.

In addition, the emerging development has been subject to preliminary review against development management criteria and other important considerations such as the constraints imposed on the development of the site by Dublin Airport.

The emerging development includes two main blocks one being 15 storeys (Block A) and the other 10 storeys (Block B). They include the following main elements:

- Apartments 200
- Retail – 2,260 sqms
- Offices – 7,060 sqms
- Creche – 195 sqms

The initial apartment mix is as follows:

- 1 bed = 50 units - 20%
- 2 bed = 140 units - 70%
- 3 bed = 20 units - 10%

Some of the key statistics provided by MCA Architects in relation to the site include:

- Total Site Area: 0.8ha
- Net site area = 0.78ha
- Overall GFA = 31,297sqm
- Residential GFA = 21,460sqm
- No. of residential units = 200
- Residential GFA as a portion of development = $21,460/31,297 = 69\%$
- Reduced site area = $0.78\text{ha} \times 69\% = 0.54\text{ha}$
- NET residential density = $200/0.54 = 370\text{dph}$

This emerging development is considered later in the context of national, regional and local planning policy. We set out the planning history of the subject site in the following section.

Planning History of Subject Site.

F08A/0578 and F08A/0578/E1

This application was for a mixed-use development granted on 7 August 2009. It was subject of an Extension of Duration application which pushed the life of the permission out to 6 August 2018.

A mixed-use residential, office and neighbourhood retail development on lands, located adjacent to Ballymun Road. The development will comprise of a basement car park with 129 car and 24 bicycle parking spaces, plant rooms, bin storage and resident storage areas. Ground floor parking will be provided for 104 cars and 48 bicycles. The retail element of the development will consist of 3 no. retail units, a cafe and a licensed discount food store, accumulating to 1,958.60 sq.m. of gross floor area.

Above the retail units it is planned to construct 48 no. apartments, 4 no. 1-bedroom, 36 no. 2-bedrooms and 8 no. 3-bedrooms with a gross floor area of 4,458.4 sq.m. Amenity space will be provided at 1st and 5th floor level. To the north of the site it is proposed to construct 2 no. office buildings with 3 storeys elevated above ground floor lobbies consisting of 3,303 sq.m. gross floor area. The development will also include an ESB substation, boundary treatments and ancillary site works. The site area is ca. 0.804533 ha or 1.98804 acre and is bounded to the west by Ballymun Road (Ballymun Dual Carriageway), to the east by Old Ballymun Road and to the south by the road linking Ballymun Road and Old Ballymun Road (western entrance to Santry Demesne and Northwood Business Park). Green Field land is adjacent to the property to the north at Ballymun, Dublin 11.

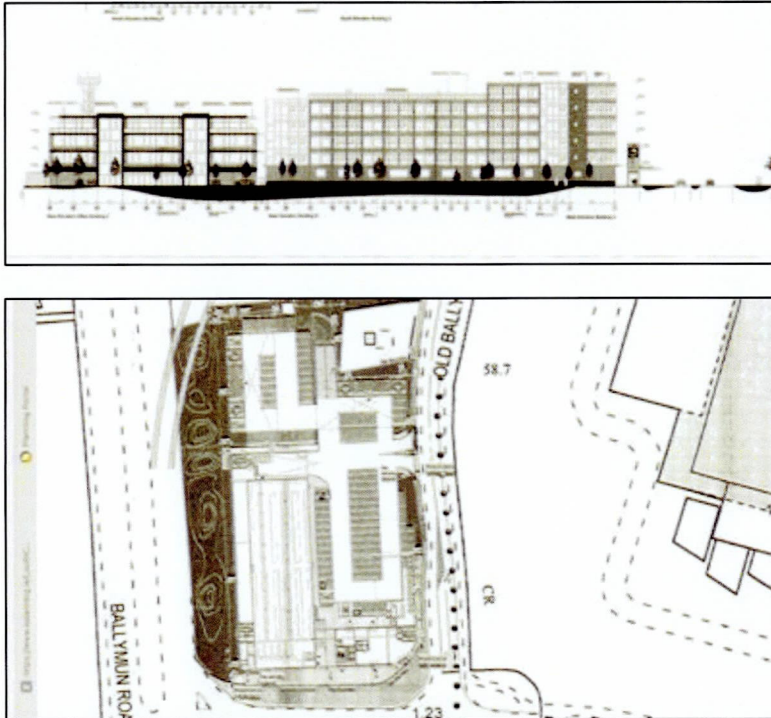


Figure 1.0: Extracts from proposed plans (FCC Website)

The granted development incorporated the full extent of the land. It was subject to a condition 2 directing the reduction of the development to 37 units:

That the proposed layout shall accord with the revised plans and elevations lodged on the 23rd December 2008. In this regard, the permission authorises (inter alia) 37 residential units, consisting of 3 x 1-bed units, 28 x 2-bed units and 6 x 3-bed units, 3 no. retail units, 1 no. cafe 1 no. discount food store and 2 no. office buildings only. REASON: In the interests of clarity.

F11A/0223

This application was for a foodstore which was refused by Fingal County Council on 27 July 2011.

Development of a Licensed Discount Foodstore measuring 1,777 sq.m. gross floor space on this site of 0.81 hectares, on which planning permission was previously granted for a mixed-use development, including a Licensed Discount Foodstore (under Fingal County Council Planning Ref: F08A/0578).

The proposed development comprises: the construction of a single storey, mono-pitched roof Licensed Discount Foodstore measuring 1,777 sq.m. gross floor space with a total net retail sales area of 1,274 sq.m.; the provision of 2 no. building mounted, 1 no. free standing and 1 no. trolley bay internally illuminated signs, and 2 no. wall mounted externally illuminated billboard poster signs; the provision of a surface car park comprising 126 no. car parking spaces and 12 no. cycle parking spaces; the provision of a vehicular and pedestrian access via the Old Ballymun Road and pedestrian/cycle access via the road linking the old and new (R108 dual carriageway) Ballymun Road's and the western entrance to Santry Demesne and Northwood Business Campus, and the provision of boundary treatments, hard and soft landscaping, lighting, connections to drainage and water services and all other ancillary and associated works.

Refusal Reasons

1. Objective EE12 of the Fingal Development Plan seeks to 'Protect the integrity of the Metro Economic Corridors from inappropriate forms of development **and optimise development potential in a sustainable and phased manner**'. It is considered that the proposed development, if permitted, would contravene Objective EE12 and would also be contrary to the vision statement for the area, as set out in the Fingal Development Plan 2011 – 2017, which seeks to '**Facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor.**'

2. The site is located within the Metro Economic Corridor, an area for which a Local Area Plan shall be prepared under the current Fingal Development Plan. A grant of permission for a discount foodstore at this time would pre-determine the outcome of this Local Area Plan and would prejudice the future development of these lands. **A grant of permission would therefore be considered premature pending the completion of this LAP,** which would be contrary to the proper planning and sustainable development of the area.

3. Insufficient information has been submitted regarding the foul sewer, surface water and water supply arrangements for the proposed development. In the absence of same, the proposed development is considered to be prejudicial to public health and contrary to the proper planning and sustainable development of the area.

F12A/0021

This application was refused by Fingal County Council and ultimately refused by An Bord Pleanála on 30 January 2013 (PL06F.240482). The application was for a standalone foodstore.

Permission for development of a Licensed Discount Foodstore measuring 1,777 sq.m. gross floor space on this site of 0.81 hectares, on which planning permission was previously granted for a mixed-use development, including a Licensed Discount Foodstore (under Fingal County Council planning ref. F08A/0578). The proposed development comprises: the construction of a single storey, mono-pitched roof Licensed Discount Foodstore measuring 1,777 sq.m. gross floor space with a total net retail sales area of 1,274 sq.m.; the provision of 2 no. building mounted, 1 no. free standing and 1 no. trolley bay internally illuminated signs, and 2 no. wall mounted externally illuminated billboard poster signs; the provision of a surface car park comprising 126 no. car parking spaces and 12 no. cycle parking spaces; the provision of a vehicular and pedestrian access via the Old Ballymun Road and pedestrian/cycle access via the road linking the Old and New (R108 Dual Carriageway) Ballymun Road's and the western entrance to Santry Demesne and Northwood Business Campus; and, the provision of boundary treatments, hard and soft landscaping, lighting, connections to drainage and water services and all other ancillary and associated works.

Refusal reasons:

1. The site of the proposed development is located within an area zoned 'ME' in the Fingal County Development Plan 2011-2017 where it is a **stated objective of the Development Plan to 'facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor'**.

In addition, Objective 'EE12' of the Development Plan seeks to 'protect the integrity of the Metro Economic Corridors from inappropriate forms of development and optimise development potential in a sustainable and phased manner' and Objective 'EE13' seeks to 'ensure high quality urban design incorporating exemplary public spaces, contemporary architecture and sustainable places within a green landscape setting'. It is considered that **the low density**, standalone nature and generic design of the proposed development, would be contrary to the stated zoning objective for the site and to the provisions of Objectives 'EE12' and 'EE13' of the said Development Plan. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The site of the proposed development is an important strategic site located in close proximity to a planned public transport corridor (adjacent to the proposed Northwood Station on the Metro North Scheme). In addition, the site is located within the Metro Economic Corridor and in an area for which it is an objective of the Fingal County Development Plan 2011-2017 that a Local Area Plan shall be prepared. Having regard to this objective and to the strategic nature of the site, it is considered that the proposed development **would prejudice the outcome of this Local Area Plan** and the appropriate future development of these lands. The proposed development would, therefore, be **premature pending the completion of this Local Area Plan** and be contrary to the proper planning and sustainable development of the area.

