



**ARMSTRONG
FENTON**
ASSOCIATES

PROJECT: SANTRY AVENUE STRATEGIC HOUSING DEVELOPMENT

REPORT: PLANNING REPORT

CLIENT: DWYER NOLAN DEVELOPMENTS LTD.

DATE: 20 | 06 | 22

**Planning &
Development
Consultants**



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1.0. Introduction

1.1. Purpose of Report

- 1.1.1. This Planning Report has been prepared by Armstrong Fenton Associates, Planning & Development Consultants, on behalf of Dwyer Nolan Developments Ltd. (the applicant) to accompany this application for permission for a Strategic Housing Development submitted to An Bord Pleanála in respect of a site measuring c. 1.5 hectares located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.
- 1.1.2. The subject application comprises a strategic housing development as defined within Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 and has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017.
- 1.1.3. The purpose of this Planning Report is to provide background information on the application site, give details of the proposed development, and, where applicable, demonstrate compliance with the development management standards of the relevant development plan (the Dublin City Development Plan 2016-2022) and Ministerial Guidelines issued under Section 28 of the Planning & Development Act 2000 (as amended).
- 1.1.4. Set out further in this report (section 4.0) is the planning history associated with the subject site, however, the applicants have taken on board the previous decisions to refuse permission on this site and it is considered that the overall proposal has been revised in a manner that addresses previous concerns, whilst also taking into consideration the context of the site itself.

1.2. Accompanying Documents

- 1.2.1. Section 8(1)(a)(iv)(I) of the Planning and Development (Housing) and Residential Tenancies Act 2016 directs an applicant for strategic housing development to submit a statement setting out how a proposed development will be consistent with the objectives of the relevant development plan and/or local area plan. In accordance with same, a 'Statement of Consistency' has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying this application.
- 1.2.2. Section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016 also directs an applicant for strategic housing development to submit a statement indicating why permission should be granted in cases where a proposed development will materially contravene the relevant development plan and/or local area plan other than in relation to the zoning of the land. In accordance with same, a 'Material Contravention Statement' has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying the application.
- 1.2.3. Section 172 of the Planning & Development Act 2000 (as amended) directs that an Environmental Impact Assessment is required for certain developments where stated thresholds are exceeded. While the proposed development does not alone exceed the required thresholds for the preparation of an Environmental Impact Assessment Report (EIAR), cognisance has been paid to the contextual location of the proposed development and the potential cumulative effects of the proposed development in combination with other developments in the vicinity which have recently been permitted and/or are currently under construction. Therefore, to ensure a thorough assessment of environmental impacts, an '*Environmental Impact Assessment Report*' has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying the application.
- 1.2.4. The application is also supported by a comprehensive range of additional planning documentation including for, inter alia:



- Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion
- Social & Community Infrastructure Assessment
- Quality Housing Assessment

All of these planning documents have been prepared by Armstrong Fenton Associates and accompany the application as separate standalone documents.

1.2.5. In addition, the application is also supported by a comprehensive range of drawings and technical reports prepared by the various disciplines of applicant's design team. A full schedule of all supporting documentation, drawings and details, submitted as part of the application can be found in the cover letter prepared by Armstrong Fenton Associates which is submitted with the application.

1.2.6. This Planning Report should be read in conjunction with all the supporting drawings, documentation and details submitted with the application.

1.3. Application Distribution

1.3.1. In accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017, the application has been distributed as follows:

- **An Bord Pleanála** - 2 no. printed copies & 3 no. digital copies submitted (on USB sticks)
- **Dublin City Council** - 6 no. printed copies & 1 no. digital copy submitted (on USB stick)

1.3.2. Furthermore, An Bord Pleanála's Notice of Pre-Application Consultation Opinion directed the applicant send copies of the application to 7 no. prescribed bodies as follows:

- Irish Water:
- Transport Infrastructure Ireland:
- The National Transport Authority:
- Dublin City Childcare Committee:
- Irish Aviation Authority:
- Dublin Airport Operator:
- Fingal County Council.

Prior to the submission of the application each of the above named prescribed bodies were contacted directly and asked if, given the ongoing Covid-19 pandemic and associated working restrictions related to same, 1 no. digital copy only of the application would be sufficient for their assessment of the application. It should be noted that each of the 7 no. prescribed bodies requested to receive a softcopy of the application only. As such, these each of the prescribed bodies have been sent a softcopy of the application only as requested.

In the interest of transparency, a copy of correspondence with each of the prescribed bodies confirming the above is enclosed with the application – for full details please refer to same.

1.3.3. In addition, it should be noted that the application, including for all drawings, documentation and details submitted, is available to view on a dedicated website set up by the applicant at www.santryavenuenshd2.ie.



2.0. Development Synopsis

- 2.1. In summary, the proposed strategic housing development provides for residential, commercial / retail, community, and residential amenity, uses on a site of c. 1.5 hectares located at the junction of Swords Road and Santry Avenue, Santry, Dublin 9.
- 2.2. The vast majority of subject site is owned by the applicant; however, due to the nature of some public realm works included for as part of the proposed development, a small portion of the site, where it addresses Santry Avenue and Swords Road (e.g., footpaths / roadways), are under the control of Dublin City Council. To this end, we enclose a letter of consent from Dublin City Council, and an associated map detailing the area of the site in question, consenting to the land within their control to be included in this application for permission – please refer to same for details. Please also note that the 2 no. vehicular accesses proposed to serve the development are permitted under the adjoining “*Santry Place*” development (Dublin City Council Ref. 2713/17), which is in the control of Zoltorn Limited, who have also provided a letter of consent to the applicant to include these accesses as part of the proposed development – please refer to their letter of consent also enclosed.
- 2.3. While the applicant owns the vast majority of the site, it is currently occupied, under lease, by Chadwicks Builders Merchants (formerly Heiton Buckley Builders Merchants) and will remain so until the lease expires. The proposed development includes for the demolition of the existing industrial type building on site (i.e., the Chadwicks Builders Merchants) and, in its place, will see the construction of 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), ranging from 7 no. storeys to 14 no. storeys in height, over a basement level car park.
- 2.4. The residential element of the development consists of 350 no. apartments in 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), comprised of the following mix of dwellings:
- 113 no. 1 bed dwellings:
 - 218 no. 2 bed dwellings:
 - 19 no. 3 bed dwellings.

Table 1 details a breakdown of the proposed residential mix:

Block	Total No. of Dwellings	No. of 1 beds	No. of 2 beds	No. of 3 beds	Total Residential Floor Area (sq.m)
Block A	59	26	27	6	4,002.2
Block B	38	6	26	6	3,150.6
Block C	55	13	42	N/A	4,088.5
Block D	51	25	19	7	3,700
Block E	58	10	48	N/A	4,228
Block F	55	13	42	N/A	4,068.2
Block G	34	20	14	N/A	2,113.1
Total	350	113	218	19	25,350.6

Table 1 - Proposed Residential Mix.



2.5. The proposed development also provides for 4 no. commercial / retail units and a medical suite / GP Practice unit located on the ground floor of Blocks A, B, and D, a community use unit located on the ground floor of Block E, and a 1 storey residential amenity use unit located between Blocks A and D. All these proposed non-residential uses face onto Santry Avenue and Swords Road to cater for active frontage at an important corner location. Table 2 provide for a breakdown of the proposed non-residential uses.

Block	Other Uses	Floor Area (m ²)	Total Floor Area (m ²)
Block A	Commercial Unit B	132.4	305.4
	Commercial Unit C	173	
Block B	Commercial Unit D	162.3	292.7
	Unit E – Medical Suite / GP Practice	130.4	
Block C	N/A	N/A	0
Block D	Commercial Unit A	163.3	163.3
Block E	Community Use	188.1	188.1
Block F	N/A	N/A	0
Block G	N/A	N/A	0
Between Blocks A & D	Residential Amenity Use	187.9	187.9
Total	N/A	1,137.4	1,137.4

Table 2 - Proposed Non-Residential Uses.

- 2.6. The proposed development includes for a basement level car park (c. 5,471sq.m) comprised of 173 no. car parking spaces (including for 12 no. disabled parking spaces) & 719 no. bicycle parking spaces. The basement level is internally accessible from cores of Blocks A, B, C, D, E, & F, while vehicular access to the basement is from the south between Blocks B & C. An additional 36 no. car parking spaces & 58 no. bicycle parking spaces (including 42 no. visitor spaces) are also provided for within the site boundaries, at surface level. Blocks F & G cater for internal bicycle storage areas at ground floor level also.
- 2.7. Public open space of c. 1,915sq.m is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122sq.m is provided for as follows: (i) between Blocks E, F, & G (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F, and on the proposed residential amenity use unit. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels. The development includes for hard and soft landscaping & boundary treatments, which clearly define public, private, and communal open spaces.
- 2.8. Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining "Santry Place" development (Dublin City Council Ref. 2713/17).



2.9. The site is currently in private use by Chadwicks Builders Merchants and therefore the development will not result in any loss or reduction of existing public open space, residential dwellings, or community related facilities. It is considered that the development, comprising a mix of uses, represents sustainable planning of the lands available, in compliance with the land use zoning objective attached to the site, which will benefit both existing and future residents of the Santry area.



Figure 1 - Proposed Site Layout Plan.



3.0. Pre-Application Consultations

3.1. Section 247 Meeting

- 3.1.1. A formal Section 247 pre- planning consultation meeting was held between the applicant and Dublin City Council at via Microsoft Teams on 24th November 2021. The Dublin City Planning Officer chairing the meeting was Siobhan O'Connor.

Based upon the recent planning history attached to the site as well as the fact that previous pre-planning consultation had been held regarding the subject site with Ms O'Connor, the proposed design and mix of uses, as well as building height and open space provision were discussed at this meeting.

Subsequent to this meeting, the individual members of the applicant's design team liaised with the various sections of Dublin City Council to further work through details of the development which were raised as issues in order to address any perceived shortcomings. Feedback from this pre-application meeting and various departments of Dublin City Council were incorporated into the proposed design / layout prior to proceeding to the tri-partite Pre-Application Consultation with An Bord Pleanála.

3.2. Pre-Application Consultation with An Bord Pleanála

- 3.2.1. A tri-partite Pre-Application Consultation with An Bord Pleanála, under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016, was held online via Microsoft Teams on 22^d April 2022. This meeting was chaired by Stephen O'Sullivan of An Bord Pleanála. The case reference for this meeting is ABP-312127-21. A record of this meeting is enclosed within Appendix A of this Planning Report.

The main topics for discussion at the tri-partite meeting related to the density and housing quality analysis and unit mix.

3.3. An Bord Pleanála's Pre-Application Consultation Opinion

- 3.3.1. The An Bord Pleanála's Notice of Pre-Application Consultation Opinion (hereafter the '*Opinion*') was received in April 2022 under Case Reference ABP-312127-21. A copy of the Opinion is enclosed within Appendix B of this Planning Report.
- 3.3.2. Enclosed with the application is a separate document prepared by Armstrong Fenton Associates entitled '*Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion*'. This document fully addresses all the matters raised in the Opinion – for full details please refer to same. For convenience, a summary of the matters raised in the Opinion is outlined in Section 3.3.3. below.
- 3.3.3. The Opinion considered that the documents submitted to An Bord Pleanála as part of the pre-application consultation constituted a reasonable basis for an application for a Strategic Housing Development. However, the Opinion directed the applicant to submit 3 no. items of additional specific information with the application. Table 3 summarises the 3 no. additional items of specific information requested and details how the additional information requested has been addressed within the application.

Item No.	Item Requested	Method of Response
	<i>"Submission of a Sunlight/Daylight/Overshadowing analysis including all relevant plans and documentation showing an acceptable level of residential amenity, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report</i>	On behalf of the Applicant Chris Shackleton Consulting has prepared the enclosed detailed Daylight & Shadow Analysis– please refer to same.



