

Statement of Consistency with the Draft Dublin City Development Plan 2022-2028

In respect of

**Site located to the north west corner of the Omni Park
Shopping Centre, Santry and at Santry Hall Industrial
Estate**

Prepared for

Serendale Ltd

Prepared by

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DOCUMENT CONTROL SHEET

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1.0 INTRODUCTION

- 1.1. On behalf of the applicant, Serendale Ltd., we hereby submit this Statement of Consistency with Planning Policy to accompany this Strategic Housing Development application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 in relation to a Proposed Mixed Use development on lands at Omni Park, Swords Road, Dublin 9.
- 1.2. In summary, the proposed development comprises 457 no. residential units and will range in height from 4 no. storeys on the western boundary to 12 no. storeys to the south over basement.
- 1.3. This Statement of Consistency addresses the Draft Dublin City Development Plan 2022-2028 and is provided in the scenario where a decision is made post the new Development Plan coming into operation. This Statement of Consistency incorporates the material alterations to the Draft Development Plan that were published on 27th July 2022.
- 1.4. A separate Planning Report and Statement of Consistency with the current Dublin City Development Plan 2016-2022 is also submitted. This report should be read in conjunction with the Statement of Consistency with the current Development Plan and the other application documentation submitted.

2.0 CHAPTER 2: CORE STRATEGY

Policy CSO 7: Promote Delivery of Residential Development and Compact Growth

To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas

- 2.1. The proposed development will encourage compact growth by delivering 457 no. residential units on an appropriately zoned, underutilised brownfield site (Draft Development Plan Land Use Zoning is Z4 – Key Urban Villages/ Urban Villages). The site is well served by existing public transport networks and is also located along the proposed Bus Connects corridor Core Route Corridor No. 2 ‘Swords to City Centre’

3.0 CHAPTER 3: CLIMATE ACTION

Policy CA1 National Climate Action Policy

To support the implementation of national objectives on climate change including the ~~‘Climate Action Plan 2019 to Tackle Climate Breakdown’~~ ‘Climate Action Plan 2021: Securing Our Future’ (including any subsequent updates to or replacement thereof), the ‘National Adaptation Framework’ 2018 and the ‘National Energy and Climate Plan for Ireland 2021-2030’ and other relevant policy and legislation.

- 3.1. The proposed development incorporates various features outlined in the ‘Climate Action Plan 2021: Securing Our Future’, the ‘National Adaptation Framework’ 2018 and the ‘National Energy and Climate Plan for Ireland 2021-2030’ to minimise the carbon emissions of the construction and operation of the development. Actions include the reduction of car parking provision, of energy efficient design, the location of the development within an existing urban area and close to public transport infrastructure, the layout of the development to encourage sustainable modes of transport etc. as outlined in the Architectural Design Statement accompanying this application, prepared by John Fleming Architects.

- 3.2. As set out in Energy and Sustainability Statement prepared by OCSC:

“The proposed mixed-use development will comply with residential Part L 2021 (Dwellings), as well as targeting an A2/A3 BER, while the proposed non-residential aspects of the development will comply with non-residential Part L 2021 (Buildings Other Than Dwellings), as well as targeting an A3 BER.

The optimised approach is based on the Energy Hierarchy Plan - Be Mean, Be Lean, Be Green.”

Policy CA2 Mitigation and Adaptation

To prioritise {and implement} measures to address climate change by both effective mitigation and adaptation responses in accordance with available guidance and best practice.

- 3.3. A Site Specific Flood Risk Assessment of the subject site has been carried out by EirEng Consulting Engineers which outlines that the site is at a low risk of coastal and fluvial flooding. A portion of the site is at low risk of pluvial flooding. The proposed development includes various features to minimise this risk of fluvial flooding including SuDs features, localised ramping, and attenuation tank storage. These measures increase the resilience of the development by increasing its resistance to the impacts of climate change.

Policy CA3– Climate Resilient Settlement Patterns, Urban Forms and Mobility

To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019

- 3.4. The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will minimise transport requirements of future residents.

Proposed Amendment:

{Policy - Improving Mobility Links in Existing Areas}

To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.}

- 3.5. The proposed development will provide for increased permeability, through the replacement of an existing transport depot with 3 no. blocks. The existing wall around the depot will be demolished, and a public plaza will be provided which will encourage pedestrian and cyclist activity. New and improved shared surfaces and links.



Policy CA6 – Energy Efficiency in the Built Environment

To support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro-fitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the Government's Housing for All Plan retrofit targets for 2030.

- 3.6. The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will minimise transport requirements and therefore energy usage of future residents.

- 3.7. A Building Life Cycle report has been prepared by John Flemming Architects with inputs from the other consultants, which details the energy usage of the development. It is proposed to target an A2/A3 BER for the apartments.

Policy CA7 – Climate Mitigation Actions in the Built Environment

To ~~(promote)~~ {require} low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation ~~(-)~~ {, see Section 15.7.1 when dealing with development proposals.} New development should generally demonstrate/ provide for:

- A. building layout and design which maximises daylight, natural ventilation, active transport and public transport use;
 - B. sustainable building/services/site design to maximise energy efficiency;
 - C. sensitive energy efficiency improvements to existing buildings;
 - D. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;
 - E. on -site renewable energy infrastructure and renewable energy;
 - F. minimising the generation of site and construction waste and maximising reuse or recycling;
 - G. the use of construction materials that have low to zero embodied energy and CO2 emissions; and
 - H. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.
- 3.8. A Daylight and Sunlight Assessment has been prepared by 3D Design Bureau and is submitted with this application. This assessment has studied the effect the proposed development would have on the level of daylight and sunlight received by the neighbouring residential properties that are in close proximity to the proposed development.
- 3.9. The assessment concludes:

“These studies have shown that whilst the proposed development, in conjunction with the granted SHD (ABP-307011-20), would cause a perceptible reduction to some of the assessed commercial premises, there would be a negligible level of effect to the daylight and sunlight received by all existing neighbouring properties.

The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development. Future residents will have access to external amenity areas capable of receiving sufficient levels of sunlight with a reasonable percentage of proposed units have achieved the minimum recommendation for Sunlight Exposure. The vast majority of proposed units have the recommended level of daylight as shown in the study of Spatial Daylight Autonomy.

The supplementary ADF assessment as per the ABP request and for comparative purposes shows the net positive impact of all implemented design amendments...

In this context, it is the opinion of 3D Design Bureau, that the proposed development serves as a great example of how proposed urban developments can achieve both high compliance rates for SDA whilst maintaining a high level of density in compliance with national and regional design policy.”

Policy CA8 – Climate Adaption Actions in the Built Environment

Development proposals ~~{should}~~ **{must}** demonstrate sustainable, **{climate adaptation, circular}** design principles for new buildings / services / site. The Council will promote and support development which is resilient to climate change. This would include:

- A. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;
 - B. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;
 - C. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);
 - D. reducing flood risk, damage to property from extreme events– residential, public and commercial;
 - E. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;
 - F. promoting **{, developing}** and protecting biodiversity, **{novel urban ecosystems}** and green infrastructure.
- 3.10. The proposed development includes various features outlined in Policy CA8 including green roofs, SuDs, localised ramping, attenuation tanks, and green areas that will provide habitats for biodiversity.

Policy CA9 – Climate Action Energy Statements

All new developments involving 30 residential units and/ or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development

- 3.11. The proposed development includes 457 no. residential units. An Energy and Sustainability Report has been prepared by OCSC and is submitted with this application.

Policy CA23 – Waste Management Plans for Construction and Demolition Projects

To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements

- 3.12. A Resource and Waste Management Plan & Operational Waste Management Plan has been prepared by EirEng and is accompanied with this application. The document outlines the principles and measure by which the waste generated during the construction phase of the proposed development will be managed and disposed of in compliance with the provisions of the Waste Management Acts 1996 to 2013 and the Eastern Midlands Region (EMR) Waste Management Plan 2015-2021. It describes the measures by which optimum levels of waste reduction, re-use and recycling shall be achieved.

Policy CA24 – Electric vehicles

To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.

Objective CAO4 – Regional Strategy for Electric Vehicle (EV) Charging

To support and implement the forthcoming Regional Strategy for Electric Vehicle (EV) charging over the lifetime of the plan in order to facilitate the transition to low carbon vehicles required to achieve 2030 national targets

- 3.13. The proposed development includes the provision of 22 no. EV Charging Points which will facilitate and encourage the use of Electric Vehicles by residents and visitors of the development. All other car parking spaces will have ducting to facilitate charging infrastructure. 100% of spaces in basement shall be ducted for future provision.

Policy CA25 – Flood and Water Resource Resilience

To support {,encourage and facilitate} the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary.

- 3.14. The proposed development includes both green and grey adaption measures to enhance flood and water resource resilience in the development. Green measures include the use of SuDs and grey measures include the use of large attenuation tanks.

Policy CA26 – Flood Risk Assessment and Adaption

To address flood risk at strategic level through the process of Strategic Flood Risk Assessment, and through improvements to the city's flood defences.

- 3.15. A Site Specific Flood Risk Assessment of the subject site has been carried out by EirEng Consulting Engineers and is submitted with this application.

Policy CA27 – Natural Flood Risk Mitigation

To encourage the use of natural flood risk mitigation or nature based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience

Policy CA28 – Climate Action and Green Infrastructure

To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides

- 3.16. The use of natural based solutions, notably SuDs features, to improve the flood resilience of the development, are an effective way to mitigate flood risk while also enhancing the biodiversity and landscaping in the development.

4.0 CHAPTER 4: SHAPE AND STRUCTURE OF THE CITY

Policy SC1 – Consolidation of the Inner City

To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties ~~(and)~~ the North East Inner City {and the south and north Georgian cores} with each other, and to other regeneration areas.

- 4.1. The proposed development promotes the compact growth of Dublin City and is located on a site that is well served by existing and proposed public transport infrastructure, notably BusConnects.

Policy SC3 – Mixed Use Development

To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development~~(-)~~ {, and facilitating the conversion of both old office buildings and over shop spaces to residential.}

- 4.2. The proposed development will deliver 457 no. residential units as well as a creche, 2 no. retail units and community facility at ground floor level fronting to the Omni Shopping Centre which will promote a more balanced mixed-use of land in the area.

Policy SC5 – Urban Design and Architectural Principles

To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.

- 4.3. As previously outlined, the proposed development incorporates various features to achieve climate resilience. The proposed development contributes to achieving compact growth in Santry which is identified in the Draft Development Plan as a Key Urban Village and a suitable located for increased height and density. The site of the proposed development is close to existing and proposed high capacity and frequency transport links which connects the development with the city centre and surrounding areas.

Policy SC8 – Development of the Inner Suburbs

To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport ~~(infrastructure)~~ {services and enhanced walking and cycling infrastructure}.

- 4.4. The proposed development supports this strategic development by increasing land use intensity and efficiency on a brownfield site that aligns with existing and pipeline public transport infrastructure.

Policy SC9 – Key Urban Villages, Urban Villages and Neighbourhood Centres

To develop and support the hierarchy of the suburban centres, including Key Urban Villages, Urban Villages and Neighbourhood Centres, in order to:

- *support the sustainable consolidation of the city and align with the principles of the 15 minute city;*
- *provide for the essential economic and community support for local neighbourhoods; and*
- *promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services*

4.5. The proposed development is located on lands that are zoned Z4 – Key Urban Villages/ Urban Villages. The proposed delivery of residential units adjoining to existing Omni Park Shopping Centre supports the principles of the 15 minute city by providing a large range of services which may be needed on a daily basis. The proposed development will also deliver a creche, 2 no. retail units, a public plaza and public realm infrastructure which will contribute to creating a distinctive character and sense of place in the development and surroundings.

Policy SC10 – Urban Density

To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.

Policy SC11 – Compact Growth

In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.*

- 4.6. The proposed development has been designed to comply with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual. Please see Planning Report and Statement of Consistency with Planning Policy prepared by JSA with the current Development Plan for detailed response to this consideration.
- 4.7. The proposed development will contribute to achieving compact growth as advocated for in the Dublin Metropolitan Area Strategic Plan.
- 4.8. A Santry Community and Local Needs Audit has been prepared in support of the proposed development. This Audit outlines the abundance of existing services, facilities and amenities in Santry that have the capacity to support future residents and users of the proposed development.

Policy SC12 – Housing Mix

To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.

- 4.9. A variety of unit types are proposed within the scheme, ranging from 1 to 3 beds. The overall Santry area provides many single family homes so it is considered that these apartment units will support a more varied community. All units have been designed to Build to Sell standards. The proposed development will also result in significant diversification of the housing stock in the area which will create a housing stock that is more reflective of the demographics and needs of the area.

Policy SC13 – Green Infrastructure

To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.

- 4.10. The proposed development incorporates elements of Green Infrastructure into its design in the form of Green Roofs which are also a component of the SuDS of the development and a significant quantum landscaped areas which include pollinator friendly planting.

Policy SC14 – Building Height Strategy

To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4

- 4.11. Please see Planning Report and Statement of Consistency, with current DCC Development Plan prepared by JSA which sets out a detailed response to the Urban Development and Building Height Guidelines. We have responded to the Table 3 of appendix 6 of the Draft Plan within this report.

Policy SC16 – Building Height Locations

To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance ~~{with}~~ ~~(between)~~ the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.

- 4.12. The subject site is considered a suitable location for increased height due to its proximity to a high quality public transport corridor, setting within the Omni KUV and the presence of recently permitted / under construction developments at Omni Living, Santry Place and Swiss Cottage.

Policy SC17 – Building Height

To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:

- *follow a design led approach;*
- *include a masterplan for any site over 0.5ha {(in accordance with the criteria for assessment set out in Appendix 3)};*
- *make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;*
- *deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; (and)*
- *{Do not affect the safety of aircraft operations at Dublin Airport (including cranes); and}*
- *have regard to the performance-based criteria set out in Appendix 3.*

- 4.13. The proposed height of the development ranges in height from to 4 no. storeys to the west of the site increasing to 12 no. storeys to the southern boundary of the site. The placement of the 12 no. storey buildings within the site has been strategically chosen and orientated to minimise overlooking to existing homes along Shanliss Avenue and to maximise the sunlight and daylight levels in the proposed development, both internally and externally.
- 4.14. As set out widely in the application documentation, the proposed development has been developed by a multi-discipline design team in an approach which entails a careful consideration of the existing and permitted context. Further, this approach has been informed by the environmental surveys carried out as part of the design process.
- 4.15. The site of the proposed development is 2.5 ha. A Framework Strategy has therefore been prepared and is submitted with this application which meets the masterplan requirement of the policy.
- 4.16. The landscape strategy entails high quality materials and carefully considered open spaces. High quality materials and finishes are proposed, active uses at ground floor level will result in a accessible and pleasant place. The overall result will be a significant contribution to the existing context. Please see respective Landscape and Architectural Design Reports for further detail of design strategies from each discipline.
- 4.17. Through public realm upgrades and proximity to public transport, the proposed development prioritises permeability and walkability which will contribute to delivering a walkable and accessible neighbourhood.
- 4.18. Location and erection of cranes will be placed in consultation and accordance with requirements of IAA and DAA whom have been consulted by the design team in advance of lodgement.
- 4.19. Please see Section 14 of this report for a response to the Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale set out in table 3 of Appendix 3.

Policy SC18 – Landmark/ Tall Buildings

To promote a co-ordinated approach to the provision of landmark/tall buildings through Local Area Plans, Strategic Development Zones and the Strategic Development and Regeneration Area principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline and that such proposals comply with the performance based criteria set out in Appendix 3.

- 4.20. Appendix 3 defines Landmark/tall buildings as follows:

“Landmark/tall buildings are generally considered to be those that are substantially taller than their surroundings and cause a significant change to the skyline. They are typically buildings greater than 50 metres in height.

In terms of suitable locations, it is considered that landmark/tall building proposals are most appropriate in locations that are identified as a significant public transport interchange and/or areas for large scale regeneration and redevelopment; that are well connected centres of employment; which have the capacity to create their own character and identity and where the existing character of the area would not be adversely affected by the scale, mass and height of a landmark/tall building.”

- 4.21. Given the existing developed nature of Omni Park Shopping Centre and the permitted Omni Living development to the east (noting other developments such as Swiss Cottage and Santry Place), it is considered that the proposed development does not constitute a taller building as requiring response within Table 4 of Appendix 3. Further the proposed development is not in excess of 50 metres in height nor considered to have a significant impact on the skyline.
- 4.22. KUV's are specifically identified as locations in which increased height is considered acceptable, as set out generally within the documentation the proposal will make a valuable contribution to the development of a truly mixed use quarter. Please see section 14 for a response to the Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale set out in table 3 of Appendix 3.

Policy SC19 – High Quality Architecture

To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.

Policy SC21 – Architectural Design

To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.

- 4.23. The proposed development promotes healthy placemaking by making active transport a safe, attractive and convenient mode of transport for residents, users, and visitors of the proposed development. This is achieved by prioritising pedestrian and cyclist permeability in the design of the development, public lighting and through the use of active and passive surveillance. Please see JFA Architectural Design Statement and

Murray and Associates Landscape Design Statement for detailed overview of the quality of the proposed scheme including overview of materials used and quality of the public realm. The materials to be used in the proposed development have been selected to reflect the character of the area.

Policy SC20 – Urban Design

Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013)

- 4.24. The proposed development has been designed to comply with the guidelines set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013). Please see JSA Planning Report and Statement of Consistency with Planning Policy for detailed assessment of same.

Policy SC23 – Design Statements

That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.

- 4.25. An Architectural Design Statement has been prepared by John Flemming Architects and is submitted with this application.

5.0 CHAPTER 5: QUALITY HOUSING AND SUSTAINABLE NEIGHBOURHOODS

Policy QHSN1 – National and Regional Policy

To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.

- 5.1. The proposed development has been designed with due regard to the relevant local, regional, and national planning policies and guidelines. Please see JSA Planning Report and Statement of Consistency with Planning Policy for detailed assessment of same.

Policy QHSN2 – National Guidelines

To have regard to the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population ~~(2020)~~ {2019, the Design Manual for Quality Housing (2022),} ~~(and)~~ the Design Manual for Urban Roads and Streets (DMURS) (2019) {the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.}

- 5.2. The proposed development is designed in accordance with the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets’ (DMURS) (2019). Please see JSA Planning Report and Statement of Consistency with Planning Policy for detailed assessment of same.

Policy QHSN5 – Urban Consolidation

To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.

- 5.3. The site of the proposed development is currently occupied by a warehouse and several ancillary buildings related to its use as a transport depot. The repurposing of these buildings to create residential units is not a feasible option. Construction of new buildings on this site will allow for a more efficient use of land and will support residential consolidation.

Policy QHSN9 – Urban Density

To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

- 5.4. The high densities of the proposed development are suggested to be appropriate in the Urban Development and Building Height Guidelines 2018 due to the proximity of the site to high-quality public transport links and potential for the proposed development to support compact urban growth.

Policy QHSN10 – 15-Minute City

It is the Policy of Dublin City Council to promote the ~~(concept)~~{realisation} of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, {intergenerational and accessible,} safe and inclusive public spaces served by local services, amenities(, sports facilities) and sustainable modes of {public and accessible} transport {where feasible}.

- 5.5. The proposed development is fully consistent with and supports the core principles of the 15 minute city concept by providing a place to live which is within walking distance of essential and recreational services, public transport, facilities and amenities.

Policy QHSN11 – Neighbourhood Development

To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:

- *build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;*
- *integrate active recreation and physical activity facilities {including community centres and halls as part of the 15-minute city};*
- *encourage sustainable and low carbon transport modes through the promotion of alternative modes and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance;*
- *promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.*
- *promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;*
- *promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;*
- *cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;*
- *provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;*
- *have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the Regional Spatial and Economic Strategy and national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS)’;*

- *are designed to promote safety and security and avoid anti-social behaviour* The proposed development will create a vibrant mixed-use neighbourhood and will add to the existing retail, workspace and leisure uses currently existing in Omni Park Shopping and Leisure Centre. The proposed new public plaza and public realm improvements will complete the pedestrian facilities in the complex and help to further integrate Omni into the surrounding community.
- 5.7. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme.
- 5.8. The proposed development has been designed to ensure walking and cycling is a safe, attractive, and feasible mode of transport for future residents and users of the development by creating a highly permeable development that also provides for greater permeability into the Omni Park District Centre and surrounding areas.
- 5.9. The communal open spaces will benefit from passive surveillance from apartments within the scheme. Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting & CCTV scheme will ensure that this sense of security will be maintained throughout the evening. Good privacy and defensible urban spaces are also provided through suitable landscaping and balcony finishes.

Policy QHSN12 – Healthy Dublin City Framework and the Healthy Ireland Framework 2019 – 2025

To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long term vision of improving the physical and mental health and well-being of the population at all stages of life.

