

**Statement of Response to An Bord Pleanála's Opinion  
in relation to Reg. Ref.: ABP- 312202-21**

*In respect of*

**A Proposed Strategic Housing Development**

*at*

**North west corner of Omni Park  
Shopping Centre, Santry Hall Industrial Estate, Swords  
Road, Dublin 9**

*Prepared for*

**Serendale Ltd.**

*Prepared by*

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**August 2022**



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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 Response report which seeks to address the issues raised within the Opinion of An Bord Pleanála, issued following pre-application consultation in respect of the proposed development. The Opinion of the Board was issued on the 13th May 2022.
- 1.2. This Statement will refer to other documentation which forms part of the final planning application pack, where more detailed and specific responses are provided to the issues dealt within this Statement by the relevant experts / design team members and consultants.
- 1.3. This Statement demonstrates that the issues raised in the Board's Opinion have been fully and satisfactorily responded to in the Strategic Housing Development planning application.

## 2.0 RESPONSE TO AN BORD PLEANÁLA OPINION

- 2.1. The Opinion of An Bord Pleanála on the pre-application stage for the proposed development noted that it *"is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development"*.
- 2.2. An Bord Pleanála set out 2 No. key issues that need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development
- 2.3. In addition, the Opinion set out 14 no. items of specific information that should be submitted with any SHD planning application. The following sections of this report set out these specific items and summarises how these items have been addressed in the final application.

### ITEM 1 – URBAN DESIGN RESPONSE

- 2.4. The first item of specific further information relates to the proposed development's urban design response. This item of the Board's Opinion is as follows:

#### *Urban Design Response*

*1. Further consideration and/or justification of the documents as they relate to design response of the proposed development to the site and the surrounding environment. The further consideration and/or clarification should clearly indicate:*

*(a) sufficient permeability from the site through the Omni Park to provide appropriate linkages to the Swords Road for pedestrians/cyclists,.*

*(b) the design rationale for the proposed design, scale and mass of the buildings within the Omni Park to ensure an attractive high-quality residential environment is achieved. Particular regard should be had 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) and the requirement for good design and the inclusion of a sense of place*

#### **Response to Item 1**

- 2.5. In response to this item, the development has been revised and the accompanying documentation further developed to provide a rationale for proposed development. This item is primarily addressed in the Architectural Design Statement.

a) Proposed permeability

The project Architects JFA set out the following detail in specific regard to this item:

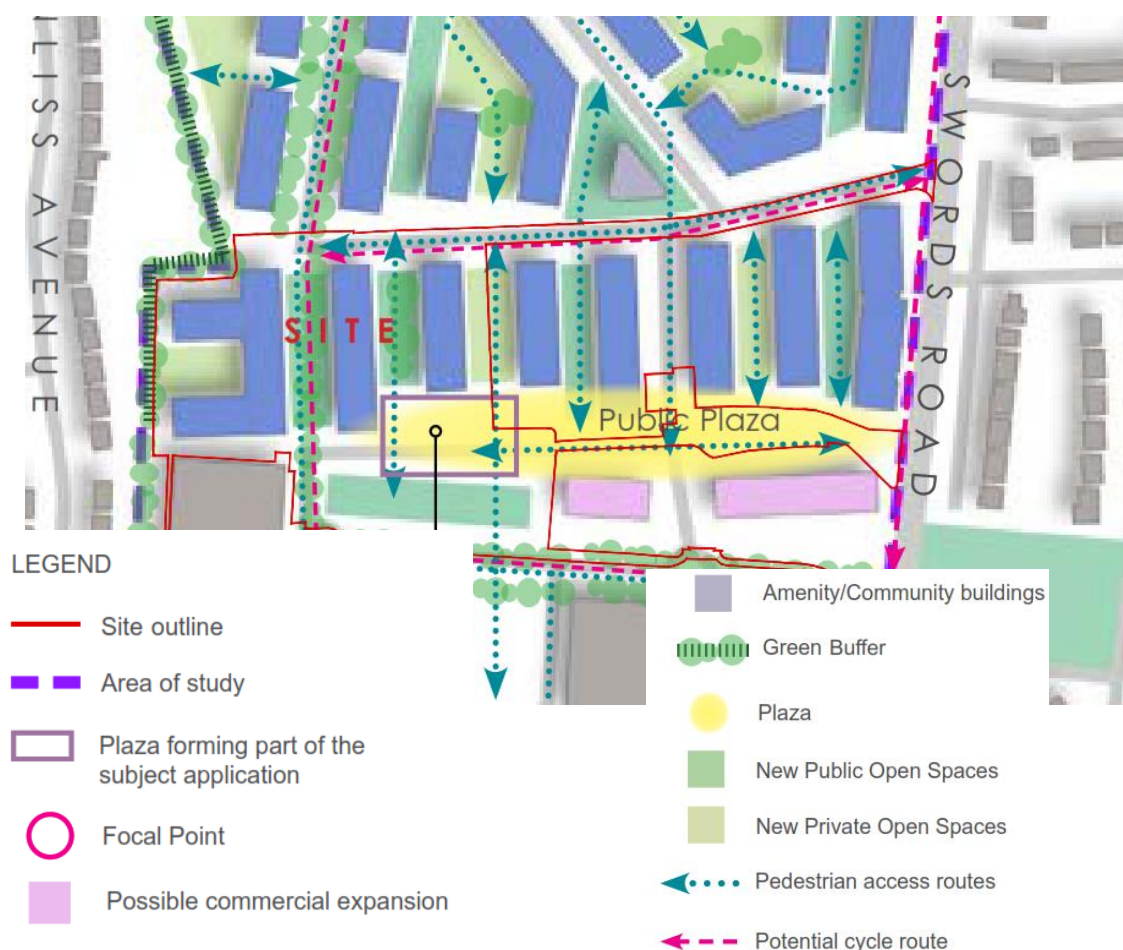
- In response to this the landscape design has been amended to include the Swords Road entry plaza, previously approved as part of the Omni Living SHD, within our proposed scheme.

- As well as this the southern pedestrian link will be improved and northern pedestrian link widened to allow shared pedestrian and cycle paths to both routes. We believe these combined approaches provides a robust connection from Santry Avenue through the District Centre into the proposed Omni Plaza development.

- We believe these combined approaches provides a robust connection from Santry Avenue through the District Centre into the proposed Omni Plaza development.

2.6. As part of the proposed development significant public realm improvements are proposed including provision of 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.

2.7. The site has been laid out with pedestrian movement as a priority, with car movements eliminated from within the site area as far as possible through the provision of a basement car park. A new landscaped pedestrian spine will link the proposed public plaza and the entrance plaza of Omni Living, creating a safe and legible route for pedestrians from Swords Road to the scheme. In addition an upgraded pedestrian & cycle link will be provided to the south.



