

Strategic Housing Development (SHD) at Park West, Dublin 12

Greenseed Limited (Applicant)



PLANNING STATEMENT & RESPONSE TO ABP STAGE 2 OPINION

November 2021

BMA PLANNING

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Appendix A: Notice of Preapplication Consultation Opinion

1.0 INTRODUCTION

1.1 PURPOSE OF REPORT

This *Planning Statement* has been prepared on behalf of the applicant, Greenseed Limited (hereafter Greenseed), to accompany a planning application to An Bord Pleanála (ABP) for a Strategic Housing Development (SHD) at the Park West Avenue and Park West Road, Park West, Dublin 12.

The proposed development, as described in Section 2.0 below, comprises a Strategic Housing Development as defined within Section 3 of the *Planning and Development (Housing) and Residencies Act 2016*.

The purpose of this *Planning Statement* is to provide background information on the site, a description of the proposed development and supporting information to aid consideration of the proposed development.

In particular, the report responds to the ABP Stage 2 Opinion (See Section 3.0 below). This overview response cross refers to the drawings and other specialist reports enclosed with the application which provide greater detail in relation to the issues raised.

This *Planning Statement* should be read in conjunction with the technical reports enclosed with this planning application. A list of all Reports is included in the accompanying Cover Letter.

1.2 SHD DEVELOPMENT DEFINITION

This application falls under the definition of Strategic Housing Development as set out under Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 which includes the following definition of SHD:

“strategic housing development” means—

a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses,

(b) the development of student accommodation units which, when combined, contain 200 or more bed spaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon,

(c) development that includes developments of the type referred to in paragraph (a) and of the type referred to in paragraph (b), or

(d) the alteration of an existing planning permission granted under section 34 (other than under subsection (3A)) where the proposed alteration relates to development specified in paragraph (a), (b) or (c),

each of which may include other uses on the land, the zoning of which facilitates such use, but only if—

(i) the cumulative gross floor area of the houses or student accommodation units, or both, as the case may be, comprises not less than 85 per cent, or such other percentage as may be prescribed, of the gross floor space of the proposed development or the number of houses or proposed bed

- spaces within student accommodation to which the proposed alteration of a planning permission so granted relates, and*
- (ii) the other uses cumulatively do not exceed—*
- (I) 15 square metres gross floor space for each house or 7.5 square metres gross floor space for each bed space in student accommodation, or both, as the case may be, in the proposed development or to which the proposed alteration of a planning permission so granted relates, **subject to a maximum of 4,500 square metres gross floor space for such other uses in any development, or***
- (II) such other area as may be prescribed, by reference to the number of houses or bed spaces in student accommodation within the proposed development or to which the proposed alteration of a planning permission so granted relates, which other area shall be subject to such other maximum area in the development as may be prescribed*
(our emphasis)

The proposed development comprises 750 residential units.

The non-residential element is 705sqm (ie. less than 4,500sqm) and the residential element is 99% (i.e. no less than 85%) of the total gross floorspace.

1.3 STATEMENT OF CONSISTENCY AND MATERIAL CONTRAVENTION STATEMENT

A separate report entitled - ***Statement of Consistency and Material Contravention Statement*** [BMA Planning] – is also submitted.

The Statement of Consistency examines the proposed development in terms of consistency with the relevant policies and objectives of the Development Plan and relevant Section 28 Ministerial Guidelines. It also examines the proposed development in relation to National Policy.

The proposed development is a Material Contravention of the *Dublin City Development Plan 2016- 2022* and *Park West Local Area Plan 2019* and a Material Contravention Statement is provided and indicates why permission should be granted for the proposed development, having regard to Section 37(2)(b) of the Planning and Development Act, 2000, as amended.

1.4 PRE-PLANNING CONSULTATION (SECTION 247)

Section 247 preplanning consultation took place with the Planning Authority on 9th March 2020 and 27th August 2020. Feedback from these meetings has informed the design and layout of the proposed development.