- 5.10. The proposed development encourages an active lifestyle by making active transport an attractive mode of transport. The proposed development also provides ample open and green recreational areas.
- 5.11. These actions contribute to the overall physical and mental well-being of residents and users of the proposed development.

Policy QHSN15 – Accessible Built Environment

To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 {and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities}.

- 5.12. All public areas have been designed with Part M of the Building Regulations in mind enabling users with reduced mobility to move easily throughout the scheme. The design includes appropriate accessible parking spaces and dipped kerbs, tactile paving and other landscape features to improve accessibility for a wide variety of users with impaired mobility. Please refer to the Universal Design Statement prepared by John Fleming Architects.

Policy QHSN16 – Sustainable Neighbourhoods

It is the Policy of Dublin City Council to promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, {e.g.}(i.e.) children, people of working age, older people,{, people living with dementia} and people with disabilities.

- 5.13. Santry typically comprises of low-rise suburban dwellings which are made up of 3 / 4 bed detached and semi-detached units. The proposed development will help balance the existing housing stock by providing an alternative choice, thus catering for a broader cohort of the population and creating a more sustainable neighbourhood.

Policy QHSN20 – Gated Residential Development

It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods

- 5.14. The proposed development improves the connectivity of the wider area by delivering a highly permeable development that is not gated to the public.

Policy QHSN21 – Adaptable and Flexible Housing

It is the Policy of Dublin City Council: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of the Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) (.) {and the Universal Design Guidelines for Homes in Ireland 2015.}

Policy QHSN22 – Independent Living

To support the concept of independent living and assisted living for older people, to support and promote the provision of specific purpose built accommodation, including retirement villages, and to promote the opportunity for older people to avail of the option of 'rightsizing', that is the process of adjusting their housing to meet their current needs within their community.

Policy QHSN24 – Housing for People with Disabilities

It is the Policy of Dublin City Council: To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which (promotes){facilitates} equality of (opportunity){outcome}, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/ supported living units, lifetime housing, and adaptation of existing properties.

- 5.15. The proposed development will deliver 1 no. studio and 221 no. 1 bed apartments which have been designed to be easily accessible. The proposed development is also located in close proximity to daily essential services. These apartments may be suitable for older people wishing to downsize to accommodation that is more reflective of their requirements, while still living independently. Please also see Universal Design Access Statement prepared by JFA.

- 5.16. The proposed development has been designed to comply with Part M of the Building Regulation. This facilitates equality of outcome by ensuring units are suitable for a broad range of people, regardless of their level of mobility.

Objective QHSNO10 – Universal Design

~~(It is an Objective of Dublin City Council: To require that a minimum of 10% of dwellings in all schemes over 100 units are designed to accommodate people with disabilities and older people in accordance with the Universal Design Guidelines for Homes in Ireland 2015.)~~

(It is an Objective of Dublin City Council: To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.)

- 5.17. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme. Care has been taken to design entrances which will be well lit and clearly signposted. These entrances also provide sheltered spaces at the threshold ensuring suitability for a range of users.
- 5.18. While the proposed development fully accords with the requirement to have the majority of units at least 10% greater than the minimum sizes (50.1% of units exceeding the minimum requirement by 10% or more), we note that the proposed development does not meet the requirement of the draft Development Plan or Proposed Material Alterations outlined above in respect to Universal Design requirement. Instead, as required under current Building Regulations, all of the proposed units within the development have been designed to be compliant with Technical Guidance Document M of the Building Regulations 2010, and the Apartment Guidelines 2020, which is in conflict with the aforementioned policy. The below provides a justification for a material contravention of these aspects of the new Plan, should they be adopted, in respect of the proposed development. Please see Material Contravention Statement with the Draft Dublin City Development Plan prepared by JSA for justification of this shortfall in this regard.
- 5.19. The design includes appropriate accessible parking spaces, dipped kerbs, tactile paving and other landscape features which improve accessibility for a wide variety of users with impaired mobility. A flexible community space has been provided addressing the Public Plaza at the ground floor of Block D. This is open to local groups and residents and will enable strong community connections.

Policy QHSN33 – Diversity of Housing Type and Tenure

To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.

- 5.20. The proposed development will deliver 45 no. units as Part V of the Planning and Development Act and additionally will deliver more 1 and 2 bed units in a wider area generally characterised by 3+ bed units

Policy QHSN34 – High Quality Apartment Development

To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood

- 5.21. The proposed development includes various amenity spaces for residents and visitors in the form of private balconies, communal indoor and outdoor space, a public plaza, children's play area.

Policy QHSN35 – Houses and Apartments

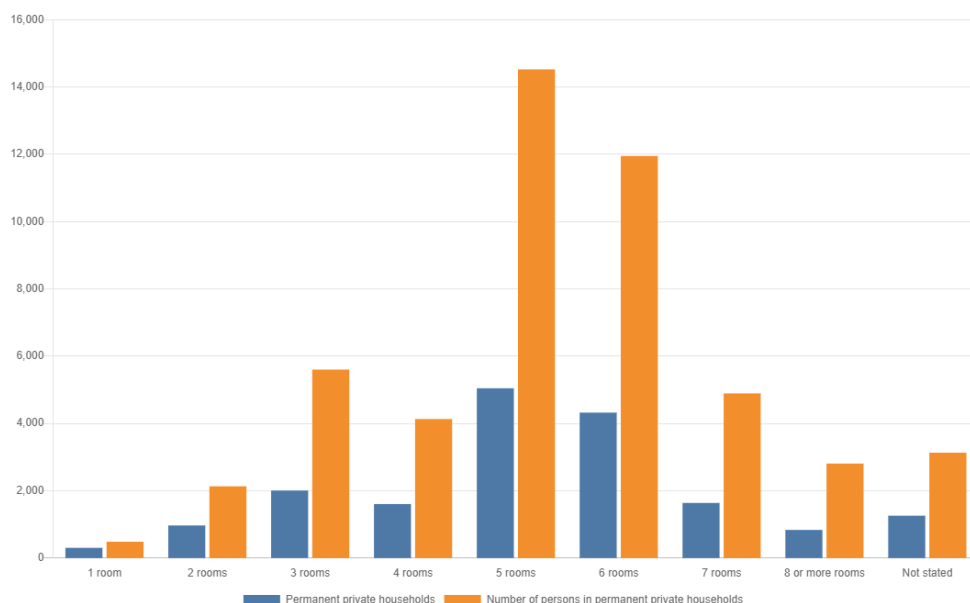
To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation

- 5.22. Each dwelling is provided with an area of usable private open space. This is generally a *private* balcony space, while some ground floor units have terrace spaces with a planted buffer. The apartments comply with the provisions of the 2020 Apartment Guidelines as set out in the Housing Quality Assessment.

Policy QHSN36 – Housing and Apartment Mix

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.

- 5.23. The Artane - Whitehall Local Electoral Area (CSO, 2016) consists primarily of houses / bungalows. This has resulted in a lack of choice of housing in the area. The proposed development provides a unit mix which complements this existing provision and will develop a range of choice allowing for mobility within the community. This creates a flexibility in the local market enabling downsizing or first time buyers to access a home better suited to their needs. CSO (2016) statistics displayed in the Tables below indicate that 82.1% of the housing stock comprises houses/bungalows with a large number of people housed in households with 3 rooms or greater. The need for smaller units has been set out both in national policy and is clearly evident in the immediate area.



Permanent private households by number of rooms

Type of accommodation	Households	%
House/Bungalow	14,826	82.1%
Flat/Apartment	2,791	15.5%
Bed-sit	35	0.2%
Caravan/Mobile Home	60	0.3%
Not stated	342	1.9%
Total	18,054	100.0%

Table 4.6: Accommodation Type (Source: CSO)

- 5.24. The proposed development will greatly increase the variety of accommodation available in Santry by adding 1,2, and 3 bed apartments to the housing stock which is currently dominated by low rise suburban dwellings which are made up of 3 / 4 bed detached and semi-detached units.

Policy QHSN37 – Management

To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.

- 5.25. A property management team will be appointed at an early stage in the development to ensure all management functions are agreed for the entire development including the basement and external grounds. The development will be managed by a

professional, well established property management company with experience in schemes of a similar nature.

Policy QHSN45 – High Quality Neighbourhood and Community Facilities

It is the Policy of Dublin City Council to encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.

- 5.26. The proposed development will deliver a range of high-quality neighbourhood and community facilities including a public plaza, public open and green space, and Children's Play area. Existing community uses are not proposed to be affected by the proposed development.

Policy QHSN46 – Community and Social Audit

To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards

- 5.27. A Santry Community and Local Needs Audit has been prepared and is submitted with this application. Cognisant of the needs of the existing and future residents at Omni Plaza, a flexible community space on the ground floor of Block D has been provided. A space measuring 195.3sqm will be provided with a high profile frontage, addressing the new public plaza and adjacent to the existing retail units to the east of the site. The space will be triple aspect with access to a small outdoor area. We envisage this community facility as providing flexible space for adults and children which could accommodate parent and child groups, community organisations and pop-up community events as needed. This space will ensure that Omni Plaza becomes integrated within the community and that members of the local community benefit from the new development.

Policy QHSN47 – Phasing

To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.

- 5.28. The proposed development will be delivered as part of a single phase with all of the requisite infrastructure to be delivered in tandem with the development. Much of which is already in place.

Policy QHSN49 – Amenities and Retail

To ensure all areas of the city, including those that have Local Area Plans, deliver social infrastructure, sports and recreational facilities, retail outlets, schools and

infrastructure in accordance to an agreed phasing programme to ensure large neighbourhoods are not left isolated without essential services

- 5.29. The Santry Community and Local Needs Audit outlines the various facilities, amenities, services and infrastructure existing in Santry which will ensure residents of the proposed development are not left isolated without essential services.

Objective QHSNO12 – Community Safety Strategy

That all housing developments over 100 units shall include a community safety strategy for implementation.

- 5.30. The proposed development will deliver 457 no. residential units. A statement on community safety has been included within the Architectural Design Statement prepared by JSA and is submitted with this application.

Objective QHSNO53 – Childcare Facilities

To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision and location is in keeping with areas of population and employment growth

- 5.31. The proposed development will deliver a creche of 225.7sq.m. which will have the capacity to accommodate c.37 children.

Objective QHSNO16 – Pre-School Facilities

To ensure that pre-school facilities are appropriately sited and protected from air pollution. Where an application is made within or proximate to locations experiencing high levels of pollution, the application must adequately address the impact through design and repositioning, and provide a suitable, attractive protected outdoor environment before permission can be considered.

- 5.32. The proposed childcare facility has been suitably design and located within the development which is not located in an area experiencing high levels of pollution. Please also see Chapter 9 from the EIAR in regard to Air Quality.

6.0 CHAPTER 6: CITY ECONOMY AND ENTERPRISE

Policy CEE11 – Key Urban Villages

To promote Key Urban Villages as mixed use service centres for the local economy, incorporating a range of retail, employment, recreational, community uses as well as 'coworking spaces' and 'office hubs'.

- 6.1. The site of the proposed development is on land that is zoned Z4 – Key Urban Villages/ Urban Villages. The proposed development will deliver a mixed-use development comprising of residential, retail, childcare and recreational uses.
- 6.2. The proposed development is an appropriate use of land in this zoning classification and will promote the strategic growth of Santry.
- 6.3. The proposed development offers an opportunity to make efficient use of a brownfield site by constructing high density accommodation on a site that is well served by existing and proposed public transport infrastructure.

Policy CEE13 – Towards a Green and Circular Economy

To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation

- 6.4. The proposed development provides 22 Electric Vehicle Charging Points and ducting for future 100% provision.

7.0 CHAPTER 7: THE CITY CENTRE URBAN VILLAGES AND RETAIL

- 7.1. The Omni Park Shopping Centre is included as 'Key Urban Village' in the Retail Strategy as per figure 7.1. The DCC Retail Strategy seeks to promote town centre vitality through the sequential approach to development. New retail development should relate to this retail hierarchy and it should be located in the designated centre and be of a scale compatible with the function and capacity of the centre (see Section 6.0 of the Retail Strategy). While the proposed development does not include a large quantum of retail, the potential impact on the Omni Park Shopping Centre has been carefully considered.
- 7.2. The Applicant has commissioned a number of reports in this regard, JFA have prepared a report titled 'Omni District Centre Land Use Analysis' report, this report presents an overview of the nature of the Omni Park in its current, permitted and proposed context. In addition Mason Own & Lyons (MOL) have prepared a report entitled 'The Impact of the Proposed Development of: Omni Plaza SHD on the Existing Retail and Services Provision at Omni Park Shopping and District Centre' which is enclosed.
- 7.3. In conclusion the MOL report states: *"Our assessment and conclusion from the above analysis is that the proposed development in conjunction with the already permitted development within the District Centre lands will serve to directly support and encourage the retention and future growth of the existing retail and service offerings within the district centre at a time when demand for retail floorspace has been in continual decline for 15 - 20 years. This loss of demand for floorspace is a consequence of the onset of online retailing in conjunction with the general decline of the historic shopping centre model whereby car-borne destination retail was the predominant attraction. District centres such as that at Omni Park are required to be substantially repositioned to become truly mixed-use destinations which provide the residential, employment, retail, leisure, and services provision for the population of their catchment."*
- 7.4. Please also read Section 3.0 of the Statement of Response in specific reference to the land-use zoning of the subject lands.



Figure 7.1: Extract from Chapter 7 of the Draft Development Plan Figure 7.1(Source: DCC, 2022).

Policy CCUV6 – Large Scale Retail/ Mixed Use Developments

To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.

- 7.5. The proposed development entails significant improvements to the public realm at Omni Park Shopping Centre. The development is entirely in compliance with DMURS.
- 7.6. There is high quality existing and proposed public transport in the area surrounding the proposed development that can cater for the increased capacity of the proposed development. As set out in Appendix J of the TAR there is capacity in existing public transport.

Policy CCUV18 – Residential Development

To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings.

*The use of upper floors for residential use is supported in principle on Category **1** **and** 2 Shopping Streets.*

- 7.7. Omni Park is a Key Urban Village which is primarily in commercial use. The subject proposal seeks to provide for the delivery of a significant quantum of residential units to provide for an improved balance of uses, without detracting from the primary commercial nature of the lands. An appropriate balance of uses has been lacking in the immediate and wider vicinity, with the Z4 district centre zoned lands comprising 100% commercial use and the surrounding residential context has been historically dominated by 3 bed semi-detached houses. This application seeks to redress this imbalance and provide a truly mixed use district centre. The proposed community facility, retail uses and creche, in conjunction with the residential uses will provide for greater activity throughout the day, ensuring vibrancy and vitality of the District Centre, strengthening its function.
- 7.8. Please see JFA Omni District Centre Land Use Analysis which sets out further detail in this regard.

Policy CCUV20 – Mixed Use Key Urban Villages/Urban Villages

To support the development, regeneration and or consolidation of Key Urban Villages/urban villages as appropriate, to ensure these centres continue to develop their mixed used role and function adding vitality to these centres including through the provision of residential development.

- 7.9. The proposed development will provide for a residential element to Omni Key Urban Village. This will help reduce the current imbalance in uses are this land of residential in particular. It will also strengthen the overall vitality and vibrancy of the district centre. The proposed development is fully in compliance with the CCUV20. support the consolidation of the area including and surrounding the site which is zoned Z4 – Key Urban Villages/ Urban Villages and will contribute to achieving a balanced mix of land uses in the area.

Policy CCUV21 – Scale of Retail Development in Key Urban Villages/Urban Villages

To have regard to the guiding principles regarding the scale of retail development to be promoted in each Key Urban Village as set out in the Dublin City Retail Strategy in Appendix 2.

- 7.10. The Omni Shopping Centre District is classified as a Level 3 centre - Town and/or District Centres & Sub-County Town Centres (Key Service Centres) in the Retail Hierarchy of the Dublin City Retail Strategy. The draft development plan states that *“The ongoing development, consolidation and rejuvenation of the Key Urban Villages is a key objective of the plan in order to ensure that these centres continue to develop as local hubs with a wide range of retail, retail services, local employment, social infrastructure and community development. It is also envisaged that the quantum of residential and office floorspace in such centres could be increased”*. The proposed development will support and facilitate this objective through public realm enhancements and the development of a large unused section of the lands. It includes a modest increase in retail provision by the introduction of 2 small retail units.

Policy CCUV22 – Intensification

To support and promote the redevelopment and intensification of underutilised sites within Key Urban Villages and urban villages including surface car parks.

- 7.11. The proposed development site is a brownfield, former industrial site that is currently in use as a haulage depot and warehouse. The proposed development offers the opportunity to increase the productivity of this strategically located land within a Key Urban Village.

Policy CCUV23 – Active Uses

To promote active uses at street level in Key Urban Villages and urban villages and neighbourhood centres

- 7.12. The proposed development will deliver 2 no. retail units at street level as well as public open space that will encourage active uses at street level in the development which is zoned as Z4- Key Urban Villages/ Urban Villages. Please see report by Mason Owen and Lyons. A series of pedestrian and cyclist facilities are also provided as part of significant public realm and landscaping works.



Policy CCUV25 – Neighbourhood Centres/ Local Shopping

To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities.

- 7.13. The increase in residents living in Santry will increase the viability of local shops in the area.

Policy CCUV37 – Plan Active and Healthy Streets

To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.

- 7.14. The proposed development has been designed to encourage active transport by creating a highly permeable development where walking and cycling is a safe, efficient, and convenient mode of transport. High quality materials are proposed and has been designed to be Part M compliant which will ensure an accessible public realm for individuals with additional mobility requirements.

Policy CCUV38 – High Quality Streets and Spaces

To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.

- 7.15. All public areas have been designed with DMURS and Part M of the Building Regulations in mind enabling users with reduced mobility to move easily throughout the scheme. A DMURS Design Statement Technical Note has been prepared by NRB Consulting Engineers and is submitted with this application.

Policy CCUV39 – Permeable, Legible and Connected Public Realm

To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.

- 7.16. The proposed development has been designed to comply with a range of policies and guidelines that ensure high quality design and healthy placemaking are achieved in the development.

Policy CCUV40 – Public Safety

To promote the development of a built environment and public spaces which are designed to deter crime and antisocial behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012

- 7.17. The development is designed to maximise the number of communal areas that benefit from passive and active surveillance in addition to providing significant public realm improvements in the area aiding the usage and accessibility of Omni Park. A public safety strategy is set out within the JFA Design Statement.

Policy CCUV42 – Public Realm – Key Urban Villages/Urban Villages

To provide environmental and public realm improvements in Key Urban Villages and urban villages around the city through the implementation of Local Environment Improvement Plans / Village Improvement Plans and Placemaking Strategies in order to support the regeneration and revitalisation of the city's urban villages. Such plans:

- 1. will identify opportunities for micro spaces (small spaces to facilitate lingering and social, community and cultural interaction and events); and*
- 2. will be informed by walkability exercises led by older people, parents, visually impaired and people with disabilities, to make city outdoor spaces more accessible and safe for all, creating walkable communities and age friendly spaces.*

Policy CCUV43 – New Development

That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility

- 7.18. The proposed development includes various features that enhance the public realm and is designed to be clutter free so that people, in particular pedestrians and cyclists, can move easily and efficiently through the development. The proposed development greatly improves the linkages and permeability of Santry and Omni Park Shopping Centre as the public will be able to visit and pass through the development which greatly increases the number of people who benefit from the amenities and public space provided. In summary the proposed development is entirely in accordance with the Retail Strategy and the Draft Plan.

Response to Appendix 2 Retail Strategy

- 7.19. In addition to the detail set out above, we note the provisions of the Retail Strategy, Omni is considered a Level 3 retail centre:

Level	RSES Classification	Dublin City Settlement Hierarchy
Level 3	Town and/or District Centres & Sub-County Town Centres (Key Service Centres)	Key Urban Villages – The RSES identifies the following Level 3 district centres for the city: Finglas, Northside Shopping Centre, Ballyfermot, Rathmines, Crumlin Shopping Centre, Donaghmede Shopping Centre, Omni, Ballymun, Point Village and Poolbeg, Clongriffin / Belmayne, Phibsborough and Naas Road.

- 7.20. As highlighted above There are 12 Key urban Villages in the city. The location of these around the city is shown in Figure 7.1 and Map K. These Key urban Villages generally attract a level of spend that does not position them as significant competitors with the City Centre. Such centres add to the vibrancy of their area and provide an important retail and service role to a wide local catchment. Whilst the scale, function and character of these centres varies widely across the city, they play a key role and contribute to the diversity of the retail environment across the greater Dublin area.

