

John Nolan
134 Santry Close
Santry
Dublin 9

ABP Case : LH29N.320106
DCC Case : LRD6044/24 S3A

10th July 2023

AN BORD PLEANÁLA	
LDG-	<u>073438-24</u>
ABP-	
25 JUL 2024	
Fee: €	<u>50</u> Type: <u>chr</u>
Time:	<u>14:36</u> By: <u>Hand</u>

Introduction

Santry Forum was formed in 2019 against the backdrop of proposed significant high-density developments in the northern area of Santry under SHD legislation. The Forum is not anti-development and has actively canvassed for a plan for the area into which such proposed developments could be incorporated with the objective of having a full suite of social infrastructure commensurate with a properly functioning community/neighbourhood. As no plan for the area has been forthcoming, we have had to raise concerns on a development-by-development basis which is less than satisfactory for all concerned. Our points of concern and objections are outlined below.

Matters of Concern giving rise to Objection

We can see evidentially that Santry is being transformed on foot of fast tracked SHD developments approved by ABP which have subsequently been used by developers as having set precedents for further high-density development. This appears now to be used as a tool for effectively disposing of the relevance of any density guidelines as set out in the DCC development plan 2022-28 on a permanent basis for our area.

We believe that this approach to development is discriminatory to Santry and in contravention of the DCC Development Plan which did not plan, nor provide, for this degree of material densification of the area. The density guidelines relevant to Santry are:-

Key Urban Village	60-150
Outer Suburbs	60-120

The developments in the area comprise

	Plot	Apts	Density	Plot Ratio
Swiss Cottage	0.48ha	120	250/Ha	2.6:1

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Omni Living	1.50ha	457	259/Ha	2.6:1
Santry Place	1.30ha	324	249/Ha	2.5:1
Chadwicks	1.50ha	321	214/Ha	1.7:1
Total	4.78ha	1,222	255/Ha	

In aggregate this amounts to 255 units per developed hectare and demonstrates a gross disregard for the form of the area and the application of density guidelines. It represents an open invitation to high density development without any social cost or contribution to the community, or even a commitment to form part of a cohesive contribution to the non residential requirements of a community with a three thousand increase in population from the above developments alone (average 2.6 people per unit).

The Chadwick's development represents the fourth high-rise high-density building to be approved in the area. The impact is significant, and the real community gain is effectively zero or in some cases, for example childcare availability, wholly negative. We believe that the extent of development in the area is starting to mirror that of an SDRA in scale. The planning authority has effectively absolved itself of any responsibility for the longer-term consequences and implications of such high-density development in an outer suburb. In this regard Fingal County Council is doing the same with the Northwood development. This is similar to Santry in incorporating high-rise high-density development at the extremity of a local authority area. Being privately owned there are no community services or schools in what is comparable in population to a mid-sized town. The population of Northwood are consumers of Santry's social infrastructure. In return Santry get the use of a Fingal County Council Park. An example of the above is the failure to reserve space in the area within the development plan for the provision of both junior and senior school places in a planned and coordinated fashion. There is a similar situation within Santry whereby the DCC designated KUV is privately owned.

Appendix A provides a detailed analysis of the errors contained in the developers submission on School Demand Assessment with fundamental errors on population in the catchment area and those of school going age. It identifies a deficiency of 1,300 school places compared with the developers view that adequate school places existed. That this was not identified by the planning authority is alarming with such potentially severe adverse social consequences.

While the DCC Development Plan makes reference to KUVs, and while their existence may indicate a strategic policy change to a polycentric approach to the development of the city there is no evidence of a plan. Nor could there be one when the KUV is under private ownership. This means that there is no element of community input into development of the neighbourhood, a fundamental and critical deficiency.

The Chadwicks site is zoned as a neighbourhood centre. The existing building supplies business located there provided jobs in the area and an accessible amenity for the community. We believe that the proposed development makes a risible offering of community space with respect to three issues. The first is that the proposed repositioning of the development fronting onto both the Swords Road and Santry Avenue acts to make access to any amenity uninviting whilst also making it difficult to discern its existence. The second is that there is no provision for "event parking" that would allow for dynamic use of any community space as a destination. This will act

to undermine the economic viability of the space. The third is the very real risk of the developer seeking a subsequent variation to planning permission that would remove this use.

There is a complete absence of connection between the non-residential aspects of each of the four developments approved to date. This acts to ensure there is no cohesive urban planning to the densification of this northern area of Santry. It is entirely ad hoc and will likely flounder as evident in Ballymun where a sense of a town centre is already destroyed by the presence of six lanes of traffic.

The intervention of the planning authority to suggest the moving of the 13 story block from the rear to the front is a point of strategic concern for the community. Placing the development to the front establishes a development line along the east side of Swords Road and the south side of Santry Avenue and sets a precedent which is not considered appropriate. It is fundamentally a form of development that is the equivalent of a gated community which is exclusionary to the majority of the community. We would point to the example of Santry Cross and particularly the siting of the Metro Hotel in reverse at the junction. There is nothing inviting or inclusive in this form of development.

With respect to creche places we note the condition included by the planning authority for the provision of creche spaces. This condition needs to be specific in not allowing a developer to exclude one bedroom apartments in their calculations. A 321 unit development requires four creches. This number is still insufficient to cover the deficit in the area which is currently being added to with the construction of additional units at Santry Place. As that development and this development are both Dwyer Nolan developments we feel it is appropriate that the Chadwicks site provide further childcare places in accordance with the needs of the neighbourhood.

We understand that a second bat survey has been put forward as a condition of approval. We suggest that the positioning of the 13 story block to the rear of the development will act to facilitate bat flight paths.