1.5 STAGE 2 PRE-APPLICATION CONSULTATION WITH AN BORD PLEANALA

Section 5 Pre-application Consultation with An Bord Pleanala was carried out in relation to this proposed development under reference **ABP-308937-20** (17th February 2021). The Board's *Notice of Pre-Application Consultation Opinion* was received on 2nd March 2021.

The Board's Opinion and the applicant's responses to the Opinion are outlined in Section 3.0 below.

1.6 SUPPORTING REPORTS

A full schedule of the particulars, plans and reports submitted with the current application is attached with the application cover letter.

2.0 PROPOSED DEVELOPMENT

2.1 THE SITE

Park West is located c.8km west of Dublin City Centre, directly east of the M50, south of Ballyfermot and Cherry Orchard residential neighbourhoods and north of the John F Kennedy and Naas Road industrial areas.

The application site (c.9.4ha) is located within Park West, Dublin 12 and east of Park West Avenue and north of Park West Road. The Dublin to Cork mainline railway defines the northern boundary with Park West Business Park to the east. The northern and eastern boundaries of the site, to the rail line and Park West Business Park respectively, are defined by palisade fencing. An existing berm defines the southern and western boundaries of the site.

The site is largely undeveloped with the exception of the Aspect Hotel, comprising an 8-storey hotel building and ancillary surface carpark accessed from Park West Avenue. Permission was granted for an extension to this hotel in February 2019 (Reg. Reg. 3436/18) on the site of the existing surface car park. This permission has not been implemented to date but remains extant until 2024.

The remaining undeveloped lands are generally flat and meet Park West Road at grade to the south while Park West Avenue rises from south to north as it bounds the site to the west and rise to the railway overbridge. An existing berm defines the southern and western boundaries of the site. The northern and eastern boundaries of the site, to the rail line and Park West Business Park respectively, are defined by palisade fencing.

Figure 2.1 illustrates the location and extent of the current application site on an aerial photograph.

Photographs 1 to 4 illustrate the principal features of the current application site.



Figure 2.1: Location and Extent of Current Application Site
(Source: Bing Maps)



Photo 1: View of the Southern Boundary of the Site with Park West Road



Photo 2: View of the Western Boundary of the Site with Park West Avenue & Aspect Hotel



Photo 3: View of Northern Boundary of the Site with Dublin to Cork Mainline Railway



Photo 4: View of the Interior of the Site from the Western Boundary

2.2 PROPOSED DEVELOPMENT

2.2.1 Summary

The proposed development (70,649 sqm gross floor area - GFA) will consist of:

- 750no. residential units (Blocks A to G) comprising a mix of one, two and three bed apartments and all associated ancillary accommodation (69,989sqm GFA)
- Non-residential uses (705sqm GFA) including a retail unit, a creche, community space and a café/ bar.

The gross floorspace of non-residential uses as a percentage of the overall gross floorspace is 1%.

For further information on the overall design rationale and details of the finishes and materials, refer to **Architectural Design Statement** (Darmody Architecture).

For further information on the overall landscape design rationale and details of the finishes and materials, refer to **Landscape Architects Report** (Murray & Associates, Landscape Architects).

A **Schedule of Accommodation** (Darmody Architecture) and a full **Housing Quality Assessment** is enclosed with the planning particulars and contains a block by block breakdown of the floor space and uses proposed in this application. The following is a summary of the key statistics.

KEY STATISTICS

- **No of Units:** 750
- **Unit Mix:** 321no. 1 beds (43%),
384no. 2 beds (51%),
45no. 3 beds. (6%)
- **Total GFA:** 70,694sqm.
- **Residential (Gross):** 69,989sqm
- **Housing Density:** 137 units / ha (based on net site of 5.4ha)
- **Non-residential (GFA):** 705sqm
- **Non-Residential %:** 1%
- **Plot Ratio:** 1: 1.29 (based on site of 6ha)
- **Site Coverage:** 23%
- **Building Height:** 2 to 15 storeys
- **Car Parking Spaces:** 552 (477no. residential/ 0.64 per unit)
- **Bicycle Parking Spaces:** 1676 (2.2 per unit)

2.2.2 Project Description

The proposed development is described below on a block-by-block basis.