- 7.21. In specific regard to Omni Park:

Limited new retail floor space is anticipated in this Key urban Village over the lifetime of the Development Plan. The Planning Authority will support a greater mix of community / civic uses at the Shopping Centre in order to further enhance its Key urban Village function

- 7.22. The overall objective with regard to KUVs is:

The consolidation and enhancement of urban villages is an objective of this plan to ensure that these centres continue to develop their mixed use inner city, inner / outer suburban role and function with a level of retail appropriate to their location. It is an objective of this plan that large scale comparison retail proposals be directed to the City Centre Retail Core. It is envisaged that over the plan period, that enhancement

- 7.23. The proposed retail aspect of the development is not of a scale that requires a retail impact assessment and the provision of additional residential is considered to support the existing centre through additional customers and added vibrancy in the area and diversify the mix of uses.



CGI of public open space (Source: 3DDB, 2022).

8.0 CHAPTER 8: SUSTAINABLE MOVEMENT AND TRANSPORT

Policy SMT1 – Modal Shift and Compact Growth

To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.

- 8.1 The proposed development will encourage the use of more sustainable forms of transport by creating a highly permeable development that prioritises the provision of active transport infrastructure and the safety of pedestrians and cyclists.

Policy SMT2 – Decarbonising Transport

To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.

- 8.2 10% of the car parking spaces (22 no. spaces) of the proposed development will be Electric Vehicle charging spaces which will facilitate and encourage residents who require private cars to use electric vehicles. 100% of car parking will be ducted and rolled out on demand based programme.

Objective SMT01 – Transition to More Sustainable Travel Modes

To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/LUAS); and 17% private (car/ van/HGV/motorcycle).

- 8.3 The proposed development facilitates and encourages the use of active and public modes of transport and will contribute to achieving the city mode share targets outlined.

Policy SMT4 – Integration of Public Transport Services and Development

To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.

- 8.4 The proposed development will deliver a mixed-use development along a public transport corridor. Permeability through the development will work in tandem with the provision of high-quality public transport to discourage the use of private vehicles where possible.

Policy SMT5 – Mobility Hubs

To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.

- 8.5 The location of the site of the proposed development close to key public transport infrastructure and the extensive walking and cycling infrastructure in the proposed development will result in the creation of a key transport location that encourages the use of public and active transport.

Policy SMT6 – Mobility Management and Travel Planning

To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity

- 8.6 The proposed development prioritises making walking and cycling an attractive, safe and convenient mode of transport. The roads and streets of the proposed development have been designed to comply with the Design Manual for Urban Roads and Streets (DMURS). A DMURS Design Statement Technical Note has been prepared by NRB Consulting Engineers and is submitted with this application.

Policy SMT7 – Travel Plans for New and Existing Developments

To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.

- 8.7 The planning application is for a new mixed-use development comprising of residential, retail, childcare and recreational land uses. A Travel Plan has been prepared by NRB Consulting Engineers and is submitted with this application.

Policy SMT8 – Public Realm Enhancements

To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.

- 8.8 The proposed development will enhance the public realm by providing infrastructure that contributes to place making and liveability and which prioritise pedestrians.

Policy SMT9 – Public Realm in New Developments

To encourage and facilitate the {co-ordinated} delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers {and all service/utility providers,} through the Development Management process.

- 8.9 The proposed development includes an upgrade to existing elements of the public realm as well as the delivery of new high-quality public realm features including a public plaza that will be of benefit to residents and visitors of the development.

Policy SMT10 – Pedestrian network

To protect, improve and expand on the pedestrian network ~~(inclusive of facilities for people with mobility impairment and/or disabilities, including the elderly and people with children,)~~ linking key public buildings, shopping streets, public transport points and tourist and recreational attractions {whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.}

- 8.10 All public areas have been designed with DMURS and Part M of the Building Regulations in mind enabling users with reduced mobility to move easily throughout the scheme expanding pedestrian network between Omni Park Shopping Centre and Swords Road.

Objective SMT02 – Improving the Pedestrian Network

To improve the pedestrian network {, and prioritise measures such as the removal of slip lanes, the} introduction of tactile paving, ramps {, raised tables} and kerb dishing at appropriate locations, including pedestrian crossings, {street junctions,} taxi ranks, bus stops and rail platforms in order to optimise {safe} accessibility for all users.

- 8.11 The design includes dipped kerbs, tactile paving and other landscape features to improve accessibility for a wide variety of users with impaired mobility continuing priority pedestrian access across the site.

Objective SMT03 – Public On-Street Accessible Parking Bays

To provide public on-street accessible parking bays where appropriate.

- 8.12 13 no. car parking spaces will be provided at surface level which allow for short-term shopping, business and leisure uses.

Objective SMT04 – Taxi Ranks

To ensure the City is provided with adequate ~~(and accessible)~~ taxi ranks and facilities, {accessible and inclusive for a range of users} and to engage with the National Transport Authority and representatives of the taxi industry regarding provision of same.

- 8.13 Taxis will be facilitated in the development through set down spaces as appropriate. There is an existing active taxi rank in Omni.

Policy SMT11 – Pedestrians and Public Realm

To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities

- 8.14 The road and street network of the proposed development has been informed by the Design Manual for Urban Roads and Streets (DMURS) which aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users.

Policy SMT12 – Urban Villages and the 15-Minute City

To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity, in particular for active travel {and facilitating the delivery of public transport infrastructure and services,} and public realm enhancement.

- 8.15 The delivery of residential units within Santry village supports the principles of the 15 minute city by offering people the opportunity to live, work and recreate within Santry.

Policy SMT15 – Walking, Cycling and Active Travel

To prioritise the development of {safe and connected} walking and cycling facilities and {prioritise} (encourage) a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

- 8.16 The proposed development has been designed to promote the use of active transport where possible by designing a permeable development that prioritises the safety and convenience of pedestrians and cyclists.

Policy SMT17 – The Pedestrian Environment

To continue to maintain and improve the pedestrian environment and ~~(promote)~~ {strengthen permeability by promoting} the development of a network of pedestrian routes {including laneway connections} which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

- 8.17 The proposed development will improve connectivity for pedestrians by allowing the public to pass through the development.

Policy SMT18 – Integration of Active Travel with Public Transport

To work with the relevant transport providers, agencies and stakeholders to facilitate the integration of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.

- 8.18 The proposed development is located in close proximity to existing and proposed high frequency transport routes which encourages the integration of active and public transport as bus/ rail stops are within walking/ cycling distance of where people live.

Objective SMT08 – Cycling Infrastructure and Routes

To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objectives GIO2 and GIO16.

- 8.19 A variety of well lit paths have been proposed to provide walking, running and cycling routes for residents throughout the scheme. This has the added benefit of integrating and connecting the scheme with the surrounding area and creating permeability and providing short-cuts between the sites

Objective SMT010 – Cycle Parking Spaces

To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.

Objective SMT011 - Design Standards for Cycle Parking in Developments

To prepare, ~~(in the lifetime of the plan)~~ {within two years of the adoption of the Plan,} a comprehensive guide setting out design standards and requirements for cycle parking in developments.

Objective SMT012 – Cycle Parking Facilities

To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.

- 8.20 The proposed development provides 768 no. bicycle spaces in a mix of secure basement spaces accessed through a dedicated bicycle lane, and spaces dispersed throughout the development at surface level.

Policy SMT23 – On-Street Parking Facilities

To manage on-street car parking to serve the needs of the city alongside the needs of residents, visitors, businesses, kerbside activity and accessible parking requirements, and to facilitate the re-organisation and loss of spaces to serve sustainable development targets such as in relation to, sustainable transport provision, greening initiatives, sustainable urban drainage, access to new developments, or public realm improvements

- 8.21 13 no. spaces are designated on the surface 7 no. crèche drop off spaces and 6 no. car share spaces. These will ensure easy access for those accessing the scheme as well as availability of car sharing to the wider community plus reconfiguration of existing surface parking spaces.

Policy SMT24 – Commuter, Shopping, Business and Leisure Parking

To discourage commuter parking and to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses.

- 8.22 Of the 226 no. car parking spaces provided only 13 will be at surface level which allow for short-term shopping, business and leisure uses.

Policy SMT25 – Car Parking in Residential and Mixed Use Developments

- 1. To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.*
- 2. To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.*
- 3. To safeguard the residential parking component in mixed use developments.*

- 8.23 The proposed development will include 226 no. car parking spaces including 22 no. electric vehicle spaces. There will also be 6 no. Car Club spaces which will encourage the use of car sharing.

Policy SMT27 – Expansion of the EV Charging Network

To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.

- 8.24 The proposed development will deliver 22 Electric Vehicle charging points.

Objective SMT019 – Elimination of Free' On-Street Parking

To progressively eliminate all 'free' on-street parking, both within the canals and in adjacent areas where there is evidence of 'all day' commuter parking, through the imposition of appropriate parking controls, including resident permit parking, pay and display parking, or by the provision of new cycle parking, public realm or greening.

- 8.25 Of the 226 car parking spaces provided, only 13 will be at surface level which allow for short-term shopping, business and leisure uses. The remainder (213) will be provided at basement level accessed via dedicated ramp from the main Omni Shopping Centre access roadway. This will be controlled by an electronic barrier system.

Policy SMT30 – Design Manual for Urban Roads and Streets

To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible

- 8.26 The proposed development has been designed in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS). A DMURS Design Statement Technical Note has been prepared by NRB Consulting Engineers and is submitted with this application (see TAR Appendix).

Policy SMT31 – Street and Road Design

To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.

- 8.27 The road and street network of the proposed development has been informed by the Design Manual for Urban Roads and Streets (DMURS) which aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. A DMURS Design Statement Technical Note has been prepared by NRB Consulting Engineers and is submitted with this application. A Road Safety Audit has also been completed and is enclosed within the TAR.

Policy SMT32 – Traffic Calming and Self-Regulation Street Environments

To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

- 8.28 The proposed development is designed in accordance with the Design Manual for Urban Roads and Streets which ensures streets and roads are designed to focus on the needs of pedestrians, cyclists, and public transport users.

9.0 CHAPTER 9: SUSTAINABLE ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK

Policy SI1 – Support for Irish Water

To support and facilitate Irish Water in the provision of high quality drinking water, water conservation and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the city and the Region.

- 9.1. Irish Water has confirmed the feasibility of connecting the proposed development to water. In order to connect the development, a connection must be made to the existing 12" watermain on Swords Road. A DMA meter will need to be installed on the service connection.
- 9.2. Upgrades to the water network infrastructure are required to facilitate a wastewater connection, however Irish Water have confirmed that these upgrades are part of a project on their current investment plan and is on track to be completed by 2026 (in line with the proposed programme for delivery of the proposed development).

Policy SI2 – Integrating Water Services with Development

To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.

- 9.3. Irish Water have confirmed the feasibility of the proposed development in relation to water and wastewater supply and treatment.

Policy SI3 – Separation of Foul and Surface Water Drainage Systems

To require all new development to provide separate foul and surface water drainage systems.

- 9.4. The proposed development will provide separate foul and surface water drainage systems.

Policy SI4 – Drainage Infrastructure Design Standards

To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).

- 9.5. The surface water design approach complies with the criteria set out in the Greater Dublin Regional Code of Practice for Drainage Works

Policy SI13 Minimising Flood Risk

To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, {coastal,} reservoirs and dams, (and) the piped water system {and potential climate change impacts}.

- 9.6. The proposed development has been designed with regard to "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009) and a

SSFRA has been prepared outlining how the proposed development will not contribute to increased flood risk.

Policy SI15 – Site-Specific Flood Risk Assessment

All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:

- *The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 {and any future amendments}, and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan.*
- *The application of the sequential approach, with avoidance of {highly and less vulnerable} development in areas at risk of flooding as a priority {and/ or the provision of water compatible development only}. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change {and those associated with existing flood defences}. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B(4) of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. {Allowances for climate change shall be included in the SSFRA.}*
- *{On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management). There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding.}*

- 9.7. The site of the proposed development has been subject to a Site Specific Flood Risk Assessment prepared by EirEng which concludes that there is a low risk of flooding on the subject site. The site is considered to be at risk of flooding from pluvial sources. As previously outlined, the proposed development includes various features that minimise the impact of flooding.

Policy SI21 – Managing Surface Water Flood Risk

To minimise flood risk arising from pluvial (surface water) flooding in the city by promoting the use of natural or nature-based flood risk management measures as a priority and by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits {and climate adaption}.

- 9.8. A surface water drainage system with SUDS features will be incorporated into the development to drain the entire site and to manage surface water run-off from the site.

Policy SI22 – Sustainable Drainage Systems

To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.

- 9.9. The proposed development will utilise SuDS to drain the site and to manage surface run-off from the site.

Policy SI23 – Green Blue Roofs

To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green and Blue Roof Guide (2021)

- 9.10. The proposed development includes green and blue roof areas across all four buildings to provide attenuation storage.

Policy SI25 – Surface Water Management

To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.

- 9.11. The Surface Water Management Plan of the proposed development is included in the Engineering Planning Report prepared by EirEng Consulting Engineers which is submitted with this application.

Policy SI27 – Sustainable Waste Management

*To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. *{To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).}**

- 9.12. The development will be designed and operated with the aim of a reduction in waste generation through construction and operation. Where possible waste streams will be separated on site and recycled or re used. Where possible local materials will be specified, and in addition materials that contain recycled content will be considered as preferable.

Policy SI28 – Sustainable Waste Management

To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to {develop Dublin as a circular city and} safeguard against environmental pollution.

Policy SI29 – Segregated Storage and Collection of Waste Streams

To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance see Appendix 7).

- 9.13. Waste generated during the operational phase of the development will be segregated at source. Waste categories will include:

- Dry Mixed Recyclables
- Organic Waste
- Glass
- Mixed Non-recyclables

Policy SI30 – Waste Management in Apartment Schemes

To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).

- 9.14. The Operational Management Plan details the waste management plan for the 457 no. apartment units that will be developed in the proposed development which complies with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018.

Policy SI31 – Provision of Public Recycling Facilities in Large Retail Developments

To require new retail developments in excess of 1,000sq.m (net) in size to provide for a local bring centre/ public reuse and recycling facilities on-site, where feasible, in line with the principles of the 15-minute city. The facilities should be adequately-sized and located to be easily accessible to the general public and should specifically provide for textile and glass bottle recycling (for further guidance see Section 15.18.3).

- 9.15. The proposed development includes only 430 sq. m of retail space and therefore is not required to provide a local bring centre/ public reuse and recycling facilities.

Objective SIO16 – Eastern-Midlands Region Waste Management Plan

To support the implementation of the Eastern-Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.

- 9.16. A Construction and Demolition Waste Management Plan has been prepared by AWN and is submitted with this application. This plan outlines how the proposed development complies with the Eastern-Midlands Regional Waste Management Plan

2015-2021. Please also see Waste Management Chapter of the EIAR prepared by AWN and Operational Waste Management Plan prepared by EirEng.

Policy SI34 – Management of Air Quality

To monitor, pro-actively manage and improve air quality in the city through integrated land use and spatial planning measures to avoid, mitigate and minimise unacceptable levels of air pollution in accordance with national and EU policy Directives on air quality and, where appropriate, drive compliance with established targets.

- 9.17. An assessment of air quality during the construction and operational phase of the development was carried out as part of the EIAR for the proposed development. Air quality impacts during the construction phase are expected to be “short-term, negative, localised and imperceptible” provided a series of mitigation measures are put in place. Air quality during the operational phase is described as being “imperceptible”.

Policy SI37 – Noise Sensitive Development

To give careful consideration to the location, design and construction of noise-sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance

- 9.18. An assessment of the noise and vibration during the construction and operational phases of the proposed development has been carried out by AWN Consulting as part of an EIAR for the proposed development. The EIAR concludes that the noise and vibration impacts of the construction phase will be “short-term, negative and slight” provided outlined mitigation measures are taken. During the operational phase provided that the appropriate glazing is incorporated into the design for facades exposed to noise from the outdoor crèche area and provided that the mitigation measures are employed, it is anticipated that impacts will be long term, neutral and imperceptible.

Policy SI41 – Lighting Standards

To provide and maintain high quality and appropriate street/ outdoor lighting on public roads/ footways/ cycleways/ public realm throughout the city in accordance with the Council’s Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates.

- 9.19. Lighting to the proposed development consists of columns to the road, plaza and parking areas with low-level lighting measures to the residential areas/courtyards. The luminaires are LED fittings which allow for low energy, directionally focused lighting that minimises light spill to the surrounding areas.

Policy SI42 – Light Pollution

To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.

Policy SI43 – Energy Efficient Lighting

To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.

- 9.20. The light fittings are LED fittings which allows for directionally focused light that minimises light spill to the surrounding areas. We note no impact on bats as per Altamar Bat Fauna Impact Assessment included within EIAR Chapter.

Policy SI46 – Open Access/ Operator Neutral Host Connectivity

To require all new developments to provide open access connectivity arrangements directly to the individual premises to enable service provider competition and consumer choice.

- 9.21. A Telecommunications report was produced by ISM for the proposed development. This report concludes that the proposed development allows for the retention of important Telecommunication Channels, such as Microwave links, and therefore satisfies the criteria of Section 3.2 of the Building Height Guidelines.

Policy SI47 – Future-Proofing for Digital Connectivity Requirements

To require the consideration and provision of telecoms / digital connectivity infrastructure as part of the design of all Council capital projects and public projects, including public realm improvements (where appropriate), to ensure the future-proofing of capital investment in digital connectivity infrastructure in line with the EU Broadband Cost Reduction Directive Regulation (2020).

- 9.22. The proposed development includes a dedicated allowance of space at and on the lift shaft overrun on Block C, together with access to a power supply, where steel support structures can be fixed at a future date if required, to provide necessary mitigation measures should retention of any Microwave links be required.

10.0 CHAPTER 10: GREEN INFRASTRUCTURE AND RECREATION

Policy GI3 – Multi-functionality

To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multifunctionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.

- 10.1. The proposed development includes public open space that will be of benefit to the wider community. The proposed development includes the use of SuDS which will be used to manage surface water while also enhancing biodiversity.

Policy GI4 – Accessibility

To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.

- 10.2. Public areas within the proposed development are designed to comply with DMURS and Part M of the Building Regulations to ensure users with reduced mobility are able to benefit from the various open and green areas of the development.

Policy GI6 – New Development/ New Growth Areas

To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development

- 10.3. SuDS will be used to manage surface run off while also supporting the biodiversity and ecosystems present at the site.

Policy GI7 – Connecting Greening Elements in Site Design

To avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green infrastructure / the public realm where feasible and to provide for ecological functions.

Objective GIO1 – Green Roof Guidance Document (2021)

*The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green **{and Blue}** Roof **{Guide}(ance)** Document (2021), see Appendix 11.*

- 10.4. The proposed development includes green roofs as an element of the overall SuDS of the development.

Policy GI9 – European Union Natura 2000 Sites

To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).

- 10.5. An Appropriate Assessment Screening Report has been prepared by Altamar. The AA Screening report concludes:

“Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.”

Policy GI11 – Proposed Natural Heritage Areas

To protect and enhance the ecological functions and connectivity of habitats and species of proposed Natural Heritage Areas (pNHAs) to be designated by the National Parks and Wildlife Service (NPWS).

Policy GI12 – National and International Sites for Nature Conservation

To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.

Policy GI14 – Ecological/ Wildlife Corridors

To maintain and strengthen the integrity of the city’s ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent to an ecological corridor.

- 10.6. In regard to the above objective the please see Chapter 8 of the EIAR for detailed response to the above considerations.

The designated conservation sites within 15km of the site were examined for potential impact. Sites beyond 15km had no direct or indirect pathways. This assessment included sites of international importance; Natura 2000 sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA)) and Ramsar sites and sites of National importance ((Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA). Up to date GIS data (2022 NPWS data shapefiles) were acquired and plotted against 1, 5, 10 and 15km buffers from the proposed development site. A data search of rare and threatened species within 10km of the proposed site (GIS shapefile) was provided by NPWS. Additional information on rare and threatened species was researched through the National Biodiversity Data Centre maps.

- 10.7. This chapter in conclusion states:

The demolition, construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on the sensitive receptors through the application the standard demolition, construction and operational phase controls. The overall impact on the ecology of the proposed development will result in

a long term slight positive residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of SuDS, additional biodiversity features and habitat complexity.

- 10.8. The proposed development will deliver a wide variety of green areas that will act as “stepping stones” in the city’s ecological corridors. The site is currently comprised of industrial sheds and a large tarmacadam yard which do not support these ecological corridors.