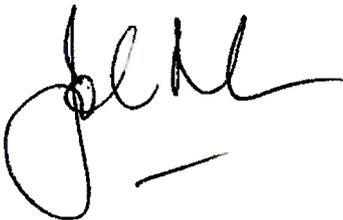
The proposed development reaches a height of 13 storeys as a result of the breaching of density guidelines on the site. We believe this to be inappropriate overdensification and as a result that the development be scaled back in height to comply with the recommended maximum of 150 units per hectare for an outer suburb.

As the social mix has been fundamentally altered by SHD development we believe that a minimum of 60% of the units in this development should be available to individual owner occupiers and not be available for bulk sale. This is the only way to ensure the development of a community across the 4.78 hectares of development and 3,177 increase in population at the northern end of Santry.

Summary (of requests and objections)

In the first instance we do not object to residential development on the site at Chadwicks. We do however believe that the following conditions are appropriate having regard to the matters referred to above

- The development should be restricted to the guidelines recommended for an outer suburb 120 units per hectare
- Height should be scaled back proportionately to this reduced density
- The tallest part of the development should be restored to its original positioning at the rear of the site
- The development of the site should be delayed pending completion of an accurate and independent school demand assessment
- The creche facilities appropriate to the site should apply to the TOTAL number of residential units without exception
- The provision of neighbourhood centre amenities on the site is inadequate and should be subject to a revised plan incorporating the community need and a commercial viability assessment across the northern Santry area (footprint of the 4 developments listed above) also having regard also to access and parking
- 60% of the units should be available for owner occupiers to start the process of rebalancing the social mix in the area



John Nolan

134 Santry Close Santry Dublin 9

Santry Forum Committee Member

[REDACTED]

[REDACTED]

Submission for appeal on permission granted for LRD6044/24/S3A

Acknowledgement letter from Dublin City Council and appropriate fees attached for Santry Forum, Santry Community Centre, Domville Court, Dublin. D09E338

This section relates to the School Demand Assessment Report as supplied by Armstrong Fenton Associates (AFA) under the planning application.

Please see copy of above report attached with remarks and amendments noted. Of particular importance are the misrepresentation/omission of figures and facts as outlined in the report.

Demographic Profile

On page 8 section 4.3 the AFA report states "a study area has been defined by 2 km radius" around the site, yet on page 11, Table 1 is at variance to the actual figures of the study/catchment area.

	State	Dublin	Catchment Area	Whitehall C DED
2016	4,761,865	1,347,359	15,679	2,153
2022	5,149,139	1,458,154	16,125	2,908
Change	387,274	110,795	446	755
Percentage	7.5%	7.5%	2.7%	25%
Table 1 page 11				
Above percentage line corrected should read:				
Percentage	8.1%	8.2%	2.8%	35%

The Catchment Area figures should read:

	Catchment Area
2016	10,097
2022	55,246
Change	3,149
Percentage	6.0%

*as per census figures of all electoral divisions within the 2km radius of applicant site. See table below and attached map for background details.

On the same page, page 11 table 2, the figures are again inaccurate

	2022	2022 Correct figures
Catchment Area		
Total population	16,125	55,246
5-18 Age cohort	2,238	5,998 (5-14 Age Cohort)
% of Total Population	3.7%	3.3%

* in the census size you can only do either to age 14 or to age 19 (not 18)

Electoral Division	% within 2km radius	Used in figures	population aged 5-14 (2022)	Total population (2022)
Whitehall C	100	Yes	250	2,908
Whitehall B	100	Yes	428	4,371
Whitehall A	80 approx.	Yes	302	3,117
Whitehall D	90 approx.	Yes	329	3,279
Airport*	20 approx.	Yes	752	6,152
Turnapin	100	Yes	167	1,730
Priorswood A	50 approx.	Yes	193	1,574
Kilmore A	100	Yes	512	3,678
Kilmore B	90 approx.	Yes	306	2,546
Beaumont A	100	Yes	282	2,668
Beaumont B	85 approx.	Yes	466	5,103
Beaumont F	55 approx.	Yes	483	3,893
Ballymun C	100	Yes	554	5,729
Ballymun B	55 approx.	Yes	475	4,273
Ballymun D	100	Yes	302	2,551

Ballymun E	55 approx.	Yes	198	1,674
Ballymun A	10 approx.	No		
Dubber	20 approx.	No		
Ballygall C	15 approx.	No		
Total			5,196	55,246

Note: *Airport ED land is only about 20% but population is 100% within radius.

Population summary

Reports	
Armstrong Fenton Associates	16,125
KPMG (census 2016)	52,097
Census 2022	55,246

The catchment population is 3 times more than that reported by the applicant.

See also the School demand assessment report (<https://www.pleanata.ie/publicaccess/EIAR-NIS/314458/Other/KPMG%20Future%20Analytics/Schools%20Demand%20Assessment.pdf?r=985985450660>) submitted for development "Omni Plaza" ABP 314458 by KPMG, it is a more accurate report, but now a little out of date.

School Provision

For the schools listed on page 13 of the AFA Schools Demand Assessment, listed are a number of schools outside the 2km catchment area, namely St. David's Boys National School and Corpus Christi G.N.S. and some other schools were omitted, namely Our Lady of Victories schools and Virgin Mary schools. See attached spreadsheet and accompanying map for 2023/2024 enrolments and schools with 2 Km (as the crow flies) of the proposed development, as per Department of Education.

As per the Department of Education website there were enrolments of 3,513 places in primary schools located within the 2km radius for 2023/2024 and yet, as per the census of 2022, of the population aged 5-14 years there is a CURRENT population of 5,999. In reality any schools listed to the east of the site can be disregarded, as there is no-way for children to navigate the crossing of the M50.

This is a major deficit of places for children of our community and this does not take into account the other developments recently applied for or granted permissions.