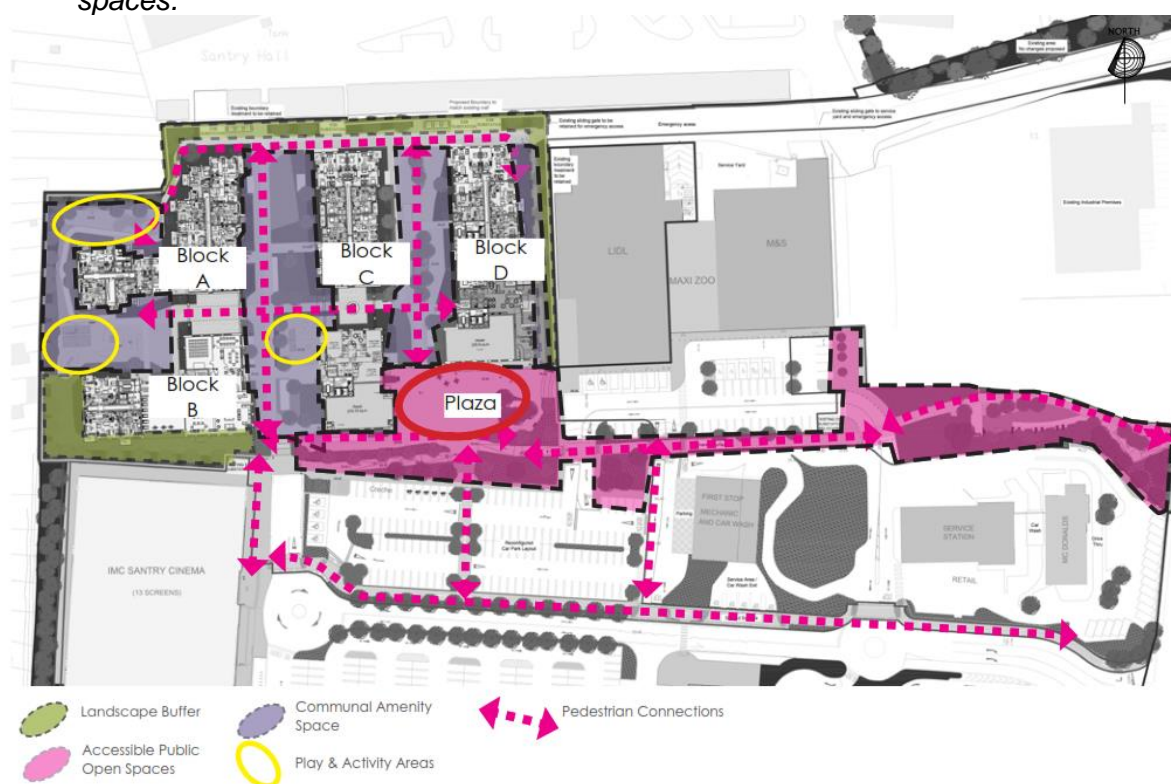
**Figure 2.1: overview of permeability and open spaces within the proposed development and to Omni Park. (source: JFA, 2022)**

2.8. 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.”*



**Figure 2.2: extract from Murray and Associates Design Statement (Murray and associates, 2022).**

2.9. Further information has been enclosed within the Murray and Associates Landscape Design Statement and the JFA Design Statement.

b) Design Rationale for design, scale and mass of the buildings

2.10. In response to Item 1 (b) the project Architects JFA sets out the following detail in specific regard to this item:

- Refer to the Section 04 Design Strategy of this Design Statement for details on the Design Approach & Urban Design Criteria.
- The scheme is designed to make efficient use of the available site, noting the good availability of public transport and numerous adjacent services.



- *The scheme & proposed Framework strategy pay due regard to the recent and approved schemes to the North & East of the site and step down to the Western Boundary in order to respect existing low density housing beyond this boundary.*
- *The blocks are arranged so as to create a legible urban form, around green amenity spaces.*
- *The tallest element addresses the proposed public plaza in order to create a focal point and sense of identity within the scheme.*
- *The proposed design, scale and mass of this scheme has been carefully considered to deliver quality homes in a pleasant setting.*

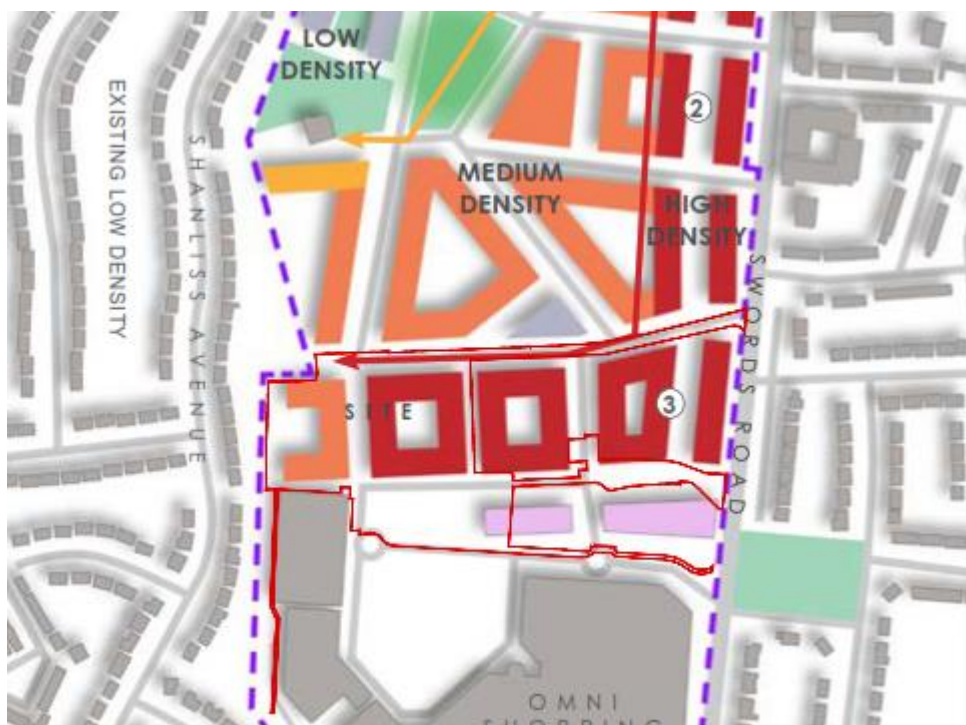
2.11. As part of the early pre-application consultation strategy Dublin City Council expressed a desire to see a framework strategy proposal for the wider Santry area and Omni District Centre. The development of this framework strategy has informed key aspects of the height, scale and massing of the proposed development