- Block A (11,563sq.m GFA): - A 2 to 15 storey with 109no. residential units and 1no. retail/ commercial unit of 156sq.m.
- Block B (4,180sq.m GFA): - A 2 to 8 storey block with 44no. residential units and resident services and amenities of 84sq.m.
- Block C (8,865sq.m GFA): - A 2 to 8 storey block with 100no. residential units.
- Block D (16,403sq.m GFA): - A 2 to 8 storey block with 179no. residential units in. Residential services and amenities of 403sq.m are proposed at ground, first and second floor levels.
- Block E (15,995sq.m GFA): - A 2 to 8 storey block with 179no. residential units.
- Block F (9,629sq.m): - A 2 to 8 storey block with 99no. residential units.
- Block G (4,059sq.m): - A 1 to 8 storey block with 40no. apartments, a creche of 410sq.m with associated external play area, a café/ bar unit of 91sq.m and a community space of 48sq.m.
- Public Open Space: - c.1.3ha (14%) of public open space is provided and comprises a linear park orientated west to east and functioning as a link to the established residential areas to the west of Park West Avenue and a public plaza/ square including Multi-Use Games Area (MUGA) located centrally within the site.
- Communal Amenity Space: - Communal amenity spaces totalling 6,175sq.m are provided at podium level within each of the proposed Blocks A to F and at roof levels within Block G and include passive open spaces that are visually and functionally accessible to the future residents of the development.
- Private Open Spaces: - Will be in the form of balconies for the apartments and duplexes and terraces for ground floor units.

Vehicular access to serve the proposed development will be provided via access roads off Park West Road and Park West Avenue. Tie-in works are required to Park West Avenue and Park West Road to provide for suitable junctions and pedestrian crossings at the proposed access points.

In addition to pedestrian and cycle access at the above two locations there will be a pedestrian and cycle access at the north western corner of the site adjoining Park West Avenue and providing access to the proposed west to east street (Railway Avenue) along the northern boundary of the site. This access to Park West Avenue will facilitate safe and efficient access for pedestrians and cyclists to Park West and Park West - Cherry Orchard Train Station located directly to the north west across Park West Avenue.

Car parking is provided at ground floor/ undercroft level beneath Blocks A, B, C, D, E and F and at street level. A total of 552no. car parking spaces are proposed including 477no.

residential car parking spaces at ratio of 0.64 per residential unit. 5no. car parking spaces will serve the proposed non-residential uses.

99no. existing car parking relating to the existing Aspect Hotel are located within the current application site. The Aspect Hotel is a pre-existing building located centrally within the site. Permission was granted for an extension to this hotel in February 2019 (Reg. Ref. 3436/18). Condition 3 attached to Reg. Ref. 3436/18 addresses a legacy issue relating to the Aspect Hotel car park which is located on the site of the proposed Block G. The current application provides for the demolition of the hotel car park to facilitate the development of Block G. It is proposed that the car parking (totalling 70no. spaces) to serve the hotel will be relocated beneath Blocks A-B-C (36no. spaces) and at street level to the south of the existing Aspect Hotel (34no. spaces). The existing car park is proposed to be demolished and the site of the permitted hotel extension landscaped pending the development of the hotel extension.

A total of 1,676 cycle parking spaces are proposed. The cycle parking is provided at ground floor/ undercroft level beneath Blocks A to F to serve the proposed residential units and integrated into the public realm at street level for visitors.

Permission is also sought for associated hard and soft landscaping, boundary treatments and all associated site and development works.

Drawings No. PA-003 - 100 to 102 by Darmody Architecture illustrate the proposed site layout plan.

The proposed development will be development on a phased basis as set out within the enclosed **Phasing Management and Delivery Report** [Greenseed Limited]. In summary, it is proposed that the north-south access road from Park West Road, the west to east link from Park West Avenue, the central public open space and Blocks A, B and C will be constructed in Phase 1 of the development. Blocks D and E will be constructed in Phase 2. Phase 3 will comprise the construction of Block F. The final phase of development will comprise the relocation of the hotel car park and the construction of Block G.

