

29th July 2019

An Bord Pleanála,
Strategic Housing Development,
64 Marlborough St,
Dublin 1
D01 V902

Ref: ABP-3033-01-18 – Kilcarbery SHD

Dear Sirs,

I refer to the application in respect of the proposed strategic housing development at Kilcarbery, Clondalkin, Dublin 22 (ref. ABP-3033-01-18) attached.

South Dublin County Council is a key stakeholder in this application which represents a strategic housing delivery response to *Rebuilding Ireland* as follows:

- All subject lands (28.58 Hectares Gross Area) included in this application are in the Council's ownership with the Council acting as development agent and stakeholder in this process, completely separate from its role as Planning Authority.
- The project being promoted by the Council in partnership with the development consortium Adwood Ltd, proposes to deliver 1,034 homes focused around a new village centre including community, retail and creche facilities, as well as future locations for new school and additional retail, accommodation.
- The model has been developed following a public procurement process and can be viewed as the inaugural model of new joint-venture partnerships structured to deliver a master-planned, sustainable, urban neighbourhood with an integrated tenure mix of social, affordable and private housing underpinned by economically advantageous, efficient and risk adverse objectives.
- The site location was identified as a key strategic site within the Council's landbank for fast track delivery as a Major Urban Housing Delivery sites (*MUHDS*).

The application demonstrates the potential for new home delivery through an innovative masterplan-led Joint Venture development model comprising design/build developer and local authority. This model is supported by the Department of Housing, Planning and Community (DHPLG) through Local Infrastructure Housing Activation Fund (LIHAF) grants for enabling infrastructure and funding for the 310 social homes that the project will deliver. This model is now being replicated by other Local Authorities on several large residential projects across the country. Three additional locations that are currently at masterplan stage with development potential for circa 3,000 homes will also look to following this template within South Dublin County.

The process undertaken to date by the Council to bring the project to application stage in line with our commitment to accelerated delivery of these much-needed new homes has included:

- commitment by the Council to the earliest possible delivery of a sustainable housing community on this site in line with MUHDS designation;
- preliminary masterplan developed by Council led multi-disciplinary team including external consultants for Planning, Urban Design, Urban Planning, Engineering, Infrastructure Design, Drainage Design, Traffic Assessment, Strategic Environmental Assessment, Strategic Flood Risk Assessment, Appropriate Assessment and Archaeology and Site Investigation and Topographical Surveyors.
- investment of significant resources to address economic and regulatory issues, to de-risk the financial investment required of the consortia and increase confidence in the partnership process;
- approval of detailed masterplan by the Elected Members of the Council to allow procurement process to commence;
- pre-qualification procurement to shortlist appropriate development consortia to participate in a competitive dialogue process followed by final tender submissions;
- marketplace assessment of masterplan by National Treasury Management Agency to refine financial and planning models for the final tender stage and ultimately the final proposal; and,
- a partnership development agreement based an approved disposal of the site to the preferred bidder by the Council under section 183 of the Local Government Act 2001, as amended, subject to delivery of the new homes on site.

In addition to the above, it is our view that the proposed development at Kilcarbery will be a testbed to provide integrated solutions for a range of current regulatory, environmental, social and economic demands to be synergised into viable and maintainable urban fabric. These design issues (explored further in the appendix to this letter) include:

- Individual responses to site contexts to address existing and proposed site infrastructure and links which delivers a bespoke response to appropriate and sustainable density.
- Introducing new typologies for a wide range of needs and independently accessed level access apartment homes as social provision.
- Innovative approaches to SUDS;
- Design development and resolution in replicable models.

It is considered that the constraints of this site require a medium -density development. The ambition for Kilcarbery Grange is to create a sustainable urban neighbourhood integrating public and private housing in a range of tenure and type in a connective network of streets and squares incorporating existing trees and hedgerows and encouraging walking and cycling.

Densities

Residential development in South Dublin County take place in the context of the National Planning Framework; Project Ireland 2040, the Draft Regional Spatial and Economic Strategy for the East and Midlands and the Dublin Metropolitan Area Strategic Plan. This Council's overview of the hierarchy of residential development in the County is that high density and increased building heights in line with Building Height Guidelines/ SPPR 4 should in the first instance be linked to mass-transit infrastructure particularly rail/light-rail or enhanced-service bus corridors. Areas identified by this Council's policy and planning, for delivering both density and height as early as possible include:

- Adamstown Strategic Development Zone;
- Clonburris-SDZ (that includes Council owned lands with capacity for 2,000+ homes);
- Cookstown /Tallaght- core - Regeneration Zone included in current Development Plan in Tallaght town-centre to deliver higher buildings at higher density;
- N7 Corridor inside M50 (subject of joint planning study with Dublin City Council under Urban Regeneration Development Fund).

Areas not as well-served by public-transport will be evaluated balancing their location within the metropolitan area against issues of access and environment. Large Council owned sites of this nature targeted for earliest delivery of housing under the joint-venture approach set out above include Kilcarbery (1,034 homes), Killinarden (approx. 500 homes) and Rathcoole (approx. 250 homes).