2.12. As set out within the JFA Design Statement:

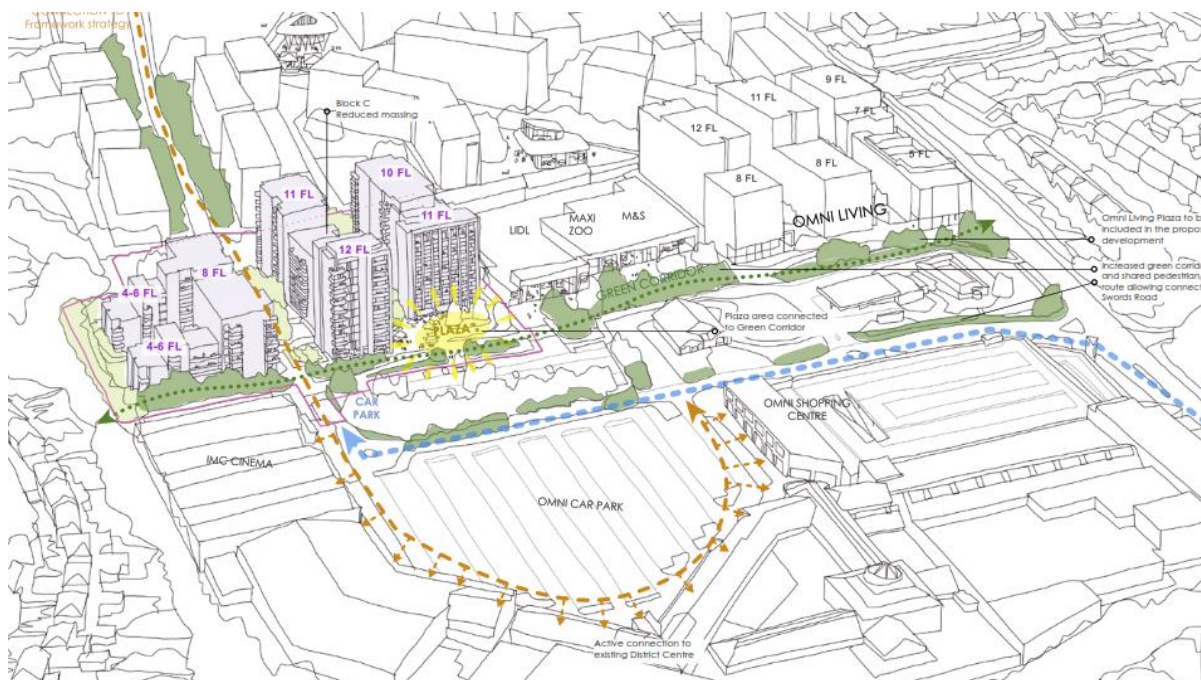
*The framework strategy area creates a unique opportunity to regenerate underutilized (mainly outdated industrial units) on appropriately zoned lands between Omni Park District Centre and Santry Demesne. These strategic lands are located on a QBC and future BusConnects route and within easy access of the M50, M1, Dublin Airport, DCU and Beaumont Hospital.*

*The role of this framework strategy is to:*

- *understand the existing and emerging context within which this proposal sits*
- *understand how the proposed development and Omni District Centre could form part of a broader regeneration of Santry*
- *set out proposals for future permeability and movement patterns*
- *set out proposals in relation to the height, scale and massing of future developments*



**Figure 2.2: overview of density as part of framework strategy within JFA Design Statement. (source: JFA, 2022)**



**Figure 2.3: proposed massing / height in context of framework strategy within JFA Design Statement. (Source: JFA, 2022)**

- 2.13. As set out in the diagrams above prepared by JFA the as part of the Framework Strategy prepared. The proposed development specifically density has been design in accordance with the permitted and potential surrounding context. The height, massing and density of the proposed development have been carefully developed in response to the permitted and existing context balancing the existing residential amenity and noting the significant potential for change in the area. Santry Place has completed 3 blocks of the residential components. An application for an additional 7 storey mixed-use office / residential block development to the west of the site has recently been made to DCC and is under consideration (DCC Reg. Ref. 4549/22).
- 2.14. The Swiss Cottage (ABP Reg. Ref. ABP-303358-18 & ABP 303358-19) redevelopment is a Build to Rent scheme, and is an example of the successive change in scale of the area.
- 2.15. Omni Living (ABP Reg. Ref. 307011-20) is an approved mixed use scheme consisting of 3 buildings of 324 apartments, amenity and crèche as well as an 81 room aparthotel. The scheme creates a new entrance plaza to the Omni area with generous landscaping, creating a new varied community with excellent amenities on the doorstep. The granted scheme consists of 3 buildings arranged over 5 to 12 storeys.
- 2.16. 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.*



2.17. Figure 2.3 below illustrates the granted and proposed heights in the area.



**Figure 2.3: extract from JFA Design Statement illustrating proposed and permitted height context within the Santry area. (source: JFA Design Statement, 2022)**

2.18. Figure 2.4 below illustrates the response to the potential massing of other buildings in the area.





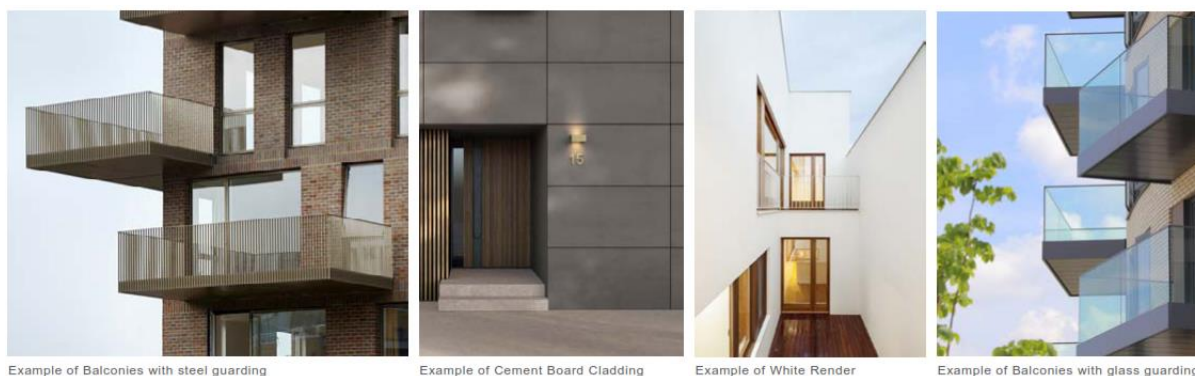
**Figure 2.4: massing strategy for the framework strategy and context. (source: JFA Design Statement, 2022)**

2.19. 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).**

## ITEM 2 – Waste Water Services

- 2.20. The first item of specific further information relates to waste water services. This item of the Board's Opinion is as follows:

*2. Further consideration and/ or justification of the documents as they relate to the proposed wastewater services. In particular, the consideration/clarification should address the contents of the submission from Irish Water concerning the need to for all works and/or agreements necessary to facilitate the connection and/or upgrade of the development to wastewater infrastructure. Clarity is required at application stage as to what upgrade works are required, who is to deliver these works, when are the works to be delivered relative to the completion of the proposed housing development and whether such upgrade works are to be the subject of separate consent processes.*

### Response to Item 2

- 2.21. In response to this item, the Applicant has engaged extensively with Irish Water . As noted above, Confirmation of Feasibility & Statement of Design Acceptance have been received from Irish Water for the development. The Confirmation of Feasibility letter received from Irish Water for the development noted that a foul connection for the proposed site is feasible subject to upgrades (Ref: CDS21003688), which was also noted in the Irish Water submission at pre-application stage for the development, with specific comments from Irish Water as follows:

*“In order to accommodate the proposed connection at the Premises, upgrade works are required to increase the capacity of the Irish Water network. Irish Water currently has a project on our current investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by 2026 (this may be subject to change) and the proposed connection could be completed as soon as possibly practicable after this date.”*

- 2.22. Following engagement by EirEng and the Applicant with Irish Water, this required clarification is now provided and the production of a detailed project timeline for the proposed development by the client and design team is enclosed (Figure 2.6 below).