F13A/0297

This application was granted by Fingal County Council on 7 October 2013 and later refused by An Bord Pleanála on 27 February 2014.

10 year permission for a mixed used development to be constructed over 2 no. phases (1 & 2) and 3 no. blocks (A,B, & C) and totalling 7,398 sq.m gross floor space on this site of 0.81 hectares. The proposed development comprises: Phase 1 - Blocks A & B fronting Northwood Avenue with a proposed new vehicular access off Old Ballymun Road; Block A comprises a 4 storey height building of three floors over a 64 no. space undercroft car park, 1st floor Licensed Discount Foodstore with a net retail sales area of 1,415 sq.m. 2nd and 3rd floor office space of 2000 sq.m, Block A has a gross floor space of 4,259.5sq.m, and Block B comprises a 2 storey drive-thru restaurant of 352 sq.m; Phase 2: Block C fronting Ballymun road will share the proposed vehicular access and provide a pedestrian link to the proposed Northwood Metro stop; Block C comprises a 6 storey height building of five floors over a 13 no. space undercroft car park with offices at upper floors of 502 sq.m per floor and a plant and reception floor area of 160 sq.m and 116.5 sq.m respectively and as totalling 2,786.5 sq.m. The development also comprises surface level car parking of 59 no. spaces and as totalling 136 no. car parking spaces, 46 no. cycle spaces, the erection of associated advertising signage (including 1 no. tripod sign), the provision of new pedestrian/cycle access, enhanced circulation areas and civic space to the Northwood Avenue frontage and the provision of boundary treatments, hard and soft landscaping, lighting, connections to drainage and water services and all other ancillary and associated works.

Refusal Reasons:

Having regard to:

1. (a) The policies set out in the "Retail Planning Guidelines for Planning Authorities" issued by the Department of Environment, Community and Local Government in April 2012,

2. (b) the policies and objectives as set out in the Fingal County Development Plan 2011-2017 including policies regarding retail development and Objectives ME, EE12 and EE13,
3. (c) the planning history of the site,
4. **(d) the low density of the proposed development,**
5. (e) the nature of the uses proposed in which car based foodstore and restaurant/take away uses predominate in Phase one,
6. (f) the design of the proposed development and particularly the elevation of Phase one to the R108,
7. (g) the pattern of development and the established character of the area, which has not developed as planned with the result that the site remains isolated from the main centres of population.
8. (h) the documentation lodged at planning application and appeal stage, and
9. (i) the report of the planning inspector,

it is considered that the proposed development would be contrary to the ME zoning objective for the site and to Objectives EE12 and EE13 of the Plan, would result in substantial car based traffic movements to and from the development, and the Board was not satisfied that adequate justification had been provided by means of a sequential test to show that the site is the optimum location for a convenience foodstore use. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The appeal site is an important and strategic site located within the Metro Economic Corridor and in an area for which it is an objective, as set out under Objective UC06 in the Fingal Development Plan 2011- 2017, that a Local Area Plan shall be prepared. Having regard to this objective and the strategic nature of the appeal site, it is considered that the proposed development would prejudice the outcome of this Local Area Plan and the future development of these lands. The proposed development would, therefore, be **premature pending the completion of this Local Area Plan and would be contrary to the proper planning and sustainable development of the area. [Emphasis added]**

Conclusions to be drawn from planning history of subject lands

The 2008 mixed use development allowed for apartments and a discount foodstore at a reasonable density but below the levels that would be achieved in today's planning climate where Compact Growth is a key objective especially at Transport Interchanges and nodes.

Subsequent applications sought permission variously for a discount foodstore and in 2013 an increased density development including a foodstore, driv-thru restaurant and offices. These developments were refused in part due to their low density within the strategic importance of the subject site in Metro Economic Corridor.

The An Bord Pleanála refusals, reference the strategic importance of the site, and the need for high density, mixed use development in relation to the underlying zoning of the site².

² Reference to prematurity pending the LAP relate to the relevant objective for the area at that time. Under the current Development Plan 2023-2029 there is an updated objective for a Framework Plan although as we note later the subject site sits outside the area defined for the Framework Plan.

Policy Review

National Planning Framework 2040

The National Planning Framework (NPF) prioritises compact growth, emphasising the importance of renewing existing settlements rather than continuing urban sprawl. This approach acknowledges the negative impacts of dispersed settlement patterns on various aspects including people, the economy, and the environment.

Section 1.3 notes Shared Goals across all communities:

Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.

NPO 11 notes:

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

In seeking to address urban sprawl in favour of compact growth Page 93 points to the need to build inward and upward rather than outward.

NPO 35 seeks

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024).

Since our original submission these Guidelines provide more clarity on density of development, particularly at planned public transport interchanges such as Northwood. Table 3.1 at page 22 relates to Dublin and notes:

City - Urban Neighbourhoods

The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. **It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.**

Table 3.8 defines high capacity public transport nodes as:

Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail 11, light rail or **MetroLink** services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' 12 stop.

Highest densities should be applied at the node or interchange and decrease with distance.

'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

The Metrolink is identified in the Greater Dublin Area Transport Strategy 2022-2024 (NTA). The proposed Preferred Route for the line was published in 2019 and is now subject of the current Railway Order. These **Guidelines point to the need for the highest density on the subject site given its location at a planned high capacity, urban, public, transport interchange** with the BusConnects Ballymun (Finglas) to City Centre Route, commencing at the entrance to Northwood.

There are exceptions to the density above. Section 3.3.6 includes the following:

(a) There is a presumption in these Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.

(b) Strategic and sustainable development locations of scale (described in section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022) will be capable of defining densities or density ranges across different neighbourhoods on a plan led basis, based on considerations such as proximity to centre, level of public

transport service and relationship with surrounding built form. Densities within strategic and sustainable development locations may therefore, exceed the ranges set out in Section 3.3 on a plan-led basis.

The site, we expect, could accommodate higher density development above 300dph (net) Indeed, we expect the Height Strategy and Density Study³, which will be prepared by the Planning Authority within the life of the current Development Plan, to identify this site as a location for densities above 300 dph net, given its specific locational characteristics and the weight of wider national, regional and local planning policy, including the underlying zoning.

In any event, the current Development Plan already zones the subject site for high density development under "MRE".

Sustainable Urban Housing: Design Standards for New Apartments 2023

This document sets out the general minimum standards for new apartment developments and updated previous iterations.

As part of this submission we have conducted a preliminary review of the apartment standards applicable to the proposed development, enclosed at **Appendix 1**.

Opportunities for Transport Orientated Development (TOD) in Major Urban Areas – Dublin Study May 2023⁴

Transport Orientated Development or TOD is defined at Section 1.1 as:

"..a form of urban development that seeks to maximise the provision of housing, employment, public services and leisure space in close proximity to frequent, high quality transport services.

Page (i) notes the that "TOD":

..is important to achieving the National Planning Framework's (NPF) priorities for compact and sustainable growth, supporting climate targets under the Climate Action Plan 2023 and in meeting housing delivery targets in Housing for All. The National Development Plan 2021-2030 (NDP) commits to investing significantly in public transport that will facilitate TOD in Dublin including the delivery of the MetroLink, DART+ and BusConnects projects.

Northwood including the Subject Site is part of the Ballymun TOD incorporating Ballymun centre north towards the M50.

³ Objective SPQH03, FCC Development Plan 2023-2029, page 115.

⁴ In December 2021 the Department of Housing, Local Government and Heritage1 (DHLGH) and the Department of Transport2 (DOT) jointly established a working group to consider opportunities for Transport Orientated Development (TOD) in major urban centres. This group was established under Action 26.1 of Housing for All. Governments housing plan to 2030. The group comprises membership from the DHLGH and DOT, the National Transport Authority (NTA) and the Land Development Agency (LDA).