Policy GI16 – Habitat Creation and New Development

That new development {s (as appropriate) will be required to support local biodiversity and} ~~(should provide opportunities to)~~ incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity {and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.}

- 10.9. The proposed development greatly increases the biodiversity present at the site as it includes green space and green roofs on what is currently a brownfield site with minimal biodiversity and wildlife habitat. The development will result in a significant net gain in biodiversity at the site

Policy GI18 – Minimise Impact – Light and Noise

To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of sensitive species such as bats (see also Section 9.5.9 Public & External Lighting).

- 10.10. A daylight/ sunlight assessment has been prepared by 3D Design Bureau and is submitted with this application. This report addresses the availability and quality of internal lighting within the development. Please also see Public lighting report prepared by Sabre.

Objective GIO7 – National Biodiversity Action Plan 2017-2021

To support the management targets for nature conservation sites set out in the National Biodiversity Action Plan 2017 (and as updated) and the objectives for local authorities to address threats to biodiversity.

- 10.11. The varied and extensive planting and green spaces in the proposed development will offer habitats for biodiversity and would be a significant improvement relative to the current use of the site as an unused warehouse.

Policy GI28 – New Residential Development

To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.

- 10.12. The proposed development includes extensive public and communal open space located in various locations across the development that will provide a range of recreational areas for future residents of the development and the public. The proposed development includes a playground and play areas. The design of the proposed development includes various features that make walking and cycling safe.

Policy GI51 – Children’s Playing Facilities – General

To seek the provision of children’s playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds.

Policy GI52 – Children’s Playing Facilities in New Residential Developments

To seek the provision of children’s playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising

- 10.13. An outdoor play area will be provided adjacent to the creche. 2 designated children’s play area will also be provided to the west of the site, play areas include younger play, older play and the dedicated crèche playspace. Please see Murray and Associates Design Report for details of same,

11.0 CHAPTER 12: CULTURE

Policy CU14 – Cultural Uses in Developments on Former Industrial Lands

To ensure new developments on former industrial lands incorporate cultural uses {(including night-time entertainment space designed to minimise impact on residential areas)} as part of new mixed-use communities.

- 11.1. The location of the site adjacent to the existing Omni Park Shopping Centre and which offers 7,052 sqm of Leisure, Food & Entertainment services and the IMC Cinema will provide a wide variety of night-time entertainment options for future residents. The proposed development can provide a contribution to this through its small scale retail units proposed.

Objective CUO22 – SDRAs and Large Scale Developments

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide for 5% community, arts and culture and artist workspaces internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.

*{*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.}*

- 11.2. It is recognised that the under-provision of floorspace for cultural/community facilities would not be fully consistent with the draft Development Plan requirements as set out in policy objective CUO22 above. In the event that a decision on the application is made subsequent to the new City Development Plan 2022-2028 coming into effect, the Board may consider that the proposed development constitutes a material contravention of new Development Plan as it relates to cultural facilities as currently set out in Section 12.5.3. Please see the Material Contravention Statement prepared by John Spain Associates which accompanies this application for further detail of justification of community uses proposed.

Objective CUO26 – Co-Design and Audits

Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (COU38 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.

- 11.3. A Santry Community and Local Needs Audit has been prepared and is submitted with this application. A community facility is proposed and the Applicant is will to working with the DCC Arts Office to determine its future use.

12.0. CHAPTER 14: LAND USE ZONING

12.1. The subject site is zoned Z4 -Key Urban Villages/ Urban Villages. The objective of this zoning is *“To provide for and improve mixed-services facilities”*.

12.2. In this regard the draft Development Plan states:

“The role of Z3 (Neighbourhood Centres) and Z4 (Key Urban Villages) have been reviewed in the context of recent socio-economic trends and resulting changes in consumer behaviour which have enhanced the importance that such centres play in serving the needs of their local population hubs and in delivering on the vision of Dublin as a 15-minute city. An increased focus on encouraging mixed use development has also been introduced in Z5 City Centre (see also Chapter 7: The City Centre, Urban Villages and Retail)”

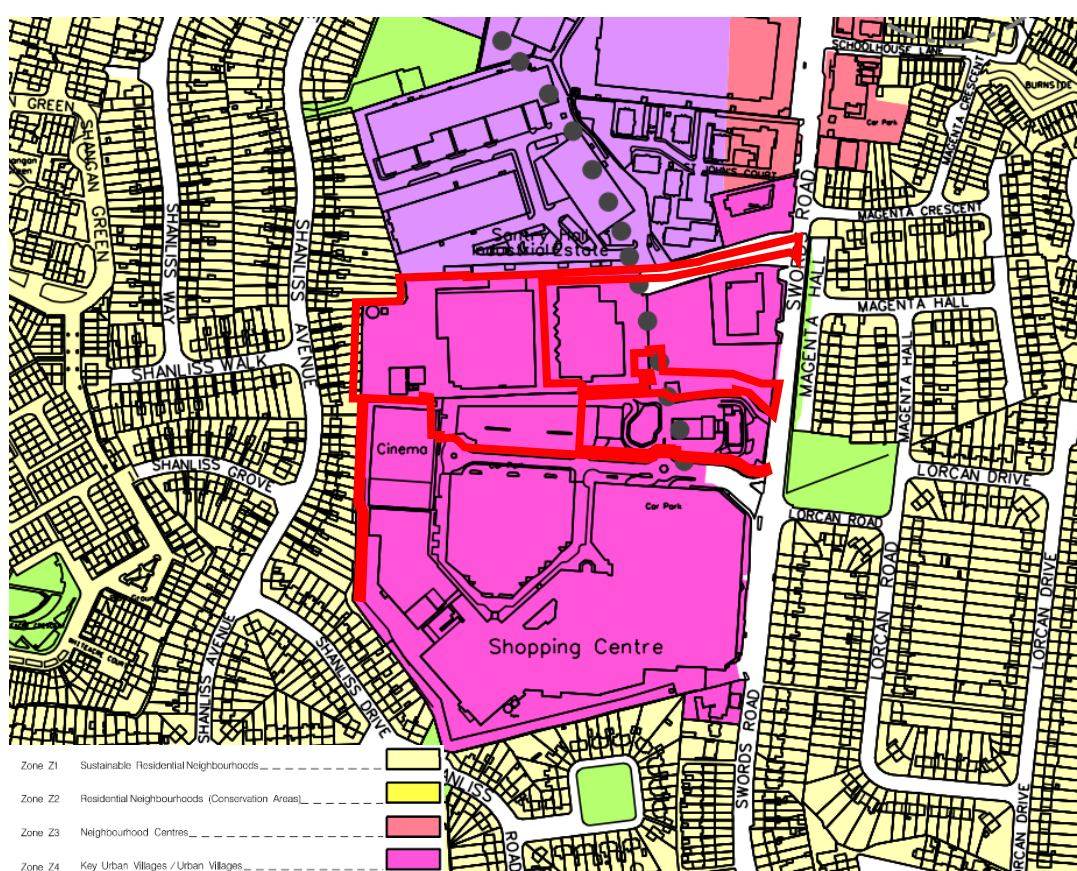


Figure 12: Draft Development Plan Zoning Map, Mapset B

12.3. Permissible uses on lands zoned Z4 include:

- Amusement/leisure complex,
- assisted living/retirement home,
- bed and breakfast,
- buildings for the health, safety and welfare of the public,
- **café/ tearoom,**
- car park,
- car trading,
- **childcare facility,**
- civic offices,
- **community facility,**
- cultural/recreational building and uses,
- craft centre/ craft shop,

- *delicatessen,*
- *education,*
- *embassy office,*
- *enterprise centre,*
- *financial institution,*
- *garden centre/ plant nursery,*
- *guesthouse,*
- *halting site,*
- *home based economic activity,*
- *hostel (tourist),*
- *hotel, industry (light),*
- *live-work units,*
- *media-associated uses,*
- *medical and related consultants,*
- *mobility hub,*
- *motor sales showroom,*
- *office,*
- *off-licence, off-licence (part),*
- *open space,*
- *park and ride facility,*
- *petrol station,*
- *place of public worship, primary health care centre,*
- *public house,*
- *public service installation,*
- *recycling facility,*
- ***residential,***
- *restaurant,*
- *science and technology-based industry,*
- *shop (district),*
- ***shop (local),***
- *shop (neighbourhood),*
- *sports facility,*
- *take-away,*
- *training centre,*
- *veterinary surgery.*

12.4. Open for Consideration Uses are

- *Advertisement and advertising structures,*
- *betting office,*
- *Build to Rent residential,*
- *civic and amenity/recycling centre,*
- *conference centre,*
- *embassy residential,*
- *funeral home,*
- *garage (motor repair/service),*
- *household fuel depot,*
- *internet café/call centre,*
- *laundromat,*
- *nightclub,*
- ***(office)***
- *outdoor poster advertising,*
- *postal hotel/motel,*
- *shop (factory shop),*
- *shop (major comparison),*
- *student accommodation,*
- *warehousing (retail/non-food)/retail park*

- 12.5. The subject property is within the Z4 zoning objective (District Centres) which aims “to provide for and improve mixed-service facilities”.
- 12.6. It is noted a small portion of the application site is on ‘white land’. This includes the existing access route along the north, which would be utilised for secondary servicing and fire tender access.
- 12.7. The Draft Development Plan sets out further detail in regard to Z4 lands:

“Key Urban Villages and urban villages (formerly district centres) function to serve the needs of the surrounding catchment providing a range of retail, commercial, cultural, social and community functions that are easily accessible by foot, bicycle or public transport; in line with the concept of the 15-minute city. Key Urban Villages form the top tier of centre outside the city centre. They typically have retail outlets of a greater size selling convenience and comparison goods or provide services of a higher order. The catchment area generally extends spatially to a greater extent than that of urban villages and neighbourhood centres (see Chapter 7: City Centre, Urban Villages and Retail and Appendix 2: Retail Strategy for further detail). Urban villages zoned Z4 are typically smaller in scale and provide a more localised role for the daily shopping needs and local services of a residential community. A symbol and reference number identifies the designated Key Urban Villages on the Dublin City Development Plan 2022–2028 zoning maps and they are also identified on Map K. These centres have, or will have in the future, the capacity to deliver on a comprehensive range of integrated services along with residential development.”

- 12.8. The proposed development represents an important opportunity to realise this vision and supports the achievement of the overall z4 lands objectives. The Draft Plan set out a series of general principles:

General principles with regard to development in Key Urban Villages/ urban villages are set out below. Proposals for development within these areas should be in accordance with these principles in addition to complying with the land-use zoning.

- *Mixed Use: Promote an increased density of mixed-use development including residential development with diversity in unit types and tenures capable of establishing long-term integrated communities.*
- *Density: Ensure the establishment of higher density development capable of sustaining quality public transport systems and supporting local services and activities. Encourage the development/ re-development of under-utilised sites and intensification of underutilised areas such as surface parking. Opportunity should be taken to use the levels above ground level for additional commercial/ retail/services or residential use.*
- *Transport: Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow. Ensure that enhanced connectivity and permeability is promoted.*
- *Commercial/Retail: Promote the creation of a vibrant retail and commercial core with animated streetscapes. A diversity of uses should be promoted to maintain vitality throughout the day and evening.*

- *Community and Social Services: Encourage these centres to become the focal point for the integrated delivery of community and social services.*
- *Employment: Encourage the provision of employment uses incorporating office, work hub, live-work units, professional and financial services and the creation of small start-up units.*
- *Built Environment: Ensure the creation of high-quality, mixed-use urban districts with a high quality public realm, distinctive spatial identity and coherent urban structure of interconnected streets and child-friendly, accessible public spaces and urban parks. Development should have regard to the existing urban form, scale and character and be consistent with the built heritage of the area*

12.9. This section of the report sets out the rationale for the compliance with the land use provisions, principles and objectives for the Z4 lands, which is summarised below and addressed in further detail in the following pages:

- The existing land use is a non conforming use and the proposed uses are all listed as permissible in principle uses;
- In assessing the overall land use in the Z4 land bank; commercial (primarily retail) and service uses remain the predominant land use;
- The provision of additional population will strengthen the long term viability and functioning of the District Centre and the existing uses on site
- The proposal will provide a diversity of uses in the District Centre, as sought under the zoning objective
- The additional population will ensure vibrancy throughout the day in the District Centre, beyond retail trading hours
- Currently there is over 2,300 sq.m. of vacancy in the District Centre retail floorspace indicating there is sufficient space existing for the retail needs of the catchment. There is considerable land remaining in the form of surface car parking to allow for future additional retail and service floorspace should a need be identified.

12.10. The proposed development for a mixed use scheme, comprising of residential development with retail units, a childcare facility and a community use building and is fully compliant with the land uses specified as 'permissible uses' under the Z4 zoning objective.

12.11. Therefore, it is respectfully submitted, that the existing land use is a non conforming use with the Z4 land bank and does not contribute to the overall zoning objectives. The proposed uses however, are all 'permissible uses', and therefore more appropriate.

12.12. In specific response to the above principles of Z4 please see below:

- **Mixed Use:** The subject site includes an existing warehouse/distribution depot and a portion of Omni Park, which is in the control of the applicant. Omni Park Shopping Centre is a district centre with a land bank of 11 ha. which is primarily in retail and other commercial use. The subject proposal seeks to provide for the integration of the subject lands into Omni District Centre and the delivery of a significant quantum of residential units to provide for an improved balance of uses, complementing the primary commercial nature of the lands. An appropriate balance of uses and housing typologies has been lacking in the immediate district centre, which currently has no residential component, and wider vicinity, with the Z4 district centre zoned lands comprising 100% commercial use and the surrounding

residential context has been historically dominated by 3 bed semi-detached houses. This application seeks to redress this imbalance and provide a truly mixed use district centre. The proposed community facility, retail uses and creche, in conjunction with the proposed residential uses will provide for greater activity throughout the day and night, ensuring vibrancy and vitality of the District Centre, strengthening its function.

The proposed development proposes to create a vibrant mixed use neighbourhood and deliver homes to add to the existing retail, workspace and leisure uses currently existing in Omni Park Shopping Centre. The proposed new public plaza and public realm improvements will complete the pedestrian facilities in the complex and help to further integrate Omni Park into the surrounding community.

- **Density:** As widely set out within the application documentation the proposed density on the subject site is 295 no. units per hectare. It is considered that the proposed density is appropriate given the National Policy objective to increase residential density in existing urban infill and underutilised brownfield sites. Comparable or higher densities have also been granted permission by An Bord Pleanála since the adoption of the National Planning Framework.
- **Transport:** 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 and M1 motorway. The site is well served by existing bus services with Dublin Bus routes No.'s 1, 16, 16c, 16d, 33, 33e, 41, 41b, 41c and 41d within easy walking distance of the site which connect the site to Dublin Airport, Ballbriggan and Swords to the north and the city centre and Ballinteer to the south. The site is also located along the proposed BusConnects Corridor.

The proposed developments movement and permeability strategy has been carefully considered to integrate with the permitted and provide an easily accessible, legible and safe public realm. The subject development also includes a public plaza (substantially in the form permitted as part of Omni Living) enabling for improved linkages with the Swords Road and the Omni Shopping Centre. The inclusion of the plaza within the subject application delivers a connection to the Swords Road, improving permeability through the overall Omni Park, without being dependent on the delivery of Omni Living.

- **Commercial/Retail:** The subject proposal seeks to provide for the integration of the subject lands into Omni District Centre and the delivery of a significant quantum of residential units to provide for an improved balance of uses, complementing the primary commercial nature of the lands. An appropriate balance of uses and housing typologies has been lacking in the immediate district centre, which currently has no residential component, and wider vicinity, with the Z4 district centre zoned lands comprising 100% commercial use and the surrounding residential context has been historically dominated by 3 bed semi-detached houses. This application seeks to redress this imbalance and provide a truly mixed use district centre. The proposed community facility, retail uses and creche, in conjunction with the proposed residential uses will provide for greater activity throughout the day and night, ensuring vibrancy and vitality of the District Centre, strengthening its function.

- **Community and Social Services:** the proposed development entails community facility. In addition a Community and Local Needs Audit is submitted with the application, setting out the range of existing services and community, education, amenity and leisure facilities in the Omni centre and wider area. This Audit clearly demonstrates the extensive services existing both within the existing district centre and in the vicinity of the site which will support the future residents of the subject development.
- **Employment:** small scale retail and other non-residential uses are included which will provide employment and support the overall Omni Park Shopping Centre.
- **Built Environment:** Currently the district centre is situated as an island site of commercial uses which do not integrate to the wider surrounds. This application seeks to ensure the district centre is at the heart of and directly linked / integrated into the evolving local context which see an increase in residential accommodation as well as a commensurate provision of community facilities which will provide for a truly sustainable mixed use and vibrant urban quarter. In terms of design response to the existing and permitted context, the landscape, planting, materials and palettes are complementary resulting in a pleasant public realm. In terms of architectural design of the buildings, both developments use complementary materials, colours and finishes and the north south orientation of blocks in order to create a coherent streetscape and urban environment which responds to the existing context.

Quantification of Uses

Existing

- 12.13. In examining the current land uses (in terms of land usage/site coverage) within the Z4 land bank, 77% are commercial uses (primarily retail with related uses including services and leisure), 23% industrial and 0% residential,

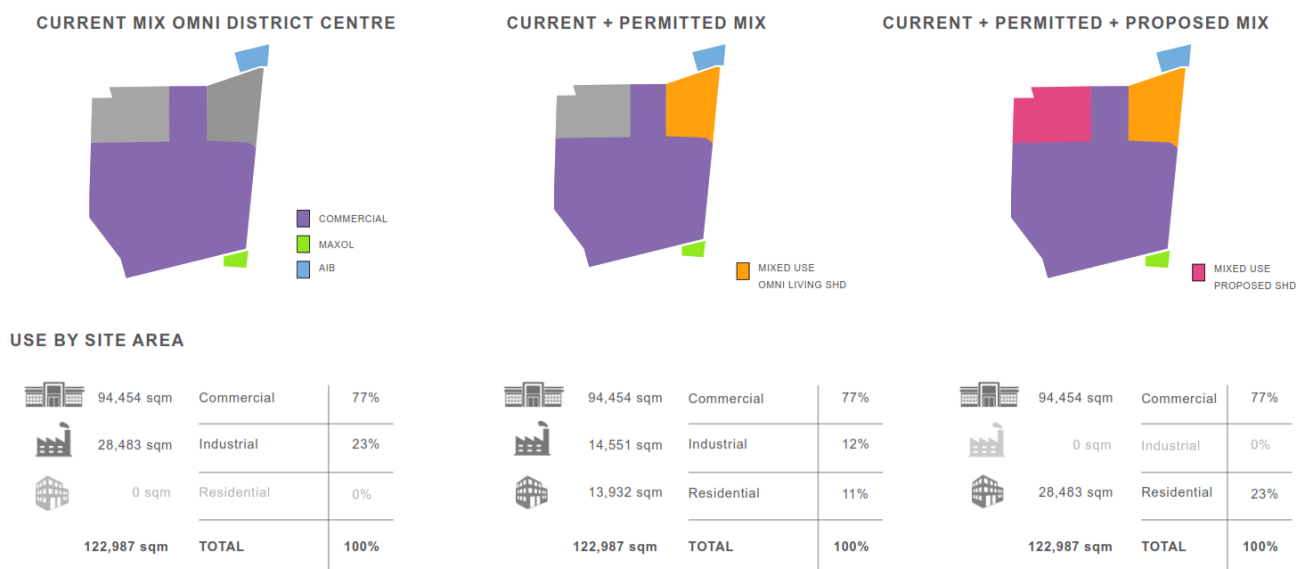
Existing and Permitted

- 12.14. In completing a similar exercise accounting for permitted development (i.e. Omni Living) 77% of the lands are commercial uses, 12% industrial and 11% residential with the residential element comprising the permitted Omni Living development. The permitted Omni Living scheme includes an aparthotel and small commercial units. For the purposes of land usage, the Omni Living site is taken as wholly residential to present a worst case scenario, as the uses vary by floor, which does not allow a straightforward division of the lands uses. The floor areas do take account of the separate uses.

Existing, Permitted and Proposed

- 12.15. Taking into account the existing, permitted and proposed development, 77% of the lands are commercial uses and 23% residential.
- 12.16. In effect, the subject proposal taken in combination with the permitted Omni Living scheme take the land use mix from 77% Commercial uses (primarily retail with related uses including services and leisure) and 23% industrial to 77% commercial and 23%

residential. The permitted and proposed residential development remove non conforming uses in favour of uses complementary to the district centre function.



12.17. Further in response to Item 2 of the Opinion of An Bord Pleanála Mason Own & Lyons have been instructed by the applicant to prepare a report on ‘The Impact of the Proposed Development of: Omni Plaza SHD on the Existing Retail and Services Provision at Omni Park Shopping and District Centre’.