The residual lands within Site 6, identified as development Stages 2 and 3, are sites for future development and will be seeded/ grassed and fenced until such time as development proposals for those sites are advanced. The Stage 2 lands include a site for a proposed school as identified within the LAP and to be brought forward by the Department of Education and Skills. The applicant has commenced discussions with the Department as outlined in the **Phasing Management and Delivery Report**.

All water services proposed as part of this application meet the requirements set out in the *DCDP*. Refer to the **Engineering Services Report** [CS Consulting], including the *Irish Water Confirmation of Feasibility*, for further details.

Stormwater will be attenuated on site before discharging to the public sewer on Park West Road/ Heaney Avenue. Refer to the **Engineering Services Report** [CS Consulting] for further details.

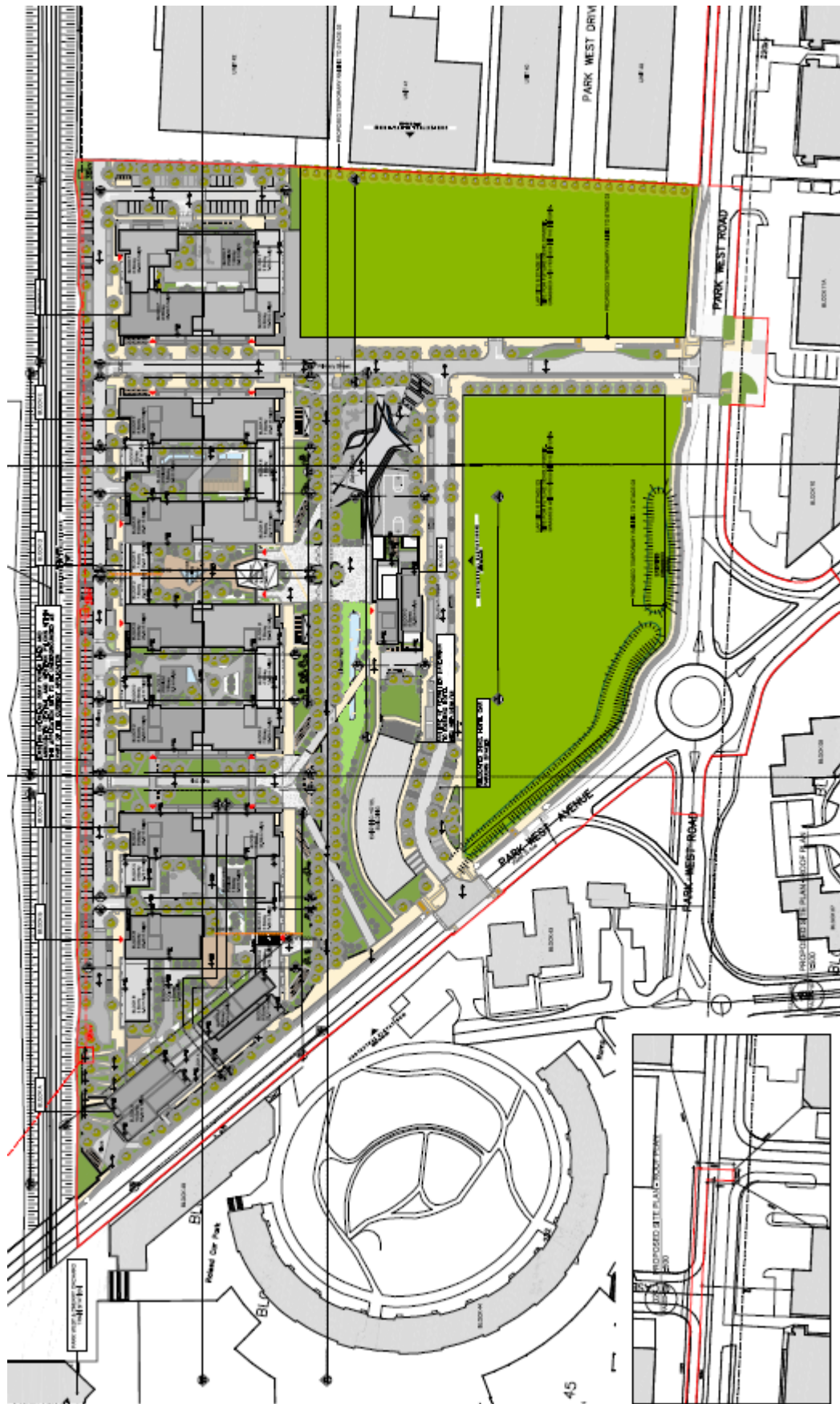


Figure 2.2: Proposed Layout Plan

3.0 RESPONSE TO AN BORD PLEANALA OPINION

The Board's Notice of Pre-Application Consultation Opinion (Appendix A) was issued in March 2021. The responses below describe the additional information that accompanies the planning application to address the comments.

3.1 ITEM 1 – DESIGN RATIONALE

1. *The proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed public interface along the north of the site, having regard to inter alia, the site's context along the railway line, the amount of surface car parking and the impact on the residential amenity of the future occupants of the ground floor units. The report should outline the height design rationale in light of the publication of 'Sustainable Residential Development in urban Areas' and the accompanying Urban Design Manual.*

RESPONSE

The **Architectural Design Statement** [Darmody Architecture] together with the architectural drawings illustrates detailed proposals for the proposed northern boundary of the site, the adjoining proposed east-west street (to be named Railway Avenue) and the proposed residential blocks to the south.

Detailed landscape proposals for the proposed Railway Avenue have also been prepared by Murray & Associates Landscape Architects. These drawings illustrate the proposed boundary treatment along the full extent of the northern boundary and the planting proposed within the site between the northern boundary and the proposed residential blocks.

The design rationale for the proposed public interface along the northern boundary of the site involves the provision of a safe and efficient vehicular, pedestrian and cycle route linking to Parks West Avenue to the west and the interior of the site while safeguarding the residential amenity of the future residents of Blocks A to F.