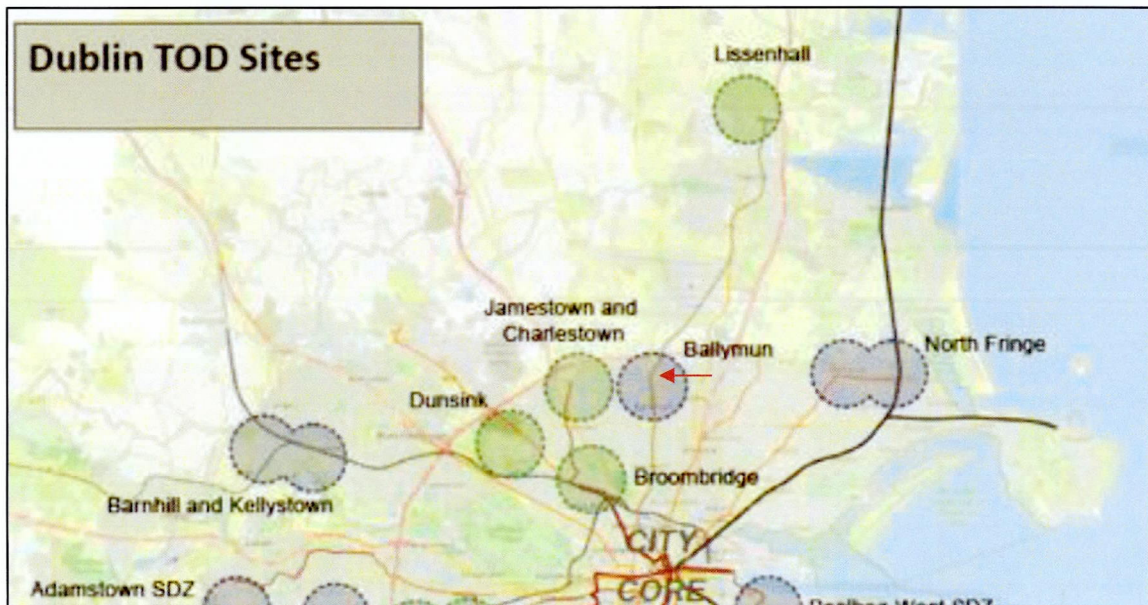


Figure 1.1: Extract from page 18 – Indicates Ballymun as one of 9 short to medium term sites in the Dublin area. It has potential for up to 6,000 residential units.

Table 5.1 addresses the short to medium term opportunities for TOD and notes of the Ballymun Area:

*Ballymun LAP 2017 covers regeneration lands. 35 ha remain undeveloped with potential for c. 2200-2350 dwellings. **There are additional lands between the LAP area and M50 that will benefit from MetroLink with potential for TOD. These lands are zoned as Metro Economic Corridor and will support high density mixed use development in the medium to longer term.** The LDA have identified a capacity for some c. 3640 homes within this area.*

It notes there is remaining capacity for between 5,840 and 8,190 housing units in this area. **The emphasis in this document is maximising development of lands within the TOD areas.**

EMRA Regional Spatial and Economic Strategy 2019-2031 (RSES)

Continuing the compact growth approach advocated in the NPF, the RSES notes at page 38:

A key National Strategic Outcome (NSO 1) in the NPF and Regional Strategic Outcome (RSO 2) in the RSES is the need to achieve ambitious targets for compact growth in our urban areas. Urban regeneration and infill sites can contribute to sustainable compact growth and revitalisation of existing settlements of all scales. This will help to address National Policy Objective 3a, 3b and 3c of the NPF which targets the delivery of new homes within the footprint of existing settlements. Achieving this target will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential.

In respect of "Dublin City and Suburbs", in which the subject site is located, the Settlement Strategy at Page 45 notes:

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

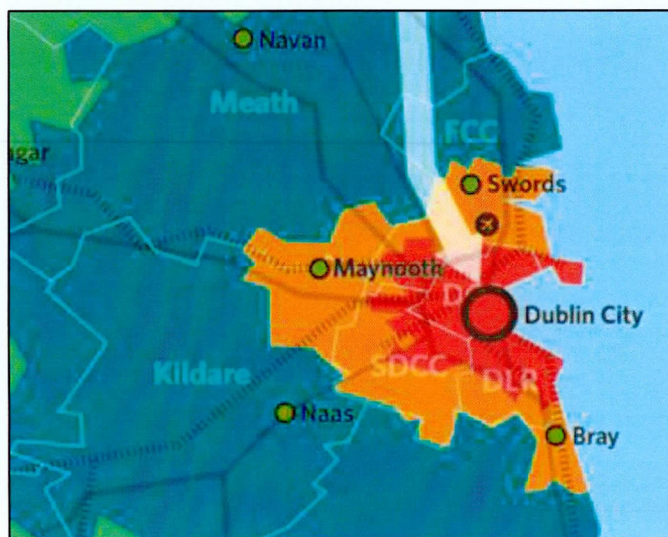


Figure 1.2: Extract from Page 45.

The Guiding Principles for Growth in the GDA are set out at page 101 and include:

- *Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes **within or contiguous to the built-up area of Dublin City and suburbs**, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.*
- *Integrated Transport and Land use – To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.*
- *Increased employment density in the right places – To plan for increased employment densities within **Dublin City and suburbs** and at other sustainable locations near high quality public transport nodes, near third level institutes and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and existing built-up areas. (emphasis added)*

At page 107, RPO5.3 seeks to:

Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle

Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.

GDA Transport Strategy 2022-2042

The introduction to the Strategy notes that major projects provided for in the strategy include both the "Metrolink" and "Investment in bus priority and bus services improvements - BusConnects Dublin".

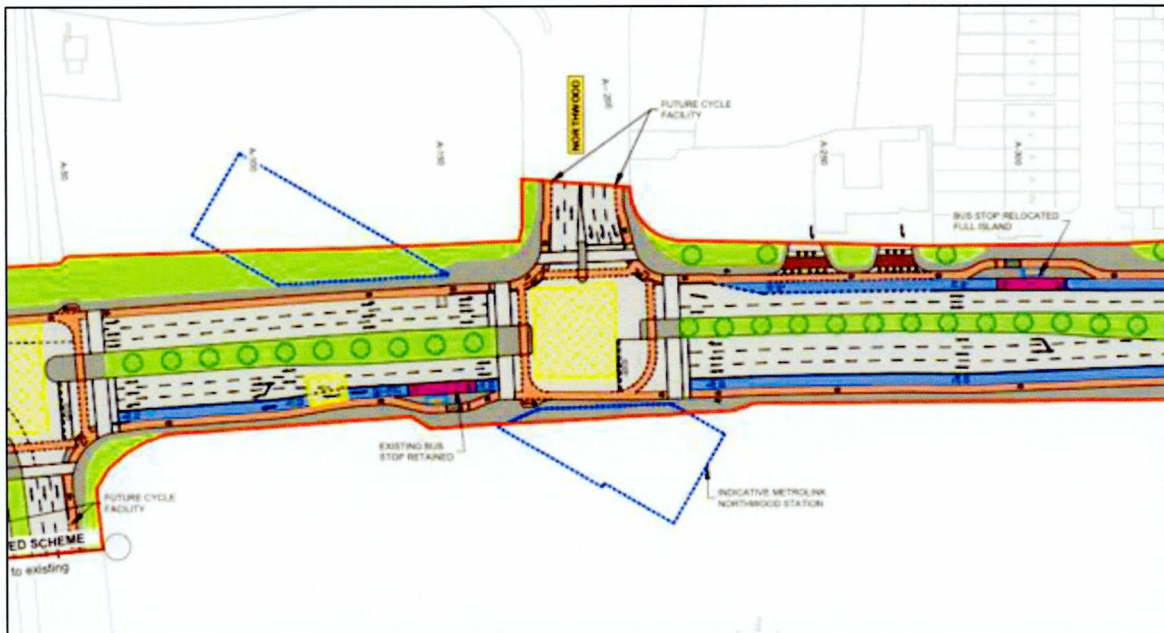


Figure 1.3: Plan for Bus Connects at Northwood.

It points to the importance of locations such as interchanges where services intersect. Section 9.5.3 notes:

In addition to the major interchanges and Mobility Hubs linked to high-capacity services, any point on the transport system where services intersect is considered an interchange and aspects of Measure INT4 will also apply to all of these locations. With the introduction of significantly enhanced orbital bus services as part of BusConnects Dublin, it is anticipated that the role of interchange will increase. The pedestrian environment, in particular how convenient and safe it is for passengers to cross roads between stops, becomes critical in these locations as improvements to services occur and as passenger numbers increase. The quality of the information and signage for passengers changing services is also a key factor in making the interchange as easy as possible.

Fingal County Development Plan 2023-2029

Core Strategy

The Core Strategy sets out the Fingal Settlement Hierarchy at Table 2.20. **Santry (including Ballymun) is located in the "Dublin City and Suburbs"**, which the Plan describes as the majority of Fingal's urban footprint (Page 76).



Figure 1.4: Extract from Fingal County Development Plan Core Strategy Page

Policy and objectives for "Dublin and Suburbs" include:

Policy CSP19 Compact, Sequential and Sustainable Urban Growth. Promote compact, sequential and sustainable urban growth to realise targets of at least 50% of all new homes to be built, within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.

Objective CS021 – Promotion of Higher Densities: Promote higher densities (50+ units per hectare) at appropriate locations in urban built up areas subject to meeting qualitative standards at appropriate locations with particular reference to urban centres and/or in proximity to high-capacity public transport nodes while demonstrating compliance with all relevant Section 28 Ministerial Guidelines.

Subject Site's Zoning

The subject lands are zoned "MRE" Metro And Rail Economic Corridor.

Objective: Facilitate opportunities for high-density mixed-use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor.

Vision: Provide for an area of compact, high intensity/density, employment generating

activity with associated commercial and residential development which focuses on the MetroLink, or rail or light rail stations within settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high-quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure.



Figure 1.5: Extract from South Fingal Development Plan Map.