The developments consist of: Omni Plaza (457 apartments), Omni Living (324 apartments), Swiss Cottage (112 apartments), Santry Place (137 apartments), Oscar Traynor (850 homes) and of course this development, Santry Avenue, (321 apartments). The listed developments are all within a 1km area. The above list gives a total new 2,201 homes to this small area. Assuming 2 adults per home that would mean a requirement of 528 school places (quoting the average of 12% of the population are school age). All the planning applications only focus on the one application, but when combined they make considerable impact on the community and the demand for school places.

I have not fully analysed the demands of Post-Primary school places in the area, as the community are promised that a new Post-Primary school will be delivered in Whitehall in the very near future. Also we would expect that the majority of future residents in these developments will be families with young children.

Overall Conclusions

The School Demand Assessment Report as supplied by Armstrong Fenton Associates under the planning application for Santry Avenue LRD6044/24 S3A is inaccurate and does not portray a proper analysis of current or future population of school aged children or of school demand.

The report is inaccurate and I would hope that it is not a reflection of other aspects of this build, either in relation to actual material building or other reports.

Of the 5,999 children aged 5-14, if we assume they all finish Primary school aged 12, this would leave us with 4,800 ($5,999/10 \times 8 = 4,799$) requiring primary school places in this catchment area and we only have supply of 3,500, giving a deficit of 1,300 places, yet the schools demand assessment by Armstrong Fenton Associates conclude "there are adequate spaces for the 65 no. children to attend local primary schools near the proposed development".

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Total			5,999	55,246

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Supporting data:

- The population of the catchment area is under reported in the AFA report by 29% (16,125 versus actual 55,246)
- The %'s on the tables page 11 are incorrect also the table page 13 lists the wrong schools and the distances are wrong
- Inaccuracies and poor attention to detail would lead me to dismiss the report and double check all submissions made by this applicant

The locality is totally undersupplied with places for children of primary school age, both currently and based on the development applications will only get worse in the future.

LOGISTICS PARK

P7

MERRYFALLS

Silloge Park Golf Club

SILLOGE

NCT Centre Northpoint 1/2

BALLYMUN

AKSTOWN

HAMPTON WOOD

IPS Customer Centre

Popintree

FINGLAS EAST

Johnstown Park

GLASNEVIN

Albert College Park

Dublin City University

Omni Shopping Centre

Santry

GULLIVER'S RETAIL PARK

Crowne Plaza Dublin Airport, an IHG

LYNEMOOD Mews

Santry Park

Santry Royal Oak

KILMORE BIG

AIRWAYS INDUSTRIAL ESTATE

Jump Zone Santry

TURNAPIN GREAT

Top Oil Collinstown

Dardistown Cemetery

Carlton Hotel Dublin Airport

Clayton Hotel Dublin Airport

CLONSHAGH

MIDDLETOWN

CLONSHA

MALA INDUS

Leisureplex Co

Coolock

ARTA

Artane Castle Shopping Centre

Dinos Alive The Immersive

Beaumont Hospital

BEAUMONT WOODS

KILMORE WESP

Northside Shopping Centre

BONNYBROOK

WHITEHALL

Ellenfield Park

LORCAN AVE

LARCH HILL

KILMORE

Kilmore Rd

5 Briggs Rd

Kilmore Rd

Swords Rd

Swords Rd

Lorcan Ave

Larch Hill

Kilmore

Kilmore West

Northside

Bonnybrook

Coolock

Beaumont Woods

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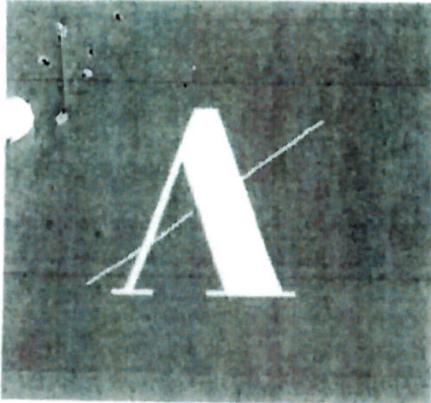
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Silloge Park Golf Club

Merryfalls



ARMSTRONG
FENTON

PLANNING NO. LRDB044/24/53H
SS - FEB 13 2024

PROJECT: Large-scale Residential Development (LRD)

LOCATION: Junction of Swords Road & Santry Avenue,
Santry, Dublin 9.

REPORT: School Demand Assessment.

CLIENT: DWYER NOLAN DEVELOPMENTS LTD.

DATE: April 2024

LRDB044/24/53H

Planning &
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Consultants

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1.0. Introduction

1.1. This Childcare and School Demand Assessment has been prepared by Armstrong Fenton Associates on behalf of Dwyer Nolan Development Ltd to accompany a Large-scale Residential Development (hereafter "LRD") planning application located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.

This report provides a detailed review of the planning policy context relating to the provision of primary, post-primary and third level educational facilities. The report also outlines the existing range of educational services in the vicinity of the development proposal; describes the expected demand for these services to be generated by the development proposal; and offers insights into the future capacity of the existing facilities.