Refer to the **Architectural Design Statement** [Darmody Architecture] and **Landscape Architect's Report** [Murray & Associates] for further details.

3.2 ITEM 2 – PHASING AND DELIVERY PLAN

2. *A detailed phasing and delivery plan, including timing and delivery of the works on the site, the surrounding area and the overall Site 6 in the LAP. The phasing and masterplan documentation may include permanent solutions for the hotel carpark, justification and/or compliance with any required commercial/ residential mix for the site, phasing and delivery of the infrastructure.*

RESPONSE

A report entitled **Phasing Management and Delivery Plan** has been prepared by the applicant, Greenseed Limited.

The development of Site 6 is divided into 4 phases. These phases will be broken down further into construction stages relating to the development of individual or combined blocks depending on the construction programme. The current application relates to Stage 1 of the Local Area Plan Site 6 development. Stages 2 and 3 will be subject of separate application(s) to Dublin City Council.

As part of the current Stage 1 application, It is proposed that the north-south access road from Park West Road, the west to west link from Park West Avenue, the central public open space and Blocks A, B and C will be constructed in Phase 1 of the development. Blocks D and E will be constructed in Phase 2. Phase 3 will comprise the construction of Block F. The final phase of development will comprise the relocation of the hotel car park and the construction of Block G. Details are contained within the enclosed **Phasing Management and Delivery Plan**.

3.3 ITEM 3 – TRAFFIC AND TRANSPORT ASSESSMENT

3. *A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes, mobility management plan and Residential Travel Plan.*

RESPONSE

A **Traffic and Transport Assessment** [CS Consulting] and is enclosed within the current application.

The TTA provides details of existing land uses and associated traffic volumes within the area and confirms that the proposed development and associated trip generation can be accommodated within the existing roads and public transport network. The TTA also includes justification of the proposed car and cycle parking provision.

The TTA concludes that the proposed development will not impact significantly on the operation of the existing surrounding road network, that appropriate quanta of car and bicycle parking are provided, and that the internal road layout of the proposed development is fit for purpose and complies with the Design Manual for Urban Roads and Streets.