Uses permitted in Principle		
Aparthotel	Betting Office	Childcare Facilities
Community Facility	Conference Centre	Cultural Facility
Dancehall/Nightclub	Education	Exhibition Centre
Funeral Home/Mortuary	Guest House	Health Centre
Health Practitioner	Home-Based Economic Activity	Hospital
Hostel	Hotel	Office Ancillary to Permitted Use
Office ≤ 100 sqm	Office > 100 sqm and < 1,000 sqm	Office ≥ 1,000 sqm
Open Space	Place of Worship	Public House
Public Transport Station	Research and Development	Residential
Residential Care Home/ Retirement Home	Residential Institution	Restaurant/Café
Retail – Local < 150 sqm nfa	Retail – Convenience ≤ 500 sqm nfa	Retail – Comparison ≤ 500 sqm nfa
Retail – Supermarket ≤ 2,500 sqm nfa	Sheltered Accommodation	Sustainable Energy Installation ³⁵
Taxi Office	Telecommunications Structures	Training Centre
Traveller Accommodation	Utility Installations	Veterinary Clinic

The proposed development includes a retail supermarket, offices and residential which are acceptable in principle on the subject site.

Proposed Framework Plan - Northwood

The above yellow dashed line around Northwood (Figure 1.5), but excluding the subject site, (and other zoned "MRE" areas) indicates the Planning Authority's intention to prepare a

Framework Plan. The PA has not commenced its preparation to date but intend doing so within the life of the current plan.

As the subject site is located outside the Framework Plan area it is not a material consideration moving forward.

Proposed Fingal County Council - Height Strategy and Density Study

It is an objective of the Development Plan to prepare a Building Height Strategy and Density Study.

Objective SPQHO3 – Building Height Strategy and Density Study: Prepare a Building Height Strategy and Density Study for the larger urban centres of the County.

Fingal County Council confirmed to my office that this Strategy has not been commenced to date.

Connectivity and Movement

In the chapter on Connectivity and Movement page 230 notes:

To ensure that the population and employment growth projected for Fingal occurs in a sustainable manner, it is essential that land-use and transport planning continues to be closely aligned. Integrating new housing, employment and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. This also has the benefit of extending the catchment of sustainable modes to more people and places to support investment in public transport infrastructure. This will enable the implementation of Transit Oriented Development whereby development is consolidated around existing or planned public corridors at a scale or density that supports the viability of high-capacity public transport infrastructure.

Adopting this approach facilitates compact growth, a recurring theme in this Plan and maximises the opportunities presented by MetroLink, LUAS and DART+ proposals, as well as the existing and planned bus improvements under BusConnects. Land-use policy within Fingal supports development along its identified high-capacity public transport corridors.

This Plan supports high-density, mixed-use development and trip intensive uses integrated with high-quality walking and cycling infrastructure around high-capacity public transport corridors and nodes, through plan frameworks, in order to generate and reinforce sustainable patterns of growth and development in the County. This policy focus is intended to, not only reflect the policy supported in the NPF and RSES but critically, as a measure, has the potential to reduce the climate impact of transport by encouraging a shift from the private car to public transport, walking and cycling

Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.

Arising from this Objective CMO3:

Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County. [Emphasis added]

Objective EE015 (page 272) seeks to make the most effective use of lands in the Metro and Rail Economic Corridor:

Protect the integrity of the Metro and Rail Economic Corridor from inappropriate forms of development and optimise development potential⁵ in a sustainable and phased manner.

Development Management – Section 14 of the Development Plan.

We include a preliminary review the standards for Apartments at **Appendix 1** referencing the Sustainable Urban Housing Design Standards for New Apartments 2023, in accordance with objective DMS024, page 541 Fingal County Development Plan 2023-2029. It states:

All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application). (Underlining added)

The following section considers wider criteria in the Section 14 of the County Development Plan.

Height and Density

At Section 14.5.3 of the Development Plan, it references the guidance document “Urban Development and Building Heights – Guidelines for Planning Authorities” 2018 and the relevant SPPR's therein including SPPR 1 supports:

...increased building height and density in locations with good public transport accessibility, particularly town/ city cores. Increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

Regarding density generally, the Development Plan observes at 14.5.2:

⁵ I interpret this to mean: “make best use of...” or “make something as good as possible...”

The Plan promotes compact growth and consolidation of Fingal's large urban areas, towns and villages and will support appropriate densities as expressed in national and regional policies NPF, RSES and the Section 28 Guidelines. In complying with national guidance, development proposals must also be cognisant of and respect the character, context and architectural qualities of the surrounding area and seek to ensure in all instances a high-quality architectural response to site development.

In respect of residential density in particular, the Development Plan states at 14.6.3:

In general, the density and number of dwellings to be provided within residential schemes should be determined with reference to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009. Development should also be consistent with the policies and objectives set out in Chapter 3 Sustainable Placemaking and Quality Homes and should promote appropriate densities, having regard to factors including the location of the site, accessibility to public transport and the principles of sustainability, compact growth and consolidation.

The 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas have been replaced by the 2024 Sustainable and Compact Settlements – Guidelines for Planning Authorities. Section 2.1.2 of the 2024 Guidelines direct that:

In accordance with the provisions of Section 34 of the Act when making a decision in relation to an application that includes a residential element or other elements covered by these guidelines, the planning authority is required to have regard to the policies and objectives of the Guidelines and to apply the specific planning policy requirements (SPPRs).

Objective CS021 of the Development Plan's Core Strategy (noted above), refers to all relevant Ministerial Guidelines in the promotion of higher densities so the 2024 Guidelines are applicable.

[Residential Unit Mix \(section 14.6.2\)](#)

The preliminary mix of units in the residential component includes:

- 1 bed = 50 units - 20%
- 2 bed = 140 units - 70%
- 3 bed = 20 units - 10%

I refer to a recent permission granted by An Bord Pleanála in Northwood (in 2022), on lands between Swift Square offices and the Sports Surgery Clinic, 600 metres east of the Subject Site.

Foodstore (incl discount foodstore)	1 per 20sqm	90	60
Offices	1 per 80sqms	88	0
Residential 1-2 bedroom	0.5 in Zone 1 (i.e. close to Public Transport)	95	19
Residential 3-3+ bedroom	1	10	5
Creche	0.5 per classroom	1	1
	Totals	(284 Max)	85

The proposed parking above accords with the parking standards in the Fingal County Development Plan and has regard to the site's location as proposed public transport interchange.

Community and Social Infrastructure (14.14)

The most recent assessment of Community and Social Facilities in this area was conducted for the SHD development next to the Sports Surgery Clinic (ABP Ref: AO6F.313317) and was accepted by An Bord Pleanála in 2022. That assessment was based on a development of 255 units.

In relation to schools, the submitted study pointed to the average class sizes in the area being smaller than the national average and to future reduction in enrolment numbers. As average household size reduces, so too will the numbers of pupils enrolling each year.

We have not conducted a detailed School Capacity assessment as part of this report as this would form part of any future planning application.

Childcare Facilities (14.14.2)

The emerging development includes provision of a creche of 195sqms with outdoor space.

Other considerations

Dublin Airport Restrictions

The height of the development has regard to the restrictions imposed by Dublin Airport. In preparing the proposed scheme the MCA Architects consulted with O'Dwyer Jones Aviation Consultants who confirmed the site could accommodate the height of building illustrated, having regard to the Inner Horizontal Surface at 112m OD.

The site outside the Noise Contours and also the Public Safety Zones of Dublin Airport.

A copy of Preliminary report by O'Dwyer Jones Aviation Consultants is included at **Appendix 2**.

Concluding Comments

The purpose of this statement is to outline the policy imperatives for the future development of the subject site. It demonstrates the need for high-density, mixed-use, development on the subject site, having regard to national, regional and local policy objectives. In particular it notes the objectives to maximise development on the subject site, having regard to its specific location at the proposed Metrolink station and proposed BusConnects stops at Northwood.

This submission, alongside the emerging plans prepared by MCA, and the information provided by Punch Consulting, on revised loadings and other associated technical points, illustrate how overstation development can be achieved in accordance with prevailing policy objectives that seek to marry high density development at public transport interchanges and nodes.

The National Planning Framework promotes compact growth over urban sprawl to mitigate negative impacts on various aspects such as people, the economy, and the environment. Development priorities emphasise activating strategic areas within urban settlements for development, focusing on effective density and consolidation.

The new 2024 Sustainable Residential Density Guidelines promote enhanced density particularly at and around high-capacity, public, transport nodes or interchanges.

Transport-Oriented Development (TOD) is highlighted as a means to achieve compact and sustainable growth, maximising development near high-quality transport services.

The RSES stresses the importance of compact growth, urban regeneration, and integration of transport and land use for sustainable development.

The GDA Transport Strategy underscores the significance of transport interchanges and improving pedestrian environments to facilitate enhanced public transport services.

The Fingal County Development Plan 2023-2029 outlines policies and objectives aimed at promoting compact, sequential, and sustainable urban growth within the Dublin City and Suburbs area. This includes promoting higher densities and maximising development potential. By aligning land use and transport planning, emphasising transit-oriented development, and promoting higher densities in appropriate locations, it aims to achieve compact and sustainable development while maximising development opportunities around high-quality public transport services. This is specifically achieved through the "plan-led" zoning of the subject site, within the Metro and Rail Economic Corridor ("MRE") which expressly facilitates high density, mixed-use development.