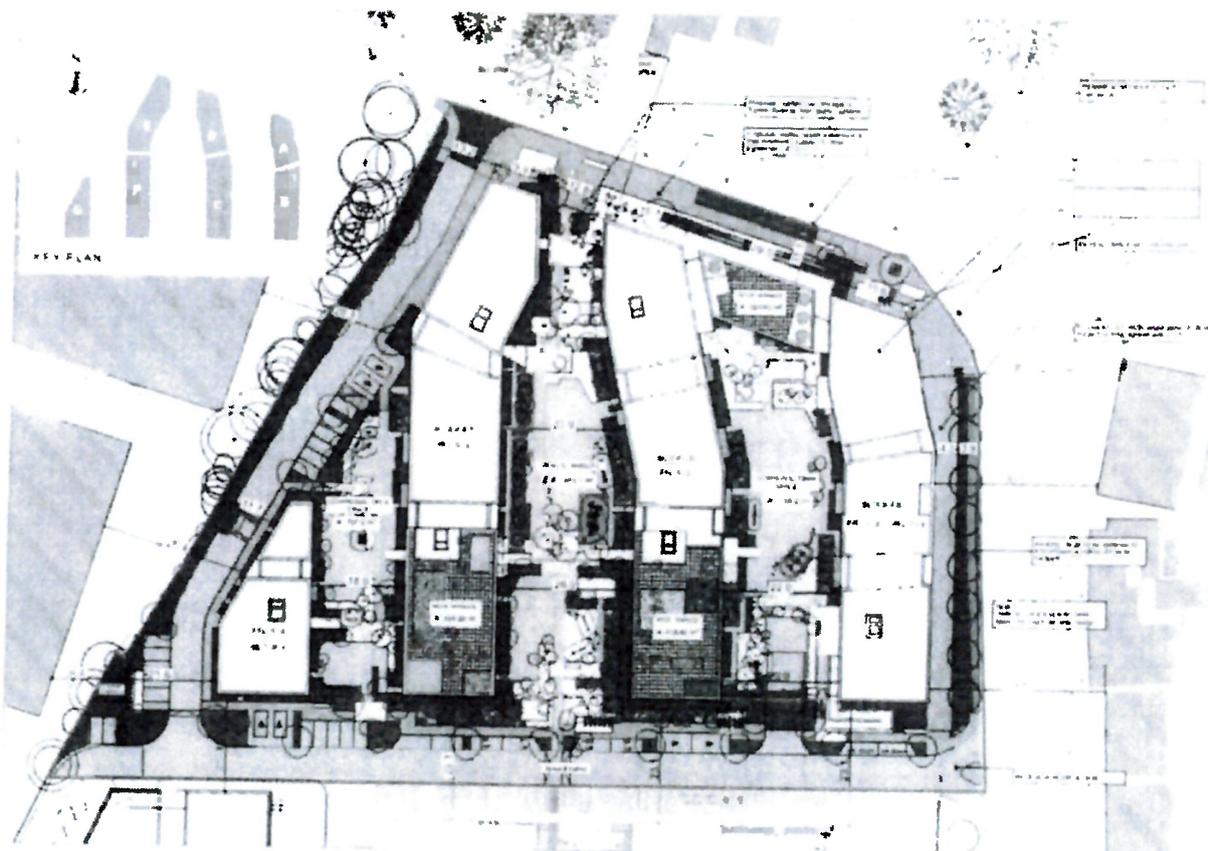


Figure 1: Location of proposed development site at junction of Santry Avenue and Swords Road, Santry, Dublin 9

2.0. Site Context

2.1. Site Location and Description

2.1.1. The application site is located in Santry, Dublin 9, approximately 6km to the north of Dublin city centre. Santry represents a dispersed and established suburb of north Dublin which straddles the boundaries of Dublin City Council and Fingal County Council; however, the application site lies entirely within the Dublin City Council administrative area.

2.1.2. At present, Santry is denoted by several established housing estates and communities, as well as numerous industrial estates and businesses which benefit from the accessible nature of Dublin Airport (c. 5km to the north) and the M1 / M50 motorways. There are also extensive institutional lands in the area catering for specialist care and mental health services, while Beaumont Hospital, to the east, is also easily accessible from the subject site. As referred to earlier and as discussed in Section 4 of this Planning Report, several new

developments are currently under construction in the vicinity, bringing a new vitality to the area and transforming this outer area of the city into a compact neighbourhood.

2.1.3. More specifically, this proposed LRD is located at the junction of Santry Avenue and Swords Road, Santry, is bounded to the north by Santry Avenue, to the east by Swords Road, and to the west by Santry Avenue Industrial Estate. To the south, the site abuts the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17, 2737/19 & 4549/22). Taking into account the three aforementioned permissions, this overall permitted development provides for a total of c.253 no. apartments, 3 no. retail units, a creche, community unit, and c.14, 119sq.m of commercial / office floor space, in 6 no. 3 to 7 storey blocks. This development is being constructed by the applicant and is currently nearing completion. Blocks A, B & C are completed and occupied. The current development proposal has been designed with careful consideration paid to the neighbouring Santry Place development to create spatial and visual integration between the permitted and proposed developments.

2.1.4. The application site is zoned "Z3" (Neighbourhood Centres) in the existing Dublin City Development Plan 2022-2028 (hereafter CDP) which has an objective "To provide for and improve neighbourhood facilities." The CDP notes that Z3 zoned lands generally provide for local facilities within a residential neighbourhood which can range from the traditional parade of shops to larger neighbourhood centres. The CDP goes on to state that Z3 lands: "can form a focal point for a neighbourhood and provide a range of services to the local population. Neighbourhood centres provide an essential and sustainable amenity for residential areas and it is important that they should be maintained and strengthened, where appropriate. Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level".