12.18. In conclusion this report states: “Our assessment and conclusion from the above analysis is that the proposed development in conjunction with the already permitted development within the District Centre lands will serve to directly support and encourage the retention and future growth of the existing retail and service offerings within the district centre at a time when demand for retail floorspace has been in continual decline for 15-20 years. This loss of demand for floorspace is a consequence of the onset of online retailing in conjunction with the general decline of the historic shopping centre model whereby car-borne destination retail was the predominant attraction. District centres such as that at Omni Park are required to be substantially repositioned to become truly mixed-use destinations which provide the residential, employment, retail, leisure, and services provision for the population of their catchment.

12.19. Please also see response to Item 2 of the Response to An Board Pleanála’s Opinion prepared by JSA for further detail.

12.20. The proposed development for a mixed use scheme, comprising of residential development with retail units, a childcare facility and a community use building and is fully compliant with the land uses specified as ‘permissible uses’ under the Z4 zoning objective.

12.21. Therefore, it is respectfully submitted, that the existing land use is a non conforming use with the Z4 land bank and does not contribute to the overall zoning objectives. The proposed uses however, are all ‘permissible uses’, and therefore more appropriate.

CHAPTER 15: DEVELOPMENT STANDARDS

Key Design Principles

Healthy Placemaking

- *The contribution to the public realm for the benefit and / or enjoyment of the locality.*
- *The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.*
- *The use of high quality materials and finishes including hard and soft landscaping.*
- *The orientation of open space and the accessibility to daylight and sunlight.*
- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.*
- *The accessibility of the development and the traffic calming measures in place in accordance with DMURS.*
- *The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.*
- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged*

- 13.1. The enhancement of existing and delivery of new high quality and varied public realm features including a Public Plaza, Children's Play Area and open spaces for recreation.
- 13.2. The careful design of buildings and landscaping will contribute to creating a sense of distinctiveness and place. The proposed development uses high-quality materials and finishes including hard and soft landscaping.
- 13.3. The proposed development includes a variety of well-lit paths have been proposed to provide walking, running and cycling routes for residents throughout the scheme. This has the added benefit of connecting the schemes and creating permeability and providing short-cuts between the sites.
- 13.4. The street and road network has been designed in compliance with DMURS. A DMURS Design Statement Technical Note has been prepared by NRB Consulting Engineers and is submitted with this application.
- 13.5. The communal open spaces have been designed to benefit from passive surveillance.

Sustainability and Climate Action

- *Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.*

- *Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain.*
 - *Materials should be selected which are sustainably sourced and existing materials re-used and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged.*
 - *Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10.*
 - *Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance – see policy SI25.*
 - *New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council's Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23.*
 - *For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA10, CA14, CA15, CA16, CA17 and Section 15.7.2 below.*
- 13.6. An Energy and Sustainability Report has been prepared by OCSC and is submitted with this application. This report outlines the various action that will be taken to minimise energy, water and resource consumption including:
- Actions to limit heat loss from buildings
 - The proximity of the development to public transport links
 - Façade design that facilitates energy efficiency
- 13.7. The proposed development utilises green infrastructure in the SuDS to manage Surface Water.
- 13.8. District heating is not a feasible option for the proposed development.

Inclusivity and Accessibility

Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation to both indoor and outdoor environments.

- 13.9. The proposed development is compliant with Part M of the Building Regulations which ensures people with limited mobility can move easily within the development. Please see JFA Design Statement for statement in relation to accessibility considerations.

- 13.10. The design also includes appropriate accessible parking spaces and dipped kerbs, tactile paving and other landscape features that improve accessibility for a wide variety of users with impaired mobility.

Safe and Secure Design

- *Maximising passive surveillance of streets, open spaces, play areas and surface parking.*
- *Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas.*
- *Eliminating leftover pockets of land with no clear purpose.*
- *Providing adequate lighting.*
- *Providing a clear distinction between private and communal or public open space, including robust boundary treatment.*
- *Enabling residents to watch over the entrance to their home; recessed entrances should be avoided and front doors should also be overlooked from other houses or from well-trafficked public areas.*
- *Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas.*
- *Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds.*
- *Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead.*
- *Using materials in public areas which are sufficiently robust to discourage vandalism.*
- *Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths.*
- *Consulting with An Garda Síochána crime prevention design advisor where appropriate; Dublin City Council will also have regard to the Guidelines on Joint Policing Committees as established under the Garda Síochána Act 2005 as amended (2014), in order to ensure safe and secure communities.*
- *On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy (see policy QHSNO12) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes*

- 13.11. The proposed development has been designed to maximise passive surveillance of public areas. The design of the development ensures there is interconnectedness between the various areas which prevents the formation of pockets of land with no clear purpose.

Site Characteristics and Design Parameters

Brownfield, Regeneration Sites and Large Scale Development

- *To encourage innovative, high quality urban design and architectural detail in all new development proposals.*

- *To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- *To respect and enhance existing natural features of interest.*
- *To contribute to the streetscape creating active and vibrant public realm.*
- *To create animation and create activity at street level and vertically throughout the building.*
- *To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- *To ensure land contamination is appropriately dealt with and mitigated against.*
- *To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- *To create new compositions and points of interest.*
- *To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- *To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- *To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*
- *To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
- *Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.*

13.12. The proposed development will deliver a high-quality mixed-use development on an underutilised brownfield site. The development is reflective of the surrounding built environment and will integrate into the surroundings of Santry village.

13.13. Please see JFA Design Statement for statement for details of materials, finishes used which are of a high quality and respond to the surrounding context. This document also sets out the massing and height strategy which will contribute to a new urban environment. The layout and orientation of the building responds to the existing Omni Shopping Centre and complements the surrounding uses and potential desire lines across the site.

13.14. A significant quantum of public realm upgrades and provisions are proposed which will result in the improvement of the pedestrian environment. Public realm improvements will entail a high degree of accessibility for a range of users and will be Part M compliant.

Infill Development

- *To respect and complement the prevailing scale, mass and architectural design in the surrounding townscape.*

- *To demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area.*
- *Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area.*
- *In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest.*
- *Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts in the surrounding neighbourhood.*

13.15. As set out above, the proposed development will deliver a high-quality mixed-use development which is reflective of the surrounding built environment and will integrate into the surroundings of Omni Park Shopping Centre.

13.16. Please see JFA Design Statement for statement for details of materials, finishes used which are of a high quality and respond to the surrounding context. This document also sets out the massing and height strategy which will contribute to a new urban environment. The layout and orientation of the building responds to the existing Omni Shopping Centre and complements the surrounding uses and potential desire lines across the site.

Sustainable Height and Density

Key criteria which all proposals for increased urban scale and height must demonstrate include:

- *The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040.*
- *Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.*
- *Proximity to a range of employment, services and facilities.*
- *Provision of adequate social and community infrastructure.*
- *The availability of good walking, cycling and public transport infrastructure.*
- *Appropriate mix of uses, housing typologies and tenures.*
- *The provision of high quality public open space and public amenities.*
- *The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.*
- *That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.*
- *Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.*
- *Adequate infrastructural capacity*

- 13.17. As set out within Section 5.0 of the Planning Report prepared by JSA, the proposed development supports the objectives of the NPF, the RSES and other national policy guideline which aim to achieve compact urban growth principles.
- 13.18. As set out in the NRB TAR the proposed development is adjacent to high quality public transport connectivity along the Swords Road.
- 13.19. significant employment and service areas in the area include DCU, Beaumont hospital and Dublin airport, as well as Omni Park Shopping centre itself and other industrial and business parks in the area.
- 13.20. As set out within the JSA Santry Community and Local Needs Audit there is a good provision social and community infrastructure to support the development. the proposal makes a contribution in this regard through the provision of a community facility.
- 13.21. The existing provision of walking, cycling and public transport infrastructure is set out within the TAR prepared by NRB. Significant contributions are also made to this infrastructure by the proposed development.
- 13.22. The proposal is intended to complement the existing pattern and type of housing found in Santry through the appropriate mix of uses and housing typologies.
- 13.23. High quality public open space and public amenities proposed are set out in the Architectural and Landscape design statements and associated documentation.
- 13.24. Please see respective EIAR chapters including and the SSFRA prepared by EirEng for further detail in regard to the resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.
- 13.25. That the ecological and environmental sensitivities of the receiving environments have been comprehensively assessed and addressed as part of the EIAR in particular and enclosed documentation.
- 13.26. As widely set out an appropriate design response that considers the characteristics of the site, any development constraints and prevailing character as been set out within the Architectural and Landscape design statements and associated documentation.
- 13.27. Adequate infrastructural capacity has been assessed as part of the EIAR and other enclosed documentation such as the EPR prepared by EirEng and the TAR prepared by NRB.
- 13.28. For detail in regard to the above criteria, please see Section 14 of this report in relation to Appendix 3. In relation to Table 3 of Appendix 3.

Materials and Finishes

- *To ensure materials and finishes complement the existing pallet of materials in the surrounding area.*
- *Promote durability to ensure a good visual appearance over time.*

- *The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity.*
- *To support the use of structural materials that have low to zero embodied energy and CO2 emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials*

13.29. The materials used throughout the proposed development have been chosen to reflect the natural and built environment of the surroundings. The proposed scheme will comprise a primary high quality buff brick with simple brick detailing at lower levels, and a cement board cladding. To soften the massing of the blocks, elements like steel balconies and spandrel cladding features have been included throughout the scheme.

Architectural Design Statements

Information requirements for Design Statements

- *Site Location and Description*
- *Context and Setting*
- *Urban Design Rationale*
- *Design Evolution / Alternatives Considered*
- *Block Layout and Design*
- *Site Connectivity and Permeability*
- *Height, Scale and Massing*
- *Materials and Finishes*
- *Open Spaces (Private, Communal, Public)*
- *Public Realm Contribution*
- *Compliance with Internal Design Standards*
- *Daylight and Sunlight*
- *Overlooking, Overbearing, Overshadowing*
- *Car and Cycle Parking*
- *Management/ Lifecycle Report*
- *Compliance with DMURS*
- *Safety and Security*
- *Universal Access*

13.30. An Architectural Design Statement containing the above requirements has been prepared by John Flemming Architects and is submitted with this application which addresses the above majority considerations.

13.31. In addition please see the following separate reports:

- *Alternatives have been considered within the EIAR prepared by AWN Considered*
- *Car and Cycle Parking rationale and provision are set out within the TAR prepared by NRB which contains report setting out DMUR Statement of Consistency*
- *A Building Lifecycle Report and Universal Design Statement Access prepared by JFA*

Models and Photomontages

In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted.

- 13.32. Photomontages of the proposed development have been prepared by 3D Design Bureau and are submitted with this application.

Green Infrastructure and Landscaping

The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following:

- *Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.*
 - *The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection.*
 - *Potential applicants should refer to the Draft Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.*
- 13.33. A Landscape Design Statement has been prepared by Murray & Associates which details the landscape plans for the proposed development and outlines planting and landscaping proposals are incorporated into landscape plans. Murray & Associates have also prepare Arboricultural Impact Assessment.

Green Infrastructure

The following measures to strengthen the city green infrastructure (GI) network plan will be required.

- *Increase habitat protection to support the wider GI network.*
- *Provide additional green space to meet deficiencies in connectivity of the GI network.*
- *Ensure retention of mature habitats and provide for long-term ecological succession.*

- *Increase connections and improve accessibility for pedestrians and cyclists to the wider GI network.*
- *The use of drainage systems (SuDs) and soft/ nature-based engineering solutions for surface water management to control the rate of run-off, protect water quality and mitigate the environmental impacts of flooding and erosion.*
- *Provide for public access to ensure that the benefits of access to the GI network is available to all citizens.*
- *Ensure that proposed developments do not create negative impacts on the existing GI network*

13.34. The proposed development will expand and improve the connectivity of the Green Infrastructure network in Santry through the use of green roofs, green space, planting and SuDs features.

Surface Water Management and SuDs

All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance. All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan

SuDS Requirement 1 - Runoff Destination

The following methods of utilising or releasing rainfall run-off from development are set out in order of preference:

1. *Use surface water run-off as a resource.*
2. *Provide interception of rainfall through the use of nature based SuDS approaches.*
3. *Where appropriate, infiltrate run-off into the ground.*
4. *Discharge to an open surface water drainage system. Discharge to a piped surface water drainage system.*
5. *Discharge to a combined sewer.*

Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.

SuDS Requirement 2 - Hydraulic Control

Hydraulic criteria are as set out in the GDSDS and Regional Drainage Code of Practice. Surface run-off from new development will be restricted to 2 l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep) where surface water leaving the site:

- *poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse);*
- *has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event)*

In all other instances, the following criterion tabled below shall apply.

SuDS Requirement 3 - Water Quality

SuDS designs will demonstrate sufficient number of SuDS techniques which are sufficiently sized to manage and remove pollution, to provide protection of groundwater, surface waters and sensitive coastal waters. The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.

SuDS Requirement 4 - Amenity

Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.

SuDS Requirement 5 - Biodiversity

Designs should seek to generate biodiversity benefits using SuDS

- 13.35. The proposed development includes various amenity benefits from SuDS features including green roofs and green spaces. As set out in EirEng Engineering Planning Report:

“In accordance with best practice and Dublin City Council’s requirements for SHDs a two stage SUDS treatment approach has been incorporated on site. The proposed two-stage surface water SUDS approach will slow down the rate of surface water runoff from the development, intercept first flush flows and improve the quality of water that is intercepted by the surface water drainage network through biodegradation, pollutant adsorption and settlement and retention of solids.

The SUDS Masterplan layout for the development is indicated on EirEng Consulting Engineers drawing 201121-ECE-ZZ-XX-DR-C-0002

- 13.36. Other surface water management measures proposed include: Green & Blue Roof Systems, Permavoid Podium Attenuation System, Interception Storage, Underground Attenuation Storage.
- 13.37. Other minor SuDS include: In areas at ground level it is proposed to use permeable reinforced grass, permeable paving and tree pits where feasible to drain landscaping and paving areas located outside the footprint of the basement such as the plaza area.

Urban Greening

All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc

- 13.38. In addition to SuDS proposals by EirEng, a Landscape Design Statement has been prepared by Murray & Associates which details the landscape plans for the proposed development and outlines planting and landscaping proposals are incorporated into landscape plans.

Landscape Design Rationale

It will be a requirement of planning permission that all planting takes place in the first planting and seeding seasons following occupation of the building or completion of the development, whichever is the sooner, and that any trees or plants which, within a period of 5 years from the completion of the development, die, are removed, and that any which become seriously damaged or diseased are replaced in the next planting season. All landscaping works associated with a development will be required to be complete prior to the occupation of the development. This will be a condition attached to relevant planning decisions.

Materials must be appropriate, durable and of a good quality. Careful consideration must be given to the design of hard-surfaced areas including streets, squares, open spaces, paved areas, footpaths and driveways. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. Areas of schemes to be taken in charge by Dublin City should be designed with reference to the palette of materials used by the Local Authority to ensure later maintenance and replacement of materials in the upkeep of the area by the Local Authority

Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off consistent with sustainable development

- 13.39. A Landscape Design Statement has been prepared by Murray & Associates which details the landscape plans for the proposed development and outlines planting and landscaping proposals are incorporated into landscape plans.

Landscape Plans and Design Reports

Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.

Landscape design reports should address the following:

- *The protection and incorporation of existing trees and landscape features worthy of retention.*
- *The contribution of the proposed development to the landscape character and setting and open space amenity of the area.*
- *The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas.*
- *The relationship between existing green corridors, public open spaces or area of high ecological values.*
- *The detail and specifications for materials, finishes and maintenance details.*
- *The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13.*
- *The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged and required in certain instances (see Chapter 10 and Appendix 11).*
- *The details of ecosystems services and biodiversity including pollinator friendly approach.*
- *The maintenance and management strategy for the landscaped features.*

- 13.40. A Landscape Design Statement has been prepared by Murray & Associates which details the landscape plans for the proposed development and outlines planting and

landscaping proposals are incorporated into landscape plans. Please also see Chapter 8 of the EIAR in relation to Biodiversity considerations.

Trees and Hedgerows

A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development. Information will be required on which trees are to be retained and on the means of protecting these trees during construction works. Where development is proposed, it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account in all projects.

The following criteria shall be taken into account by Dublin City Council in assessing planning applications on sites where there are significant individual trees or groups/lines of trees, in order to inform decisions either to protect and integrate trees into the scheme, or to permit their removal:

- *Habitat/ecological value of the trees and their condition.*
- *Uniqueness/rarity of species.*
- *Contribution to any historical setting/ conservation area.*
- *Significance of the trees in framing or defining views.*
- *Visual and amenity contribution to street*

Tree Removal

Where a proposal impacts on trees within the public realm, a revised design will need to be considered to avoid conflicts with street trees. Where a conflict is unavoidable and where a tree, located onstreet, requires removal to facilitate a new development or widened vehicular entrance and cannot be conveniently relocated within the public domain, then when agreed by Parks Services and the Planning Department by way of condition to a grant of permission, a financial contribution will be required in lieu. The financial contribution is calculated by the Capital Asset Value for Amenity Trees (CAVAT) by an Arboriculturist. The payment is required to be lodged with Dublin City Council before the tree can be removed

- 13.41. An Arboricultural Impact Assessment has been prepared by Murray & Associates which details the potential impact of the proposed development, noting that there are no trees within the main confines of the site. This report which concludes:

“It was determined that there will be no direct impact arising from the proposed development to the trees T10-T19 located to the west and north west external boundary of the site. Given there are extensive areas of hardstanding within the site, it is unlikely that there are any roots of trees within the development. The impact of the proposed development will therefore be negligible. In relation to the trees on the car park islands, these trees will be replaced with equivalent trees.

The proposed envisages a large number of new tree planting within the subject site, so in conclusion the net effect to the existing tree cover will be positive.”

- 13.42. As set out in the Murray and Associates Landscape Design Report (Planting / Tree Planting):

“To the north and west there will be substantial planting of native standard trees to aid screening for the residential areas to the west and north-west.

There will be additional tree and shrub planting within the courtyard areas and the new public plaza. There will be additional visual interest within the plaza, buffering the ground floor of the development. The development will continue to be softened and screened over time as the trees and planting mature.

The biodiversity of the area will be increased significantly due to the addition of approximately 150 new trees planted within the development, along with approximately 3,400 sqm. of planting at ground level and terrace levels. This will have a positive effect on the local habitat and ecology compared with the existing site’s lack of biodiversity.”

Public Open Space and Recreation

Public open space should utilise a combination of hard and soft landscaping to cater for a wide range of needs such as children’s play, passive recreation and sporting facilities. Where adjacent to canals or rivers, proposals must take into account the functions of a riparian corridor and possible flood plain,

All applications which include areas of open space should refer to the Dublin City Council Parks Strategy 2017-2022 or any further iteration for guidance on the design and aspirations for city parks. Planning applications including any open space area (public or communal) should incorporate green infrastructure strategies including SuDs, flood management, biodiversity, outdoor recreation, connection and carbon absorption in accordance with Policy GI24 of the plan.

In areas with a deficit of public open space in the city centre, SuDS proposals will be supported where it can be demonstrated that they have positive recreational and biodiversity functions. Any SuDS proposal that would negatively impinge on the conservation objectives of a historic park will not be supported.

The planning authority will seek the provision of public open space in all residential schemes (see Section 15.8.6) and commercial developments in excess of 5,000 sq. m. Dublin City Council will seek the following in the delivery of public open space:

- *The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.*
- *Open space should be overlooked and designed to ensure passive surveillance is achieved.*
- *The space should be visible from and accessible to the maximum number of users.*
- *Inaccessible or narrow unusable spaces will not be accepted.*
- *The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16.*
- *Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.*
- *Protect and incorporate existing trees that are worthy of retention into the design of new open spaces*

- *Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.*
 - *Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.*
 - *Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).*
 - *Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.*
 - *Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.*
 - *Age friendly measures should be incorporated into the design.*
 - *Permeability and accessibility for all users, particularly disabled persons should be provided.*
 - *Cycle and pedestrian friendly routes should be accommodated.*
- 13.43. Please see detail above in regard to proposed SuDS and set out in further detail within EirEng Engineering Services Report. Permeable services are included where possible.
- 13.44. The rationale, design and layout of the open space has been set out within Murray and Associates Landscape Design Report, proposed open spaces respond to the immediate context namely the Omni Park Shopping Centre. A range of open spaces are distributed through the scheme including public and communal open spaces. This open space achieves a good balance between privacy for residents and passive surveillance. The Landscape Design Report sets out use of materials, street furniture proposed
- 13.45. Public Realm has been designed to be Part M compliant. The basis for open space calculation is set out within the JFA Design Statement and does not include narrow sections. A Universal Access Statement has been prepared by JFA and enclosed.
- 13.46. Communal open spaces have been assessed in terms of the level of daylight and sunlight received. Public and communal open spaces in excess of requirements are generally provided.
- 13.47. Please see arborist inputs and proposed planting plan for overview of potential impact on trees. Open spaces have been assessed as part of the 3DDB's Sunlight and Daylight Assessment Report.
- 13.48. Proposed landscaping works have been coordinated with surface water management and SuDS strategy.
- 13.49. The landscape design statement sets out proposed planting, street furniture, surfaces materials which are durable and of a good quality and respond to the existing context.
- 13.50. Permeability and accessibility arrangements are set out within the JFA Design Statement. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme.