1	<i>should address the full extent of requirements of BRE209/BS2011, as applicable.”</i>	
2	<i>“In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant’s opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such a statement should have regard to the development plan in place at the time of the application and that likely to be in place at the date of the decision of the Board in respect of the application.”</i>	Please refer to the enclosed Statement of Consistency and Statement of Compliance with Draft Dublin City Development Plan 2022-2028 prepared by Armstrong Fenton Associates
3	<i>“The information referred to in Article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.”</i>	Please refer to the enclosed Environmental Impact Assessment Report prepared by Armstrong Fenton Associates.

Table 3 - Summary of Additional Information Requested in the Opinion.

3.3.4. The Opinion also directed the applicant send copies of the application to 7 no. prescribed bodies as follows:

- Irish Water:
- Transport Infrastructure Ireland:
- The National Transport Authority:
- Dublin City Childcare Committee:
- Irish Aviation Authority:
- Dublin Airport Operator:
- Fingal County Council:

As detailed in Section 1.3.2. each of these prescribed bodies has been provided with a soft copy of the application as required.

3.3.5. It is considered that the application now submitted to An Bord Pleanála for assessment appropriately addresses all the issues raised at the pre-application consultations and in the Opinion and contains all the requested items of specific additional information as appropriate. Having regard to relevant national, regional, and local planning policy, the zoning objective attached to the site, the contextual location of the site, the development now put forward for permission is considered to represent a sustainable development and efficient use of an underutilised site located at an important junction within the existing urban footprint of Dublin City.



4.0. Planning History & Context

- 4.1. There is no significant planning history attached to the application site, with the site currently occupied by Chadwicks Builders Merchants, in a large industrial type building, with an associated yard and car parking.
- 4.2. The applicant acquired the subject site in 2019 and, while there is no significant planning history attached to the site, of relevance to the current application is the planning history of the lands immediately to the south. This history is detailed below:

- **Reg. Ref. ABP-310910-21** - A Strategic Housing Development planning application was submitted on this site under Ref. ABP-310910-21 proposing the development of 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 7 no. seven to fourteen storey blocks, over basement level, with 5 no. retail / commercial units and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.

A decision to refuse permission was made on 4th November 2021 for one reason only which related to the fact that proposed mix of dwelling units was not addressed in the Material Contravention Statement submitted with the application which precluded An Bord Pleanála from granting permission. We note that Dublin City Council recommended a grant of permission subject to conditions and having read the Inspector's Report it is also considered that An Bord Pleanála had no objection in principle to the proposed development.

Based upon the above, we have addressed the previous reason for refusal and taken into account comments made in the assessment of the previous application by both the Planning Authority and An Bord Pleanála. To that end, we are resubmitting essentially the same development proposal as that assessed under Ref. Ref. ABP-310910-21 for pre-application consultation.

- **Reg. Ref. 2713/17** - Carnamadra Ltd. received a final grant of permission on 23rd April 2018 for a mixed use development located at Santry Avenue and Swords Road, Santry, Dublin 9. The development included for the partial demolition of existing buildings and the construction of 137 no. residential dwellings, 3 no. retail/commercial units, commercial office uses and a creche in 5 no. four and five storey blocks (Blocks A-E). The development also included for new vehicular and pedestrian accesses via Swords Road, environmental improvements along the Swords Road frontage, basement level car parking, and all ancillary and associated site development works on a site of c. 1.9 hectares.

Subsequent to the granting of permission under Ref. 2713/17, which has the approved name of “*Santry Place*”, the site was put up for sale and is now owned by Zoltorn Limited. Our client, Dwyer Nolan Developments Ltd is currently carrying out the construction of this permitted development on behalf of the landowner.

Dwyer Nolan Developments Ltd. submitted an application for modifications to the permitted development to Dublin City Council in April 2019. The details of same are as follows:

- **Reg. Ref. 2737/19** – permission granted on 1st October 2019 for modifications to the development permitted under Reg. Ref. 2713/17. This permission increased the heights of the permitted Blocks A, B & C from 5 storeys to 7 storeys, and included for a change in unit type and increase in number of apartments (68 no. apartments after design changes at Additional Information stage). The permission included for the provision of balconies and roof terraces (i.e., 240sq.m. each) to Blocks A, B & C.
- 4.3. Following the commencement of construction on Santry Place, the current strategic housing development application site was put up for sale and acquired by the applicant. The site remains occupied by Chadwicks Builders Merchants, until their lease expires, however, with the Santry Place development to the south currently



nearing completion, the subject application is considered to represent an ideal opportunity for an integrated mixed-use development which will continue the recent regeneration of the Santry area. To this end, we note the following developments in the vicinity of the subject site which have been recently permitted and /or are under construction:

- **ABP-306987-20** - Permission for the development of 120 no. apartments and associated site development works on the former Swiss Cottage lands, Swords Road, Santry, Dublin 9. The development included for building heights of 3 no. storeys to 7 no. storeys and caters for a density of c. 250 no. dwellings per hectare. The development supersedes and amended the previously permitted development granted under ABP-303358-19. The site is located approximately 100 meters to the south-east of the subject application site.
- **ABP-307011-20** - Permission for the development 324 no. apartments, a creche and associated site development works on lands to the northeast of Omni Park Shopping Centre, Swords Road, Santry, Dublin 9. The development included for building heights of 5 no. storeys to 12 no. storeys and caters for a density of c. 250 no. dwellings per hectare. The site is located approximately 250 meters to the south of the subject application site.

4.4. It is considered that the proposed development is in keeping with the aforementioned recently permitted developments at Santry Place, Swiss Cottage and the site to the northeast of Omni Shopping Centre, particularly in terms of height and density, and represents sustainable and coherent planning of this important corner location on an established entrance route into Dublin City.



5.0. Proposed Development Overview

5.1. Site Location

- 5.1.1.** The application site is located in Santry, Dublin 9, approximately 6km to the north of Dublin city centre. Santry represents a dispersed and established suburb of north Dublin which straddles the boundaries of Dublin City Council and Fingal County Council; however, the application site lies entirely within the Dublin City Council administrative area.
- 5.1.2.** At present, Santry is denoted by several established housing estates and communities, as well as numerous industrial estates and businesses which benefit from the accessible nature of Dublin Airport (c. 5km to the north) and the M1 / M50 motorways. There are also extensive institutional lands in the area catering for specialist care and mental health services, while Beaumont Hospital, to the east, is also easily accessible from the subject site. As referred to earlier and as discussed in Section 4 of this Planning Report, several new developments are currently under construction in the vicinity, bringing a new vitality to the area.
- 5.1.3.** More specifically, this proposed strategic housing development is located at the junction of Santry Avenue and Swords Road, Santry. The site is bounded to the north by Santry Avenue, to the east by Swords Road, and to the west by Santry Avenue Industrial Estate. To the south, the site abuts the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19). This permitted development includes for a total of 205 no. apartments, 3 no. retail units, a creche, community / office floor space, in 5 no. 4 to 7 storey blocks. This development is being constructed by the applicant and is currently nearing completion. The subject development has been designed with careful consideration paid to the Santry Place development to create spatial and visual integration between the permitted and proposed developments.

5.2. Site Description

- 5.2.1.** The application site measures c. 1.5 hectares and is currently occupied by Chadwicks Builders Merchants (formerly Heiton Buckley Builders Merchants) in a large industrial type building with an associated yard and car parking. The site is roughly square in shape and is generally level with the road but rises slightly at the southern end.
- 5.2.2.** The existing boundary to the Swords Road comprises a steel fence and mature hedging, while the boundary at Santry Avenue consists of a low wall with a steel fence on top. Existing vehicular access to the site is from Santry Avenue to the north.
- 5.2.3.** The site is currently fenced off from the Santry Place development to the south (due to on-going construction), and the existing access to same from the Swords Road; however, the proposed development will see integration between permitted and proposed developments in this regard.



Figure 2 – Subject Site in Context.



Figure 3 – Aerial View of Subject Site, looking from west to east.



5.3. Zoning

5.3.1. The application site is zoned “Z3” (Neighbourhood Centres) in the existing Dublin City Development Plan 2016-2022 (hereafter CDP) which has an objective “To provide for and improve neighbourhood facilities.” The CDP states the following in relation to Z3 lands:

“These are areas that provide local facilities such as small convenience shops, hairdressers, etc. within a residential neighbourhood..... They can form a focal point for a neighbourhood and provide a limited range of services to the local population, within 5 minutes walking distance. Neighbourhood centres provide an essential and sustainable amenity for residential areas, and it is important that they should be maintained and strengthened where necessary. Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level.”

5.3.2. Residential use is listed as a ‘permissible use’ under the Z3 zoning, together with, inter alia: childcare facilities, community facilities, cultural / recreational uses, medical use and related consultants, office use (max 300sq.m), open space, primary health care centres, restaurants and shops (neighbourhood).

5.3.3. The CDP recognises the importance of Z3 lands in contributing to meeting the future housing requirements of the city. To this end, it is considered that the site represents a highly suitable location for the provision of new residential development, given its location on an established entrance route into the city, next to high frequency public transport (Swords Road QBC), and the accessibility of M50 / M1 motorways.

5.3.4. The objective of the Z3 zoning is to provide for and improve neighbourhood facilities. The proposed development provides for a community use unit, a medical suite / GP Practice unit, a residential amenity unit and 4 no. commercial / retail units facing onto Swords Road and Santry Avenue. It is considered that these non-residential uses will provide for strong active frontage at street level, bringing vibrancy to a prominent corner location, and improve the range of facilities in the area in compliance with the vision for lands contained in the CDP.

5.3.5. To summarise, in compliance with the Z3 zoning objective, the proposed development includes for retail / commercial, community, and residential amenity uses at ground floor level, with high density residential development alongside and above.