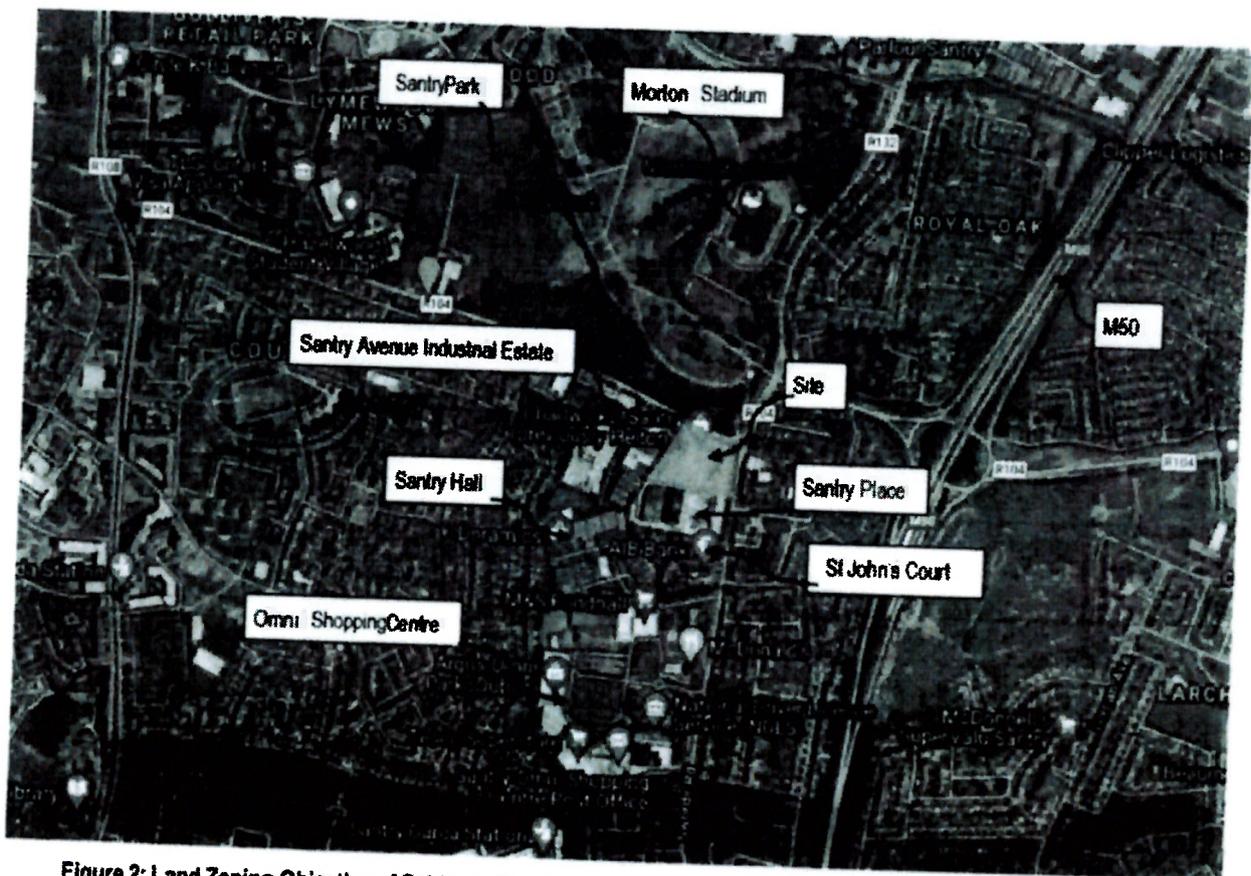


Figure 2: Land Zoning Objective of Subject Site - Z1 "Sustainable Residential Neighbourhood" - CDP 2022-2028

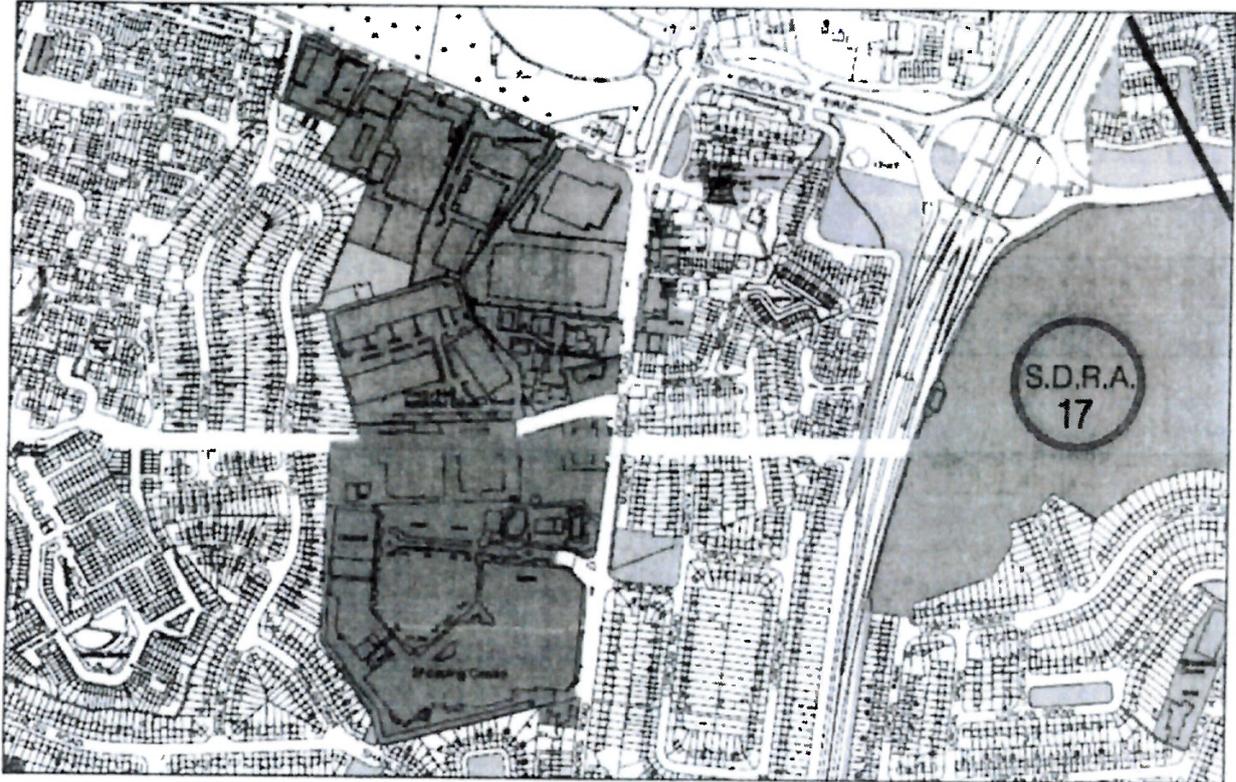


Figure 3: Subject Site Zoning (Extract of Zoning Map B of the existing CDP).