A **Residential Travel Plan** [CS Consulting] is also enclosed with the current application.

3.4 ITEM 4 – DMURS COMPLIANCE STATEMENT

4. *A Design Manual for Urban Streets and Roads (DMURS) compliance statement.*

RESPONSE

A **DMURS Statement of Consistency** [CS Consulting] is enclosed with the current application. This Statement confirms that the proposed design and layout of the road and street network is consistent with the *Design Manual for Urban Roads and Streets 2019*.

3.5 ITEM 5 – SUNLIGHT/ DAYLIGHT ANALYSIS

5. *An Updated Sunlight/Daylight analysis showing an acceptable level, inter alia, details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.*

RESPONSE

The proposed design and layout of apartment units and amenity spaces has been informed by a **Sunlight, Daylight & Shadow Assessment** [Chris Shackleton Consulting]. The Assessment addresses the site context and interpretation of the BRE guidelines 'Site Layout Planning for Daylight and Sunlight'.

The principal conclusions of the assessment are: -

- The overshadowing impact of the proposed development on existing residential amenity at the Barnville/ Cherry Orchard area to the north and Park West Pointe area to the west is imperceptible.
- Sunlight to the proposed public open space and communal courtyards within the proposed development areas will be in excess of the BRE guidelines. The proposed communal roof terraces will also receive high levels of sunlight.
- The proposed apartment units will receive good levels of daylight throughout the habitable areas. In addition, the Assessment has identified improvements to the building facades and apartment layouts and these have been incorporated into the architectural floor plans and elevations. The Assessment provides details of the compensatory design solutions integrated into the design.

3.6 ITEM 6 – OPEN SPACE

6. *Updated landscape plans delineating the public open space and communal open space and including useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.*

RESPONSE

Landscape drawings and a Landscape Design Report have been prepared by Murray & Associates Landscape Architects and included with the application.

The Landscape Design Report provides a detailed breakdown of the location and extent of the proposed public open space and communal open space provision. The report also details the proposed play provision.

3.7 ITEM 7 – CAR PARKING

7. *A rationale for the proposed car parking provision should be prepared, to include details of local census, mobility split, car parking management, car share schemes and a mobility management plan.*

RESPONSE

The rationale for the proposed car parking provision is set out within the enclosed **Traffic and Transport Assessment** prepared by CS Consulting.

The TTA concludes that the proposed development includes an appropriate quantum of car, bicycle, and motorcycle parking, meeting Local Authority development plan requirements and the recommendations of the 2020 Apartment Guidelines. The proposed provisions of disabled-accessible parking spaces and EV charging points exceed Local Authority standards.

3.8 ITEM 8 – PART V

8. *Part V proposals.*

RESPONSE

The proposed development comprises 750 units and therefore the Part V requirement is 75 units.

It is the applicant's intention to provide 75no. units on site to meet their Part V obligation.

The specific units to be allocated are contained in the **Part V Proposal**, containing a BMA cover letter and accompanying documents by Darmody Architecture and Greenseed Limited.

The Part V proposal has been discussed with Dublin City Council Housing Department and validation letter is enclosed with the Part V Proposal confirming initial discussions have taken place.

3.9 ITEM 9 – WIND ASSESSMENT

9. *Wind micro-climate study, including analysis of balconies.*

RESPONSE

A *Wind and Microclimate Modelling Assessment* [B-Fluid] is enclosed with the application.

This assessment concludes that the built environment created by the development will be comfortable and pleasant for future residents and pedestrians with no critical wind or microclimate impact arising as a result of the proposed development.

3.10 ITEM 10 – MATERIALS AND FINISHES

10. *A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes and frontages including the maintenance of same, shopfronts and commercial units, the treatment of landscaped areas, pathways, entrances and boundary treatment/s. The treatment/screening of exposed areas of basement ramps and any podiums as well as the under side of the proposed highline structures should also be addressed. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the overall development. The documents should also have regard to the long term management and maintenance of the proposed development.*

RESPONSE

A Report entitled *Materials and Finishes Report* has been prepared Darmody Architecture and is included with the application. This report includes input from Murray & Associates Landscape Architects in relation to hard and soft landscaping proposals.