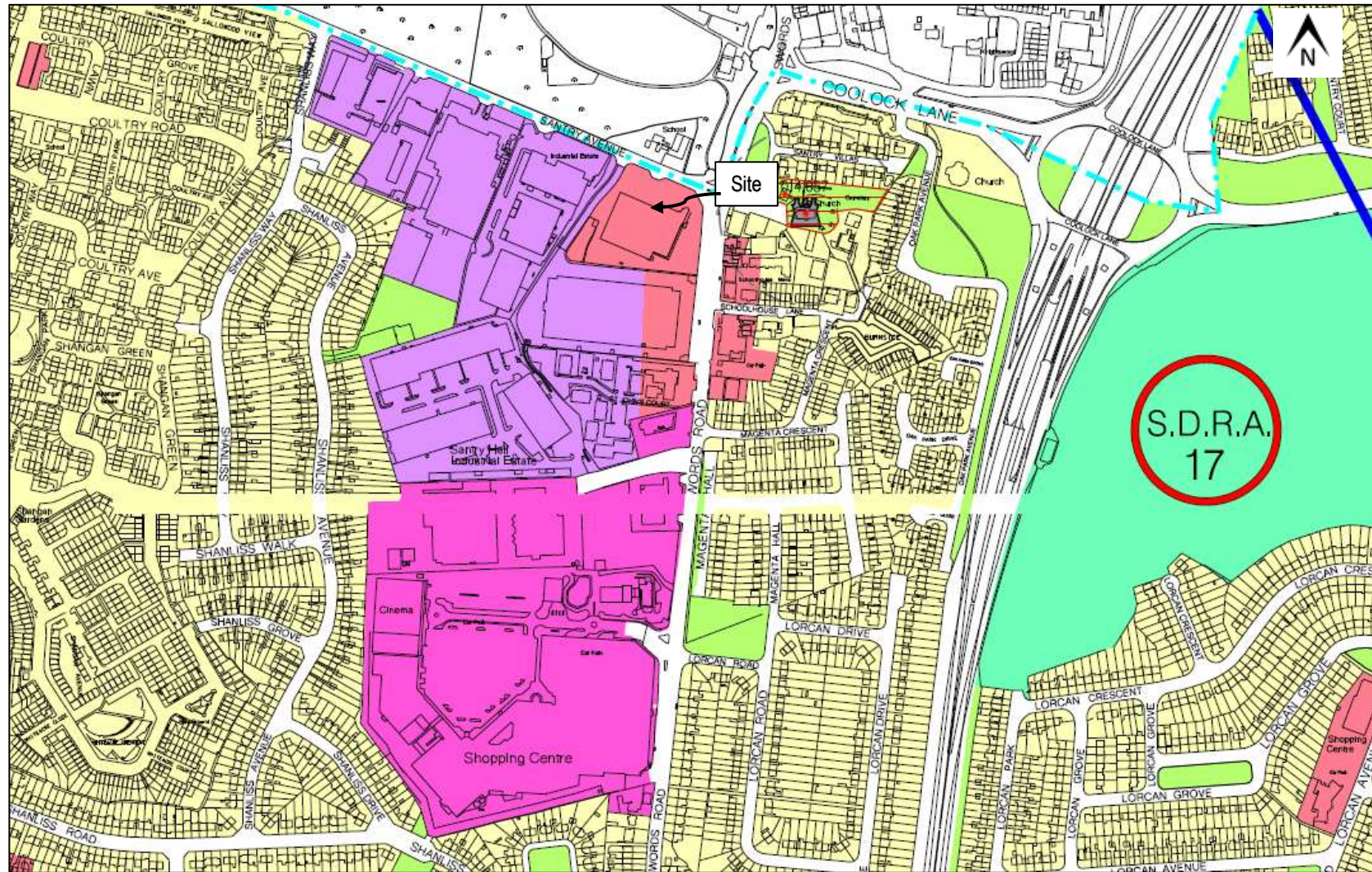


Figure 4 - Subject Site Zoning (Extract of Zoning Map B of the existing CDP).



5.4. Development Description

5.4.1. The application for Strategic Housing Development is detailed in full below, as per the public notices:

Dwyer Nolan Developments Ltd. intends to apply to An Bord Pleanála for permission for a strategic housing development, on a site of c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19).

The proposed development provides for 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 4 no. retail / commercial units, a medical suite / GP Practice unit and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.

The development consists of the following:

- (1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).
- (2) Construction of 350 no. 1, 2, & 3 bed apartments, retail / commercial, medical suite / GP Practice and community uses in 4 no. buildings that are subdivided into Blocks A-G as follows:
 - Block A is a 7 to 14 storey block consisting of 59 no. apartments comprised of 26 no. 1 bed, 27 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. commercial/retail units located on the ground floor (c. 132.4m² & 173m² respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. commercial/retail unit and 1 no. medical suite / GP Practice unit located on the ground floor (c. 162.3m² & 130.4m² respectively). Refuse storage areas are also provided for at ground floor level.
 - Block C is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. Refuse storage areas are provided for at ground floor level. Adjoining same is Block D which is a 7 to 10 storey block consisting of 51 no. apartments comprised of 25 no. 1 bed, 19 no. 2 bed, & 7 no. 3 bed dwellings, with 1 no. commercial unit / café located on the ground floor (c. 163.3m²). A refuse storage area is also provided for at ground floor level.
 - Block E is a 7 to 10 storey block consisting of 58 no. apartments comprised of 10 no. 1 bed & 48 no. 2 bed dwellings, with 1 no. community use unit located on the ground floor (c. 188.1m²). A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.



- Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
- (3) Construction of a 1 storey residential amenity unit (c. 187.9m²) located between Blocks A & D.
 - (4) Construction of basement level car parking (c.5,470.8m²) accommodating 173 no. car parking spaces & 719 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 36 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
 - (5) Public open space of c. 1,915m² is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122m² provided for between (i) Blocks E, F, & G, (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
 - (6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
 - (7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

The application contains a statement setting out how the proposal is consistent with the objectives of the Dublin City Development Plan 2016-2022, and also contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the development proposal and accompanies the application. The application, together with the Environmental Impact Assessment Report, may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dublin City Council. The application may also be inspected online at the following website set up by the applicant: www.santryavenueshd2.ie.



6.0. Residential Development

6.1. Dwelling Mix

6.1.1. In summary, the residential element of the development consists of 350 no. apartments provided for in 4 no. buildings, sub-divided into 7 no. blocks (Blocks A - G). A summary of the proposed dwelling mix can be found in Tables 4-6, while the application is also accompanied by a Housing Quality Assessment, submitted as a separate standalone document, which contains a fully detailed schedule of accommodation for each individual apartment and demonstrates the compliance of the proposed dwellings with the standards set out in the 2020 Guidelines on Design Standards for New Apartments - please refer to same for further details.

Block	Total No. of Dwellings	No. of 1 beds	No. of 2 beds	No. of 3 beds	Total Residential Floor Area (sq.m)
Block A	59	26	27	6	4,002.2
Block B	38	6	26	6	3,150.6
Block C	55	13	42	N/A	4,088.5
Block D	51	25	19	7	3,700
Block E	58	10	48	N/A	4,228
Block F	55	13	42	N/A	4,068.2
Block G	34	20	14	N/A	2,113.1
Total	350	113	218	19	25,350.6

Table 4 – Proposed Dwelling Mix.

Block	Total No. of Dwellings	% of 1 beds	% of 2 beds	% of 3 beds
Block A	59	44%	46%	10%
Block B	38	16%	68%	16%
Block C	55	24%	76%	N/A
Block D	51	49%	37%	14%
Block E	58	17%	83%	N/A
Block F	55	24%	76%	N/A
Block G	34	59%	41%	N/A
Total	350	32%	63%	6%

Table 5 - Proposed Percentile Mix.



Dwelling Type	Total No. of Dwellings	Total Gross Floor Area (sq.m)
1 bed	113	5,832.7
2 bed	218	17,364.8
3 bed	19	2,153.1
Totals	350	25,350.6

Table 6 - Proposed Dwellings & Floor Area.

6.1.2. All of the apartments have a gross floor area which meets with and/or exceed the requirements of the Sustainable Urban Housing: Design Standards for New Apartments 2020 (hereafter ‘*Apartment Guidelines*’). Internal room areas are also put forward in compliance with the requirements of the Apartment Guidelines. For further details on gross floor areas and integral room areas, please refer to the Quality Housing Assessment which accompanies the application as a separate document.

6.1.3. Private amenity spaces are in the form of terraces at ground floor level and balconies on the upper floors, with the quantum of private amenity space for each apartment meeting with and/or exceeding the requirements of the Apartment Guidelines - for further details refer to the Quality Housing Assessment which accompanies the application as a separate document. The location and orientation of each private amenity space has been carefully considered to maximum use of space and receipt of sunlight/daylight throughout the day.

6.1.4. The proposed dwelling mix is put forward in consideration of projected trends for declining household sizes in the State, and the required housing needs for Dublin detailed in the existing CDP. The 2018 National Planning Framework (hereafter NPF) notes that roughly 70% of Irish households consist of three persons or less, with the average household size in the State projected to decline to c. 2.5 persons by 2040. The NPF also details that household sizes tend to be smaller in urban areas such as Dublin, in comparison to suburban or rural areas, and notes that in Dublin City, c. 80% of all households are made up of 3 people or less. The national need for a range of smaller accommodation is also emphasised in Apartment Guidelines which also notes the long-term move towards smaller average household sizes.

6.1.5. The existing CDP notes that:

“One of the challenges facing the city is to successfully accommodate people at different stages in their life-cycle, having regard to emerging demographic trends. For example, household size is decreasing, and the number of older people is increasing. This indicates that there will be an increasing need for different types of residential accommodation....”

The Housing Strategy for Dublin City, detailed in the appendices of the CDP, states that 30% of households in Dublin City are one person households, with an average household size of 2.4 persons per dwelling.

6.1.6. It is considered that the proposed dwelling mix ensures a variety of apartment types, sizes, and tenures is delivered in a compact urban layout at an efficient density, addressing the required housing needs of both Dublin City and the State. It is also considered the proposed dwelling mix caters for a diverse and appropriate range of housing needs, in accordance with Criterion no. 4 of the Urban Design Manual which recognises that a successful neighbourhood will be one that houses a wide range of people from differing social groups with a good mix of unit types of varying sizes.

6.1.7. Section 16.10.1 of the Dublin City Council Development Plan 2016 – 2022 sets out the requirements in relation the mix of residential units provided as part of new apartment developments, which are as follows:



- A maximum of 25 - 30% one-bedroom units
- A minimum of 15% three or more bedroom units

The residential unit mix proposed as part of this development is as follows:

Block	Total No. of Dwellings	No. of 1 beds	No. of 2 beds	No. of 3 beds
Block A	59	26 (44%)	27 (46%)	6 (40%)
Block B	38	6 (16%)	26 (62%)	6 (16%)
Block C	55	13 (24%)	42 (76%)	N/A
Block D	51	25 (49%)	19 (37%)	7 (14%)
Block E	58	10 (17%)	48 (83%)	N/A
Block F	55	13 (24%)	42 (76%)	N/A
Block G	34	20 (59%)	14 (41%)	N/A
Total	350	113 (32%)	213 (61%)	24 (7%)

Table 7 - Proposed Dwelling Mix

- 6.1.8** We note, however, that the Section 28 Ministerial Guidelines ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ (December 2020) contains a “Specific Planning Policy Requirement” in relation to dwelling mix requirements, i.e. SPPR 1 which takes precedence over any conflicting policies and objectives of Development Plans.
- 6.1.9** SPPR 1 of the Apartment Guidelines (2020), states: ‘Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)’.
- 6.1.10** The proposed mix of units is therefore in accordance with the more recent SPPR 1 of the Apartment Guidelines, which would take precedent over the Development Plan where there is a conflict between them. Current national planning policy documents such as the National Planning Framework would also support this mix of units for the proposed development given its location and proximity to public transport. In this regard, the Board would be entitled to grant permission under Section 37(2)(b) of the Planning and Development Act, 2000 as amended.
- 6.1.11** Alternatively, the Board could grant permission on the basis that Section 9(3)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016 provides that when making its decision in relation to an application under this section, the Board shall apply, where relevant, specific planning policy requirements of guidelines issued by the Minister. Where specific planning policy requirements in such Ministerial guidelines differ from the provisions of the Development Plan of a Planning Authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the Development Plan. It is respectfully submitted that even if the Board does not expressly grant permission on the basis of material contravention, the Board is required to dis-apply any provisions of the Dublin City Development Plan 2016-2022 to the extent that they differ from any specific planning policy requirements set out in Ministerial Guidelines, which has been set out above. Further details are set out in the enclosed Material Contravention Statement – please refer to same.



6.2. Residential Density

6.2.1. The application site measures c. 1.5 hectares and therefore, based on the construction of 350 no. dwellings, the development produces a gross density of c. 233 dwellings per hectare. Having regard to ‘Appendix A: Measuring Residential Density’ of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) it is also considered that the development provides a net density of c. 233 dwellings per hectare.

6.2.2. The existing CDP states that Dublin City Council will promote densities in accordance with aforementioned guidelines. With regard to density, the guidelines identify a number of locations where increased densities should be encouraged to support sustainable and inclusive communities. In this context, the application site can be considered a ‘Brownfield’ or ‘Public transport corridor’ site. In relation to brownfield sites, the guidelines state that higher densities should be promoted subject to appropriate safeguards, while in relation to public transport corridors the guidelines state that:

“In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors”.