2.2. Development Proposal

The development being put forward for consideration can be described as follows:

Dwyer Nolan Developments Ltd. wishes to apply for permission for a Large-Scale Residential Development (LRD) on this site, c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref.s. 2713/17 (as extended under Ref. 2713/17/X1), 2737/19 & 4549/22).

The proposed development provides for 321 no. apartments, comprised of 104 no. 1 bed, 198 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to thirteen storey buildings, over basement level, with 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space (total c.1,460sq.m), all located at ground floor level, as well as a one storey residential amenity unit, facing onto Santry Avenue, located between Blocks A & D.

The proposed development consists of the following:

- (1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).**
- (2) Construction of 321 no. 1, 2, & 3 bed apartments, retail units, medical suite / GP Practice, community/arts & culture space, and a one storey residential amenity unit in 4 no. buildings that are subdivided into Blocks A-G as follows:**



- Block A is a 7-13 storey block consisting of 51 no. apartments comprised of 22 no. 1 bed, 23 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132sq.m & c.172sq.m respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. retail unit (c.164sq.m) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130sq.m). Refuse storage areas are also provided for at ground floor level.
 - Block C is a 7 storey block consisting of 53 no. apartments comprised of 14 no. 1 bed & 39 no. 2 bed dwellings. Adjoining same is Block D which is an 8 storey block consisting of 44 no. apartments comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed dwellings. Ground floor, community/arts & culture space (c. 583sq.m) is proposed in Blocks C & D, with refuse storage area also provided for at ground floor level.
 - Block E is an 8 storey block consisting of 49 no. apartments comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 52 no. apartments comprised of 13 no. 1 bed & 39 no. 2 bed dwellings. Ground floor, community/arts & culture space (c.877sq.m) is proposed in Blocks E & F. A refuse storage area, bicycle storage area, substation, & switchroom are also provided for at ground floor level of Blocks E & F.
 - Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
- (3) Construction of a 1 storey residential amenity unit (c. 166.1sq.m) located between Blocks A & D.
- (4) Construction of basement level car park (c.5,470.8sq.m), accommodating 161 no. car parking spaces, 10 no. motorbike parking spaces & 672 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 33 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
- (5) Public open space of c. 1,791sq.m is provided for between Blocks C-D & E-F. Communal open space is also proposed, located between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit, totalling c.2,986sq.m. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
- (6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
- (7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.



3.0. Planning Policy

For the purposes of this report, Armstrong Fenton Associates have reviewed national, regional, and local planning level planning policy relating to childcare and school provision. These policy documents are discussed in detail below.

3.1. Project Ireland 2040 – The National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of the country to cater for a projected population increase of one million people up to the year 2040. The NPF is accompanied by the National Development Plan, a 10-year capital investment strategy, and together they are known as Project Ireland 2040.

Childcare, Education and Life-Long Learning

Chapter 6, Section 6.5, of the NPF has regard to school provision. The NPF states that access to a high standard of education should be a priority. The NPF acknowledges the existing school system is experiencing contrasting pressures. Certain parts of the country, where a high level of population growth has occurred, are unable to meet the demand for school places while in other parts of the country the viability of some schools experiencing population decline is being called into question. These contradicting elements underscore the need for the planning system to strategically assess and plan for the provision of school facilities to ensure sustainable development of new and existing communities. The NPF therefore seeks to prioritise the alignment of targeted and planned population and employment growth with educational investment.

Of relevance to this report is the following National Policy Objective:

- **National Policy Objective 31** - *"Prioritise the alignment of targeted and planned population and employment growth with investment in:*
 - *A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;*
 - *The provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built-up areas, that meet the diverse needs of local populations;*
 - *The expansion and consolidation of Higher Education facilities, particularly where this will contribute to wider regional development, and*
 - *Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified".*

3.2. Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (2019-2031)

The NPF is underpinned by the establishment of statutory Regional Spatial & Economic Strategies. The Eastern & Midland Regional Spatial & Economic Strategy 2019 - 2031 (RSES) is the relevant regional strategy for the development proposal. The RSES is a strategic plan and investment framework which aims to shape the future development of the Eastern & Midland Region up to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the State. To this end, the RSES notes that the provision of school facilities is of critical importance not just for child development but also for parents in the labour market.

Access to Childcare, Education and Health Services

Chapter 9, Section 9.6 of the RSES has regard to school provision. It is stated that a key aim of the RSES is to:

"address misalignment in the Region across a range of factors including school provision, facilities, and child-friendly amenities. School provision is a key part of social infrastructure to be provided in tandem with housing provision. The RSES will seek to prioritise the alignment of targeted and planned population and employment growth with educational investment, including the provision of new schools on well-located sites within or close to existing built-up areas that meet the diverse needs of local populations".

The RSES projects that the number of children in the country will continue to increase until the mid-2020s and as such, the provision of schools is a priority for the foreseeable future. Ideally, new school facilities should be located along sustainable transport corridors (i.e. walking, cycling, public transport). The RSES states that County / City Development Plans should provide a planned approach to new educational facilities.

Of relevance to this report are the following Regional Policy Objectives:

- **Regional Policy Objective 9.21** - *"In areas where significant new housing is proposed, an assessment of need regarding schools' provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations".*

This report addresses the above requirements.

3.3 The Provision of Schools and the Planning System: A Code of Practice (2008)

The Provision of Schools and the Planning System: A Code of Practice Guidelines stipulate the methodology for forecasting future education demand. The Guidelines state that the identification of future primary school demands should be based upon:

- *The anticipated increase in overall population for the city/county plan area over the next nine years (as set out in relevant development or local area plans).*
- *The current school-going population based on school returns.*
- *The increase in school going population, assuming that an average of 12% of the population are expected to present for primary education; and,*
- *The number of classrooms required in total derived from the above".*

Regarding post-primary schools, the Guidelines note the following in relation to the identification of future demand: *"in some cases, be more complex as it involves not just an assessment of likely population growth but also an appraisal of the capacity of existing post-primary schools, coupled with an assessment of the enrolment patterns in existing and anticipated 'feeder' national schools".*

3.4 Dublin City Development Plan 2022- 2028

The Dublin City Development Plan 2022-2028 (hereafter CDP) is the current statutory Development Plan relevant to the development proposal and details the overall strategic policies and objectives for the city, including Harold's Cross.