3.11 ITEM 11 – TAKING IN CHARGE

11. *A drawing detailing all areas proposed for Taking in charge.*

RESPONSE

A Taking in Charge drawing (Dwg. No. PA-006) has been prepared by Darmody Architecture and is enclosed with the current application.

3.12 ITEM 12 – RESPONSE TO DCC

12. *Response to issues raised in Addendum B of Planning Authority Report, received 28th of January 2021, which includes the internal report of the Transportation Planning Dept.*

RESPONSE

A response to the issues raised by Dublin City Council Transportation Planning Department is contained within Section 8.0 of the **Traffic and Transport Assessment** [CS Consulting].

3.13 ITEM 13 – SOCIAL INFRASTRUCTURE AUDIT

13. *A Community and Social Infrastructure Audit.*

RESPONSE

KPMG Future Analytics have prepared a **Social Infrastructure Audit** to support the current application. The Audit concludes that the social infrastructure provision within proximity to the subject site is capable of serving the existing and future populations.

3.14 ITEM 14 – CHILDCARE PROVISION

14. *An analysis of the childcare provision in the vicinity and justification for the absence of any childcare facility on the site.*

RESPONSE

The proposed development includes a creche facility of 410sq.m within the proposed Block G.

The *Childcare Facilities Guidelines for Planning Authorities 2001* refer to a benchmark of an average of one facility (with 20 childcare spaces) for 75 houses. The *Sustainable Urban Housing: Design Standards for New Apartments (2020)* provided an update on this guidance, noting that studio and 1 bed units should not generally be considered to contribute a requirement for childcare provision, and in some cases should also exclude 2 beds.

The requirement to provide a childcare facility as part of a new residential development under the *Development Plan* will also have regard to Policy SN17 by taking account of existing facilities in the local area and the demographic profile of the area.

On the basis of these Guidelines and the Development Plan, an assessment of childcare needs has been undertaken.

Demand for Childcare

The proposed development will comfortably cater for the childcare requirements of the proposed development.

This is based upon the following assessment of the demographic profile of the future residents:-

- 429no. two and three bed residential units are proposed which equates to a population of c.944 persons, based upon an occupancy factor of 2.2 persons per household.

- Having regard to the current demographic profile of the area¹, 8.6% of the population (4,551 persons) are aged between 0-4 years (391 persons). Applying this rate to the future population of the proposed development of c.944 equates to c.81 persons aged between 0-4 years.
- Not all persons aged between 0-4 years will require childcare and others will attend a crèche or childminder off site.

The proposed creche of 410sq.m has capacity for c.84no. children. With 84 no. childcare places proposed, it is reasonable to consider that the proposed crèche is more than suitable to cater for the future requirements of the proposed development.

Choice is also available to the future residents with many existing childcare facilities within c.2km of the current application site including the existing Giraffe Childcare facility at Park West Plaza directly to the south of the current application site.

3.15 ITEM 15 – NOISE IMPACT ASSESSMENT

15. *Noise Impact Assessment including the impact of the traffic noise and any mitigation measures necessary to reduce a negative impact on the amenity of future occupants.*

RESPONSE

An assessment of noise and vibration impacts, including an assessment of inward noise impacts arising from traffic and rail movements is included within the **Environmental Impact Assessment Report** (EIAR) enclosed with the application.

Chapter 9 – Noise and Vibration of the EIAR concludes that the construction phase noise impacts with mitigation will be negative, slight to moderate and short-term at existing local residential receptors and the operational phase noise impact will be neutral, imperceptible and long-term at local residential receptors. It is predicted that the inward noise impact, including external transportation noise, with mitigation will be neutral, not-significant and long-term.

¹The electoral division of Cherry Orchard is the relevant ED for the site. The population of this ED is 4,551 persons (Census 2016).