6.2.3. The gross and net density of subject development meets with the minimum density standards outlined above and, having regard to the site’s proximity to the Swords Road QBC and the proposed design / layout of the development, is considered to be an appropriate density which makes efficient use of available land adjacent to existing high frequency public transport.

6.2.4. The density of development is also considered to be fully in compliance with the objectives of the NPF which seeks to increase densities and compact forms of development in existing urban areas, in particular Objective 35 of the NPF which states the need to:

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

6.2.5. It is also considered relevant to note that the proposed density of development is similar to the densities recently permitted for strategic housing developments in the vicinity, i.e., those previously discussed in Section 4, and is therefore considered to be appropriate and in keeping with the established pattern of development in the surrounding environs of the site.

6.3. Apartment Standards

6.3.1. The Apartment Guidelines detail the most up to date standards relating to the development of new apartment schemes and as Section 28 Ministerial Guidelines, which came into force after the adoption of the existing CDP, they take precedence over any conflicting policies and objectives of the CDP.

6.3.2. The Apartment Guidelines contain 9 no. Specific Planning Policy Requirements (SPPRs) which Planning Authorities and An Bord Pleanála are required to apply in carrying out their functions. These SPPRs, and the proposed development’s compliance with same, are addressed in the following sub-sections:

6.3.3. SPPR 1 of the Apartment Guidelines states that development of new apartment schemes may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. The proposed development does not cater for any studio type units and includes for 113 no. 1 bed dwellings representing c. 32% of the total number of proposed dwellings. The proposed development is therefore in compliance with SPPR 1 of the Apartment Guidelines.



6.3.4. SPPR 2 of the Apartment Guidelines states for new developments of 50 or more dwellings, SPPR 1 shall apply to the entire development. As stated above, the proposed development is compliant with SPPR 1 of the Apartment Guidelines and is therefore considered compliant with SPPR 2 of the Apartment Guidelines.

6.3.5. SPPR 3 of the Apartment Guidelines states the minimum floor areas for apartments, being:

- 37 sq.m for studios:
- 45 sq.m for 1 bed apartments:
- 63 sq.m for 2 bed / 3 person apartments:
- 73 sq.m for 2 bed / 4 person apartments:
- 90 sq.m for 3 bed apartments.

All of the proposed apartments meet with and/or exceed these minimum floor areas stated in the Apartment Guidelines, as detailed in the Housing Quality Assessment prepared by Armstrong Fenton Associates which accompanies the application as a separate document – please refer to same. The proposed development is compliant with SPPR 3 of the Apartment Guidelines.

6.3.6. SPPR 4 of the Apartment Guidelines has regard to dual aspect ratios, with the minimum number of dual aspect apartments being based on the location of a proposed development. To this end, the subject site is considered to be a *'more central and accessible urban location'* given that the site is located adjacent to existing high frequency public transport (the Swords Road QBC). SPPR 4 of the Apartment Guidelines states that it is a requirement to deliver at least 33% of proposed units as dual aspect units at such locations. Table 7 sets out the quantum and percentage of single and dual aspect units within the proposed development.

Block	Total No. of Units	No. of Single Aspect	% Single Aspect	No. of Dual Aspect	% Dual Aspect
A	59	13	22%	46	78%
B	38	20	53%	18	47%
C	55	34	62%	21	38%
D	51	20	39%	31	61%
E	58	36	62%	22	38%
F	55	34	62%	21	38%
G	34	7	21%	27	79%
Totals	350	164	47%	186	53%

Table 7 – Proposed Residential Aspect.

It is evident from above, and on the enclosed block drawings with accompany the application, that the proposed development is compliant with SPPR 4 of the Apartment Guidelines.

6.3.7. SPPR 5 of the Apartment Guidelines states that ground level apartment floor to ceiling heights should be a minimum of 2.7m. As detailed on the drawings for each individual block, prepared by Davey & Smith Architects and enclosed with the application, the proposed development complies with SPPR 5 of the Apartment Guidelines.

6.3.8. SPPR 6 of the Apartment Guidelines states that a maximum of 12 no. apartments per floor per core can be provided in new apartment schemes. The proposed development has a maximum of 8 no. apartments per floor per core, in Blocks C & F, and is therefore in compliance with SPPR 6 of the Apartment Guidelines.

6.3.9. SPPR's 7, 8 and 9 of the Apartment Guidelines have regard to *'Built to Rent'* and co-living / shared accommodation schemes. The subject development put forward for permission is a conventional apartment



scheme i.e., **it is not a 'Built to Rent' and/or co-living / shared accommodation scheme**, therefore SPPR's 7, 8 and 9 of the Apartment Guidelines do not apply to the proposed development.

- 6.3.10.** In line with Section 3.7 of the Apartment Guidelines which states that no more than 10% of the total no. units in a development can be 2 bed / 3 person units; the development provides for 16 no. 2 bed / 3 person units (7 no. units in Block C and 9 no. units in Block E) which equates to 4.57% of the total number of units proposed as part of the development.
- 6.3.11.** The Apartment Guidelines provide for the most up-to-date and highest quality living standards for new apartment schemes in Ireland. The proposed development's compliance with all of the applicable SPPRs of the Apartment Guidelines has been demonstrated above and it is therefore considered that the proposed development represents high-quality apartment development at an appropriate location.



7.0. Non-Residential Development

7.1. Non-residential uses within the proposed development include the following:

- 4 no. commercial / retail units:
- 1 no. medical suite / GP Practice unit:
- 1 no. community use unit:
- 1 no. residential amenity use unit.

These non-residential uses are further detailed in Table 8:

Location	Use	Floor Area (m ²)	Total Floor Area (m ²)
Block A	Commercial Unit B	132.4	305.4
	Commercial Unit C	173	
Block B	Commercial Unit D	162.3	292.7
	Unit E- medical suite / GP practice	130.4	
Block D	Commercial Unit A / Café	163.3	163.3
Block E	Community Use	188.1	188.1
Between Blocks A & D	Residential Amenity Use	187.9	187.9
Total	N/A	1,137.4	1,137.4

Table 8 – Proposed Non-Residential Uses.

Commercial / Retail Uses

7.2. The development includes 4 no. commercial / retail uses located on the ground floors of Blocks A, B and D. These commercial / retail uses have been strategically located, fronting on to both Santry Avenue and Swords Road, to cater for active frontage and bring a new vibrancy to a highly visible corner location in this urban community. The proposed commercial / retail uses are also put forward in recognition of the Z3 (Neighbourhood Centres) zoning attached to the site. In accordance with the vision for Z3 lands, these uses will create a new focal point in the neighbourhood by providing a range of convenience type services to both the existing and future local population. It is also considered that these commercial / retail units compliment larger existing commercial / retail facilities in the area, particularly the Aldi supermarket to the west and the Omni Shopping Centre to the south.

7.3. It is submitted that the provision of 4 no. commercial / retail units at ground floor level, forming a strong ground floor frontage, directly addressing the adjoining streetscapes, and adjacent to an existing large urban park (Santry Demesne), will provide for an attractive new range of facilities to serve local needs in compliance with the zoning objective attached to the site.

Medical Suite / GP practice use

7.4 On the ground floor of Block B, it is proposed to accommodate a medical suite / GP use in Unit E. Under the Z3 “Neighbourhood Centres” land use zoning objective attached to the site, “medical and related consultants” is a permissible use in accordance with the CDP.



- 7.5** We note from the assessment of the previous SHD application (Ref. ABP-310910-21) that the Planning Authority stated that in terms of the ground floor uses that a condition should require retail / medical use of such units. The Planning Authority also noted that many observations referred to the lack of GP services in the area. We also note that in their recommendation to grant permission, the Planning Authority suggested that commercial unit E shall be provided as a medical suite/GP practice unit.
- 7.6** In addition, in his assessment of the application, the An Bord Pleanála Inspector concurred with the Planning Authority and stated the following: *“In respect of the commercial units proposed on the site, I note that condition no. 4 recommended by the Chief Executive identifies uses for the commercial units, including the use of Unit E as a medical suite / GP practice. I consider this condition to be reasonable and appropriate having regard to the objectives for the Z3 zone. Such condition would also satisfactorily address observer’s concerns regarding the lack of healthcare facilities in the area. In the event that the prescribed uses proved unviable, it would be open to the landowner to demonstrate same and seek a change of use at a later date. I consider that the condition should allow some flexibility with regard to which specific unit is used for medical / GP surgery use”.*
- 7.7** Based upon all of the foregoing, the current proposal provides for a medical suite / GP practice unit in unit E on the ground floor of Block B, occupying a space of c. 130sq.m

Community Use

- 7.8** In accordance with the Z3 “Neighbourhood Centres” zoning attached to the site, the proposed development provides for a community use unit on the ground floor of Block E, addressing Santry Avenue, of 188.1m². The rationale for this proposed community hub is to provide for new community space available to both future and existing residents of the Santry area. It is considered that this community hub, dependant on the tenant, will provide the opportunity to implement a range of programmes and services to benefit the community, such as community drop ins, community breakfast clubs, and other supportive groups. It is envisaged that the community hub will enable new and established communities in Dublin 9 to engage with each other, fostering a sense of community and increasing the social interaction.
- 7.9** The facility has been designed as a welcoming space, with large windows maximising light and amenity use. It is considered that the facility has the potential to cater for a number of functions and will offer a focal point within the scheme. The location of the community hub fronting onto Santry Avenue and adjoining commercial and resident support/amenity space will ensure that there will be a consistent level of activity in this part of the development.
- 7.10** The provision of this community unit is put forward in recognition of the Z3 zoning on the site, the nature and scale of the overall proposed development, plus the changing nature of the environs in recent times due to on-going and permitted development in the immediate vicinity. It is considered that the community unit will aid in the creation of a sense of community with the overall scheme, tying individual neighbours together and forming an important meeting point within the scheme. It is envisaged that the management of this facility will be operated by a specified management company, who may liaise with Dublin City Council and / or the Dublin City Local Community Development Committee in terms of what services the unit caters for.

Residential Amenity Use

- 7.11** In addition to the above commercial / retail and community uses, the proposed development includes for a one storey residential amenity use unit (187.9m²) located between Blocks A & D which fronts onto Santry Avenue. It is considered that the proposed residential amenity use unit will be capable of supporting a range of services while also providing for recreation space to future residents of the development, helping to create a sense of community between residents of the proposed apartment blocks. The residential amenity use unit also provides for a focused entrance point to this new development on Santry Avenue, aiding the creation of a sense of place and identity for the development.



7.12 The proposed residential amenity use unit has been designed to provide recreation and relaxation amenity spaces to its residents close to home. Communal amenity facilities that can be accommodated in the residential amenity unit will be up to the eventual operator as to the function of the space; however, the design of this unit allows flexibility to facilitate numerous uses. Common amenity uses include:

- Gym
- TV Room
- Co-Working Desks
- Conference Facilities
- Cinema Room
- Library Area / Quiet Zone
- Dining / Entertainment Area

7.13 Within the stand alone residential amenity unit, flexible residential amenities are catered for, such as a residents lounge for recreation and co-working which could include work booths for individual work or two to four person meetings. The use of the co-working facilities will be managed by the Management Company. Residents can use the space to meet up and socialise or it could be used for many activities including presentations, workshops or classes. The Management Company will be responsible for managing the leasing or booking of these spaces.

7.14 The dedicated residential amenity unit fronts onto the new public realm at Santry Avenue, adjacent to the proposed commercial unit / café at ground floor of Block D and the commercial unit at ground floor of Block A. To the west, on the ground floor of Block E is the proposed community use unit, so the location of all of these units alongside each other and fronting onto the street will create a vibrancy along the new street front and provide residents with essential amenity space. The community unit and café, as well as the commercial units will create a homely and welcoming atmosphere within the development.