The accumulation of the above evidence points to a site that is important as a location for high density, mixed use development.

I respectfully submit to An Board Pleanála that a substantial, high density development can be delivered on the subject site in accordance with national, regional and recent Ministerial Guidance which seeks the highest density at this location. The emerging development is also in accordance with the Fingal County Development Plan 2023-2029. Overstation development can also be delivered on the site, thus maximising its potential. The technical evidence from Punch Consulting will consider that in more detail.

Recommended Action



I note the recently published agreement between TII and DAA (dated 23 February 2024) wherein condition 2 states:

Future potential development: The Metrolink structures shall be constructed so as to accommodate future development above the station and tunnels.

The emphasis of this condition clearly suggests that tolerances of the Metrolink structures will be adjusted to allow for "future potential development" within Dublin Airport.

Punch Consulting will explain the tolerances required and other technical matters in order to accommodate future overstation development, on the subject site, to ensure it can be developed in accordance with policy objectives that obligate the maximisation of mixed use development on the subject site.

Yours faithfully



Tony Bamford
Tel: 087 2903208

Appendix 1

Quality Assessment – New Apartments

Section 14.6 Design Criteria for Residential Development in Fingal – Preliminary Review

Section	Section Title and quantitative measure	Response
14.4 Design Standards for Residential Development in Fingal		
14.6.2	Mix of Dwellings	Refer to page 18 of TBP report and can be adjusted as necessary in consultation with Fingal County Council.
14.6.3	Residential Density	Refer to page 10-11 of TBP report.
14.6.5	Private Open Space	Apartments proposed can deliver adequate private open space on balconies.
14.6.5	Communal Open Space	Refer below.
14.6.5	Public Open Space	Minimum required is 805sqms. The emerging development makes provision for 810sqms. See page 20 of TBP report.
14.6.6.1	Daylight and Sunlight	Daylight analysis tools will be employed as part of a quantitative analysis of the schemes performance. Any shortcomings will be identified, with alternative, compensatory design solutions set out.
14.6.6.2	Wind Assessment	Through engagement with a wind specialist consultant, a wind analysis will be undertaken as part of a qualitative assessment of the scheme's performance. Opportunities for optimising the schemes performance related to wind will be assessed, and appropriate design solutions set out.
14.6.6.3	Separation Distances 22m metres	This can be achieved although the 2024 Guidelines also refer to 16 metre separation. The emerging development achieves a 20m separation between blocks A & B and 22m separation between opposing windows serving

		habitable rooms. This may be reviewed as a smaller separation could be achieved.
14.7 Apartment Standards (we reference Sustainable Urban Housing Design Standards for New Apartments 2023) – in accordance with objective DMS024, page 541 Fingal County Development Plan 2023-2029.		
3.4 and 3.8	Minimum Apartment Floor Areas Studio apartment (1 person) 37 sq.m 1-bedroom apartment (2 persons) 45 sq.m 2-bedroom apartment (4 persons) 73 sq.m 3-bedroom apartment (5 persons) 90 sq.m Exceeding minimum standards by 10%.	The typical apartment details in the MCA submission indicate that the minimum floor areas would be achievable including the required 10% exceedance.
Appendix 1	Minimum internal dimensions	Area allocations for apartments will be capable of achieving the minimum width requirements for living, dining and bedrooms, as set out in the Design Standards for New Apartments 2023.
3.16	Dual Aspect 33% required	38% of apartments would be dual aspect.
3.20	Floor to Ceiling Heights Apartments: 2.4-2.7 metres Ground Floors 3.5-4.0 metres	The development accords with these standards.
3.26	Lift and Stair Cores	There are no more than 12 units per core. 14 apartments per floor in Block A with 2 cores.

	12 apartments per floor per core	
3.30	Internal Storage Studio 3 sq m One bedroom 3 sq m Two bedrooms (3 person) 5 sq m Two bedrooms (4 person) 6 sq m Three or more bedrooms 9 sq m	These can be achieved.
	Private Amenity Space Studio 4 sq m One bedroom 5 sq m Two bedrooms (3 person) 6 sq m Two bedrooms (4 person) 7 sq m Three bedrooms 9 sq m	These standards can be achieved.
	Communal Amenity Space Under the standards 1,320sqms is required. Studio 4 sq m One bedrooms 5 sq m Two bedrooms (3 person) 6 sq m Two bedrooms (4 person) 7 sq m Three bedrooms 9 sq m	1,370 sqms is provided.
4.13	Children's playground. <ul style="list-style-type: none"> Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for 	The public open space can accommodate suitable playground facilities.

	<p>parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and</p> <ul style="list-style-type: none"> • within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms. 	
4.15	<p>Bicycle Parking</p> <p>A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.</p> <p>865 spaces required</p>	865 spaces provided split between the two blocks.
4.16	Car parking	Please refer to page 21 of TBP report.
	The preliminary review indicates the apartments can be designed in accordance with the quality standards included in the County Development. Given recent guidance on separation distances this could be reviewed as part of the next design review.	

Appendix 2

Preliminary Report by O'Dwyer Jones Aviation Consultants

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PLANNING APPLICATIONS SECTION 5 APPLICATIONS EXEMPT DEVELOPMENT ENFORCEMENT
EXPERT WITNESS LOCAL AREA PLANS APPEALS PORTFOLIO MANAGEMENT COMMUNITY
CONSULTATION ENVIRONMENTAL IMPACT RETAIL IMPACT

OUTLINE AVIATION REPORT
RE
PROPOSED DEVELOPMENT
AT
NORTHWOOD, SANTRY, COUNTY DUBLIN

FOR
LIDL IRELAND

FEBRUARY 2024



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LIDL SITE AT NORTHWOOD, SANTRY, CO. DUBLIN INITIAL OUTLINE AVIATION REPORT

1. Aviation Considerations (re the Lidl Site at Northwood)

[A Summary of the considerations is given in Section 10, on page 11.]

1.1 Aviation Items Referred to in the Fingal County Development Plan 2023-29

- (i) Updated Dublin Airport Noise Contours & Noise Zones
[New noise contours are close to, but just outside, this Northwood Site].
- (ii) Dublin Airport's Public Safety Zones
[These do not affect this Northwood Site].
- (iii) General Objectives regarding the Safeguarding of Aviation, and comments re aviation in Fingal CDP 2023-29 and Dublin Airport LAP of 2000, which include references to —
 - (i) a DAA "Safeguarding Chart" based on previous ICAO* requirements; and
 - (ii) references to EASA** Specifications now applicable at Dublin Airport.

[* ICAO = The International Civil Aviation Organization (whose "Annex 14" Standards apply at Weston and Casement Aerodromes etc.)]

[** EASA = The European Union Aviation Safety Agency, whose Specifications – introduced at end of 2017 – replaced the previous ICAO Standards at Dublin Airport (and 8 other Irish airports).]

Compliance of the development with the above aviation-related items should be demonstrated as part of a planning application to Fingal.

1.2 Compliance with additional significant aviation considerations (as listed in Section 1.4 on the following page) also ought to be demonstrated to the satisfaction of the IAA [Irish Aviation Authority] and DAA [Dublin Airport Authority].

1.3 It is noted that the Zoning of this Northwood site in the Fingal Development Plan 2023-2029 falls into a new Zoning category:

"MRE – Metro and Rail Economic Corridor", with Objective to —

"Facilitate opportunities for high density mixed use employment and commercial development and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor."

1.4 Significant Aviation Items affecting this Northwood Site and its Development:

- (i) **The Dublin Airport “Safeguarding Chart” of mid-2017:**
This is referred to in the Airport LAP, and supported by DAA, but provides rough guidance only (and has not been updated to correspond exactly with the post-2017 EASA Specifications now applicable at Dublin Airport).
- (ii) **The EASA Specifications and “Obstacle Limitation Surfaces”:**
These set out the primary limitations on building heights in the vicinity of Dublin Airport. Their calculation would be required by the IAA (and they also affect crane heights).
- (iii) **Crane height limitations, notifications, and protocols:**
These are regulated under S.I. 215 of 2005. Where a crane might constitute an “obstacle” to aviation, advance notifications to DAA and IAA are essential, along with agreements in regard to any crane operating limitations.
- (iv) **Solar/PV panels:**
Under any flight paths, and within 5km of Dublin Airport’s Aerodrome Reference Point, a Glint & Glare analysis will be required to assess any adverse effects on aircraft or in relation to the airport’s new control tower, etc.
- (v) **Airport Noise Zones:**
These indicate the level of noise insulation required (and may prohibit some development), and will be monitored by Fingal. The Northwood site appears to lie in a new Airport Noise Zone “D” (referred to in the Fingal Development Plan 2023-29, outside the green contour line on the CDP Index Map).
- (vi) **Public Safety Zones:**
Fingal has retained in its Development Plan 2023-29 the same PSZs as were in the ERM Study of 2005. However the size of these PSZs are now greatly out of step with PSZs at other airports worldwide.
- (vii) **Building Restrictions in vicinity of Airport Navigational Equipment:**
ICAO outlines “Building Restricted Areas” around the various items of Airport Navigational Equipment – including Instrument Landing Systems and Radar/Radio equipment – with a view to avoiding surfaces which might give rise to interference with radio waves etc.
- (viii) **Bird Strike Hazard:**
This should be taken into account in the landscaping of the site, which should avoid areas of standing water within 3km of an airport’s runway (and may be variance with some of Fingal’s SuDS guidance).