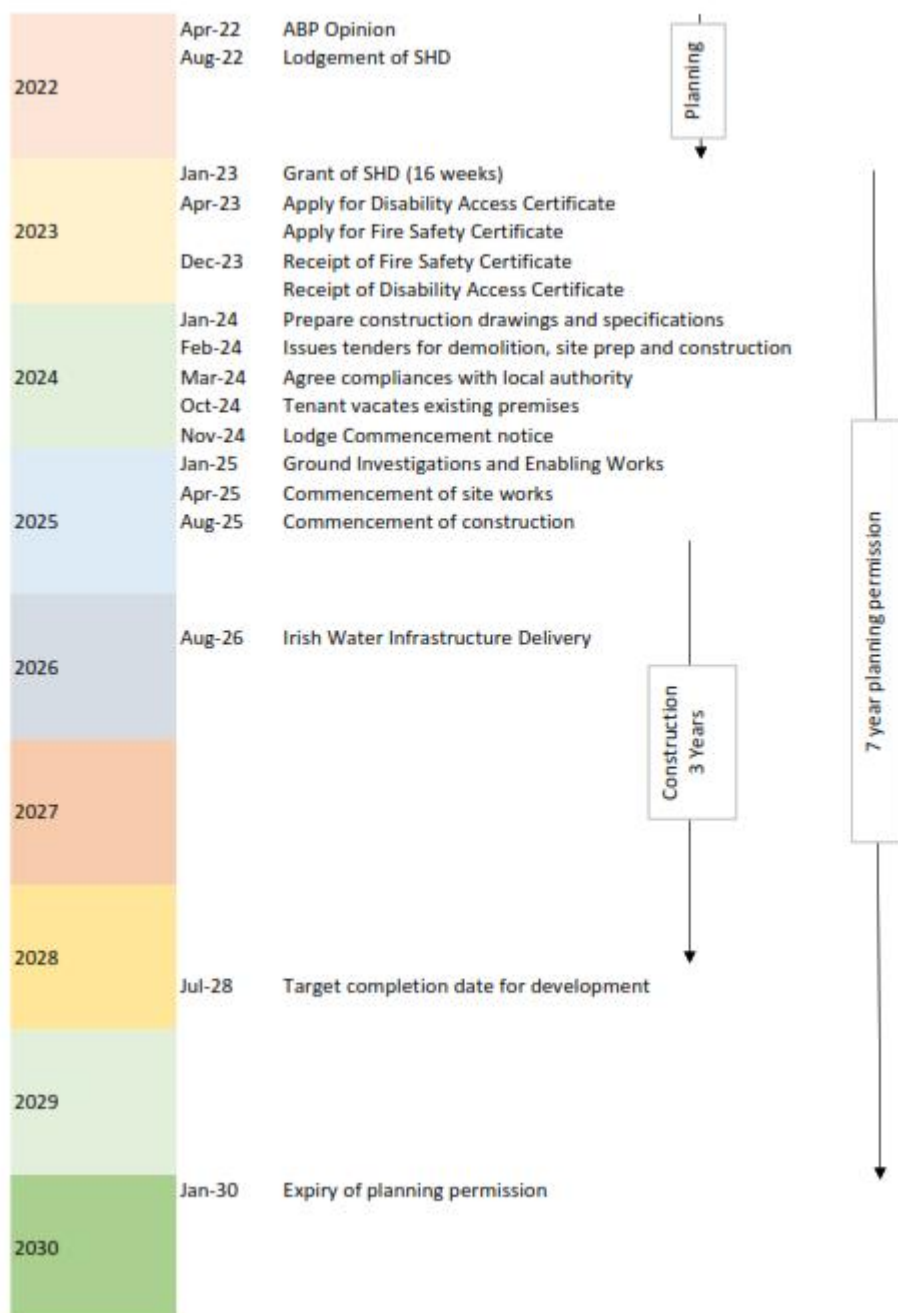
- 2.23. As set out by EirEng within their Engineering Services Report:

*“The projected completion date for the development, subject to a planning grant, is July 2028 and a minimum 1.5 years later than the projected Irish Water upgrade delivery date, which Irish Water have noted in correspondence as being “currently on track for substantial completion of the works in 2026”. A detailed project timeline for the proposed development is included in Appendix E. The earliest expiry date for a grant of planning pursuant to this development (assuming a decision within 16 weeks) is January 2030. This allows a further buffer beyond the delivery date of the Irish Water upgrade delivery if required. Notwithstanding these dates the client has agreed, and*

*as would be expected to be included in a standard condition wording of any planning decision, that first occupation of any unit will not take place until a connection agreement, and subsequent connection, is in place for the development.”*

#### Example proposed development timeline

(for illustrative purposes only)



**Figure 2.6 overview of approximate timeline illustrating compatibility of proposed development with infrastructure upgrade works. (Source: Serendale Ltd./EirEng, 2022)**

2.24. As set out in the Engineering Service Report prepared by EirEng:

*“In correspondence with Irish Water they have provided the relevant information and clarification to address the queries noted in item 2 of the ABP opinion. A conference call between the design team and Irish Water was also undertaken immediately prior to submission of this application to ensure all information submitted is current. A copy of this correspondence is included in Appendix E and confirms that “Irish Water are delivering the upgrade works at Santry Pump Station. The Santry Pump Station*

*upgrade is (required) due to overflows into the adjacent watercourse. There is no storage at this location. In addition, the diversion of flows to the north fringe will increase capacity to the network in the North Side of Dublin City". The upgrade works will divert flows from the existing Santry Pumping Station to the North Fringe Sewer including "a complete civil and M&E replacement and relocation of the Santry pump station site. A new emergency overflow tank will also be constructed at the site". No agreements are necessary between Irish Water and the developer to facilitate the upgrade works with the development only requiring a connection application, as is standard. All agreements and consents required for the upgrade works will be applied for and put in place by Irish Water, "as necessary, in line with the project timeline". Irish Water confirm in their correspondence they "are currently on track for substantial completion of the works by 2026" which aligns with the project delivery date noted in the Confirmation of Feasibility letter. A conference call between the design team and Irish Water was also undertaken immediately prior to submission of this application to ensure all information submitted is current.."*

- 2.25. In this regard a letter of clarity was received from Irish Water 19<sup>th</sup> August 2022 which states:

*"The Santry Wastewater Pump Station Upgrade project is part of Irish Water's Capital Works Programme and shall be funded by Irish Water to cater for growth and development in the wider Santry area, Co Dublin.*

*The upgrade works include a complete civil and M&E replacement and relocation of the pump station site. A new emergency overflow tank will also be constructed at the site. A new rising main will divert existing flows away from the current discharge point to a new connection point with the North Fringe Sewer.*

*The detailed design phase has commenced, and Irish Water's programme is currently for substantial completion of such upgrade works by 2026, subject to change. All agreements and consents, as necessary to complete the works will be put in place in line with the current project timeline."*



### 3.0 SPECIFIC ITEMS

- 3.1. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, ABP in its opinion notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information:

#### ITEM 1 – MATERIALS AND FINISHES

- 3.2. The first item of specific further information relates to materials and finishes. This item of the Board's Opinion is as follows:

*1. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s and retail/ commercial/ crèche area. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).*

#### Response to Item 1

- 3.3. In response to this item, please see Architectural Design Statement for details of proposed materials and finishes including the treatment of balconies in the apartment buildings. A brief synopsis has been set out in response to Item 1 above.
- 3.4. A Landscape Design Report and associated drawings prepared by Murray and Associates sets out the proposed materials for landscaped areas, pathways, entrances, boundary treatments and retail/ commercial/ crèche area.
- 3.5. A HQA has been prepared by JFA in accordance with Section 6.3 setting out details of amenity spaces and their orientation.
- 3.6. A Building Lifecycle Report prepared by JFA has also been enclosed.