- 13.51. Numerous cycle and pedestrian friendly routes are proposed and set out in detail within the Landscape and Architectural Design Statement.

Boundary Treatment

Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule. In all instances, boundary treatments shall be of high quality, durable and attractive

- 13.52. Please see Murray and Associates landscape drawing 1863_PL_S_01 - 1863_PL_S_03 for details of boundary treatment.

Climate Action and Energy Statement

New developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.

The statement, which shall be prepared by a certified engineer, shall address:

- *the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power;*
- *the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems:*
- *decentralised energy supply systems based on energy from renewable and waste heat sources;*
- *co-generation (combined heat and power);*
- *district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources;*
- *heat pumps.*

Where it is not feasible for a development to be district heat enabled, the statement must provide a clear explanation as to why this is would not be the case, and must also demonstrate that the proposed development offers a similarly efficient and low carbon energy and heating solution.

- 13.53. In response to the above requirement An Energy and Sustainability Statement has been prepared by OCSC, as set out in Energy and Sustainability Statement prepared by OCSC:

“The proposed mixed-use development will comply with residential Part L 2021 (Dwellings), as well as targeting an A2/A3 BER, while the proposed non-residential aspects of the development will comply with non-residential Part L 2021 (Buildings Other Than Dwellings), as well as targeting an A3 BER.

The optimised approach is based on the Energy Hierarchy Plan - Be Mean, Be Lean, Be Green.”

- 13.54. This report identified key sustainability features including: “*the location of the proposed mixed-use development provides availability to alternative modes of transportation,*

use of water efficient fixtures, consideration for materials and resources and indoor environmental quality for the building occupants.”

- 13.55. This report confirms that if the energy and sustainability strategy is successfully implemented, the proposed Omni Plaza SHD will satisfy all Part L and BER requirements. District heat systems are not suited to this development.
- 13.56. This report should be read in conjunction with Chapter 9 of the EIAR which relates to Air Quality and Climate, stating that during construction *‘the potential impact on climate is considered to be imperceptible, neutral and short-term’* and during the operational phase *impact to climate is long-term, negative and imperceptible.’*

Community and Social Audit

“All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development.

A community and social audit should address the following:

- *Identify the existing community and social provision in the surrounding area covering a 750m radius.*
 - *Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections.*
 - *Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit.”*
- 13.57. A Santry Community and Local Needs Audit has been prepared by JSA and is enclosed with this application. This report assesses an area of 2 km from the subject site and demonstrates the existing provision of social and community facilities in the area. A community facility has been proposed as part of the proposed development.

Schools

“Planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. In the case of very large-scale developments (800+ units), the phased completion of the dwellings must be linked with the provision of new schools”

- 13.58. A School Demand Assessment has been prepared by KPMG which concludes:
- 13.59. A schools demand assessment and has been prepared by KPMG Future Analytics this report states:
- “Combining this demand with the possible demand generated by developments currently in pipeline within the study area, it is likely that the existing school network is likely to be faced with an additional demand for c.628 no children. This includes 349 no. primary and 279 no. post primary children.”*

- 13.60. Further, this report concludes: *the school demand generated by the proposed development, is likely to be accommodated within the existing school networks in the locality.*

Childcare

A minimum of 20 child spaces for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.

As part of the community and social audit, an assessment of the childcare facilities in the surrounding 1km radius of the proposed should be included. The analysis should have regard to:

- The make-up of the proposed residential area, i.e. an estimate of the mix of community that the housing area seeks to accommodate (if an assumption is made that 50% approximately of the housing area will require childcare, how does the proposal contribute to the existing demand in the area).*
- The number of childcare facilities within walking distance (i.e. 1km) of the proposal.*
- The capacity of each childcare facility and the available capacity by completion of the project.*
- The results of any childcare needs analysis carried out as part of the city childcare strategy or carried out as part of a local or area action plan or as part of the development plan in consultation with the city childcare committees, which will have identified areas already well served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.*

Childcare facilities should also be located in existing residential areas, business/technology parks, industrial estates, areas of employment and within office blocks, with such provision being established having regard to the Dublin City Childcare Committee audit and needs analysis (for full details, see Childcare Facilities, Guidelines for Planning Authorities 2001).

Design Criteria:

All childcare facilities are required to provide private outdoor play space or demonstrate safe and easy access to a safe outdoor play area. Such outdoor space should be appropriately sites to be protected from air pollution – see objective QHSNO16. The internal design, layout and size of the childcare facility shall be in accordance with the standards set out in the Childcare Facilities, Guidelines for Planning Authorities 2001. Safe and secure access should also be provided in terms of pedestrian and cycle movements in association with public transport services in the area. Associated vehicular drop off will also be required in certain locations. This should be accompanied by a traffic and transport assessment which sets out the need to accommodate vehicular movements.

- 13.61. The proposed development will provide for a creche facility of 225.7.m. (plus playground of 210.m.) located to the south of Block C at ground floor level. It is considered that this facility will be able to cater for c.37 children .

Public Realm

All residential developments that include lands within the public realm must agree, subject to a letter of consent, with the planning authority that the proposed scheme is compliant with the public realm guidance as set out on the Dublin City Council website. <https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy> Where new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to navigate and create safe and secure environments.

- 13.62. No Letter of Consent is required from DCC, however the proposed public realm is Part M compliant. Please also see public safety statement within the JFA Design Statement.

Public Open Spaces

Table 15-4: Public Open Space Requirements for Residential Development

Landuse / Zoning	Requirement (minimum)
Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%
Residential development (Z12) (Z15)	25%

- 13.63. The proposed development will provide for 2,028 sqm of public open space (as detailed in the Architectural Design Statement) which is in excess of the required 10% (13% provided).

Play Infrastructure

Play Infrastructure Applications which include the provision of public open space shall be subject to a requirement to provide for appropriate playground facilities. In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.

The following Principles for Designing Successful Play Spaces shall be applied:

- *Bespoke*
- *Well-located*
- *Use natural elements*
- *Wide range of play experiences provided*
- *Accessible to both people with and without disabilities*
- *Meets community needs*
- *Allows children of different ages to play together*
- *Builds in opportunities to experience risk and challenge*
- *Sustainable and appropriately maintained*
- *Allows for change and evolution*
- *invest in and prioritise universal design to support accessible and inclusive opportunities to play with regard to input from relevant representative organisations*

• **{Increase and enhance passive surveillance.}**

- 13.64. The proposed development has been carefully designed to incorporate play spaces. Please see the landscape architecture drawings and reports for further details of proposed playspace. Provision is in excess of requirements.

Dual Aspect

Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.

- 13.65. The apartment guidelines state that a minimum of 50% dual aspect apartments should be provided in any development and that a minimum of 33% dual aspect units should be provided in central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage.
- 13.66. The proposed development provides for an overall of 46% dual aspect units, well in excess of the 33% requirement of the apartment guidelines for such locations and is an appropriate design response to the subject lands. A Housing Quality Assessment prepared by John Flemming Architects is submitted as part of this application which demonstrates compliance with the applicable standards. No single aspect north facing units are proposed.
- 13.67. As set out in the JFA Design Statement:

“From the outset the design team placed a high importance on maximising the number of dual aspect apartments in the scheme.

Measures to improve the number of dual aspects such as increasing the number of cores have been incorporated into the design. Care has also been taken to ensure that there are no Single aspect North facing units.

Where possible, units that would ordinarily have been considered single aspect have been improved with a projecting bay window that will capture light and views from multiple aspects. We refer to this as an “Enhanced Single Aspect” apartment. Circulation”

Floor to Ceiling Height

A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided. Where commercial units are proposed or where flexibility for adaptation to alternative uses is required at ground floor level, a floor to ceiling height of 3.5m to 4m shall be applied. This will be assessed on a case by case basis.

- 13.68. Appropriate Floor to ceiling heights are proposed at ground floor level for residential units and where non-residential uses are proposed.

Lift, Stair Cores and Entrance lobbies

Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12

apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.

- 13.69. No more than 12 apartments per core are provided.

Internal Storage

Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020)

Flexibility shall be provided in certain circumstances on a case by case basis.

- 13.70. A good quantum of storage space is proposed per apartments, please see HQA provided by JFA in this regard.

Private Amenity Space

Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment

At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment

- 13.71. Private amenity space is provided in the form of terraces at ground floor with planted buffer and balconies elsewhere please see HQA provided by JFA in this regard.

Communal Amenity Space

All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development.

Communal amenity space must be clearly defined and distinguished within a scheme and clearly identified as part of any planning application. The communal amenity areas should be of high landscape quality and provide for adequate daylight and sunlight access throughout the year. The communal amenity area should be functional and usable to a range of activities including, children's play (see Section 15.8.8 for further details), passive recreation and leisurely activities such as games and exercise.

Communal amenity space should be located in areas that are overlooked and passively supervised. Where ground floor balconies/ terraces bound directly onto communal spaces the use of a separation strip of low level planting between the two areas will be encouraged. Regard must also be had to future maintenance of amenity spaces in order to ensure that this is commensurate with the scale of development and does not become a burden on residents.

On refurbishment or infill sites of up to 0.25 ha, the communal amenity requirements may be relaxed on a case by case basis. Development proposals shall demonstrate that the communal open space:

- *Complies with the minimum standards based on each individual unit.*

- *Will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics.*
- *Is secure for residents and benefits from passive surveillance.*
- *Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all.*
- *Achieves good sunlight penetration – see Appendix 16.*
- *Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections*

13.72. Communal Amenity Space is calculated as 5 sq. m for a 1 bed unit, 7 sq.m. for a 2 bed unit 9 sqm for a 3 bed. The overall requirement would therefore equate to 2, 798 sq.m.

13.73. The proposed development will provide for a mix of internal and external communal spaces. The outdoor amenity space is provided within the 3 no. central courtyards. The proposed development will also provide for internal amenity spaces for the residents. The proposed development provides for 4,118 sq.m. of internal and external amenity area which is in 44.48% in excess of the apartment guidelines standards.

Internal Communal Facilities

Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents. These facilities include laundry rooms, community or meeting rooms, management offices, co – working spaces etc. Other uses such as gyms or co-working spaces can also be provided and available to non-resident users also. The range of uses proposed should be discussed with the planning authority at pre application stage.

13.74. Internal communal facilities are located in the ground floor of Block B this space will activate the courtyards to both the East and West of the space and act as a focal point for residents both during the day and night.

13.75. This Residents Amenity Space measures 604.9 sqm and will include a variety of spaces, to ensure that a broad range of needs are met. Proposed uses include a reception and parcel store for missed deliveries. A gym and games area will be provided for recreational use. Residents lounge space will allow residents to relax in space outside of their own apartment, especially in groups, minimising disruption to neighbours. Bookable meeting rooms will provide space for leisure groups such as parents groups. Flexible workspace will allow residents to work from a space separate to their home, even when working from home.



Figure 13.1: extract from JFA Design Statement Communal amenity Area. (Source: JFA,2022).

Security

New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.

The location of entrance doors and lobbies should be located in highly visible areas of the building and should be well lit and overlooked.

Ground floor level apartments should be provided with a privacy strip of approximately 1.5m in order to maintain adequate security and privacy within the unit.

- 13.76. The communal open spaces will benefit from passive surveillance from apartments within the scheme. Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting & CCTV scheme will ensure that this sense of security will be maintained throughout the evening. The community space, crèche and retail units have been located at the public plaza to ensure that there is a sense of activity and security throughout the day. Likewise, the resident's amenity space has been placed at a convenient ground floor location to ensure that it is well used and monitored. The main entrances to the blocks have been grouped around the courtyards and entrances have been carefully designed to ensure that residents & guests have shelter and light as they enter and leave their homes.

Please also see Community Safety Strategy contained within Architectural Design Statement prepared by JFA.

Access and Services

Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.

Internally within a scheme, access to each individual unit should be clearly identified and well lit through natural light where feasible.

Service ducts should be easily accessible from common circulation area to facilitate maintenance.

- 13.77. The main vehicular entrance of the scheme is provided through the existing Omni Shopping Centre entrance roadway. A new dedicated entrance will be provided from the roundabout at the western end. Access to the northern section of the Omni car park has been adjusted to suit, with an additional exit from the roundabout. The Fire Service and public utility services will also have emergency and maintenance access via the northern private roadway. Pedestrian and cycle links to Swords Road to the east will be upgraded and improved. This will tie in with the approved entrance plaza at Omni Living creating a clear pedestrian flow into and onwards around the district centre. Future possible connections have been provided for along the northern boundary, should the neighbouring lands at Santry Hall be developed in the future.



Refuse Storage

Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities.

All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy

- 13.78. A waste storage area will be provided in the basement car park to serve the fully occupied development. Residents will be provided with appropriate space within the apartment units to separate various wastes. Occupiers will be responsible for taking waste from their apartments to the communal waste storage areas.
- 13.79. All commercial properties/businesses on site will be required to separate out various wastes and dispose of them in the waste storage area. All commercial properties/businesses must comply with all specific commercial legislation.
- 13.80. An OWMP has been prepared to ensure that all waste arising from the operation of the development is dealt with in a systematic way in accordance with the governing legislation and good practice. It has also been prepared in order to assist in meeting local waste management targets.

Lifecycle Reports

All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme. The lifecycle report should include an assessment of the materials and finishes proposed, the ongoing management strategy, the protocol for maintenance and repair, the long term maintenance costs for residents and the specific measures that have been taken to effectively manage and reduce the costs for the benefit of residents. The reports should address each of the following headings:

- *Assessment of Long Term Running and Maintenance Costs*
 - *Property / Owner Management Company and Common Areas*
 - *Service Charge Budget*
- *Measures to Manage and Reduce Costs*
 - *Treatment, Materials and Finishes*
 - *Construction Methodology*
 - *Material Specification • Landscaping*
 - *Waste Management*
 - *Human Health and Well –being*
 - *Residential Management*
 - *Energy and Carbon Emissions*
 - *Transport and Accessibility*

Compliance and acknowledgement of the provisions set out in the Multi-Unit Developments Act 2011 for the ownership and management of multi- unit developments should also be included.

- 13.81. A Building Lifecycle Report has been prepared and is enclosed with this application.

Operational Management and Maintenance

On-going planned maintenance ensures the longevity of architectural and landscape design, sustains and increases the value of the property and minimises the life-cycle cost of development to owners and residents.

Service ducts serving two or more apartments should as far as practicable be accessible from common circulation areas to facilitate easy maintenance. The running of services overhead, particularly above the ceiling of a different unit should be avoided. To prevent demands for the installation of numerous individual satellite dishes on visible parts of the façades or roof of apartment buildings, provision should be made for locating communal or individual dishes on less visible parts of the building, such as at roof level. Ideally larger schemes will provide space for maintenance facilities such as a management room, maintenance store(s) and in some circumstances accommodation for a caretaker should be included.

All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.

- 13.82. An Operational Management Plan has been prepared by MKN and is enclosed with this application.

Microclimate – Daylight and Sunlight, Wind and Noise

Daylight and Sunlight:

A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme. A best practice guide for the assessment and methodology of Daylight and Sunlight Assessments

- 13.83. A Daylight and Sunlight Assessment Report has been prepared by 3DDB in accordance with the requirements of BRE209 as set out in the conclusion of this report:

“3D Design Bureau were commissioned to carry out a comprehensive BRE daylight and sunlight assessment, along with an accompanying shadow study for the proposed strategic housing development, Omni Plaza SHD, located at Omni Park Shopping Centre, Santry, Dublin 9. The impact assessment for this report has quantified the effect the proposed development would have on the level of daylight and sunlight received by neighbouring residential properties and commercial premises that are in close proximity to the proposed development.

These studies have shown that whilst the proposed development, in conjunction with the granted SHD (ABP-307011-20), would cause a perceptible reduction to some of the assessed commercial premises, there would be a negligible level of effect to the daylight and sunlight received by all existing neighbouring properties.

The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development. Future residents will have access to external amenity areas capable of receiving sufficient levels of sunlight with a reasonable percentage of proposed units have achieved the minimum recommendation for Sunlight Exposure. The vast majority of proposed units have the recommended level of daylight as shown in the study of Spatial Daylight Autonomy.

It is the opinion of 3D Design Bureau, that the proposed development serves as a great example of how proposed urban developments can achieve both high compliance rates for SDA whilst maintaining a high level of density."

Wind:

A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.

13.84. A Microclimate Effects on Wind And Pedestrian Comfort assessment has been carried out by B-fluid which concludes:

- *"The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for "Frail persons or cyclists" and for members of the" General Public" in the surroundings of the development.*
- *The development is designed to be a high-quality environment for the scope of use intended of each area/building (i.e., comfortable, and pleasant for potential pedestrians).*
- *The assessment of the proposed scenario has shown that no area is unsafe, and no conditions of distress are created by the proposed development.."*

Noise:

The following principles are recommended for minimising disruption from noise in dwellings:

- *Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and appropriate noise insulation measures to reduce noise transfer and vibration to neighbouring buildings and noise sources.*
- *Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas.*
- *Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room.*

13.85. Please refer to Chapter 10 of the EIAR which relates to Noise and Vibration.

Separation Distance (Apartments)

Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having

regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis. In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.

- 13.86. The proposed development provides for adequate separation distances on site with the 22m separation distance between proposed apartment buildings being satisfied at a number of locations. Appropriate separation distances are proposed between the existing residential units with 22m being exceeded in all cases.
- 13.87. However, in a few instances the separation distance between apartment blocks is less than the required 22m with the narrowest point between proposed blocks being identified as 18.09m. Where this occurs, the multi-discipline design team have ensured that appropriate mitigation measures have been incorporated into the design such as the staggering of opposing windows to ensure privacy and use of opaque window glazing. This maintains a high level of privacy and amenity obtained by residents and reduces the level of potential overlooking and overshadowing.
- 13.88. The potential impact of the proposed development has been assessed in detail by the 3DDB within the Sunlight and Daylight Assessment Report which details both the quality of internal spaces and potential impact on neighbouring dwellings.
- 13.89. Full details relating to the separation distances between all apartment blocks, site boundaries and neighbouring properties, is included on the *Proposed Overall Site Plan – Ground Floor Excluding Permitted Developments* (drawing no. P1001) prepared by John Fleming Architects.
- 13.90. Section 3.0 of the Statement of Material Contravention of the Draft Plan demonstrates how the separation distances proposed have been considered and how an appropriate design response is applied and therefore are justified in the context of Section 37 (2)(b)(iii) of the 2000 Act for the reasons set out in the context of current National Planning Policy, namely Sustainable Residential Development in Urban Areas Guidelines (2009) and the National Planning Framework

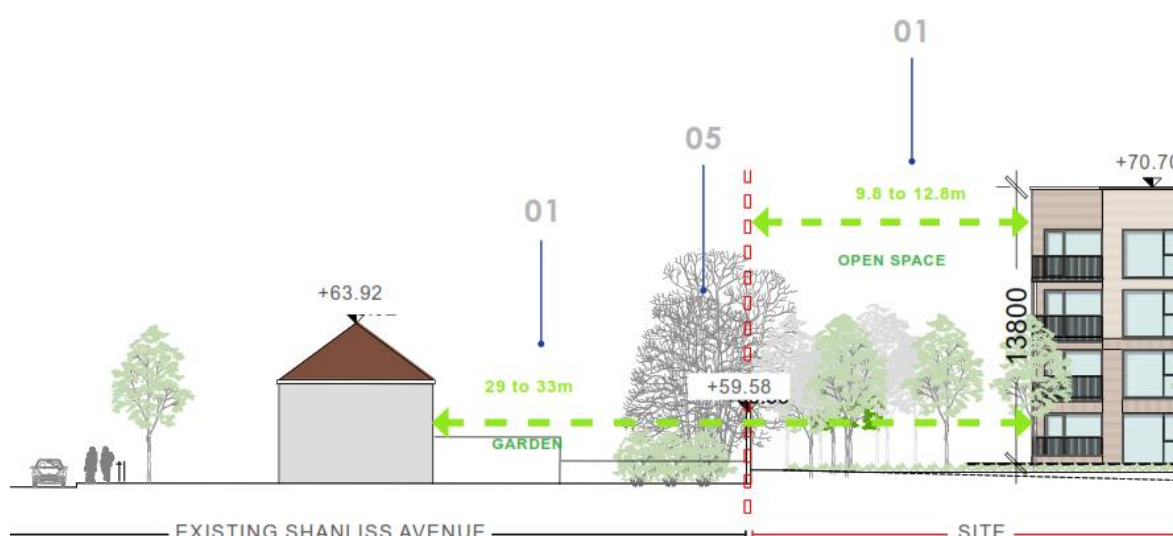
Overlooking and Overbearance

Overlooking may be overcome by a variety of design tools, such as:

- *Building configurations (bulk and massing).*
- *Elevational design / window placement.*
- *Using oblique windows.*
- *Using architectural features.*
- *Landscape and boundary treatments.*

- 13.91. As set out within the JFA Design Statement, the design team have taken great care in ensuring that the residential amenities of the neighbouring houses will not be negatively impacted by the proposal, further detail provided by JFA states:

- 01 The distance between existing houses and gardens and the proposed new buildings has been increased to a minimum of 29m, which gives a considerable distance between buildings, preserving privacy and limiting overshadowing.
- 02 All windows facing west toward the boundary are limited to high level windows in bedroom spaces, this limits overlooking and preserves privacy while ensuring excellent sunlight & daylight conditions for the new apartments.
- 03 Blocks A&B have been lowered along their western legs, reflecting the lower scale development to the west and acting as a buffer to the higher density blocks towards the east of the site.
- 04 Higher density blocks are concentrated toward the east of the site, toward less sensitive boundaries. The additional distance ensures that sunlight, daylight and privacy is retained for the existing gardens along the western boundary.
- 05 The western boundary will be extensively planted, reflecting the mature trees in existence outside of the site along this boundary. Care will be taken to ensure existing trees will be protected during construction.