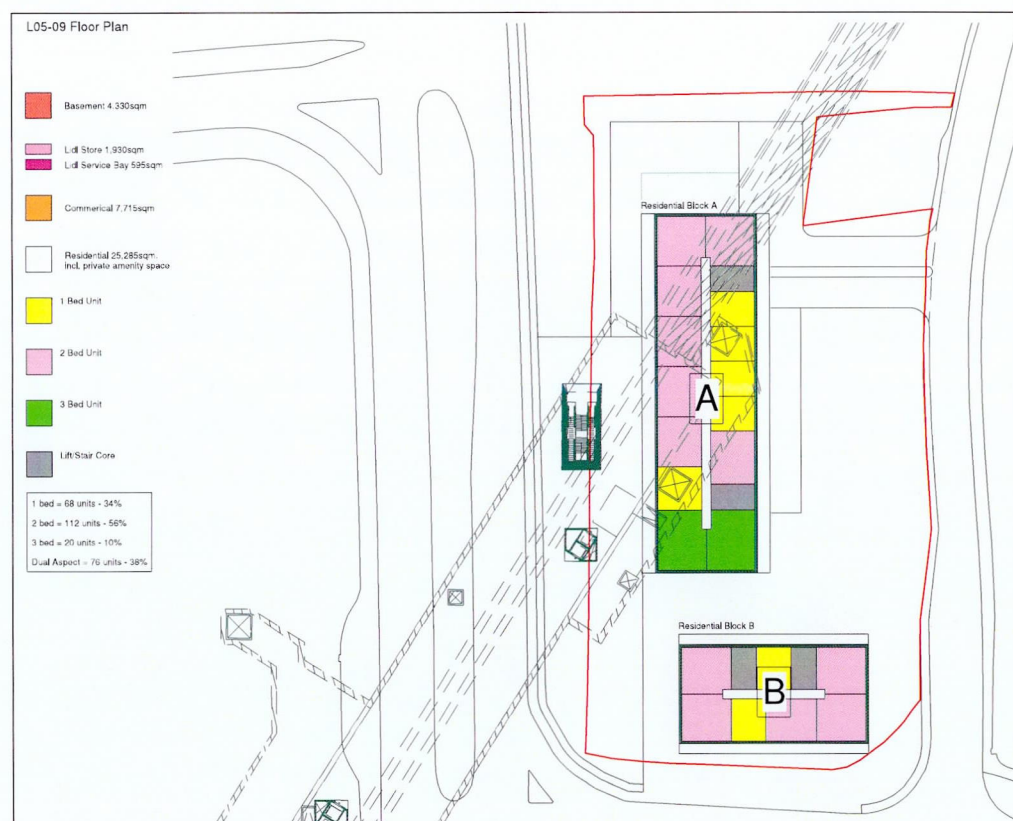
The eight items above are discussed further on pages 5-10 following >.

1.5 Outline of the Proposed Development:

The proposed (draft) development above the future Northwood Metro Station consists of two multi-storey buildings: one of 15 storeys and one of 10 storeys, plus extensive basement levels. Ground levels on the site are at around 59.2m OD.

The 15-storey building is to contain a 5m-tall Lidl Store at ground level, plus six storeys of offices and eight residential floors above (all of 3.15m floor-to-floor), plus rooftop services and lift overrun of ~3m height. The overall height of this 15-storey building is **52.1m AGL** approx. (with gnd floor FFL at ~59.3m OD). The 10-storey building is to contain a 5m-tall commercial floor at ground level, with 9 residential floors above (of 3.15m floor-to-floor) plus ~3m for rooftop services etc., with overall building height of **36.35m AGL** approx.

Schematic Elevation and Plan drawings (by MCA Architects) are shown below —



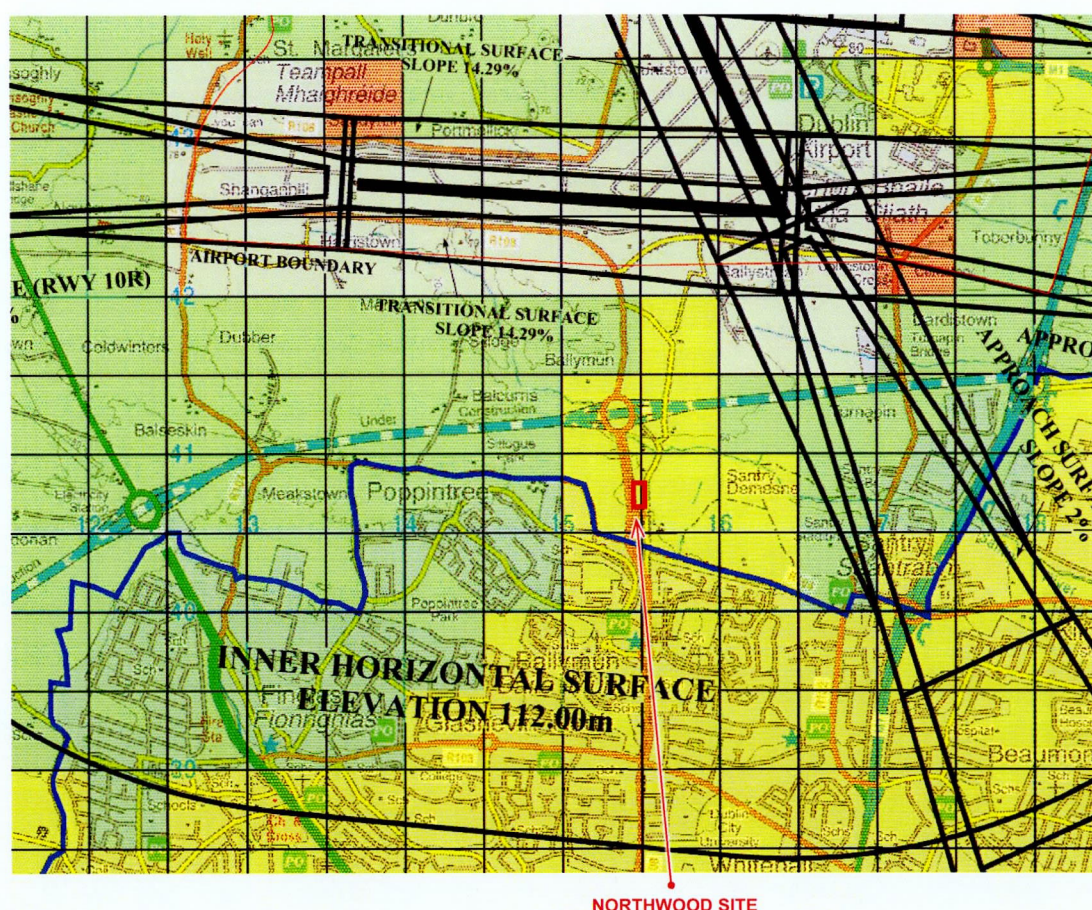
2. The Dublin Airport “Safeguarding Chart” (dated mid-2017)

- 2.1 This item – although superseded by the EASA Specifications of December 2017 – is of significance to DAA.

This Chart sets out coloured 0.5km × 0.5km grid-squares which indicate building height limitations in the vicinity of Dublin Airport. It lists heights (per grid-square) above which any proposed building or structure should be referred to “the airport licensee” (i.e. to Dublin Airport Authority).