#### ITEM 2 – OMNI SHOPPING CENTRE

- 3.7. The first item of specific further information relates to the mixed use zoning objective of the subject site. This item of the Board's Opinion is as follows:

*2. A report that specifically addresses the impact of the proposed development on the services and retail product within the existing Omniplex park. The report shall address the quantum of retail/ commercial and residential proposed and the consideration of the Z4, mixed use zoning.*

#### Response to Item 2

- 3.8. In response to this item, the Applicant has prepared a number of reports. JFA have prepared a report titled 'Omni District Centre Land Use Analysis, this report presents an overview of the nature of the Omni Park in its current, permitted and proposed context.
- 3.9. In addition Mason Own & Lyons (MOL) have prepared a report '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.

- 3.10. The subject property is within the Z4 zoning objective (District Centres) which aims “to provide for and improve mixed-service facilities”. The Dublin City Development Plan 2016 further elaborates on the Z4 Zoning Objective:

*“District centres, which include urban villages, provide a far higher level of services than neighbourhood centres. They have outlets of greater size selling goods or providing services of a higher order, and their catchment area extends spatially to a far greater area than that of neighbourhood centres (see Chapter 7 and Appendix 3 for details of policies, standards and the retail strategy). As the top tier of the urban centres outside the city centre, key district centres have been identified which will provide a comprehensive range of commercial and community services. These centres often attract large volumes of traffic and should, therefore, be well served by public transport.*

*To maintain their role as district centres, new development should enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening. In this regard, **opportunity should be taken to use the levels above ground level for additional commercial/retail/ services or residential use with appropriate social facilities.** Higher densities will be permitted in district centres, particularly where they are well served by public transport. The district centre can provide a focal point for the delivery of integrated services and the designated key district centres have, or will have in the future, the capacity to deliver on a range of requirements, the most important of which are:*

- *An increased density of development*
- *A viable retail and commercial core*
- *A comprehensive range of high-quality community and social services*
- *A distinctive spatial identity with a high quality physical environment”. [Our emphasis]*

- 3.11. 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.
- 3.12. 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 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.
- 3.13. The subject site comprises a portion of the overall Omni Centre lands, which accommodates a large warehouse and a number of ancillary buildings related to its former use as a transport depot. The site is located in the north west corner of the wider Omni landholding.

- 3.14. In order to deliver the zoning objective of “a diversity of uses” which “should be promoted to maintain their vitality throughout the day and evening” including “residential use with appropriate social facilities”, the application proposes to deliver a significant quantum of residential units in conjunction with other commercial, public plaza, creche and community facility, which will improve the overall mix of uses in the District Centre and ensure its long term viability. The Omni Centre provides a significant number of services to support the additional population (as set out in the submitted Community Audit), and the additional population in turn will ensure vibrancy throughout the day as sought under the zoning objective.
- 3.15. 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 urban quarter.
- 3.16. The proposed development will provide for a truly mixed use area, further enhancing the highly successful Omni Park Shopping Centre. In its current condition the site makes not contribution to urban place.

CURRENT MIX OMNI DISTRICT CENTRE

CURRENT + PERMITTED MIX

CURRENT + PERMITTED + PROPOSED MIX



- 3.17. As set out within the JFA Omni District Centre Land Use Analysis report prepared by JFA:

*“The site falls under the auspices of the Dublin City Council Development Plan 2016-2022 and is Zoned Z4 - District Centre.*

*This zoning is designed to provide for and improve mixed-services facilities. District centres provide a far higher level of services than neighbourhood centres. They provide a comprehensive range of commercial and community services. According to*

*the DCC Development Plan 2016-2022 new development within these areas should “enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening. In this regard, opportunity should be taken to use the levels above ground level for additional commercial/retail/ services or residential use with appropriate social facilities. “ As such, we believe this development will support a diverse range of uses and ensure vitality throughout the day in Omni Park.*

*In addition to this the Development Plan states that “higher densities will be permitted in district centres, particularly where they are well served by public transport.” Omni Park is served by a Quality Bus Corridor (including a 24/7 service) which will be further strengthened by Bus Connects proposals. We therefore believe that the density and scale of the proposed development is also in line with the Z4 zoning designation.*

*Among uses accepted in principle within the DCC Development Plan are residential, community facility, car park, childcare facility, retail, restaurant and open space, all of which are included within our proposed development. Not included as a permissible use is the most recent use industrial or light industrial therefore the proposed development represents a significant improvement in the alignment with the zoning goals of z4 - district centre.*

*The proposed mix of uses across the overall omni district centre zoning will represent a strong mix of permitted uses and ensure that the site will be well used at all times.”*

- 3.18. 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.
- 3.19. Please also read Section 6.0 of the Statement of Consistency in specific reference to the land-use zoning of the subject lands.

### **ITEM 3– ADDITIONAL CGIS**

- 3.20. The third item of specific further information relates to additional CGIs and cross sections assessing the potential visual impact on residential areas to the west. This item of the Board’s Opinion is as follows:

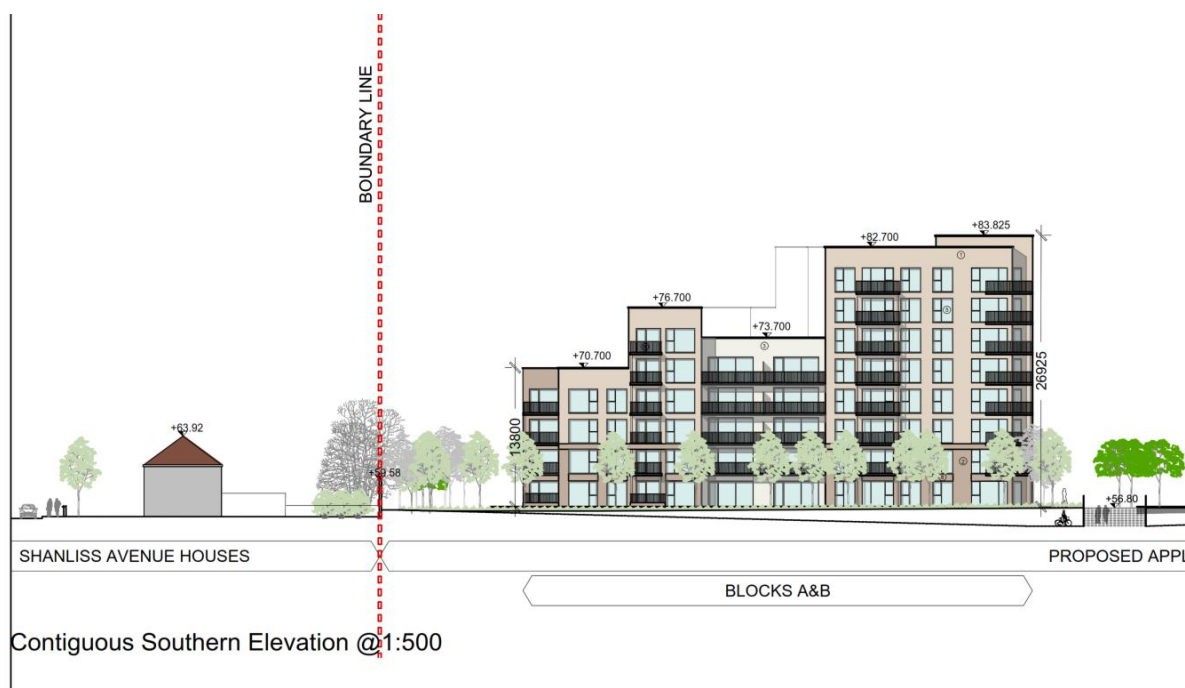
*3. Additional Computer-Generated Images (CGIs) and visualisation/cross section drawings should elaborate on the visual impact of the proposed development in the context of the impact of the residential area to the west of the site.*