Responses to Issues Raised In Pre-Application Consultation Opinion

The issues raised by An Bord Pleanála to the project team in pre-application consultation have resulted in amendments to the proposed site extents, density, building heights, balance and mix of unit types; communal and private open space arrangements, phasing, distinctive character of development (areas), childcare facility, and pedestrian/cycle connections to Corkagh Park.

Density- Revised Development proposal

Noting the pre-application consultation opinion by An Bord Pleanála, the proposal has been revised to include 56 additional dwellings, increasing the number of apartments and decreasing the number of houses. The design now incorporates a broad range of size and typology including 142N°. 1 bedroom, 224N°. 2 bedroom, 539N°. 3 bedroom and 129N°. 4 bedroom dwelling units delivered as traditional apartments, as well as own door units including houses, duplex, and ground floor apartments. to achieve a nett density of 42 dwellings per hectare. The proposed development provides density at the mid-point of the 35-50 dwellings per hectare density deemed appropriate in the current South Dublin Development Plan and DHPLG's Sustainable Residential Development in Urban Areas,

balancing density targets against an opportunity to retain and revitalise green corridors. Please see further detail on Development Proposal Densities in appendix to this letter.

Design (Character, height, typology).

The overall strategy includes three overarching character areas organised along a generous spine avenue linking the site's two entrances with focus on three public gardens. Each area has differing building materials, colour palette, paving, and planting supported by a green pedestrian/cycle corridor.

The scheme faces outward with a strong built edge and a reinforced central avenue with non-residential uses gathered around the square to consolidate its urban role and character and hierarchy of street types linked to planting strategies, paving, car-parking and levels of urban enclosure.

The masterplan identifies key urban focal points to delivery increased height and density. Apartment and duplex development providing 4- 6 storeys is proposed at these locations, to provide strong urban presence, and form, as well as delivering density. Typically throughout the scheme, the scale includes two and three storey terraces forming clear urban blocks along with innovative 2/3 storey composite buildings with three frontages to generate strong corners and close the ends of the urban blocks. Overall the composition of 2-6 storey development, delivering a broad range of sustainable housing typologies adds formal, frontal urban quality to public squares, streets and spaces.

Again, further detail in this regard is provided in the appendix.

SUDS Sustainable Drainage

The overall attenuation and SUDS strategy for the Kilcarbery project has been developed in partnership with the Council's environmental, engineering, ecology and parks teams. The qualitative and quantitative management of surface water includes consideration of commencement point, conveyance mechanisms, and ultimate receiving waterbodies. This attenuation "train" seeks to maximise infiltration to ground along the progressive conveyance route. Initial attenuation, direct infiltration with overflow gullies and infiltration trenches below on-street parking bays have been carefully considered to provide to provide initial conveyance with progressive infiltration. More detail is provided in the attached appendix.

Conclusion

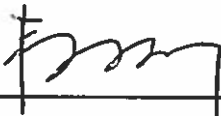
The site has been identified by this Council for large scale residential development, a view endorsed by the DHPLG designation as a MUHDS site under the Rebuilding Ireland housing policy context. As outlined above, significant resources have been committed to this project by this Council and central government to realise this exciting development opportunity to deliver 1,034 much needed mixed tenure homes in a sustainable community.

The proposed development, revised to reflect pre-application consultation opinion, will deliver:

- a sustainable development with appropriate densities;
- a new and diverse community connecting existing adjoining districts that can benefit from access to new facilities and enhanced amenity opportunities.
- genuine social integration in well dispersed tenure and wide-ranging accommodation options; and,
- retention and enhancement of natural green infrastructure.

Accordingly, we respectfully submit that this well-considered development is a strong and appropriate response to this key development site, consistent with national and local policy while also being an exemplar for key sustainability and integration development objectives.

Yours faithfully,



FKW

Eddie Conroy, FRIA
County Architect



Colm Ward

Director of Housing, Social &
Community Development.

Appendix

This appendix provides additional detail on issues raised in the main letter as follows:

Design Issues:

The proposed development at Kilcarbery includes a range of design solutions addressing the complex requirements of the current regulatory, environmental, social and economic demands. In addition to the items raised in the body of this letter, the following considerations have been included in the design.

- Individual responses to site contexts to address existing and proposed site infrastructure and links; a bespoke response to appropriate and sustainable density. The Kilcarbery design response includes the use of individual taller blocks comprising four- six storey apartment to address specific urban-design tasks (for larger public spaces, gateway features, pivot points, wayfinding) across a tightly grained lower 2-4 storey mid-rise environment. 40% of the proposed units comprise smaller multi-unit typologies including own door apartment and duplex units, walk-ups and traditional apartment units. The balance of the development will deliver a mixture of 2 and 3 storey town homes to accommodate occupancies ranging from 3 to 7 persons.
- New typologies for a wide range of needs (e.g. double-frontage 3-storey corner blocks with own-door 1 & 2-bed apartments; 3-bed 4-person houses (complying with the requirements for 2-bedroom homes to address gender-overcrowding in starter-units along with the need for smaller family units); and independently accessed level access apartment homes as social provision.
- Innovative approaches to SUDS balancing tensions between swales and open-space use, attenuation storage and tree-planting, permeable-paving and maintenance, and retention/ provision of green infrastructure.
- Design development and resolution of street planting, public-lighting and car-parking in replicable models.