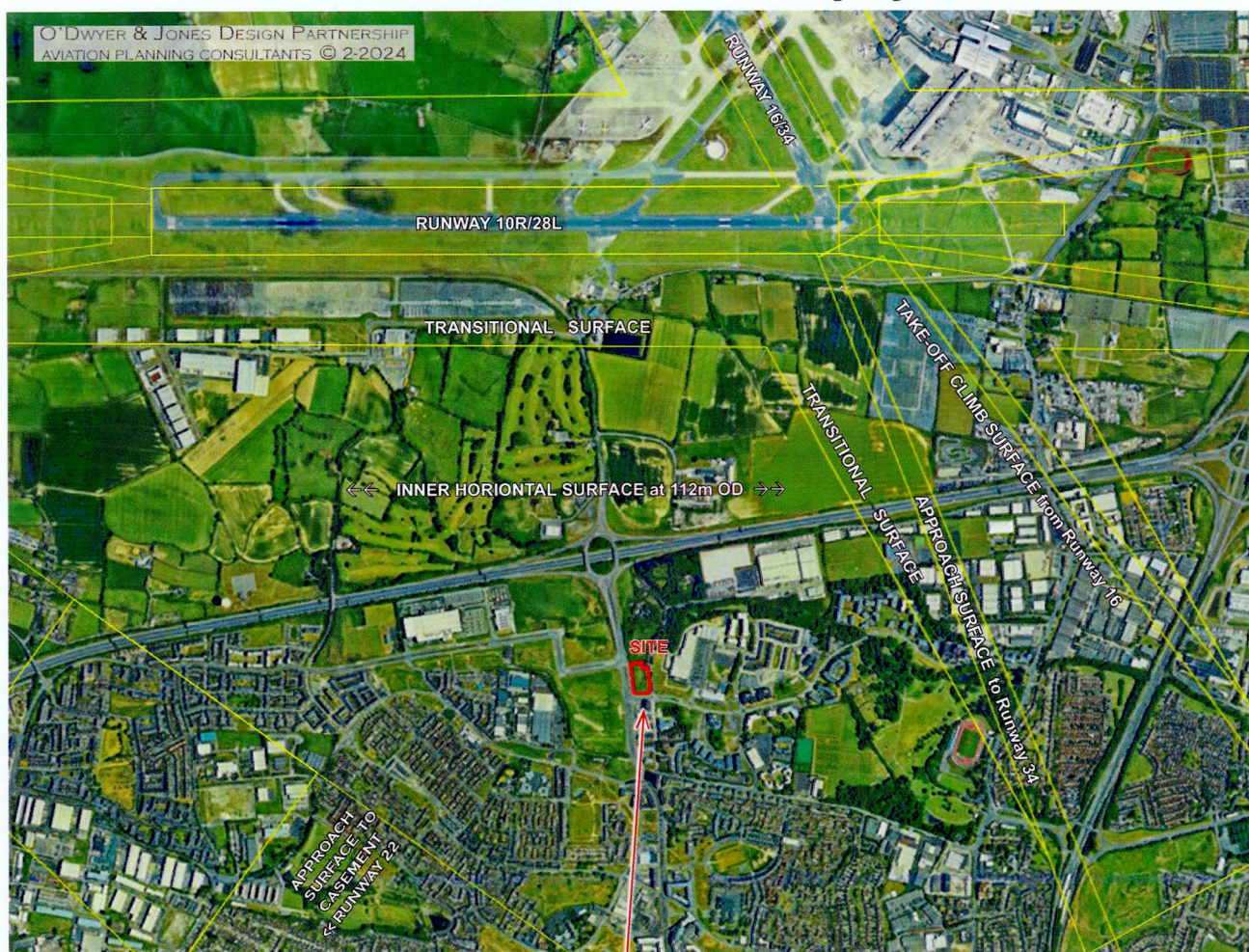
- 2.2 Below is an extract from this “chart” in which it can be seen that the Northwood site (shown in an added red outline) lies within two yellow-coloured grids-squares. The height limitation applying in these yellow grid-squares is **45 metres above ground level**. At 5m height per ground floor and 3.15m heights for higher floors, this means that the DAA would wish that any building on the site **of more than 13 storeys** be referred to it for consideration. Of the two proposed blocks (of 10 & 15 storeys) the 15-storey block (rising to 52.1m above ground level) would fall into this category where referral to DAA is requested.

However, please note that this DAA chart merely provides rough guidance, and that exact building height limitations are defined (per EASA Specifications) in Section 3 following.



3. The EASA (and ICAO) “Obstacle Limitation Surfaces”

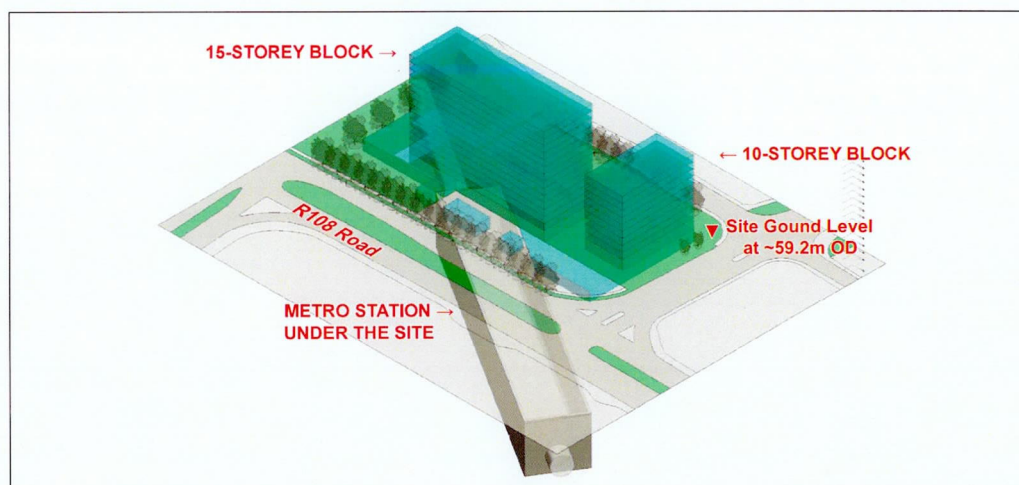
- 3.1 These Surfaces, set out by EASA in its **Aerodrome Specifications of December 2017**, constitute the **principal height restrictions which now apply in the vicinity of Dublin Airport**. These Specifications differed in a few respects from the ICAO “Annex 14” Standards which previously applied at Dublin Airport. However subsequent updates to the ICAO Standards (in November 2018) have ensured that “Annex 14” now corresponds fully with the new EASA Specifications.
- 3.2 The EASA Obstacle Limitation Surfaces which apply at (and in the vicinity of) the Northwood site at Santry, and the ICAO Surfaces arising from Casement Aerodrome in South Dublin, are shown in the following diagram:



- 3.3 This diagram shows that the Northwood site – which is at 1.75km from the centreline of Dublin’s east-west runway 10R/28L, and at 1.54km from the extended centreline of its cross runway 16/34 – lies under Dublin Airport’s “Inner Horizontal Surface”.

It also shows that the site lies outside the “Approach” and “Transitional Surfaces” of Runways 10R/28L and 16/34 (at 1.3km and 1km distances), and at 1km beyond the end of the “Approach Surface” to Casement Aerodrome’s Runway 22.

- 3.4 **The Inner Horizontal Surface of Dublin Airport** – a flat Surface which defines the maximum height to which any new object should extend – **lies at an elevation of 112m OD** (45m above the airport’s “datum level”, which is set at 67m OD). Any object above this elevation (building, mast, or crane) would constitute an “obstacle” to aviation, which would be likely to affect the obstacle clearance altitudes & heights [OCA/H] published on the airport’s charts.
- 3.5 This means that no object on the Northwood site should extend above 112m OD, and that if any object (such as cranes during construction) may need to extend temporarily above this height, special arrangements would need to be made in advance with DAA and with the IAA.
- 3.6 Assuming that the Northwood site is level at ~59.2m OD, with likely ground floor FFL at 59.3m OD (which is 7.7m below Dublin Airport’s “datum level”), the maximum building height (to topmost point) will be $112 - 59.3\text{m} = 52.7\text{m}$.
- Also assuming a ground floor of 5m height and upper floors all at 3.15m floor-to-floor, **the maximum number of storeys on the site would be 15 storeys**, comprised of one ground-floor storey of 5m, plus 14 upper storeys of 3.15m (plus ~3m for lift overrun, or roof plant, or parapets, or PV panels etc.)
- 3.7 At the proposed dimensions outlined above (*and on page 4*), the 15-storey block would have a **52.1m overall height**, with its topmost point at **111.4m OD**. At this height, the 15-storey building would not infringe Dublin Airport’s “Inner Horizontal Surface” (the only “obstacle limitation surface” extending above the Northwood site) and would lie below it with 0.6m clearance to spare.
- 3.8 The separate 10-storey block will be very well clear of all of Dublin Airport’s “obstacle limitation surfaces”, with ~16.35m clearance to spare above it.
- 3.9 Crane heights during construction – and their effect on the airport’s “Inner Horizontal Surface” will also need to be considered for both blocks, with advance notifications to the IAA and DAA required for all cranes on site. [This item is covered in Section 4 on page 8 following.]



4. Cranes on Site During Construction

4.1 It is a statutory requirement [under S.I. 215 of 2005 – *Irish Aviation Authority (Obstacles to Aircraft in Flight) Order*] for prior notification of the use of any crane/s on this site to be submitted, at least 30 days in advance, to the Irish Aviation Authority and to Dublin Airport Authority, who may need to issue any necessary notifications, and who may require cranes in this location to be fitted with aviation warning lights. This requirement arises for any temporary object greater than 45m in height within 10km of a licensed aerodrome, so it would apply to cranes used for the 10-storey block, which would be likely to extend to 56m+ in height AGL (for a single tower crane). It seems that a single tower crane might be sufficient for the 15-storey block (given its plan dimensions of 25m x 70m), but as this crane could project by at least 20m above Dublin Airport's "Inner Horizontal Surface" special advance agreements would need to be made with IAA and DAA in relation to it.

4.2 These requirements should be included in the CEMP for the development.

It might also be noted (in the CEMP) that use of lasers for surveying/setting-out purposes on this site should be strictly controlled to ensure no interference with pilots, and that use of drones for surveying purposes (or otherwise) would be prohibited on this site.

4.3 In view of the statutory requirement mentioned in para.4.1 above, the early consideration of cranes on site is advised (in particular where crane clearances of 20m+ above roof levels might be required).