### **Response to Item 3**

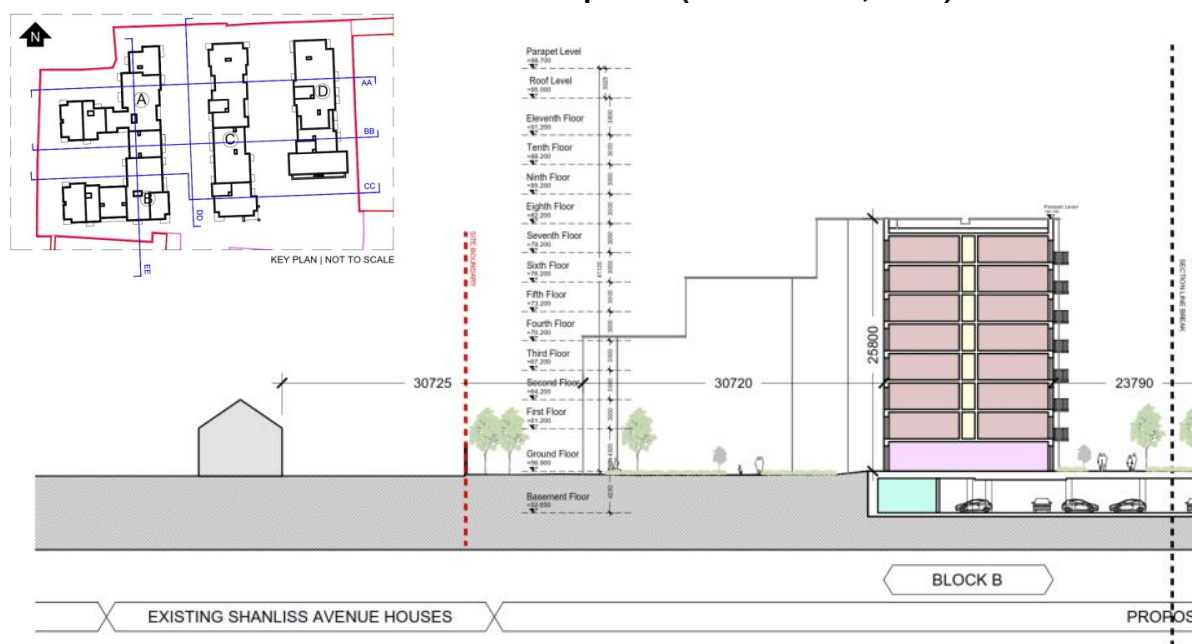
- 3.21. In response to this item, 2 no. additional CGIs have been prepared by 3DDB and are included with this application. 7 No. total CGI’s are prepared in addition to 11 No. verified views. V6, V7, V8, V10, V11 are all taken from the residential areas to the west, north west and south west of the scheme.



- 3.22. The following cross sections have been prepared by JFA to further outline the nature of potential impact on the neighbouring residential areas (OMN-JFA-EL-00-DR-A-P4010).



**Figure 3.1: extract of JFA OMN-JFA-EL-00-DR-A-P4010 illustrating contiguous southern elevation of the proposed development (Source: JFA, 2022).**



**Figure 3.2: Extract from JFA Drawing OMN-JFA-ZZ-XX-DR-A-P5000 Section BB illustrating section of the proposed development adjacent to residential areas (Source: JFA, 2022).**

- 3.23. In regard to the visual impact from the west of the scheme Murray and Associates LVIA states the following in relation to the following views:
- V6, The views north and north-east towards the site from the residential properties are partial and oblique, and mainly from upper floor windows and the public realm. The existing Omni Park Shopping Centre partially screens the development from some receptors. Interceding vegetation and boundaries within properties add

*another screening element to the northeast. Due to The distance from the site, the existing Omni Park centre and interceding vegetation, the effects on views will not be significant.*

- *V7, Views of the development site are to the east and will be glimpsed and oblique. Due to the distance from the site, the interceding vegetation and existing development, the effects on views will not be significant.*
- *V8, Views of the development site are to the east and will be glimpsed and oblique. Due to the distance from the site, the interceding vegetation and existing development, the effects on views will not be significant.*
- *V10: Views of the development site are to the south east and will be glimpsed and oblique. Due to the distance from the site, the interceding vegetation and existing development, the effects on views will not be significant.*
- *V11: Potential direct views of the development to the east are partially screened by existing boundaries and vegetation. Due to the low sensitivity yet high magnitude of change, the effect on views will be moderately negative.*

#### **ITEM 4 – Rationale for Car Parking**

- 3.24. The first item of specific further information relates to rationale for car parking. This item of the Board's Opinion is as follows:

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

#### **Response to Item 4**

- 3.25. In response to this item please see Transport Assessment Report (TAR) prepared by NRB Consulting Engineers which includes detailed rationale for car parking and sets out a Travel Plan (Appendix G of the TAR).
- 3.26. In summary, the proposed development entails the provision of 213 no. basement car parking spaces including 11 No. accessible spaces and 22 No. EV charging points. In addition, 7 no. motorcycle parking spaces are provided at basement and the provision of 768 no. bicycle parking spaces (504 at basement and 264 at surface).
- 3.27. The development also entails the reconfiguration of existing car parking to the northwest of Omni Park Shopping Centre with a net reduction of 87 no. commercial car parking spaces to allow for the provision of a new public plaza. Reconfiguration shall provide for the provision of 7 no. creche drop-off spaces and 6 no. carshare spaces to facilitate the proposed development.
- 3.28. The scheme also includes Car Club Spaces to offset the need for residents and guests to have cars and car parking spaces. It is proposed that 6 prominently located parking spaces will be allocated to car club parking spaces (e.g. "Go Car" spaces).

- 3.29. The subject site is included in Category Zone 2 in (Map J) relation to car parking which requires the following spaces for the land uses listed below (Source Table 16.1 Dublin City Development Plan 2016-2022). As set out in table 3.1 below for full list of land uses and maximum parking provision):

Use	Car Parking Requirement (Maximum)	maximum spaces
Other Retail and Main Street, Financial Offices (excl. retail warehouse)	1 per 275 sq.m GFA (2x café/retail at 431 sqm)	1.6
Childcare	1 per 100 sqm	2.3
Residential	1 space per dwelling	457

**Table 3.1: Car Parking Requirements .**

- 3.30. If these standards were applied to the proposed development, it would result in a maximum of 461 no. car parking spaces being provided for the entire development.
- 3.31. In terms of bicycle parking, Table 16.2 of the Dublin City Development Plan 2016-2022 sets out the following cycle parking standards in accordance with the different land uses (See Table 16.2 for full list of land uses and cycle parking requirements):

Use	Cycle Spaces
Shops and Main Street Financial Offices	1 per 200 sq.m
Residential	1 per dwelling