Development Proposal Densities:

Following issue of Pre-Application Consultation Opinion by An Bord Pleanála, the project has been revised to include an additional 56 dwellings, increasing the number of apartments and decreasing the number of houses. The design now incorporates 578 houses, and 456 apartments in a combination of duplex/own-door and corridor/core blocks. This will achieve a nett density of 42 units per hectare. The proposed development at Kilcarbery will provide density at the mid-point along the 35-50 units per hectare density deemed appropriate by SDCC's current County Development Plan (Chapter 8) and the Department of Environment's Sustainable Residential Development in Urban Areas. (Appendix A). Public open space, which exceeds the percentage of open space required and works to retain all significant hedgerows on the site have not been excluded from the development site for this calculation to ensure consensus of these figures.

The Kilcarbery project balances density targets against an opportunity to use the masterplan to retain and revitalise green corridors linking existing adjoining residential communities to

the north and east and the 3000 workers employed in Grange Castle Business Park to the adjoining regional Corkagh Park. Existing access to Corkagh Park on foot or cycling is impeded by heavy traffic on the Outer Ring Road to the west and the M7 to the south. The Kilcarbery masterplan has positioned commercial and community uses to the north of the site to facilitate existing communities and its proposed village square will act as a lens to focus pedestrian and cycle movement down onto the green corridors and in turn into Corkagh Park in a worthwhile piece of urban composition. A dedicated cycle-route on the Outer Ring Road will link Grange Castle Business Park onto the green corridors of Kilcarbery and in turn onto an east-west cycle route now in design development as a key element in the impending improvement of Corkagh Park bringing cyclists to Clondalkin village and the Red Cow Luas stop beyond. This will facilitate leisure and commuter cycling for the new community and its existing neighbours, and invigorate the area's non- car based transport routes.

Design (Character, height, typology):

A separate Character Area Booklet prepared by BKD Architects is included with this submission. The overall strategy includes for three overarching character areas organised along a generous spine avenue linking the site's two entrances – one a landscaped gateway at R136 and the village centre's Grange Square public space at the other. These areas focus on three public gardens each containing existing specimen trees which give the areas their names. Each area has differing building materials, colour palette, paving, and planting form and species inspired by the character of the different specimen trees. A landscaped loop including specimen trees, existing hedgerows and watercourses overlays these areas acting as a green pedestrian/cycle corridor from existing residential communities and Grange Castle Business Park to Corkagh Park to the south.

The scheme overall faces outward with a strong built edge- three-storey terraces front the R136, Corkagh Park and the central avenue reinforced with four- six-storey apartment blocks acting as gateways and pivot points adding scale to built form along the R136, elevation to Corkagh Park and at Grange Square village centre.

Non-residential uses are gathered around the square to consolidate its urban role and character. The scheme has a hierarchy of street types linked to planting strategies, paving, car-parking and levels of urban enclosure all in line with the 12 tenets of the best-practice Urban Design Manual (2009).

The houses are two/three storeys in terraces forming clear urban blocks in a loose connective grid. Innovation in typology includes a 2/3 storey composite building with three frontages to generate strong corners and close the ends of the urban blocks. These buildings combine houses and duplex apartments in own-door 1- and 2-bedroom residences developed for social tenants. These buildings add a formal, frontal urban quality where used on public squares and spaces. A number of apartments in the core/corridor blocks will be managed as social provision for smaller occupancy requirements (e.g. "empty nesters") by Approved Housing Body further increasing diversity of choice.

SUDS Sustainable Drainage

The overall attenuation and SUDS strategy for the Kilcarbery project has been developed in partnership with the Council's environmental, engineering, ecology and parks teams. The qualitative and quantitative management of surface water includes consideration of commencement point, conveyance mechanisms, and ultimate receiving waterbodies. This attenuation "train" seeks to maximise infiltration to ground along the progressive conveyance route.

Initial attenuation will occur within curtilage through water-storage butts, soak-pits in rear gardens, rainwater-harvesting, and in apartment blocks open-bottom piping with direct soakage and green-roofs. Outside curtilage biophilic streets will incorporate large tree-pits/green areas for direct infiltration with overflow gullies to assure the system. Tree pits and planters will link to infiltration trenches below on-street parking bays to provide initial conveyance with progressive infiltration. (permeable paving is acceptable within curtilage of houses/apartments but maintenance difficulties preclude it from being taken in charge). In addition, bio-swales and existing hedgerows/watercourses in linear green spaces will continue and extend conveyance of surface water. Larger public open spaces will contain Storm-tech storage carefully positioned and adequately submerged to allow large-scale planting and linking to shaped "amphitheatre" spaces to facilitate play/performance but capable of large volume water storage during major storms. The natural watershed generated by site levels requires the northern sector of site to discharge to surface -sewer at north-east corner on Old Nangor Road and the southern sector to discharge to a large surface-water sewer on Cherrywood Crescent.