7.15 Roof terraces / garden terrace amenity space are provided on the roofs of Blocks A, C, & F and the proposed residential amenity use unit, which will offer recreational meeting areas for residents to socialise and enjoy rooftop views of Dublin City and Santry Demesne park to the north.



8.0. Building Heights

8.1. With the exception of the proposed one storey residential amenity use unit located between Blocks A & D, the proposed development caters for 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), ranging from seven to fourteen storeys in height. The proposed building heights are detailed in Table 9:

Block	Total No. of Units	Building Height (Storeys)	Max. Building Height (Meters)
A	59	7 to 14	48.3
B	38	7	22.9
C	55	7	26.5
D	51	7 to 10	32.6
E	58	7 to 10	32.6
F	55	7	25.6
G	34	7	22.9

Table 9 – Proposed Building Heights.

8.2. The height strategy of the existing CDP details the maximum building height limits within the city, with the application site being denoted as an ‘Outer City’ location suitable for low rise buildings (as per Figure 39 ‘Building Height in Dublin Context’ and Section 16.7.2 of the CDP). For both residential and commercial development, the CDP states that up to 16 meters in height is permitted at such locations. As detailed in Table 9 above, the proposed development caters for building heights ranging from 7 storeys (22.9m) to 14 storeys (48.3m). The proposed building heights can therefore be seen as being above the maximum building heights stipulated in the CDP; however, the proposed building heights are put forward in recognition of and seen as wholly appropriate in the context of the objectives of the Section 28, 2018 Urban Development and Building Heights Guidelines for Planning Authorities (hereafter UD&BHG).

8.3. The UD&BHG carry forward the National Policy Objectives of the NPF and the Regional Policy Objectives of the Eastern & Midland Regional Spatial and Economic Strategy (2019) in relation to securing more compact forms of development, particularly within established urban areas. In summary, the guidelines seek to consolidate existing built-up areas, move away from blanket limitations on building height, increase densities within existing urban areas, and promote increased building height in locations with good public transport services.

8.4. The UD&BHG state, in relation to the assessment of individual planning applications and appeals, it is **Government policy that building heights must be generally increased in appropriate urban locations.** There is therefore **a presumption in favour of buildings of increased height in city and town cores and in other urban locations with good public transport accessibility.** The UD&BHG also clearly state that Planning Authorities and An Bord Pleanála are required to have regard to, and apply, any specific planning policy requirements (SPPRs) of the guidelines, in carrying out their functions. SPPRs stated in the UD&BHG **take precedence over any conflicting policies and objectives of development plans,** local area plans and strategic development zone planning schemes. To this end, it is notable that the existing CDP was adopted prior to the publication of the UD&BHG. (emphasis added)

8.5. To meet the objectives of the NPF, and solve the issues of housing undersupply in the country, the UD&BHG state that: “to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed “brownfield” land, building



up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements”.

- 8.6.** The UD&BHG also place significant emphasis on promoting development within the existing urban footprints and utilising the existing sustainable mobility corridors and networks:

“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks”.

The UD&BHG further states that: *“the preparation of development plans, local area plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.*

- 8.7.** In the context of all the above, it is considered that the application site offers an ideal opportunity to accommodate additional height without undue detriment to neighbouring residential properties, having regard to the Z3 zoning and the prominent corner position of the site on the junction addressing Santry Avenue and Swords Road, the location next to existing high quality public transport on an established entrance route into the city centre, including the proposed BusConnects Corridor, and immediately to the north of the permitted 7 storey Santry Place development currently under construction, and south of a large public park (Santry Demesne).
- 8.8.** Block A represents the tallest element of the proposed scheme (14 storeys at its northern elevation). The proposed height of Block A is put forward to directly address the corner location of the site and ensure a fitting urban edge to the development as passers-by make their way into the city from the north. The positioning of the tallest building in the scheme at this corner location has been based upon feedback received during the pre-planning stages of this application. To the west of Block A, Blocks D & E are 10 storeys in height at their northern elevations. It is considered that the 3 no. aforementioned buildings cater for a strong urban frontage which both contrasts with and compliments Santry Demesne to the north.
- 8.9.** The proposed 7 storey height of Blocks B, C, & F allow for integration with the permitted 7 storey blocks of the Santry Place development to the immediate south, with these proposed blocks aligned to address the permitted buildings to the south.
- 8.10.** Finally, the proposed 7 storey height of Block G addresses the south-west corner of the site, allows for visual integration with the heights of Blocks B, C, & F, to its east, and makes efficient use of the site given that there are no residential properties to the south-west/west which would be impacted by additional height at this location.
- 8.11.** The proposed development’s compliance with the 4 no. SPPRs of the UD&BHG, justifying the rationale for additional height in the context of national level policy, is fully detailed in the Statement of Consistency prepared by Armstrong Fenton Associates which accompanies the application as separate standalone document – please refer to same (Section 4.1) for further details.
- 8.12.** The rationale for the proposed building heights is also considered in the Architectural Design Statement prepared by Davey & Smith Architects which accompanies the application a separate standalone document. In addition, the application includes CGI images and verified views prepared by 3D Design Bureau, which visually demonstrate how the proposed development will fittingly integrate into the surrounding urban context. A Sunlight & Daylight Analysis, prepared by Chris Shackleton Consulting, is also enclosed which demonstrates that the proposed heights will not negatively impact the amenity areas of the development. A Landscape and Visual Impact Assessment has also been undertaken by Dermot Foley Landscape Architects which details how the



proposed development will make a significant and positive contribution to the new emerging townscape of wider area and the future context of the surrounding lands.

- 8.13.** A Landscape and Visual Impact Assessment (LVIA) has been undertaken by Dermot Foley Landscape Architects which details how the proposed development will make a significant and positive contribution to the new emerging townscape of wider area and the future context of the surrounding lands. This was included in the previously submitted EIAR (Chapter 14 The Landscape) and remains the same for this proposal. In his assessment of the LVIA, the An Bord Pleanála Inspector concluded that: *“I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Landscape would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Landscape”.*
- 8.14.** We note that in the assessment of the previous application Ref. ABP-310910-21, the An Bord Pleanála Inspector noted the following in relation to the same proposed building heights: *“The development would materially contravene the building height provisions of the development plan and I have considered the development under the criteria set out in section 3.2 of the Building Height Guidelines in section 11.11 below. I conclude that these criteria are satisfied and that the proposed building heights can be satisfactorily accommodated on the site. I do not necessarily concur with the planning authority recommendation that the height of Blocks A, D and E be reduced. I consider that the recommended reduction in the height of Block A would provide an unsatisfactory design solution, resulting in a block which will neither function as a landmark nor integrate with its surroundings satisfactorily. With regard to Blocks D and E, having regard to the alignment of the blocks and relative slenderness on their northern elevations, I do not consider that they would result in undue negative impacts on the visual amenities of Santry Avenue or the wider area. A reduction to 7-storeys would provide a consistent height across this site and the adjoining development to the south but would lack variety and visual interest. When viewed from the adjoining public realm on Santry Avenue, I am not convinced that the recommended reductions would result in a material change to how the development is seen or experienced or that they would result in any improvement to the design”.*
- 8.15.** In assessing the previous application, and with regard to the proposed building heights materially contravening the Development Plan, the An Bord Pleanála Inspector concluded in his report (Section 10.11.2, pg. 83): *“I consider that the provisions of Section 37(2)(b)(i) and (iii) have been satisfied and that the Board may invoke the material contravention procedure, in relation to Development Plan building height policies, and grant permission for the proposed development”.*
- 8.16.** Based upon all of the foregoing, it is considered that the proposed building heights are appropriate having regard to the site’s location and the objectives of both national and regional planning policy which seek to achieve increased building heights, densities, and compact growth on sites located within the footprint of existing urban areas, particularly where adjacent to public transport routes.



9.0. Quantum of Development

9.1. Gross Floor Space

9.1.1. The proposed residential accommodation (350 no. dwellings) comprises a total of c. 25,350.6sq.m, as previously summarised in Tables 4-6 of this Planning Report. A full schedule of residential accommodation can be found in the Housing Quality Assessment which accompanies the application as a separate document - please refer to same for further details.

9.1.2. The proposed non-residential elements of the development include for 4 no. commercial / retail units, a medical suite / GP Practice unit, a community use unit, and a residential amenity use unit.

9.1.3. Details of the total gross floor area associated with the development can be found in Table 10:

Residential	Gross Floor Area (m ²)	Total (m ²)
Apartments	25,350.6	25,350.6
-	-	-
Non-Residential	-	-
Commercial / Retail Unit A	163.3	-
Commercial / Retail Unit B	132.4	-
Commercial / Retail Unit C	173	-
Commercial / Retail Unit D	162.3	-
Medical Suite / GP Practice Unit	130.4	-
Community Use Unit	188.1	-
Residential Amenity Use Unit	187.9	1,137.4
-	-	-
Total Gross Floor Area		26,488

Table 10 - Quantum of Development.

9.2. Plot Ratio & Site Coverage

9.2.1. The proposed development has total floor area of 26,488 sq.m (including the non-residential elements) and, based upon the gross site area of 1.5 hectares, produces a plot ratio of 1.76. The existing CDP states an indicative plot ratio of 1.5-2.0 for Z3 zoned lands. The proposed plot ratio is therefore considered to be appropriate and in line with the indicative ratios stated in the CDP.

9.2.2. Based on the site area of 1.5 hectares, the proposed site coverage is c. 33.5% which, having regard to the proposed density, plot ratio, and open space provisions, is considered to be appropriate. The existing CDP states that “*site coverage is a control for the purpose of preventing the adverse effects of overdevelopment, thereby safeguarding sunlight and daylight within or adjoining a proposed layout of buildings*” and also caters for an indicative site coverage of 60% for Z3 zoned lands. The proposed plot ratio is therefore considered not to exceed same and be in accordance with the indicative ratios stated in the CDP.



10.0. Open Spaces

Public Open Space

- 10.1.1. Public open space for the proposed development is provided for in linear form, centrally located, between Blocks C, D, E, & F. The proposed public open space provision equates to c. 1.915 sq.m representing c. 13% of the site area.
- 10.1.2. The existing CDP states, in Section 16.3.4, that meaningful public open space is required for development proposals on all zoned lands and, with regard to Z3 lands, sets a requirement for 10% of the site area to be reserved for public open space. The proposed development caters for c. 13% of the subject site to be allocated as public open space and is therefore in compliance with the requirements of the CDP.
- 10.1.3. The proposed public open space has been strategically designed and located to align with the permitted public open space provision within the adjoining Santry Place development to the immediate south, allowing for visual integration between proposed and permitted developments and maximising meaningful, usable space.

Communal Open Space

- 10.1.4. In addition to the public open space provision, the proposed development also caters for a generous provision of communal open space.
- 10.1.5. Communal open space is catered for as follows:
- between Blocks E, F, & G - c. 707sq.m:
 - between Blocks A, B, C, & D - c. 1,190.2sq.m:
 - in the form of roof gardens located on:
 - Block A (c. 267.1sq.m)
 - Block C (c. 418.6sq.m)
 - Block F (c. 436.2 sq.m)
 - on the proposed residential amenity use unit (c. 104.6 sq.m).

Therefore, in totality, the proposed communal open space provision for the development equates to c. 3,122 sq.m.

- 10.1.6. With regard to communal open space provision, the CDP states that communal open space should be provided for apartment schemes as:

“a ‘breathing space’ and for meeting the amenity needs of residents. It may be in the form of accessible sheltered roof gardens, communal landscaped areas at ground level or at podium level where commercial or retail uses occupy the ground floor. Whilst private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or ‘privacy strip’ between the two.”