**Table 3.2: Cycle Parking Requirements**

- 3.32. This equates to a requirement for 468 bicycle spaces for dwellings and 4 No. for retail / creche uses, and it is noted 768 bicycle parking spaces are to be provided, with visitor spaces also being provided at grade.
- 3.33. It is also noted there are c. 1,400 car parking spaces at present in the Omni Centre, of which the subject proposal will form a complementary element of.
- 3.34. The Design Standards for New Apartments 2020 also set out specific requirements for car and cycle parking with significantly reduced the car parking requirements compared with the Dublin City Development Plan 2016-2022. Under Section 4.19 the guidelines note that in larger scale and higher density developments, comprising wholly or predominantly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be "wholly eliminated or substantially reduced". This may apply in accessible areas such as in or adjoining city cores or at a confluence of public transport systems. The guidelines describe locations suitable for reduce levels of car parking including central and accessible locations.
- 3.35. Having regard to the Design Standards for New Apartments specifically for centrally/accessible locations, the proposed car parking rate (0.48) is considered appropriate in this regard.
- 3.36. In this case, the site is in a District Centre and is immediately adjacent current bus services that by far exceed the 10 min peak hour frequency (multiple Dublin Bus Service currently pass the site - ensuring the peak hour frequency is less than 10 minutes). The services include a 24 hr service (#41). Please see Appendix J 'Bus Capacity / Demand Study' of the NRB TAR which sets out the frequency and capacity of nearby bus routes.

- 3.37. An assessment on car parking is contained in Section 2 of the Transportation Assessment Report prepared by NRB Consulting Engineers and is submitted with this application. The permitted car parking provision for Omni Living was c.0.5 spaces per unit and Swiss Cottage (proximate the site) is c. 0.3 spaces per unit.
- 3.38. This provision is fully consistent with the provision at the adjacent ABP-permitted Omni Living SHD scheme (ABP-307011-20) where a total of 324 apartments are permitted with the provision of 148 car parking spaces (plus four number club car spaces), being a parking ratio of 0.46.
- 3.39. This site is clearly well served by public transport and the existing Omni Park Shopping Centre public car park contains ~1400 car parking spaces which are available for use on a short term basis for visitors if required. In addition to the high quality public realm improvements, pedestrian and cyclist facilities provided for within the proposed development a Travel Plan is enclosed with this application as Appendix G of the TAR to demonstrate the applicants commitment to encouraging modal shift and the use of public transport, cycling and walking



## ITEM 5 – Communal and Public Open Space

- 3.40. The first item of specific further information relates to Communal and Public Open Space. This item of the Board's Opinion is as follows:

*5. A quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.*

### Response to Item 5

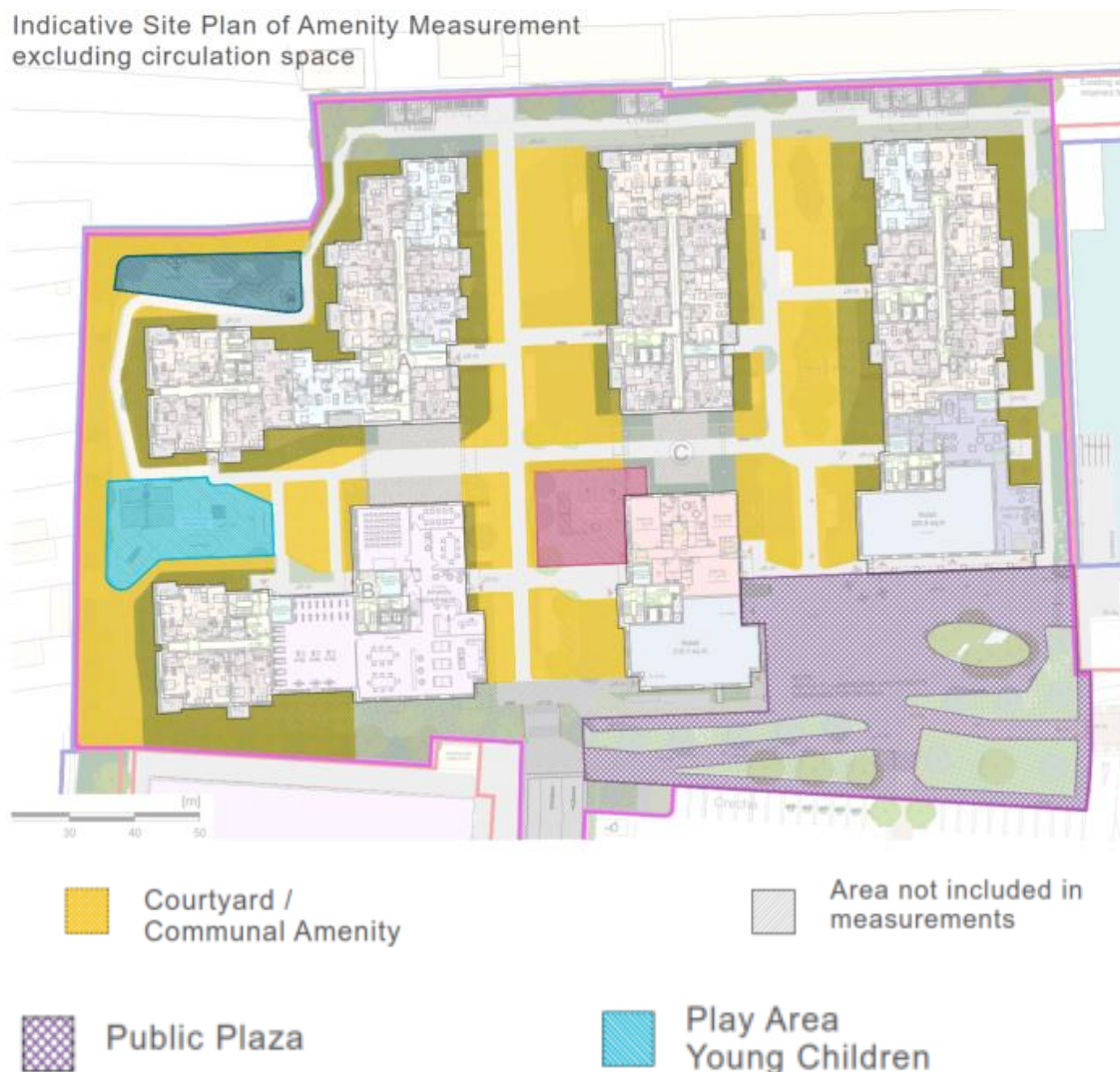
- 3.41. In response to this item Figure 3.3 below sets out the basis for open space calculation. For further detail on the usability of these spaces please see landscape drawings and Design Statement prepared by Murray and Associates.