5. Solar/PV Panels

5.1 Any solar panels proposed on the roofs of the proposed buildings should be subject to a Glint & Glare assessment in relation to Dublin Airport's flight paths, and in relation to its new control tower [>], and in relation to the helipad in use at Beaumont Hospital (at c. 2.9km from the site).

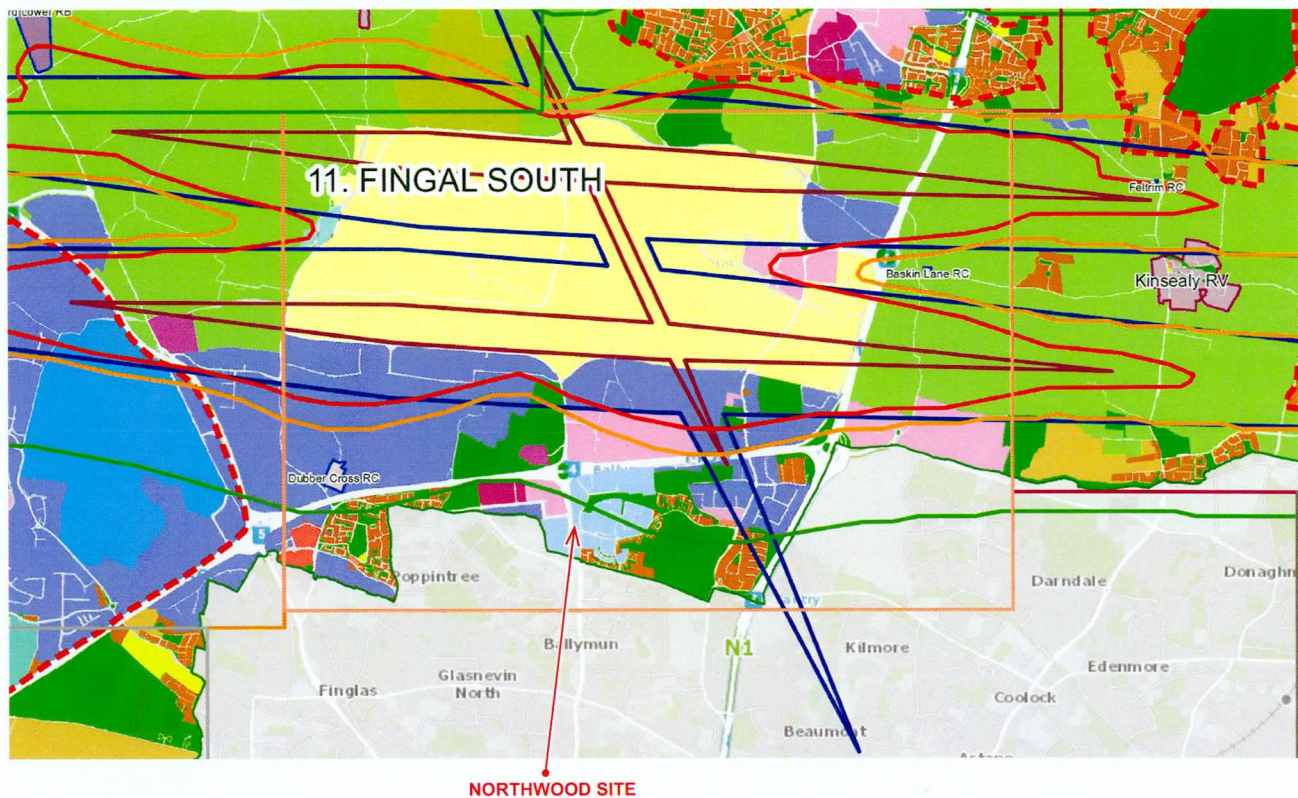
Because the new control tower at Dublin Airport is particularly tall > (extending to 526ft/160m OD, i.e. to more than double the height of the airport's "Inner Horizontal Surface"), care should be taken in the layout of rooftop solar/PV panels to ensure that none will be visible from the new Control Tower cab (which would produce an automatic Glint+Glare "fail"). However, as the site is more-or-less due south of the new control tower, this should not be difficult to achieve.



[And while it does not directly affect aviation, it might be noted that Fingal has recently requested that an aviation-related Glint & Glare Study be extended to assess any adverse glare affecting traffic using nearby main roads.]

6. Airport Noise Zones

- 6.1 Updated airport noise contours are included in Fingal's CDP Index Map 2023-2029, of which an extract is shown below.



- 6.2 It can be seen that the Green contour (containing Airport Noise Zone 'C') lies just north of the Northwood site. However, an additional Noise Zone 'D' (which does not appear on the maps) is referred to in Table 8.1 (on page 324 of the Fingal CDP Written Statement) with likely noise levels of $>50\text{dB}$ & $<54\text{dB}$ L_{Aeq} – which seem to apply just outside the green Noise Contour, and noise insulation related to this level is advised on the site. It may be noted that the new noise contours do not make any significant provision for aircraft on Cross Runway 16/34 which will continue in operation, and it would be prudent to provide noise insulation related to that runway and to Beaumont Hospital's helipad to the east.

7. Dublin Airport Public Safety Zones

- 7.1 Public Safety Zones for Dublin Airport are also included in Fingal's CDP Index Map 2023-29 (shown above in blue and purple lines).
- 7.2 Although these Public Safety Zones are very extensive in relation to any other airport worldwide (they are ten times the size of current PSZs at Heathrow, for example, and are greatly in need of updating), they do not extend as far as the Northwood site, and do not affect it in any way.

8. “Building Restricted Areas” around Airport Navigational Equipment

- 8.1 ICAO has outlined “Building Restricted Areas” [BRA] in the vicinity of aviation navigational equipment, within which it advises that new structures be assessed for potential interference with radio and radar transmissions. These BRA extend around an airport’s Instrument Landing System equipment etc., with different shapes for each type of equipment, and can extend for more than 6km from the equipment’s location. This restriction is more likely to affect metal-clad buildings (e.g. warehouses) in the immediate vicinity of airfields (and further assessment in relation to these is frequently requested by the IAA).
- 8.2 This item is unlikely to be raised in relation to the proposed development at Northwood, but if it does, we will be able to demonstrate to IAA and DAA that the site at Northwood future Metro Station is fully clear of all such “Building Restricted Areas” – the nearest of which is the BRA for the Distance Measuring Equipment of Dublin’s Runway 28L, at ~400m north-east of the site.

The following diagram indicates locations where extra analysis could arise in relation to Runway 28L’s I.L.S. equipment:



9. Bird Strike Hazard

- 9.1 Potential bird strike hazard should be considered in the landscaping of sites in the vicinity of airports/aerodromes. Broadly speaking, this means avoidance of all ponds and permanent standing water within 3km of an airport’s runway (in spite of Fingal encouragement of such items as part of its SuDS policy in the current CDP), and avoidance of avian food attractants. This is unlikely to be a problem on the Northwood site, where the Metro line underneath the site is likely to give rise to require different flood control procedures than the standard SuDS policies.

10. SUMMARY

10.1 Dublin Airport's Obstacle Limitation Surfaces:

Dublin Airports "Inner Horizontal Surface" – a flat surface at 112m OD elevation – lies above the Northwood site. Other inclined "surfaces" for Dublin (and for Casement Aerodrome) lie at distances of 1.0-1.3km from the site, but not above it.

10.2 Building (and Crane) Height Limitations:

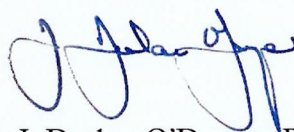
Any object extending above 112m OD on the site would be a potential obstacle to aviation, so that **building heights on the site should be limited to 52.8m above ground level**, which is assumed to be all at 59.2m OD. This limits buildings to 15 storeys (of 3.15m floor-to-floor, plus 5m at ground floor) anywhere on the site (and the proposed 15-storey block is in compliance with this aviation requirement).

This same height limitation applies to cranes on site during construction, with advance notification to IAA and DAA required for cranes extending higher than 45m AGL. Special arrangements will be required for cranes used for the 15-storey block which will extend above 112m OD, to be agreed in advance with IAA and DAA.

Dublin Airport's "Safeguarding Chart" (of 2017) requests referral to it of any structure on the site greater than 45m in height above ground level.

10.3 Additional Aviation Considerations:

- (a) Any rooftop **Solar/PV panels** should not be visible from the airport's control tower, and should be subject to Glint+Glare analysis in relation to flight paths.
- (b) The site appears to lie in an **Airport Noise Zone 'D'** (referred to in CDP Text, but not on its maps) with appropriate noise insulation required.
- (c) Consideration of "**Building Restricted Areas**" related to the airport's **navigational equipment** could arise (but will not be problematical on this site).
- (d) **Bird Strike Hazard** mitigation should be taken into account in any landscaping of the site, and in all SuDS provision.



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19th February 2024

O'Dwyer & Jones Design Partnership
Aviation Planning Consultants

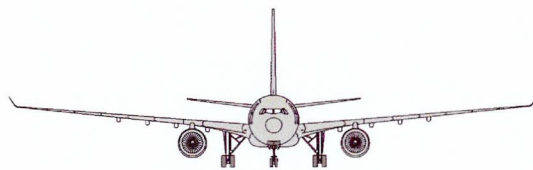
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