The Apartment Guidelines set the following standards for the provision of communal open space:

- 5 sq.m for 1 bed dwellings:
- 6 sq.m for 2 bed / 3 person dwellings:
- 7 sq.m for 2 bed / 4 person dwellings:
- 9 sq.m for 3 bed dwellings.

Based upon these standards, the communal open space requirements for the proposed development are detailed in Table 11:



Proposed Dwelling Type	No. of Dwellings Proposed	Individual Communal Open Space Requirement (sq.m)	Total Communal Open Space Requirement (sq.m)
1 bed	113	5	565
2 bed / 3 person	16	6	96
2 bed / 4 person	202	7	1,414
3 bed	19	9	171
-	350	-	2,246

Table 11- Communal Open Space Requirements.

10.1.7. The proposed development caters for 3,122sq.m of communal open space, which is in excess of the 2,246sq.m required (equating to an additional 38%) based on the proposed dwelling mix and the Apartment Guidelines. The architectural and landscaping plans/details submitted with the application, including boundary treatments, ensure that public, communal and private open spaces will clearly be defined and differentiated.

Private Open Space

10.1.8. Private amenity spaces for each apartment are in the form of terraces at ground floor level and balconies on the upper floors. The location / orientation of private amenity spaces for each apartment has been carefully considered in order to maximise use of space and receipt of sunlight/daylight throughout the day. A full Housing Quality Assessment detailing the external and internal areas of each individual apartment is enclosed with the application as a separate document – please refer to same for full details.



11.0. Parking & Road Considerations

Car Parking

- 11.1. In total, the proposed development caters for 209 no. car parking spaces provided for in the form of basement level parking and surface level parking.
- 11.2. Of the total 209 no. on-site dedicated car parking spaces to be provided, 173 no. spaces will be provided within the basement car parking and 36 no. residential and set down/visitors spaces also incorporating 6 no. mobility impaired and 3 no. car share (GoCar) spaces will be provided at surface level.
- 11.3. In accordance with Map J “Strategic Transport & Parking Areas” of the existing CDP, the subject site is located in Area 3, which requires 1.5 spaces per dwelling in accordance with Table 16.1 of the CDP. We note that the CDP states that car parking standards are **“maximum in nature and may be reduced in specific, mainly inner city locations where it is demonstrated that other modes of transport are sufficient for the needs of residents”** and that apartment spaces are mainly “to provide for car storage to support family-friendly living policies in the site and make apartments more attractive for all residents. It is not intended to promote the use of the car within the city”, (emphasis added).
- 11.4. The Apartment Guidelines also have regard to car parking for new apartment schemes and, as Section 28 Guidelines, take precedence over the CDP standards, the proposed car parking is based upon the standards set out in the Guidelines. The Apartment Guidelines seek to reduce car parking, where possible, in favour of more sustainable modes of transportation, and state the following with regard to ‘Central and/or Accessible Urban Locations’:
- “In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking **provision to be minimised, substantially reduced or wholly eliminated in certain circumstances**”, (emphasis added).*
- The Apartment Guidelines define ‘Central and/or Accessible Urban Locations’ as:
- “locations are most likely to be in cities, especially in or adjacent to (i.e., within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or **within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services**”, (emphasis added).*
- The subject site clearly defined as a ‘Central and/or Accessible Urban Location’ within the context of the Apartment Guidelines, based upon the site’s proximity to an existing high quality public transport (Swords Road QBC) and proposed public transport routes (BusConnects Corridor on Swords Road and the proposed Metro North route to the west). Therefore, the car parking provision for the development can be appropriately: *“minimised, substantially reduced or wholly eliminated in certain circumstances”* as recommended by the Apartment Guidelines.
- 11.5. The proposed car parking provision of 209 no. spaces equates to a ratio of 0.6 spaces per dwelling which represents a reduced car parking standard when compared to CDP standards (which are a maximum); however, in the context of the Apartment Guidelines the proposed car parking provision is considered to be wholly justified by virtue of the site’s proximity to existing public transport options (existing and proposed urban bus services within 1km of the application site).
- 11.6. Further details of the proposed car parking and rationale for the proposed quantum are set out in the enclosed Traffic & Transport Assessment (TTA) prepared by DBFL Consulting Engineers – please refer to same.



Bicycle Parking

- 11.7. In total, the proposed development caters for 777 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within the proposed buildings.
- 11.8. Of the proposed bicycle parking provision, 719 no. bicycle parking spaces are catered for at basement level and a further 58 proposed as short term stay on surface level.
- 11.9. The cycle provision also includes 9 no. Cargo parking spaces within basement. It is noted that the provision of cycle parking proposed within the development exceeds DCC standards and exceed the full DHPLG guideline for long term bicycle parking and is therefore considered adequate to accommodate residents' requirements and support / encourage modal shift away from private cars to a more sustainable travel by cycle.
- 11.10. Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to same.

Road Considerations

- 11.11. Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site and (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
- 11.12. The proposed development also provides for pedestrian and cyclist access from both Swords Road and Santry Avenue, whilst enabling direct access to the permitted development south of the application site at Santry Place. The proposed connections are made in compliance with Greater Dublin Area Cycle Network Plan, 2013 and the Transport Strategy for the Greater Dublin Area 2016-2035.
- 11.13. The front of the site will be highly accessible to pedestrians with the opening up of the lands to the public realm, as opposed to the current gated situation which is a consequence of the existing builders merchants. In addition, a strong, pedestrian frontage onto both Santry Avenue and Swords Road will be created, allowing for the public to access the proposed commercial units, open spaces and residential units, through the set back of the buildings from the public realm. The necessary consent to include these proposals in this application for permission, thus improving and opening up the site to the public realm, has been afforded to the applicant by Dublin City Council – please refer to the submitted letter of consent.
- 11.14. For further information regarding the road layout and design refer to the report under a separate heading - Traffic and Transport Assessment, prepared by DBFL Consulting Engineers and the relevant enclosed drawings prepared by DBFL Consulting Engineers which are submitted with the application.

12.0. Urban Design

- 12.1. Due to the prominent location of the site addressing two main roads, the proposed development has been designed to provide for a strong urban form and good street frontage. In light of the orientation of the site and having regard to both permitted developments and the changing nature of the immediate environs, the buildings are orientated in a north-south direction, whilst addressing the streets they abut.
- 12.2. The proposed blocks are defined by variations in building type and design, internal road layout and hierarchy and related open spaces. The enclosed Architectural Design Statement prepared by Davey & Smith Architects provides details of the blocks proposed in terms of their varying architectural design, layout and materiality. Details are also set out in the enclosed Architectural Design Statement of how these proposed blocks are



punctuated with large-recessed balconies which structure the elevations, with balconies framed in a strong architectural statement at this corner location.

- 12.3.** The varying heights of the proposed buildings break up the mass and volume of the scheme, with only one tall building of 14 storeys proposed, which will act as a landmark to the prominent corner at the junction of Swords Road and Santry Avenue. The proposed height of 7 storeys at the southern end of the scheme, marries in with the adjoining Santry Place, currently under construction, but also presents an appropriate urban street edge onto Swords Road. The introduction of 10 storey buildings fronting onto Santry Avenue sit side by side of the tallest building thus creating a variance and natural transition between 7 and 14 storeys.
- 12.4.** The punctuation in the site layout between buildings allows for light penetration into the site but also replicates the positioning of the buildings to the south in Santry Place. The proposed site layout plan provides for connectivity and permeability into Santry Place and for urban open spaces to be created. The overall design proposed allows for this site to be developed as a landmark setting for Santry thus creating a sense of place in itself.
- 12.5.** It is considered that the areas within the scheme, in tandem with the neighbouring permitted scheme south of the application site, will reinforce the concept of developing a new urban quarter in this northern location of Santry, providing for a sense of variety and blocks in terms of appearance, layout, while the distribution of materials has been judiciously considered as part of the design process. The development now put forward for permission provides for an appropriate variety of housing typologies which have been developed to ensure that the scheme provides for high quality design, based upon the 12 urban design criteria set out in the Urban Design Manual (2009), the details of which are set out in Statement of Consistency and the Architectural Design Statement which accompany the application.
- 12.6.** The proposed development provides for pedestrian and cyclist connectivity to adjoining lands as follows:
- The neighbouring lands bounding the southern boundary of the site are currently being developed as part of the permitted residential scheme known as Santry Place (Ref.s 2713/17 & 2737/19). The site layout plan provides for direct connectivity and permeability into Santry Place. The proposed scheme has been designed to allow for it to assimilate with Santry Place to the south, with a view to developing this area of Santry as a landmark setting, creating a sense of place.
 - The site is to be accessed via Santry Avenue and Swords Road which allows for direct accessibility to Santry Park and proposed retail / commercial units.
 - The proposed scheme will provide footpaths facing onto both Santry Avenue and Swords Road which will enable the flow of footfall to safely visit the proposed community hub and 4 no. retail / commercial units proposed.
 - The opening up of the site and proposed improvements to the public realm will allow for a natural connection for pedestrians and cyclists to access the existing crossing, at the junction of Santry Avenue and Swords Road, into Santry Demesne park to the north, on the opposite side of Santry Avenue.
 - The lands are easily accessible via the R132 Swords Road which connects the subject lands both to other parts of north Dublin and Dublin Airport to the north and the city centre to the south. The lands are also located in close proximity to the M50 which provides access to the Port Tunnel.
 - The site is well served by bus services with Dublin Bus routes No.'s 16, 16c, 33, 41m 41a, 41b and 41c connecting the site to Dublin Airport, Balbriggan and Swords to the north and the city centre and Ballinteer to the south. The site is also located along the proposed BusConnects Corridor.



13.0. Part V Proposals

- 13.1. The applicant proposes to allocate 10% of the proposed units on site for social housing in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended). Details of the proposed unit types, along with correspondence between the applicant and the Housing Department of Dublin City Council are enclosed with the application – please refer to same. Also included is a letter of validation from the Housing Department of Dublin City Council, dated 5th May 2021 (Part V Ref: 918) which confirms that the applicant has engaged in Part V discussions with and the Housing Department of DCC.
- 13.2. It is proposed to provide 35 no. units located within Block F to satisfy the applicant’s Part V obligations. The location of specific units and their plans are detailed on Drawing No. D1809.P30 ‘Part V Drawing (Block F)’ prepared by Davey & Smith Architects – please refer to same.
- 13.3. The information set out is for the purposes of facilitating a future planning application and will be subject to finalisation and formal agreement with the Local Authority. The ultimate agreement with regard to compliance with Section 96 of the Act is dependent upon receipt of a final grant of permission and on the site value at the time the permission is granted. The applicant intends to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of Dublin City Council with respect to the provision of Social Housing.
- 13.4. Please refer to the enclosed Part V proposal for further details.