JFA drawing illustrating relationship with western boundary and separation distances.

Public Realm

Public Facilities

Dublin City Council will support the provision of public facilities (e.g. public toilets and water fountains) within the public realm of the city. Large scale developments that seek to create new urban quarters and will be subject to taking in charge, will be encouraged to provide publicly accessible facilities to support the functionality of these spaces. The City Council will also encourage the provision of public facilities in the upgrade and improvement of existing public facilities, streets and spaces. The design of public toilets should:

- Be located in a busy and visible position to deter anti-social behaviour.
- Have a level threshold or be accessible by ramp.
- Include facilities for cleaning.
- Consider the security and management of the facility with an attendant's room strongly recommended as the best protection against antisocial behaviour.

CCTV coverage can also be used but it should also be ensured that the privacy of users is not compromised

- *Ensure all construction and fittings are secure, robust and vandal and graffiti resistant.*
- *Avoid the provision of turnstiles that impede access.*
- *Consider the provision of showers in some locations e.g. close to a beach.*
- *Clearly signed with adequate direction signage in the surrounding area.*
- *Provide a minimum of one wheelchair accessible unit and one unisex unit.*
- *Provide baby changing facilities.*

13.92. Public realm improvements and amenity facilities to include:

- Upgrade of existing footpaths to provide 2 no. new shared surface access routes through the existing Omni Park Shopping Centre development providing direct access for pedestrians and cyclists to the subject development from the Swords Road and Omni Park Shopping Centre.
- Provision of a new public plaza to the northeast corner of Omni Park Shopping Centre, providing access to the Swords Road including pedestrian and cyclist access route (as substantially permitted under planning permission ref: ABP-307011-20).
- Provision of a new public plaza to the northwest corner of existing Omni Park Shopping Centre integrating the proposed development with the existing district centre lands, provision of which shall require amendments to existing carpark layout and a reduction of 104 no. existing commercial car parking spaces.
- Public and communal open spaces (incl. 2 no. playgrounds) and internal communal residential amenity for the residential development and private residential amenity in the form of terraces and balconies to all elevations.

Public Lighting

The provision of public lighting, including on public roads, shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates and should be designed to minimise the impact on protected species, such as light sensitive bat species in accordance with best practice, the National Parks and Wildlife Service (NPWS) Bat Mitigation Guidelines for Ireland (2006) and the Technical Guidance Note on Biodiversity for Development Management in Dublin City (DCC 2021). ~~(Institution of Lighting Professionals (ILP) Guidance Note 08/18 on Bats and artificial lighting in the UK (2018)).~~

An Outdoor Lighting report and plan has been prepared by OCSC/Sabre , Chapter 8 of the EIAR has been prepared by Altemar noting the contents of the public lighting report confirming “therefore no negative impacts on roosts these animals are expected to result from the proposed development.”

Construction Management

All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final

construction management plan will be required to be agreed with the Planning Authority.

Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&D) waste; and Civil engineering projects which generate in excess of 500 cubic metres of waste materials used for development works on the site should also be accompanied by Construction Management Plans. The construction management plan shall set out the details of the onsite operations including traffic management (site access, deliveries and maintenance and staff parking), waste management, environmental impacts such as noise, air quality, vibrations and any other relevant detail associated with the development. Where appropriate, excavated material from development sites is to be reused on the subject site.

The construction management plan should set out a clear timeline for the development, and details of the relevant on site contact for liaison with surrounding residents and businesses. For large construction projects (30 or more residential units of 1,000 sq. m. of commercial development), details of the site contact should be circulated to the local community, and where appropriate resident monitoring committees established for the duration of the project in order to promote best construction management and considered construction practices to protect the amenities of adjacent properties. The plan should consider the potential cumulative impacts of any adjacent development project under construction or planned for construction within the timeframe of the project, and set out appropriate mitigation measures to manage such cumulative impacts.

In reviewing construction management plans, the planning authority will have regard to the following:

- Hours of operation.*
- Construction/phasing programme.*
- Community Liaison Strategy*
- Traffic Management Plan including employee parking and movements.*
- Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures.*
- Cumulative impacts.*
- Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.*
- The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan*
- Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater).*
- A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains.*
- Details of a water quality monitoring and sampling plan.*
- Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).*

Construction Traffic Management Plan

Objectives and measures should be included for the management, design and construction of the proposed development to control the traffic impacts of construction insofar as it may affect the environment, local residents and the public in the vicinity of the construction works.

Where demolition is taking place on site prior to the commencement of construction, a separate demolition construction traffic management plan is required. A Preliminary Construction Traffic Management Plan may be required during the Development Management process to ensure the feasibility of construction on constrained or restricted sites. Cumulative impacts with adjacent development sites should also be considered.

A CTMP is subject to ongoing reviews of construction traffic management and liaison by the contractor/developer with Dublin City Council's Roadworks Control Section throughout the period of construction. Where multiple sites are within close proximity of each other and residential housing, developers may be required to coordinate and update their CTMP in consultation with DCC and with adjoining landowners; and also participate in a traffic and construction management group coordinated by DCC. The contractor/developer shall apply for all necessary licenses and permits where required.

Considered Construction

Dublin City Council will support the provision of considered construction in all planning applications. Commitment to the scheme should be identified as part of the Construction Management Plan submitted with planning applications.

Phasing

Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.

A phasing proposal should be included within the construction management plan submitted with applications for agreement with the planning authority.

- 13.93. A Construction and Environmental Management Plan addressing the above requirements has been prepared by AWN and is enclosed with the application. This includes traffic management arrangements and details of the single phase proposed.

Waste Management

All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both a Construction and Operational Waste Management Plan.

The construction waste management plan may form part of the overall construction management plan and shall detail the strategy in relation to on site waste storage, segregation and disposal. Development proposals shall recycle demolition material and re-use existing building materials where possible. In all developments of 30 or more housing units or commercial developments in excess of 1,000 sq. m, a materials source and management plan showing type of materials / proportion of re use/ recycled materials to be used shall be implemented by the developer.

The operational waste management plan shall set out the strategy for waste collection, storage and recycling. All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area.

- 13.94. A Construction, Demolition and Operational Waste Management Plan has been prepared by EirEng and is enclosed with the planning application.

Recycling Facilities

Public recycling facilities (textile & glass bottles) etc. should be provided in all large scale retail developments, such as supermarkets, discount foodstores over 1,000 sq. m. Please also refer to Policy SI31 'Provision of Public Recycling Facilities in Large Retail Developments'.

Recycling facilities with the potential to create significant impact on amenity to adjoining properties/sites must demonstrate to the satisfaction of the planning authority that such impact will be controlled to an acceptable level. In some cases, measures such as site redesign, provision of noise insulation or perimeter landscape buffers, containment of yard operations within a building, or comprehensive boundary treatment may help control potential negative externalities

- 13.95. Apartment occupiers will be provided with appropriate space within the apartment units to separate various wastes. It will be the responsibility of the occupier to separate their own waste and provide suitable containers. Occupiers will be responsible for taking waste from their apartments to the communal waste storage areas.
- 13.96. All commercial properties/businesses on site will be required to separate out various wastes and dispose of them in the waste storage area. All commercial properties/businesses must comply with all specific commercial legislation.

Basements

It is the policy of Dublin City Council to generally discourage any significant underground or basement development or excavations below ground level of, or adjacent to, residential properties in Conservation Areas or to protected structures. Development of basements for residential use below the estimated flood levels for flood zone areas 'Zone A' or 'Zone B' will not be permitted (Policy SI20).

It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.

- 13.97. The proposed development is not adjacent to any conservation areas or protected structures, however a Basement Impact Assessment Report prepared by AWN is enclosed with the application which concludes:

"The proposed basement will have no long term impact on water levels in the overburden or underlying aquifer and no impact on the current water body status. The bedrock water table will not be affected by the excavation works."

Renewable Energy

Development proposals will be encouraged to utilise renewable energy sources such as wind energy where feasible. Applicant should assess the feasibility of alternative energy sources as part of the energy statement submitted with the application. In accordance with policy CA10 and CA11, the provision of on-site and micro energy production wind energy sources in industrial area and business parks will be assessed on a case by case basis where it can be demonstrated that:

- The amenity obtained by surrounding properties shall not be affected.*
- The visual impact of the provision of such facilities should also be assessed in the context of the surrounding environment as to ensure the visual amenity of the area is protected.*

13.98. Please see Energy and Sustainability Report prepared by OCSC.

Noise

Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2018–2023 when assessing planning applications. Where it is considered that a proposed development is likely to create a disturbance due to noise, a condition may be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.

Development proposals for residential development within designated noise zones, such as Dublin Airport Aircraft Noise Zones or which may generate noise sensitive activities should be accompanied by a noise impact assessment to analyse the potential noise impact on the development proposal. The applicant is required to demonstrate good acoustic design has been followed to mitigate against any potential noise impacts. Airport Noise Zone C is partially located within the Dublin City Council administrative boundary

Construction noise assessment should form part of the construction management plan and set out clear mitigation measures in place throughout the entire construction phase.

Operational noise should be assessed as part of the planning application to determine whether the proposed use of the development will impact on the ambient noise levels of the surrounding environment. Appropriate sound proofing and noise mitigation measure should be provided where necessary.

Please see Noise and Vibration Chapter 10 of the EIAR prepared by AWN.

Air Quality

All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.

As part of the operational management of a proposal, applicants are required to facilitate air extraction / ventilation units and other associated plant and services through the use of internal ducting. Details of such proposals shall be set out in planning applications as part of Mechanical and Electrical Engineering details.

Please see EIAR Air Quality chapter 9 prepared by AWN in relation to potential impact on Air Quality and Climate.

Ground Investigation

Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application. This will determine the best practice design based on the soil composition. Where lands are considered unstable or infilled, a strategy for the support and or removal of underground lands shall be provided as part of a planning application.

Ground investigations were completed and is included within the BIA and Structural Planning report prepared by AWN and EirEng respectively.

Ground Contamination

Any contaminated land will require appropriate remediation prior to redevelopment, including, in some instances, removal of material from a site which may require a licence under the Waste Management Act, 1996, as amended, prior to the undertaking of such works (see Section 9.5.6). In all cases involving contaminated land, it is the policy of Dublin City Council to require the highest standards of remediation and where appropriate to consult with the Environmental Protection Agency and other relevant bodies to resolve the environmental pollution created by contaminated land.

Where the previous history of a site suggests that contamination may have occurred, developers will be responsible for the following:

- *Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred.*
- *Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council.*
- *The decontamination of sites prior to new development works taking place, and the prohibition of development until Dublin City Council is satisfied that the affected ground has been satisfactorily treated.*
- *Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater*

13.99. Please see EIAR Chapter 6 Lands, Soils and Geology and Hydrology prepared by AWN.

Flood Risk Management

All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail (see Policy SI15 and SI16).

Potential applicants should ensure consideration of residual risk without regard to any existing flood protection structures. Dublin City Council will assess planning applications with regard to the vulnerability classes of land-use and development types in accordance with the national guidelines. Potential applicants should refer to these and demonstrate adherence to them.

In relation to rivers, potential applicants should give consideration to potential river channel impacts, adhere to the Inland Fisheries Ireland guidance and ensure access for wildlife to the river where possible.

- 13.100. A Flood Risk Assessment has been prepared by EirEng and enclosed with this application, this report concludes:

“Having reviewed the available information the site is considered to be at low risk of coastal and fluvial flooding and therefore in accordance with the Department of Environment, Heritage and Local Government and the Office of Public Work’s jointly published Guidance Document for Planning Authorities - The Planning System and Flood Risk Management.

The majority of the proposed development is classed as Highly Vulnerable with a portion of the scheme considered to be Less Vulnerable (residential comprises only a portion of the ground floor) in accordance with Table 3.1 of the PSFRM Guidelines. The information presented within the following chapters indicate that the proposed site is located within ‘Flood Zone C’ and is therefore considered Appropriate, for a residential development.

The site is also considered to be at low risk of ground water and public sewer flooding.

The site is considered to be at risk of pluvial flooding based on the FloodResilienCity mapping. Several mitigation measures including localised ramping at ground floor entrance doorways to provide a threshold, overland flow routes directed away from the buildings and a surface water drainage network including attenuation storage designed to best practice guidelines is considered to be sufficient mitigation measures to provide protection to the development from the potential pluvial flooding risk.

As the site will be positively drained, with the proposed SUDS measures reducing the outflow from the site to 2 l/s/ha, and as the existing overland flow routes are within the Omni Park Shopping Centre development falling away from the site, the proposed development will have no measurable increase on the flood risk to neighbouring lands.

Groundwater flood risk from the proposed basement construction have been assessed under a Basement Impact Assessment (BIA) undertaken by AWN Consulting submitted as part of this application. The BIA concluded that there will be no long-term impact on water levels in the shallow or bedrock aquifer, no impact on the current water body status and no impact on groundwater flow patterns in the local area. The BIA also concluded that the bedrock water table will not be affected by the excavation works.

As a result of the analysis, design and mitigation measures the proposed development is considered to be in line with the core principles of the Planning Guidelines and Objective outlined in the Dublin City Development Plan 2016-2022.

Under the Planning Guidelines the site is therefore considered suitable for development of commercial and residential land uses..”

14.0. APPENDIX 3: ACHIEVING SUSTAINABLE COMPACT GROWTH POLICY FOR DENSITY AND BUILDING HEIGHT IN THE CITY

14.1. Appendix 3 of the Draft Plan set out guidance on how to achieve appropriate and sustainable compact growth in the city and specifically, to ensure consistency with the urban Development and Building Heights Guidelines for Planning Authorities (December 2018) and the SPPR's contained therein. Guidance is set out regarding appropriate areas for increased density and height with the Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale in Table 3 of the Appendix.

14.2. The proposed development is located within a Key Urban Village (KUV) 'Omni shopping Centre (KUV No. 11), in this regard Appendix 3 states:

"12 Key urban Villages are identified and policies and objectives regarding their future development are set out in Chapter 7. urban villages are at the heart of residential communities. They function to serve the needs of the local communities providing a range of commercial and community uses for surrounding neighbourhoods. A number of the Key urban Villages have the potential to fulfil the '15 Minute City' role with compact urban and mixed use development; higher urban densities; viable commercial cores with a comprehensive range of high quality community and commercial facilities; high quality urban environments; and high levels of access to quality public transport / the development of sustainable transport modes. Many of the city's urban villages are underdeveloped and have scope for greater intensification and consolidation. It is acknowledged however, that some of the urban villages have a prevailing low density character and any proposals for increased height and density will need to have regard to the existing pattern and grain of development to ensure sensitive and successful integration with the existing urban fabric."

14.3. We have set out a response to the Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale in the table below

1. To promote development with a sense of place and character enhanced density and scale should:

- *respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,*
- *have a positive impact on the local community and environment and contribute to 'healthy placemaking',*
- *create a distinctive design and add to and enhance the quality design of the area,*
- *be appropriately located in highly accessible places of greater activity and land use intensity,*
- *have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,*
- *not be monolithic and should have a well- considered design response that avoids long slab blocks,*
- *ensure that set back floors are appropriately scaled and designed.*

14.4. The proposed development ranges in height from 4 no. storeys to 12 no. storeys. The range in building heights takes account of the surrounding context of development, in

particular the existing Omni Park Shopping Centre and permitted Omni Living SHD to the east. The reduced height along the western boundary at 4 no. storeys responds to the adjacent existing residential properties within the Shanliss estate and provides for an appropriate transition in heights from the existing 2 no. storey residential dwellings and the 4 no. storey proposal facing west.

14.5. As set out in the JFA Design Statement:

The scheme has been designed in response to the excellent public transport and infrastructure located adjacent to the site, the extensive existing amenities located within the Omni Park District Centre, and with the emerging character of Santry in mind.

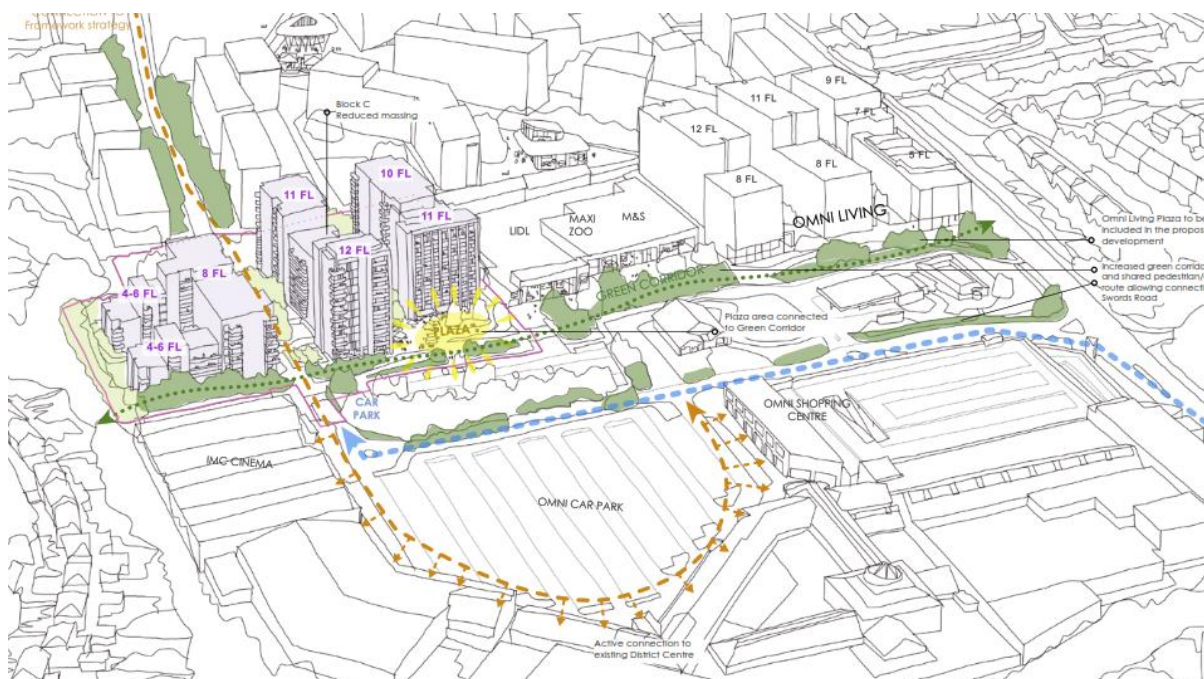
The scheme is located within close proximity to the Swords Road and to a Dublin Bus transport corridor with a frequent services at intervals of c.10 minutes during peak hours and along the proposed Bus Connects corridor. Therefore this location represents an opportunity to provide for increased building heights and densities at this location.

The proposal has varied its massing, concentrating the taller element away from the existing low density residential dwellings to the west, yet providing for a strong urban edge and active frontage to Omni Park.

14.6. The scheme has been revised in response to the considerations of DCC and ABP, as set out the JFA Design Statement:

Following the Tripartite meeting, we felt it was prudent to improve the access of Sunlight & Daylight into the eastern most courtyard. In order to achieve this we sought to reduce the massing of the central Block C in selected critical areas. The southern Tower element, was reduced to 12 storeys. This improves the amount of southerly and evening light entering the eastern half of the site, while also maintaining an elegant facade onto the main Public Plaza.