REQUIREMENT	Studio	1 Bed units	2 Beds units	3 Beds units
No Units Provided	1	221	211	24
Area Req per Unit Type	4	5	7	9
Total sqm Req by unit type	4	1105	1477	216
Total Required Communal Amenity	2802			
Playground (young children)	85-100			
Playground (older children)	200-400			
Creche Play Area (no min req for external space)	37 child spaces	Allowed for 5 sqm per child		185

Public Open Space	Development Site Area	15490
	10% Site Are Req	1549

PROVISION	Total Area	Excluding Circulation	% Green Space	Provision vs Requirement
Courtyard 1	1176	818	70%	127%
Courtyard 2	1362	962	71%	
Courtyard 3	1014	721	71%	
Total Provided Communal Amenity	3552	2501	70%	
Playground (young children)	312	312	100%	367%
Playground (older children)	205	205	100%	103%
Creche Play Area	210	210	100%	114%
	Total Area	Excluding Planters	% Paved Space	
Public Plaza	2039	1383	68%	132%



**Figure 3.3: basis for communal and open space calculations (Source: JFA, 2022).**

3.42. As set out in the JFA Design Statement, open spaces can be described as:

*“Courtyard 1 is envisaged as an active area around Blocks A & B, with an older childrens play space to the north of Block A and a young childrens play area within the sheltered courtyard, enjoying secure, sheltered space.*

*Courtyard 2 is envisaged as a bright and peaceful planted space. The area has been design with a single spine path on the western side which can tie into future pedestrian & cycle connections to the north. Green spaces have been maximised to the east of the courtyard. An 210 sqm enclosed play area for the creche adjoins this space.*

*Courtyard 3 also has a single spine route, maximising green space on the eastern side of the courtyard. Raised berms will allow for a more dynamic landscape in this area. We expect this space to be a more active and sociable area as it leads to the Public Plaza to the south. Planting creates a sense of separation between the Plaza and communal space.*

*The Public Plaza meets Public Open Space requirement and is seen as being a destination attracting pedestrians into the District Centre from Swords Rd. The space will be activated by restaurant / retail and community spaces and will be flexible to enable active use as, for example, a farmers market or similar.”*





Figure 3.4: CGI of Communal open space to the west. (Source: 3DDB, 2022).



Figure 3.5: CGI of Public open space (Source: 3DDB, 2022).



**ITEM 6 – LANDSCAPING PLAN**

- 3.43. The sixth item of specific further information relates to landscaping proposals. This item of the Board's Opinion is as follows:

*6. A detailed landscaping plan clearly illustrating the quantum and functionality of all areas designated for communal and public open space. The landscaping details shall include, inter alia, designated communal open space, the inclusion of useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and the design, a detailed trees survey and proposed tree planting scheme and shall clearly indicate the quantum and designated areas of useable public open space.*

**Response to Item 6**

- 3.44. In response to this item please see Landscape drawings, tree survey and Landscape Design Statement prepared by Murray and Associates.

**ITEM 7 – SUDS DESIGN**

- 3.45. The seventh item of specific further information relates to the design of surface water management system. This item of the Board's Opinion is as follows:

*7. Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site, discharge rates equal to greenfield sites, integration of appropriate phased works*

**Response to Item 7**

In response to this item, please see EirEng's Engineering Services Report (Section 3.2) and associated drawings.

**ITEM 8 – WIND AND PEDESTRIAN COMFORT STUDY**

- 3.46. The first item of specific further information relates to Wind and Pedestrian Comfort Study. This item of the Board's Opinion is as follows:

*8. Submission of Wind and Pedestrian Comfort Study.*

**Response to Item 1**

- 3.47. In response to this item, a Wind Microclimate and Pedestrian Comfort Study has been prepared by B-Fluid and has been enclosed with this application, this report 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.*



**ITEM 9 – CONSTRUCTION MANAGEMENT PLAN**

- 3.48. The first item of specific further information relates to a Construction Management Plan. This item of the Board's Opinion is as follows:

*9. Submission of a Construction Management Plan.*

**Response to Item 9**

- 3.49. In response to this item, a Construction and Environmental Management Plan has been prepared by AWN and is enclosed with this application.

**ITEM 10 – MICRO-CLIMATIC EFFECTS**

- 3.50. The tenth item of specific further information relates to micro-climatic effects. This item of the Board's Opinion is as follows:

*10. A specific impact assessment of the micro-climatic effects such as down-draft which shall include measures to avoid/ mitigate such micro-climatic effects.*

**Response to Item 10**

- 3.51. In response to this item, a Wind and Pedestrian Comfort Study has been prepared by B-Fluid and has been enclosed with this application and specifically addresses micro-climatic effects such as down-draft.

**ITEM 11 – Traffic and Transport Assessment**

- 3.52. The first item of specific further information relates to Traffic and Transport Assessment. This item of the Board's Opinion is as follows:

*11. A Traffic and Transport Assessment which addresses the concerns of the Transport Section in relation to the car parking management on the site having regard to the ratio proposed and the residential access into the wider Omniplex Park.*

**Response to Item 11**

- 3.53. In response to this item, a Transportation Assessment Report has been prepared by NRB Consulting Engineers. Section 5.0 of this report sets out the response the DCC Transport Department Concerns in full.

- 3.54. In regard to car parking management this report states that:

*"Omni Park Shopping Centre have on-site management who currently monitor the car park and there is also an Automated Number Plate Recognition (ANPR) system in place which picks up the car number plates as they enter and exit the car park. This allows duration of stay to be closely controlled, ensuring there is no inappropriate or long stay parking occurring. There are no car park barriers in place and it is not a ticketed car park but there is 24 hr security 365 days a year so management monitor occupancy, and resulting clamping of cars occurs. There are also clamping warning signs within the car park.*

*A key component in the effective operation of any on-site car parking is an active and enforced parking management strategy. This strategy will continue to be implemented by both the Developer and the Management Company, with the remit of the current management extended to include the subject site. The Management Company will be charged with responsibility for the control of parking & access, including the car share spaces and the creche spaces".*

- 3.55. For further information please see Section 5.0 of the TAR prepared by NRB.

## **ITEM 12 – MATERIAL CONTRAVENTION OF THE DEVELOPMENT PLAN**

- 3.56. The twelfth item of specific further information relates to material contravention of the Development Plan. This item of the Board's Opinion is as follows:

*12. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format. The notice and statement should clearly indicate which Planning Authority statutory plan it is proposed to materially contravene.*

### **Response to Item 12**

- 3.57. In response to this item, where we have considered that the proposed development materially contravenes the Dublin City Development Plan or the Draft Dublin City Development Plan, should the new plan come into effect before a decision is made, two separate statements indicating the plan objectives concerned and why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. This has also been reflected in the application notices.

## **ITEM 13 – SUNLIGHT/DAYLIGHT/OVERSHADOWING**

- 3.58. The thirteenth item of specific further information relates to Sunlight/Daylight/Overshadowing. This item of the Board's Opinion is as follows:

*13. An updated Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable*

### **Response to Item 13**

- 3.59. In response to this item 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.”*

#### **ITEM 14 – CONSISTENCY WITH THE DEVELOPMENT PLAN**

- 3.60. The fourteenth item of specific further information relates to consistency with the Development Plan. This item of the Board’s Opinion is as follows:

*14. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant’s opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.*

#### **Response to Item 14**

- 3.61. In response to this item, JSA have prepared a separate Statement of Consistency with both the current Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028 should this come into effect before a decision is made.

#### **4.0 CONCLUSION**

- 4.1. In conclusion, all the issues raised by An Bord Pleanála in its opinion dated 13th May 2022 have been comprehensively addressed in the planning application submitted to the Board as set out within this statement of response and the accompanying documentation.
- 4.2. The proposed development provides for a significant number of high-quality residential units across a range of sizes, with associated childcare facility and open space, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site-specific design.
- 4.3. The development provides for a range of connections to adjacent areas, including pedestrian and cycle linkages across the site and to Omni Park Shopping Centre, the existing road network and to adjacent existing and future residential development.