14.0. Other Services Infrastructure

14.1. DBFL Consulting Engineers have prepared the enclosed Engineering Services Report, Site Specific Flood Risk Assessment (SSFRA) and associated drawings in relation to physical infrastructure – please refer to same for further details. The following presents a summary of the aforementioned reports:

Foul Drainage

- 14.2. There is an existing 300mm diameter public foul sewer located on the Swords Road (R104) to the east of the site. As part of Irish Water Connection Reference, No: CDS19003221 a 225mm diameter foul sewer has been constructed within the previously approved mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of the site. This foul sewer has been constructed from the development site boundary across Swords Road and connected to the existing 300mm diameter public foul sewer noted above under a Connection Agreement with Irish Water. Any existing private foul infrastructure present onsite will be grubbed up and removed.
- 14.3. The foul sewerage from this development is proposed to discharge via gravity by means of a new 225mm diameter sewer outfalling to a manhole constructed as part of the previously approved proposed mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of this development. This will negate the requirement for any construction outside of the site boundary and minimise any disruption to the public. The new sewer will be designed and constructed in accordance with Irish Water Code of Practice and Standard Detail requirements.
- 14.4. A Pre-Connection Enquiry was submitted to Irish Water CDS20003546 and subsequent confirmation of feasibility letter states that connection is feasible subject to upgrades. The Applicant will enter into conversation with Irish Water to progress required works following receipt of Planning Approval. The foul water design was submitted to Irish Water to ensure compliance with Irish Water codes of practice and has received design acceptance.
- 14.5. Foul sewers have been designed and will be constructed in accordance with the Irish Water's '*Standard Details for Wastewater Infrastructure*' and '*Code of Practice for Wastewater Infrastructure*'. In addition, the foul sewers have been designed to Building Regulations and specifically in accordance with the principles and methods set out in EN 752:2008 and DOE '*Recommendations for Site Development Works*'. HR Wallingford '*Tables for the hydraulic design of pipes, sewers and channels*' and Water UK/WRc '*Sewers for Adoption – 6th Edition*' have been applied. Values for roughness of uPVC pipes were obtained from Wallingford "*Tables for the Hydraulic Design of Pipes, Sewers and Channels*" and Wavin sewer systems catalogue.
- 14.6. Further details are set out in the enclosed Engineering Services Report by DBFL and their enclosed drawings for details of the proposed foul sewer design – please refer to same.

Surface Water

14.7. There is an existing 225mm diameter public surface water sewer located on the Swords Road (R104) to the east of the site. A surface water network is currently under construction within the previously approved proposed mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of the proposed development. This system contains an attenuation system, hydrobrake and petrol interceptor on the outfall surface water sewer. This outfall sewer discharges to the existing 225mm diameter sewer noted above. A connection to the public sewer has been made at the junction of the Swords Road with Schoolhouse Lane under permission of Dublin City Council. This connection has been approved under Planning Ref: 2713/17 & 2737/19. Any existing private infrastructure present onsite will be grubbed up and removed.



- 14.8.** The surface water drainage from this development is proposed to discharge, following attenuation and hydrobrake flow control device, via a new 225mm diameter surface water sewer to a manhole constructed as part of the previously approved mixed-use development (Planning Ref: 2713/17 & 2737/19) to the south of this development. The location of the proposed connection/outfall point will be on the existing 225mm surface water sewer constructed for the mixed-use development (Planning Ref: 2713/17 & 2737/19), following the installed hydrobrake and before the petrol interceptor. The petrol interceptor, placed under the aforementioned planning reference, has been designed to accommodate the combined permitted discharge rate from both of this development and the development located to the south (Planning Ref: 2713/17 & 2737/19).
- 14.9.** Surface water management for the proposed development is designed to comply with the 'Greater Dublin Strategic Drainage Study (GSDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005' and the 'Greater Dublin Regional Code of Practice for Drainage Works, V6.0 2005'. CIRIA Design Manuals C753, C697 and C609 have also been used to design the surface water drainage system within the site.
- 14.10.** It is proposed to use a sustainable urban drainage system (SuDS) approach to stormwater management throughout the site, the overall strategy aims to provide an effective system to mitigate the adverse effects of urban stormwater runoff on the environment by reducing runoff rates, volumes and frequency, reducing pollutant concentrations in stormwater, contributing to amenity, aesthetics and biodiversity enhancement and allow for the maximum collection of rainwater for re-use where possible. In addition, SuDS features aim to replicate the natural characteristics of rainfall runoff for any site by providing control of run-off at source and this has been achieved by the current proposals.
- 14.11.** SuDS are a requirement of Dublin City Council under their 'Regional Code of Practice for Drainage Works' and 'The Greater Dublin Strategic Drainage Study'. Additionally, these systems are recommended under the 2009 guidelines, 'The Planning System and Flood Risk Management'. There are a number of SuDS features proposed including:
- Extensive Green Roofs:
 - Intensive Green Roofs:
 - Catchpit Manhole:
 - Permeable Pavement:
- 14.12.** Further details are set out in the enclosed Engineering Services Report by DBFL Consulting Engineers and their enclosed drawings also prepared by DBFL Consulting Engineers – please refer to same for full details.
- 14.13.** GSDSDS requires flood waters for a 100-year return period to be managed on-site, therefore this return period is adopted for attenuation calculations. Surface water attenuation for the site will be provided by an online attenuation system located in the open space to the south of the site Blocks C and F. The proposed attenuation system will be an underground 'Pluvial Cube - Double Module' proprietary modular system (or similar approved). This attenuation system is being proposed due to its reduced surface area in comparison to 'Stormtech' proprietary modular arch systems in order to remain within the tight confines of the public open space between blocks C and F. The attenuation system will be tanked. The discharge rate from the attenuation system will be controlled using a Hydro Brake Optimum or equivalent.
- 14.14.** The development drainage infrastructure system, including Sustainable Drainage System features (SuDS) with underground attenuation, will be designed such that the catchment will drain to the public surface water network. The surface water runoff from this catchment will be restricted to greenfield runoff rates using a hydrobrake flow control device. As required by Dublin City Council a climate change allowance of 20% will be applied to the surface water drainage design.
- 14.15.** The volume of attenuation required within the site is 416 m³. The volume of attenuation provided within the site is 536 m³.



14.16. Further details are set out in the enclosed Engineering Services Report by DBFL, including Appendix D for attenuation calculations and the enclosed drawing also prepared by DBFL Consulting Engineers.

Watermains

14.17. There is currently no water supply infrastructure, noted on Irish Water records within the subject site. There is an existing 300mm diameter cast iron public watermain located on the Swords Road adjacent to the proposed site entrance. Any existing private infrastructure present onsite will be grubbed up and removed. A Pre-Connection Enquiry was submitted to Irish Water CDS20003546 and subsequent confirmation of feasibility letter states that connection is feasible subject to upgrades. The Applicant will enter into conversation with Irish Water to progress required works following receipt of Planning Approval. The watermain design was submitted to Irish Water to ensure compliance with Irish Water codes of practice and has received design acceptance.

14.18. A connection will be made to the existing 300mm diameter cast iron watermain on Swords Road. A proposed 200mm diameter watermain and new fire hydrants will be provided throughout the site in accordance with Irish Water Code of Practice. The estimated peak demand from the development will be 10.46 l/s with the average daily demand being 144.601 m³. A bulk water meter will be provided at the connection to the site. The proposed distribution system to the communal residential development and commercial units shall facilitate the installation of approved individual meters to each individual unit or business within the development and agreed by Irish Water. Further details are set out in the enclosed engineering services report prepared by DBFL and their enclosed drawing pack for details of the proposed watermain design – please refer to same.

Flood Risk

14.19. A Site Specific Flood Risk Assessment (SSFRA) has been undertaken for the proposed development by DBFL Consulting Engineers and is enclosed – please refer to same. A summary of same is provided here:

14.20. Flood risk is normally assessed by a flood risk identification stage followed by an initial flood risk assessment. A more detailed flood risk assessment stage may then follow which includes an assessment of surface water management, flood risk and mitigation measures to be applied.

14.21. The enclosed SSFRA finds that the subject site is not at risk from tidal or fluvial flooding due to its geographic location and topography. There is a moderate risk of groundwater flooding the basement of the site. GSI records state that groundwater vulnerability is low however there were high levels of standing water noted in trial holes during infiltration tests on neighbouring site. Basement design/construction will take this into account. There is also a moderate risk of pluvial flooding due to the potential surcharging and blockage of the new drainage network.

14.22. Following the assessment of the flood risks to the site and the available information, it is considered that the proposed site is located within Flood Zone Category C as defined by “*The Planning System and Flood Risk Management Guidelines for Planning Authorities*”, and as indicated by the ECFRAMS maps. Therefore, the proposed residential development on the subject site is appropriate for this flood zone category, and a justification test is not required.

14.23. The enclosed SSFRA puts forward mitigation measures to address residual flood risks and asserts that it is considered that the flood risk mitigation measures, once fully implemented, are sufficient to provide a suitable level of protection to the proposed development and will not cause an increased risk of flooding to external properties.

14.24. The report concludes that the proposed site is located within Flood Zone C and therefore a Justification Test is not required. A regularly maintained drainage system will ensure that the network remains effective and in good working order should a large pluvial storm occur. In the event of extreme pluvial flooding then overland flood



routes will direct water towards the open space areas. While the development constitutes 'highly vulnerable' development, it is appropriate for this flood zone and the scheme is designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable. The development does not increase the risk of flooding to adjacent areas and roads once mitigation measures are implemented.

15.0. Phasing Proposals

15.1. In order to ensure coherent delivery of development, enclosed as part of the application is a proposed phasing plan. The proposed phasing plan is detailed on the enclosed Drawing No. D1809.P31 'Site Layout - Phasing' prepared by Davey & Smith Architects. As detailed on the enclosed drawing, it is proposed to deliver the development as follows:

- **Phase 1:** The first phase of development will consist of the delivery of the basement level car park, Blocks A & B (97 no. residential dwellings, 3 no. retail / commercial units & a medical suite / GP Practice unit), and the communal open space to the west of Blocks A & B / east of Blocks C & D.
- **Phase 2:** The second phase of development will consist of the delivery of Blocks C & D (106 no. residential dwellings & 1 no. retail / commercial unit), the residential amenity use unit, and the public open space for the development.
- **Phase 3:** The third phase of development will consist of the delivery of Blocks E, F, & G (147 no. residential dwellings & the community use unit) and the remainder of the communal open space (to the west Blocks E & F and east Block G).

15.2. It is considered that proposed phasing of development, as detailed above and Drawing No. D1809.P31 'Site Layout - Phasing' prepared by Davey & Smith Architects, represents a coherent and logical phasing proposal for the development which will see infrastructure delivered in an appropriate manner and in tandem with residential development.

15.3. It should be noted, however, that the phasing details submitted as part of the application are a proposal and it is considered that, given the scale of the development, a final phasing plan can be agreed with the local authority prior to commencement of development should a grant of permission be forthcoming.

16.0. Environmental Considerations

16.1. Environmental Impact Assessment Report

16.1.1. Section 172 of the Planning & Development Act 2000 (as amended) directs that an Environmental Impact Assessment, which also constitutes an Environmental Impact Statement (EIS) for the purposes of the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001-2018, is required for certain developments where stated thresholds are exceeded.

16.1.2. The proposed development is comprised of 350 no. dwellings, with associated community use hub, medical suite / GP practice unit, residential amenity unit and 4 no. commercial / retail units and all associated site development works on a site of 1.5ha in area. While the proposed development does not alone exceed the required thresholds for the preparation of an Environmental Impact Assessment Report (EIAR), cognisance has been paid to the contextual location of the proposed development and the potential cumulative effects of the proposed development in combination with other developments in the vicinity which have recently been permitted and/or are currently under construction. Therefore, to ensure a thorough assessment of environmental impacts, an 'Environmental Impact Assessment Report' (EIAR) has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying the application.



- 16.1.3.** The EIAR includes for a Non-Technical Summary as required. The EIAR has been prepared in accordance with Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16 April 2014 as an amendment of Directive 2011/92/EU.
- 16.1.4.** As required, the public notices for the development have detailed that an EIAR has been prepared as part of the application and that the EIAR is available for inspection and/or purchase from offices of An Bord Pleanála and Dublin City Council. The EIAR has also been uploaded to national EIAR portal – a confirmation notice of same is enclosed with the application. Furthermore, the EIAR is available to view on the dedicated application website set up by the applicant at www.santryavenueshd2.ie.
- 16.1.5.** The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application.

16.2. Appropriate Assessment

- 16.2.1.** An Appropriate Assessment (AA) Screening Report for the development has been prepared by Enviroguide Consulting and is submitted with the application as a separate document. The AA screening report has evaluated the development to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of the development's construction and use.