In the central part of Block C, a single storey was cut again improving southerly and evening light. This reduces this section from 10 to 9 storeys. Finally, at the rear of the block two additional storeys were trimmed from the rear section. This improves the overall ambient and evening light conditions. This section was reduced from 11 to 9 storeys. These changes resulted in the loss of 11 units and the overall reduction of the scheme from 468 units to 457 units. We feel that this is a balanced and appropriate design response.



- 14.7. The area to the north is primarily commercial and industrial in nature. However, the area has potential, and indeed having regard to the permitted Swiss Cottage and Santry Place (Dwyer Nolan) Schemes, will undergo a change to a mixed use area with industrial lands being redeveloped for residential and associated uses. The proposed development is set out in four blocks. Blocks C and D are linear in nature in a north south alignment while block A and B step down to the west. The materials and finishes of the proposed blocks will be designed to a high architectural standard and will be consistent with the surrounding developments. The proposed development ranges in building heights in response to the existing properties and permitted development surrounding the subject site. The variation in the building heights provides for visual interest to the development and avoids a monolithic visual appearance. Overall, the proposed development makes a positive contribution to the existing and permitted height in the area.
- 14.8. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material pallet in the locality. It is considered that the proposed development is in keeping with the character and building fabric of the area and in particular the existing centre.
- 14.9. In terms of the materials and finishes proposed, JFA set out the following detail:

“The selected materials were chosen to sit harmoniously within the Omni District Centre, where recent developments have employed light coloured render and reconstituted stone cladding to create a fresh and bright environment, in a step change from the darker brick that dominated earlier phases of work.

The proposed scheme will comprise primarily of high quality buff brick with simple vertical brick detailing at lower levels to engage the gaze. A lighter brick is employed above, again ensuring that there is a sense of texture across the facade.

The approved Omni Living scheme and recently completed Swiss Cottage scheme also employ a light coloured brick and render within their design, again giving a fresh impression.“

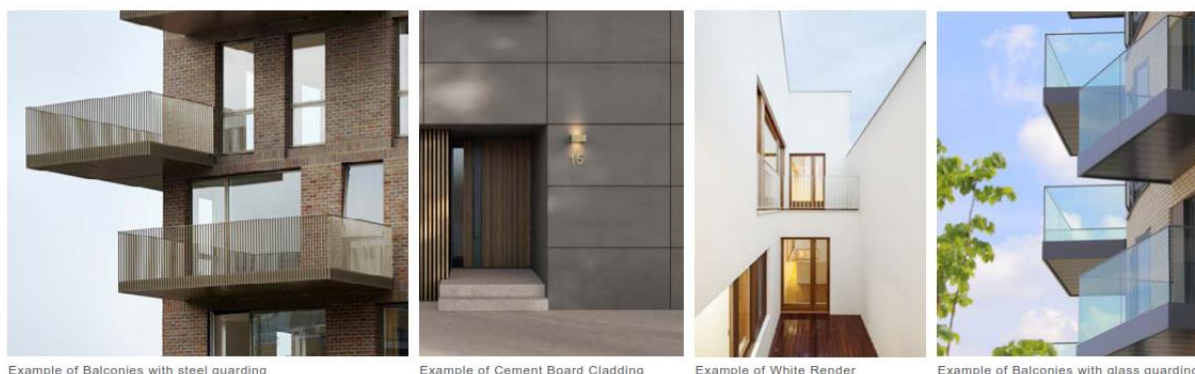


Figure 2.5: selection of finishes and materials chosen. (Source: JFA, 2022).

14.10. As set out in the Chapter 12 of the EIAR (LVIA):

In the medium to long-term, the landscape effects due to the completed development would overall be moderate and positive, due to the conversion from industrial warehouses positioned in a closed space to a public and integrated space. In the longer term, the assessment concludes that the proposed development will continue to fit into the landscape and visual character of the area.

Landscape works are proposed to reduce and offset any effects generated due to the proposed development at ground level, where possible. The planting of substantial numbers of new trees and plantings will enhance the overall appearance of the new development. Further to this, there is a net gain of c. 150 new trees planted within the site and approximately 3,400 sqm of new planting at ground level.

While the effects on views persist, the tree and shrub planting will increase the visual quality within the site. Future visitors to the development will perceive the development in positive terms due to the context and the quality of the public realm and proposed buildings.

2. To provide appropriate legibility enhanced density and scale should:

- *make a positive contribution to legibility in an area in a cohesive manner,*
- *reflect and reinforce the role and function of streets and places and enhance permeability.*

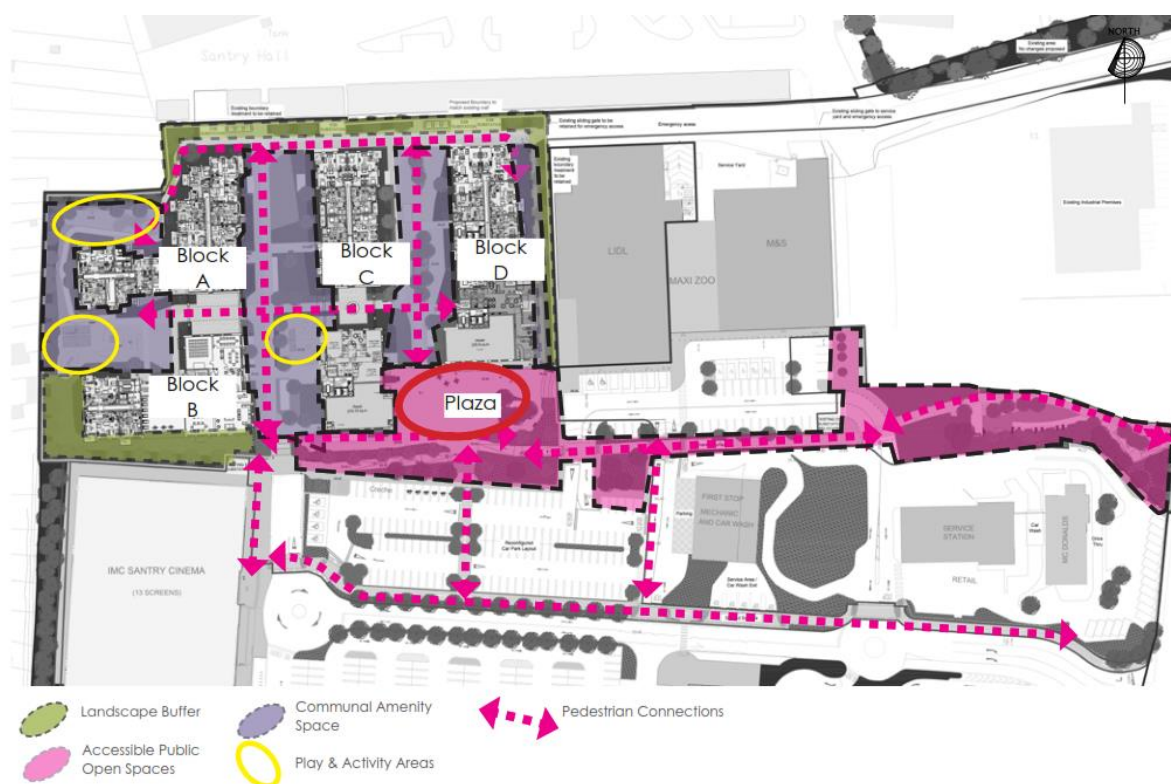
14.11. The proposal will make a significant, positive contribution to the public realm in the area, particularly with the delivery of the public plaza space 2,028 sqm in size (to the south of the proposed development), improving the wider permeability and circulation for the District Centre and creating a vibrant space supported by the proposed commercial units and new population of occupants of the residential development. The proposed development will provide linkages with permitted Omni Living SHD to the east (ABP Reg. Ref. 307011) through a coherent pedestrian environment which will be safe and convenient to use.

14.12. As set out with the Murray and Associates Design Statement:

“Permeability through the development and the associated public realm is a key driver informing the proposed layout. Pedestrian routes, access points to buildings and desire lines are all considered within the development.

The proposed public open spaces are to be used by residents, visitors and workers alike. These public/communal spaces are not seen as definitively separate or enclosed elements. Rather, they can be allowed to run into each other. This subtle treatment of the open space still allows the entire landscape to be read as a single space while simultaneously giving a human sense of scale to the users.

The quieter communal amenity space is the Block A+B courtyards to the west because although this space is readily accessible to the rest of the development, the constriction of the entrance to the space gives the visitor an impression of privacy. There are no solid boundaries between the courtyards that would create a hard division between spaces.”



14.2 extract from Murray and Associates Design Statement (Murray and associates, 2022).

To provide appropriate continuity and enclosure of streets and spaces enhanced density and scale should:

- *enhance the urban design context for public spaces and key thoroughfares,*
- *provide appropriate level of enclosure to streets and spaces,*
- *not produce canyons of excessive scale and overbearing of streets and spaces,*

- *generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,*
- *provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.*

14.13. The proposal has varied its massing, concentrating the taller element away from the existing low density residential dwellings to the west, yet providing for a strong urban edge, appropriate enclosure and active frontage to Omni Park.

14.14. The proposal, at ground level to the Omni Shopping Centre, incorporates activity to the public realm in the form of the amenities afforded to the residential development, retail units, creche and community facility. Residential open space is also incorporated, providing for footfall and passive surveillance. The private open space defensible area has been well considered and landscaped to provide for a balance of privacy and activity.

14.15. As set out in the JFA Design Statement:

The proposed Public Plaza is intended to address and link the existing Omni District Centre, the permitted Omni Living scheme. The Plaza will be activated by retail units, a new community space and a crèche provided at the base of Blocks C & D. and the new residential proposal.

The plaza forms a destination point to the newly created walkway which will also improve the pedestrian experience as they move from the Swords Road into Omni Park District Centre. There will be a variety of green landscaped areas within the Plaza, improving biodiversity and creating a green buffer to the existing northern parking areas, also improved with additional planting. Desire lines across the site, from the existing retail to the new development have been accommodated, and additional links to

The space will be passively monitored by overlooking apartments ensuring a safe and Courtyard 2 and 3 will ensure that the scheme peaceful environment for all. is permeable and accessible to the greater community.

14.16. The design will create a pleasant public gateway to the proposed Omni Plaza scheme.

14.17. The communal open spaces will benefit from passive surveillance from apartments within the scheme. Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting & CCTV scheme will ensure that this sense of security will be maintained throughout the evening. The community space, crèche and retail units have been located at the public plaza to ensure that there is a sense of activity and security throughout the day. Likewise, the resident's amenity space has been placed at a convenient ground floor location to ensure that it is well used and monitored. The main entrances to the blocks have been grouped around the courtyards and entrances have been carefully designed to ensure that residents & guests have shelter and light as they enter and leave their homes

4.To provide well connected, high quality and active public and communal spaces enhanced density and scale should:

- *integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,*

- *be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,*
- *ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,*
- *ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,*
- *ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,*
- *Provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.*

14.18. The proposed new public plaza and public realm improvements will complete the pedestrian facilities in the complex and help to further integrate Omni into the surrounding community. A Community safety strategy is included with the JFA Design Statement which relates to the following key areas:

- Lighting
- Communal Amenity Areas
- Public Open Space
- Entrances Access Routes
- Parking
- Play Areas
- Boundaries

14.19. Public realm improvements and amenity facilities to include:

1. Upgrade of existing footpaths to provide 2 no. new shared surface access routes through the existing Omni Park Shopping Centre development providing direct access for pedestrians and cyclists to the subject development from the Swords Road and Omni Park Shopping Centre.
2. Provision of a new public plaza to the northeast corner of Omni Park Shopping Centre, providing access to the Swords Road including pedestrian and cyclist access route (as substantially permitted under planning permission ref: ABP-307011-20).
3. Provision of a new public plaza to the northwest corner of existing Omni Park Shopping Centre integrating the proposed development with the existing district centre lands, provision of which shall require amendments to existing carpark layout and a reduction of 104 no. existing commercial car parking spaces.
4. Public and communal open spaces (incl. 2 no. playgrounds) and internal communal residential amenity for the residential development and private residential amenity in the form of terraces and balconies to all elevations.
5. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme.

14.20. As set out in the 3DDB Sunlight Daylight Assessment which has assessed outdoor amenity areas:

In total 3 no. amenity areas have been assessed, the proposed public amenity area, the proposed creche play area and the combined communal amenity areas all of which would meet the criteria as set out in the BRE Guidelines. Assessment of the proposed communal has also been broken down into 5 no. definable spaces as expanded on below.

The assessed exterior amenity areas consist of a public open space, a creche play area and 5 no. communal amenity areas. The public open space and creche play areas both achieve well in excess of the BRE Guidelines recommended minimum area capable of receiving 2 hours sunlight on March 21st.

The communal amenity areas identified in the report as Courtyard 3 and play area 2 do not receive the recommended minimum level of sun on ground on March 21st, with the latter marginally outside the BRE criteria. However, it is important to note that when combined, the proposed communal amenity areas provided in the proposed development would receive in excess of the recommended minimum level of sunlight as per the BRE Guidelines. Whilst certain areas may under-perform, future residents would still have access to areas capable of good levels of sunlight.

14.21. A Microclimate Effects On Wind And Pedestrian Comfort assessment has been carried out by B-fluid which concludes:

- *“The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for “Frail persons or cyclists” and for members of the” General Public” in the surroundings of the development.*
- *The development is designed to be a high-quality environment for the scope of use intended of each area/building (i.e., comfortable, and pleasant for potential pedestrians).*
- *The assessment of the proposed scenario has shown that no area is unsafe, and no conditions of distress are created by the proposed development..”*

5.To provide high quality, attractive and useable private spaces enhanced density and scale should:

- *not compromise the provision of high quality private outdoor space,*
- *ensure that private space is usable, safe, accessible and inviting,*
- *ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,*
- *assess the microclimatic effects to mitigate*
- *and avoid negative impacts,*
- *retain reasonable levels of overlooking and privacy in residential and mixed use development*

14.22. The communal open spaces will benefit from passive surveillance from apartments within the scheme. Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting & CCTV scheme will ensure that this sense of security will be maintained throughout the evening. The community space, crèche and retail units have been located at the public plaza to ensure that there is a sense of activity and security throughout the day. Likewise, the resident's amenity space has been placed at a convenient ground floor location to ensure that it is well used and monitored. The main entrances to the blocks have been grouped around the courtyards and entrances have been carefully designed to ensure that residents & guests have shelter and light as they enter and leave their homes.

- 14.23. Private open spaces are suitably arranged and designed to provide usable, safe, accessible and inviting space.
- 14.24. The microclimate effects have been assessed by B-Fluid as part of the development proposal.
- 14.25. As set out within the JFA Design Statement, the design team have taken great care in ensuring that the residential amenities of the neighbouring houses will not be negatively impacted by the proposal, further detail provided by JFA states:

- 06 The distance between existing houses and gardens and the proposed new buildings has been increased to a minimum of 29m, which gives a considerable distance between buildings, preserving privacy and limiting overshadowing.*
- 07 All windows facing west toward the boundary are limited to high level windows in bedroom spaces, this limits overlooking and preserves privacy while ensuring excellent sunlight & daylight conditions for the new apartments.*
- 08 Blocks A&B have been lowered along their western legs, reflecting the lower scale development to the west and acting as a buffer to the higher density blocks towards the east of the site.*
- 09 Higher density blocks are concentrated toward the east of the site, toward less sensitive boundaries. The additional distance ensures that sunlight, daylight and privacy is retained for the existing gardens along the western boundary.*
- 10 The western boundary will be extensively planted, reflecting the mature trees in existence outside of the site along this boundary. Care will be taken to ensure existing trees will be protected during construction.*

6 To promote mix of use and diversity of activities enhanced density and scale should:

- promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,*
 - contribute positively to the formation of a 'sustainable urban neighbourhood',*
 - include a mix of building and dwelling typologies in the neighbourhood,*
 - provide for residential development, with a range of housing typologies suited to different stages of the life cycle*
- 14.26. The site adjoins and includes an element of the existing Omni Park Shopping Centre, which comprises of retail, leisure and other commercial use at present The subject proposal seeks to provide for the delivery of a significant quantum of residential units to provide for an improved balance of uses, without detracting from the primary commercial nature of the lands.
- 14.27. The proposed development provides for a mix of 1 No. studio, 221 no. 1-bed units, 211 no. 2-bed units and 24 no. 3-bed units. The proposed apartments have been designed to fully accord with the Sustainable Urban Housing: Design Standards for New Apartments 2020. A full Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including private open space, room sizes, storage and residential amenity areas for apartment developments.
- 14.28. The Artane - Whitehall Local Electoral Area (CSO, 2016) consists primarily of houses / bungalows. This has resulted in a lack of choice of housing in the area. The proposed development provides a unit mix which complements this existing provision and will develop a range of choice allowing for mobility within the community.

- 14.29. This application seeks to redress this imbalance and provide a truly mixed use district centre. The proposed community facility, retail uses and creche, in conjunction with the residential uses will provide for greater activity throughout the day, ensuring vibrancy and vitality of the District Centre, strengthening its function.
- 14.30. The proposed development proposes to create a vibrant mixed use neighbourhood to curate and deliver homes to add to the existing retail, workspace and leisure uses currently existing in Omni Park Shopping Centre. The proposed new public plaza and public realm improvements will complete the pedestrian facilities in the complex and help to further integrate Omni into the surrounding community.

7 To ensure high quality and environmentally sustainable buildings enhanced density and scale should:

- *be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16,*
 - *not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,*
 - *ensure a degree of physical building adaptability as well as internal flexibility in design and layout,*
 - *ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,*
 - *maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,*
 - *be constructed of the highest quality materials and robust construction methodologies,*
 - *incorporate appropriate sustainable technologies, be energy efficient and climate resilient,*
{apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16).}
 - *incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SuDS solutions are in place – see Appendix 13,*
 - *include a flood risk assessment - see SFRA Volume 7.*
 - ***{include an assessment of embodied energy impacts – see Section 15.7.1}***
- 14.31. The proposed development has been carefully designed and orientated so as to maximise access to natural daylight for apartments and communal open areas, a high level of privacy is afforded to residents through careful organisation of windows and at ground floor level planting buffers.
- 14.32. A comprehensive Daylight Sunlight Assessment has been prepared by 3DDB has been prepared which assesses this and potential impact on surrounding sensitive uses.
- 14.33. Flexibility within the ground floor uses has been provided.

- 14.34. A high degree of dual aspect and enhanced aspect units are provided. A high degree of active street frontage is provided to the public plaza in the form of non-residential uses. The ground floor uses ensure that the scheme will be open and active from morning to evening. These include a community space, a crèche with adjacent outdoor play area and two retail / restaurant units.
- 14.35. The existing building comprises a lightly used 2 storey, warehouse which has been present on site for a number of years. In this regard please see Resource Waste Management Plan for detail of demolition.
- 14.36. High quality materials have been chosen for the proposed development which are robust and durable.
- 14.37. The energy efficiency strategy is set out in OCSC's Energy and Sustainability Report.
- 14.38. Surface Water Management is set out in EirEng' s Engineering Planning Report.
- 14.39. A Flood Risk Assessment is enclosed and prepared by EirEng.

8 To secure sustainable density, intensity at locations of high accessibility enhanced density and scale should:

- *be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,*
 - *look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.*
- 14.40. The subject development is currently located in very close proximity to a Dublin Bus transport corridor with a frequent service c. 10 mins peak hour. The site also has a dedicated bus stop and layby in the existing centre.. All of the bus services referenced within this report are within a circa 200-250m walk distance of the subject site. In terms of the Existing Bus Service Provision and Service Frequency details of same are set out in Appendix A of NRB's TAR.
- 14.41. A rationale for the quantum and management of car parking is also provided within the TAR.
- 14.42. The site's accessibility to bus services will be further enhanced with a high frequency service to be provided BusConnects (Main Spine Routes A2 & A4) which is to run along the R132 Swords Road. The planned frequency of service for the A Spine is a bus every 12 minutes.

9 To protect historic environments from insensitive development enhanced density and scale should:

- *not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.*
- *be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,*

- *assess potential impacts on keys views and vistas related to the historic environment.*

This site is not located within or proximate to Architectural Conservation Areas, Protected Structures and National Monuments are located. Please see Chapter 13 Archaeological, Architectural And Cultural Heritage of the EIAR for further details.

10 To ensure appropriate management and maintenance enhanced density and scale should

Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.

- 14.43. An Operational Management Plan and Operational Waste Management Plan has been prepared and is enclosed with the application.

15.0. CONCLUSIONS

- 15.1. It is submitted that the development is generally consistent with the provisions of the draft Development Plan. Where a material contravention has been identified, this is justified in the material contravention statement under separate cover. At the time of submission, the proposed material alterations to the draft Development Plan have been published and are noted within the text.