4.0 ENVIRONMENT AND EUROPEAN SITES

4.1 ENVIRONMENTAL IMPACT ASSESSMENT

On the basis that the development exceeds 500 houses, an Environmental Impact Assessment (EIA) is required for the proposed development under Part 2 (10)(b)(ii) of Schedule 5 of the Planning and Development Regulations 2001, as amended, and having regard to the requirements of Directive 2014/52/EU (Amendment of Directive 2011/92/EU).

An ***Environmental Impact Assessment Report (EIAR)*** has been prepared and is enclosed with this planning application.

4.2 APPROPRIATE ASSESSMENT SCREENING

A ***Screening Report for Appropriate Assessment*** [Altemar] has been prepared and is enclosed.

The report has evaluated the proposed development to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

Given the nature of the project and implementation of standard construction measures in relation to protection of water quality, it is concluded that there will be no negative impacts on the qualifying interests or species of any Natura 2000 sites. The Appropriate Assessment procedure for this proposed development is therefore concluded at the Screening Stage and a detailed (Stage 2) Appropriate Assessment is not required.

5.0 CONCLUSION

On the basis of the foregoing and enclosed, it is considered that the proposed SHD at Park West would provide much needed residential accommodation at a location that would promote sustainable travel patterns; is an appropriate response for this inner suburban site; and is consistent with relevant planning policy sources.

We look forward to your decision in due course.

BMA PLANNING
November 2021

APPENDIX A
Notice of Pre-Application Consultation Opinion



An
Bord
Pleanála

**Case Reference:
ABP-308937-20**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 763 no. apartments, creche and associated site works. Park West Avenue and Park West Road, Park West, Dublin 12.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. The proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed public interface along the north of the site, having regard to inter alia, the site's context along the railway line, the amount of surface car parking and the impact on the residential amenity of the future occupants of the ground floor units. The report should outline the height design rationale in light of the publication of "Sustainable Residential Development in urban Areas" and the accompanying Urban Design Manual.

2. A detailed phasing and delivery plan, including timing and delivery of the works to on the site, the surrounding area and the overall Site 6 in the LAP. The phasing and masterplan documentation may include permanent solutions for the hotel carpark, justification and/or compliance with any required commercial/ residential mix for the site, phasing and delivery of the infrastructure.
3. A Traffic and Transport Assessment including, *inter alia*, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes, mobility management plan and Residential Travel Plan.
4. A Design Manual for Urban Streets and Roads (DMURS) compliance statement.
5. An Updated Sunlight/Daylight analysis showing an acceptable level, *inter alia*, details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.
6. Updated landscape plans delineating the public open space and communal open space and including useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.
7. A rationale for the proposed car parking provision should be prepared, to include details of local census, mobility split, car parking management, car share schemes and a mobility management plan.
8. Part V proposals.
9. Wind micro-climate study, including analysis of balconies.
10. A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes and frontages including the maintenance of same, shopfronts and commercial units, the treatment of landscaped areas, pathways, entrances and boundary treatment/s. The treatment/screening of exposed areas of basement ramps and any podiums as well as the under side of the proposed highline structures should also be addressed. Particular regard should be had to the requirement

to provide high quality and sustainable finishes and details which seek to create a distinctive character for the overall development. The documents should also have regard to the long term management and maintenance of the proposed development.

11. A drawing detailing all areas proposed for Taking in charge.
12. Response to issues raised in Addendum B of Planning Authority Report, received 28th of January 2021, which includes the internal report of the Transportation Planning Dept.
13. A Community and Social Infrastructure Audit.
14. An analysis of the childcare provision in the vicinity and justification for the absence of any childcare facility on the site.
15. Noise Impact Assessment including the impact of the traffic noise and any mitigation measures necessary to reduce a negative impact on the amenity of future occupants.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. **Transport Infrastructure Ireland.**
2. **Iarnrod Éireann.**
3. **Córas Iompair Éireann**
4. **Commission for Railway Regulation**
5. **South Dublin County Council**
6. **Department of Education**
7. **Irish Water**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
Assistant Director of Planning
March, 2021