- 16.2.2.** The European sites relevant to the site are as follows:

- North Dublin Bay SAC No. 000206 - 5.8km from subject site
- Baldoyle Bay SAC No. 000199 - 6.9km from subject site
- South Dublin Bay SAC No. 000210 - 7km from subject site
- Malahide Estuary SAC No. 000205 - 7.8km from subject site
- Howth Head SAC No. 000202 - 10.2km from subject site
- Rockabill to Dalkey Island SAC No. 003000 - 10.9km from subject site
- Ireland's Eye SAC No. 002193 - 11.7km from subject site
- Rogerstown Estuary SAC No. 000208 - 11.7km from subject site
- Wicklow Mountains SAC No. 002122 - >15km from subject site
- Knocksink Wood SAC No. 000725 - >15km from subject site
- Ballyman Glen SAC No. 000713 - >15km from subject site
- South Dublin Bay & River Tolka Estuary SPA No. 004024 - 4.1km from subject site
- North Bull Island SPA No. 004006 - 8.9km from subject site
- Baldoyle Bay SPA No. 004016 - 7.2km from subject site
- Malahide Estuary SPA No. 004025 - 7.8km from subject site
- Ireland's Eye SPA No. 004117 - 11.5km from subject site
- Rogerstown Estuary SPA No. 004015 - 12.1km from subject site
- Howth Head Coast SPA No. 004113 - 12.6km from subject site
- Dalkey Islands SPA No. 004172 - >15km from subject site
- Wicklow Mountains SPA No. 004040 - >15km from subject site

- 16.3.** The AA Screening Report concludes that the assessment has taken into account the following:

- the nature, size and location of the proposed works and possible impacts arising from the construction works:
- the qualifying interests and conservation objectives of the Natura sites:



- the potential for in-combination effects arising from other plans and projects.

16.4. The AA Screening concludes that upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, that, on the basis of objective information; the possibility **may be excluded** that the proposed development will have a significant effect on any of the European sites listed above. Enviroguide Consulting also concludes that *“these complete, precise and definitive findings, based on the best available scientific evidence, remove all reasonable scientific doubt that the Proposed Development will have any significant effect on the Natura 2000 sites detailed above. It is also noted that, no avoidance or preventative/mitigation measures have been taken into account in this Appropriate Assessment Screening Report and its conclusions. Accordingly, a Stage 2 Appropriate Assessment is not required to be carried out in relation to the Proposed Development”*.

16.5. For full /further details please refer to the AA Screening Report prepared by Enviroguide Consulting which is enclosed with the application.



17.0. Conclusion and Request that Permission be Granted

- 17.1. Dwyer Nolan Developments Ltd. are applying to An Bord Pleanála for permission for Strategic Housing Development on a site measuring c. 1.5 hectares located at the junction of Swords Road and Santry Avenue, Santry, Dublin 9.
- 17.2. The residential element of the development consists of 350 no. apartments in 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), ranging from 7 no. storeys to 14 no. storeys in height and comprised of the following mix of dwellings:
- 113 no. 1 bed dwellings:
 - 218 no. 2 bed dwellings:
 - 19 no. 3 bed dwellings.
- 17.3. The development also provides for 4 no. commercial / retail units located at ground floor level of Blocks A, B, & D, a medical suite / GP practice unit, a community use unit on the ground floor of Block E, and a 1 storey residential amenity unit located between Blocks A and D.
- 17.4. The development includes for a basement level car park (c. 5,471sq.m), public open space (c. 1,915sq.m) and communal open space (3,122sq.m).
- 17.5. The proposed development is put forward in compliance with the Z3 (Neighbourhood Centres) land use zoning objective attached to the site by catering for a range of new local facilities at ground floor level, which address the surrounding streetscapes and are capable of forming a focal point for a neighbourhood, with high density housing located alongside and above.
- 17.6. All of the proposed apartments are put forward in compliance with the floor areas standards for new apartment developments and the SPPRs of the 2020 Sustainable Urban Housing: Design Standards for New Apartments ensuring a high quality development and standard of living for future residents.
- 17.7. The proposed building heights are put forward in recognition of the 2018 Urban Development and Building Heights Guidelines for Planning Authorities which seek to remove blanket limitations on building heights and increase both height and density in appropriate locations. Given the corner location of the site and its proximity to existing public transport corridors and public open space, the proposed building heights are considered to be wholly appropriate in the context of national and regional planning policies.
- 17.8. The development provides for public and communal open space which is in excess of the required standards of the existing Dublin City Development Plan 2016-2022.
- 17.9. Careful consideration has been given to the design of the proposed development to ensure integration with the permitted Santry Place development to the south, and a positive relationship with the surrounding environments of the site.
- 17.10. It is considered that the proposed Strategic Housing Development represents proper planning and sustainable development of the subject site and supports the objectives national, regional and local planning policy. Therefore, it is considered that the proposed development should be judiciously considered and granted permission so that an underutilised site within the existing urban footprint of Dublin City can be development in an appropriate manner for the benefit of both existing and future resident so of Dublin 9.
- 17.11. Having regard to the following:
- the location of the site in the established urban area of Dublin City in an area zoned Z3 Neighbourhood Centre:



- the policies and objectives of the Dublin City Development Plan, 2016-2022:
- the Rebuilding Ireland Action Plan for Housing and Homelessness, 2016:
- the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual, 2009:
- Urban Development and Building Heights Guidelines for Planning Authorities, 2018:
- the Sustainable Urban Housing: Design Standards for New Apartments, 2020:
- Design Manual for Urban Roads and Streets (DMURS), 2013:
- the nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure, and:
- the pattern of existing and permitted development in the area.

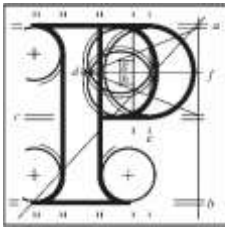
It is respectfully put forward that the proposed development constitutes an acceptable quantum and density of development in this accessible urban location, will not seriously injure the residential or visual amenities of the area, is acceptable in terms of urban design, height and quantum of development and is acceptable in terms of traffic and pedestrian safety. Taking all of the foregoing set out in this Planning Statement and as supported by all of the documentation and drawings submitted as part of this SHD application for permission, we consider that the proposed development is in accordance with the proper planning and sustainable development of the area.

17.12 Please see the pages over for appendices.



18.0. Appendices

Appendix A - Record of Pre-Application Consultations with An Bord Pleanála



An
Bord
Pleanála

Record of Meeting ABP-312127-21

Case Reference / Description	Demolition the existing building on site, construction of 350 no. apartments and associated site works. Junction of Santry Avenue a Swords Road, Santry, Dublin 9.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	22 nd April 2022	Start Time	10:00 am
Location	Remotely via Microsoft Teams	End Time	10:25 am
Chairperson	Stephen O'Sullivan	Executive Officer	Helen Keane

Representing An Bord Pleanála:

Stephen O'Sullivan, Assistant Director of Planning
Karen Hamilton, Senior Planning Inspector
Helen Keane, Executive Officer

Representing Prospective Applicant:

Tracy Armstrong, Armstrong Fenton Associates
Scott Morton, Davey-Smith Architects
Edwin O'Dwyer, Dwyer Nolan Developments
Sarah Curran, DBFL Consulting Engineers

Representing Planning Authority

Siobhan O'Connor, Senior Executive Planner
Niamh Kiernan, Acting Senior Executive Architectural Conservation Officer



Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the PA on 11th January 2022 providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000, as amended and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 7th December 2022 formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, as amended, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

1. Density
2. Housing Quality Analysis and Unit Mix
3. Any Other Matters



1. Density

ABP Comments:

- The prospective applicant should have consideration for the Material Contravention Statement having regard for public transport capacity and frequency in light of the Ballyboden High Court Judgment.
- Have regard for the apartment guidelines, and section 3.2 of the building height guidance.

Prospective Applicant's Comments:

- This is a repeat application, there have been changes since the previous application.
- The prospective applicant notes the changes and will address the future and existing transport capacity at application stage.

Planning Authority's Comments:

- No further comments on density.
- Have regard for the submitted PA report.

2. Housing Quality Analysis and Unit Mix

ABP Comments:

- The PA have included comments in relation to the housing quality analysis and unit mix in their submitted report.
- ABP representatives note that there is one storage area linked to a bedroom which is unacceptable under national guidance.

Prospective Applicant's Comments:

- The prospective applicant will address the width and aspect of the units at application stage.
- The prospective applicant will have regard for the location of the storage.
- The housing quality analysis will provide a breakdown of the floor space standards.

Planning Authority's Comments:

- The PA have raised concerns in relation to the width of the rooms. Some apartments are 10% narrower than what is acceptable.
- The prospective applicant is to have regard for the submitted PA report.

3. Any other matters

ABP Comments:

- The prospective applicant should highlight the worst-case scenario in the daylight/sunlight assessment at application stage.
- Any application lodged will be addressed on its own merits as a standalone application.

Prospective Applicant's Comments:



- An architectural impact assessment will be submitted at application stage.
- The prospective applicant will have consideration for the retention of the Heiton Buckley Merchants building.
- The results of the daylight/sunlight results were generally acceptable on the previous application.
- The prospective applicant will assess all other properties in the vicinity.
- There is 1.5% for the galley kitchen/living/dining rooms. The majority are open plan kitchen/living/dining.
- Following on from the previous application, one of the changes proposed is the addition of a medical practice. The prospective applicant takes the PA's comments on board in relation to same.

Planning Authority's Comments:

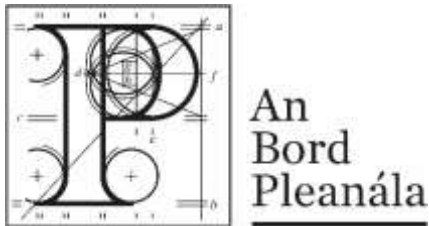
- The PA does not have any major issue in relation to roads.
- An archaeological impact assessment report is required at application stage.
- Comments in relation to drainage are included in the PA's submitted report.
- A conservation expert is to be employed to assess the existing structure on the proposed development site.
- The Heiton Buckley Merchants building is to be considered for retention as the PA considers it to be of architectural interest.
- The PA agrees with the comments of ABP representatives in relation to the daylight/sunlight assessment.
- The daylight/sunlight assessment is one of the most important things to affect the quality of the open space.

Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published.
- A Schedule of Documents and Drawings should be submitted with the Application.
- Sample notices, application form and procedures are available on the ABP website.
- Irish Water would like prospective applicants to contact Irish Water at cdsdesignqa@water.ie **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie.

Stephen O'Sullivan
Assistant Director of Planning
April, 2022

Appendix B: An Bord Pleanála's Notice of Pre-Application Consultation Opinion Ref. ABP-312127-21.

**Planning and Development (Housing) and Residential Tenancies Act 2016
Notice of Pre-Application Consultation Opinion**

Case Reference: ABP-312127-21**Proposed Development: Demolition the existing building on site,
construction of 350 no. apartments and associated site works.****Junction of Santry Avenue and Swords Road, Santry, Dublin 9.**

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. Submission of a Sunlight/Daylight/Overshadowing analysis including all relevant plans and documentation showing an acceptable level of residential amenity, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties.



This report should address the full extent of requirements of BRE209/BS2011, as applicable.

2. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such a statement should have regard to the development plan in place at the time of the application and that likely to be in place at the date of the decision of the Board in respect of the application.
3. The information referred to in Article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.

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, as amended:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Dublin City Childcare Committee
5. Irish Aviation Authority
6. Dublin Airport Operator
7. Fingal County Council

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential



Tenancies Act 2016, as amended, 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 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen O'Sullivan
Assistant Director of Planning
April 2021