Chapter 5, Section 5.58 Social and Community Infrastructure "School and Education" of the CDP has regard to education provision of schools and education facilities in the administrative boundary of the Council. With regard to school facilities, the Development Plan states that: *"...schools and education facilities are essential social*

infrastructure for new and existing city neighbourhoods. National policy highlights the importance of aligning demographics with educational provision" – (p. 161).

The CDP recognises that education has an important role to play in developing sustainable and balanced communities and that school provision should form an integral part of the evolution of compact sustainable urban development. This includes residential areas, employment nodes, large educational establishments, district, and neighbourhood centres and in locations convenient to public transport networks. The CDP further states that such provisions for school facilities within new and existing residential areas shall also have regard to the capacity and geographical distribution of established school facilities within the locality and the emerging demographic profile of the area.

Of relevance to this report are the following CDP Policies:

Policy Objective QHSN53: Education Provision

"(i) To support the provision of new schools and the expansion of existing school facilities having regard to the requirements of the DES. (ii) To protect and retain the entire curtilage of school sites, including buildings, play areas, pitches and green areas, that may be required for the expansion of school facilities in the future, unless the Council has determined in agreement with the Department of Education that the use of the site for school provision is no longer required. (iii) To support the ongoing development and provision of third level education, further education and lifelong learning in the city."

Policy Objective QHSN54: Shared Use of Educational Facilities

"(i) To encourage the co-location of schools/education facilities as part of education campuses and with other community uses to create community hubs. (ii) To support the shared use of school or college grounds and facilities with the local community, outside of core hours, anchoring such uses within the wider community."

4.0. Methodology

4.1. Having regard to the planning policy documents outlined in the previous section, it is evident that an assessment of the existing educational facilities is required as part of the proposed Large-scale Residential Development located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.

4.2. To assess same, it is necessary to establish a baseline which can then allow future demand estimations to be made, based on demographic trends and the associated impact of the proposed development. Therefore, a methodology for the assessment of school facilities has been developed in accordance with the guidance provided in the aforementioned planning policy documents, involving the following steps:

- Determining the extent and provision of existing school facilities in the vicinity of the development proposal;
- Undertaking a study of the current demographic trends and demand for existing school facilities in the vicinity of the development proposal;
- Estimating the level of demand for school facilities that may arise from the development proposal.

4.3. For the purposes of this Schools Demand Assessment, a study area has been defined by 2 km radius or 20 minute walk radius created around the centre of the development site, as per Figure 4 overleaf:

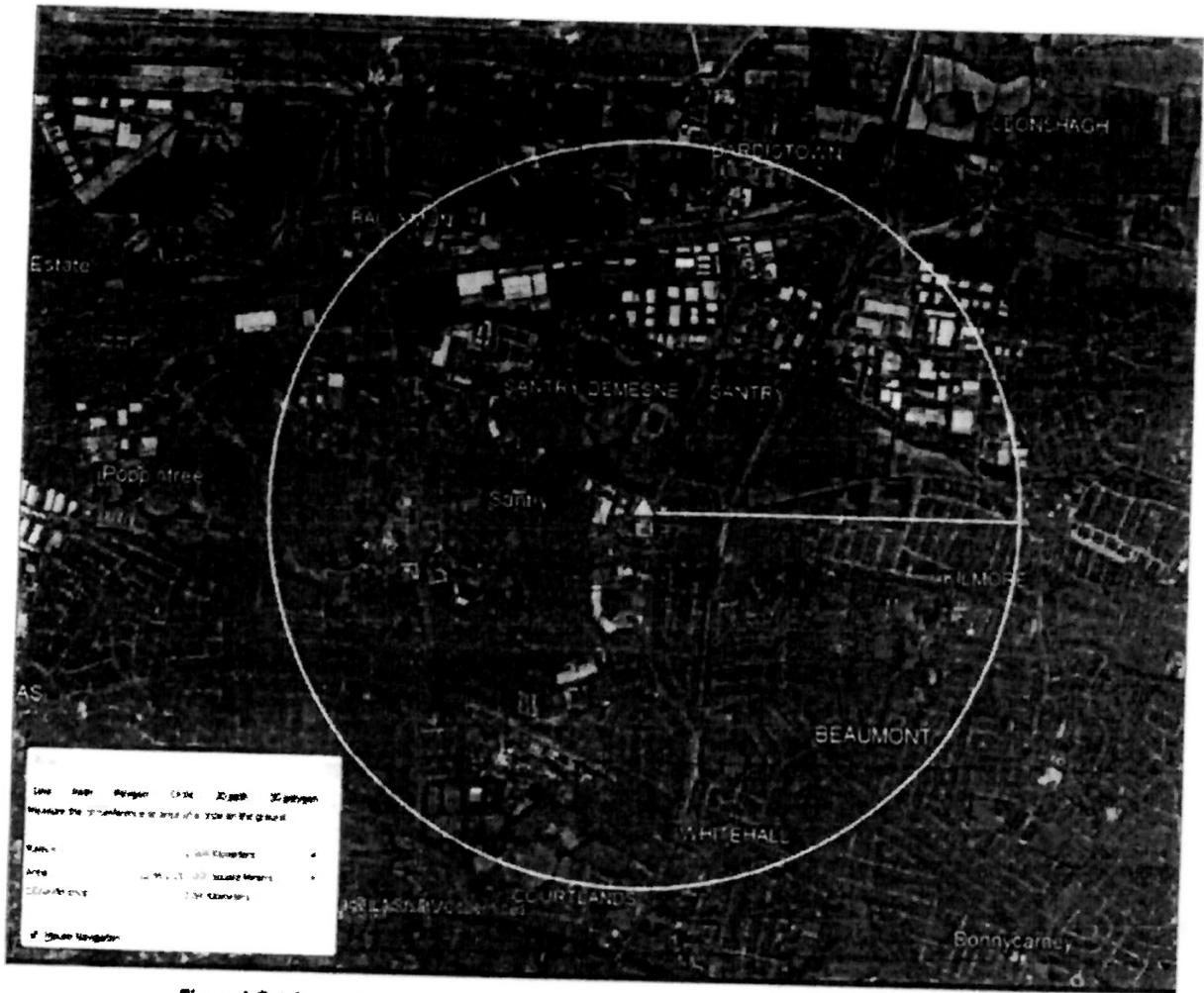


Figure 4. Catchment Area around site (2 km) - (Note: Subject Site identified with yellow triangle)

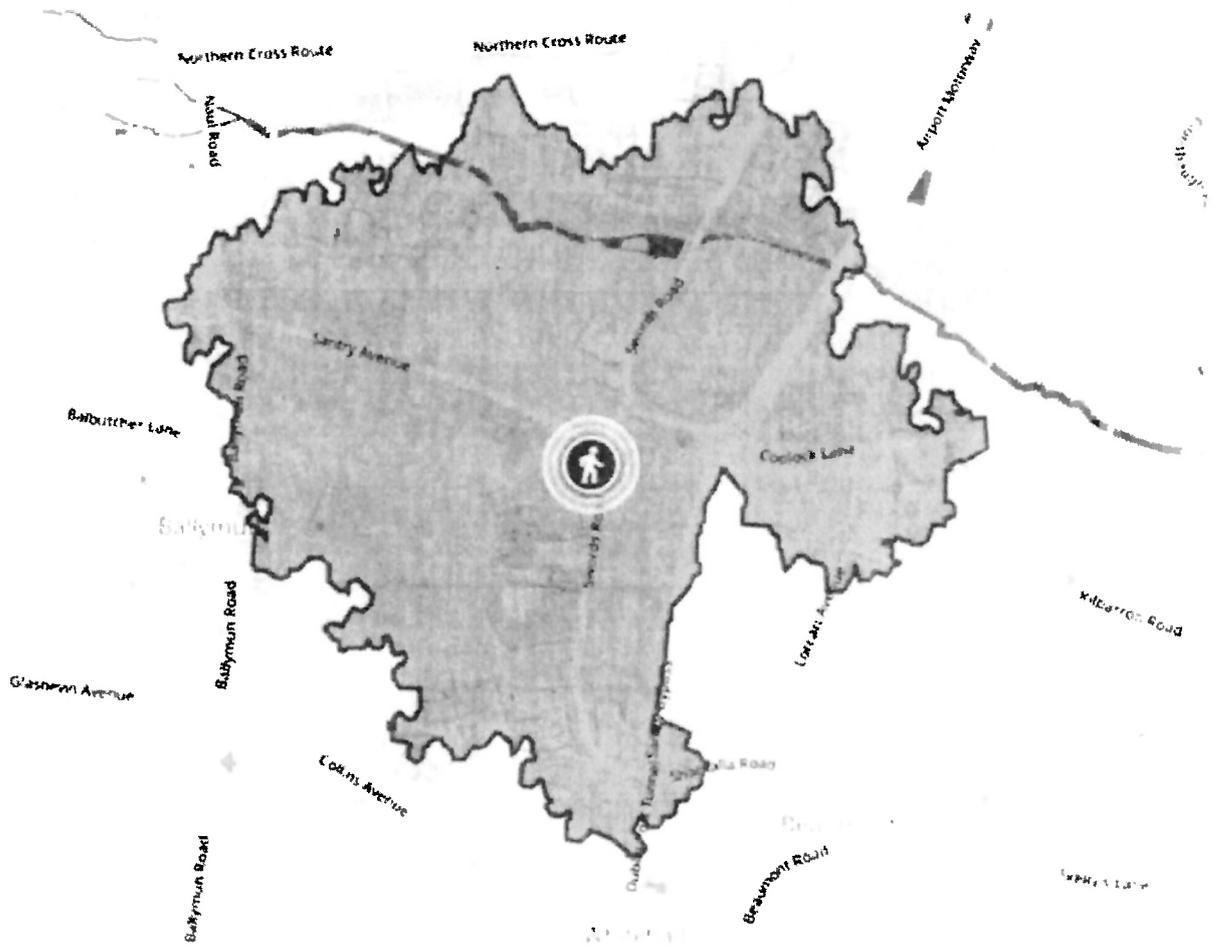


Figure 5: 20 minute walk radius from Subject Site.
(Subject Site identified with Blue walking symbol)

5.0. Demographic Profile

The following section outlines a review of population data to establish local population trends. The analysis is largely based on the Census 2016 and Census 2022 data available from the CSO website (www.cso.ie). As previously stated, the study area was defined through the selection of ED Census data.

5.1. Population Change 2016 - 2022

The 2022 Census Results revealed that the State's population grew by 8% over the five year period from 2016 to 2022. Comparative data indicates that the populations of County Dublin (7.5%), the Catchment Area (11%) and Whitehall DED (25%) also grew during the five year period from 2016 to 2022. The overall population trend is expected to continue with increased population growth and urbanisation putting pressure on the need for more residential development. Table 1 below, summarises the population changes discussed above.

	State	Dublin	Catchment Area	Whitehall DED
2016	4,761,865	1,347,359	15,679	2,153
2022	5,149,139	1,458,154	16,125	2,908
Change	387,274	110,795	446	755
Percentage	7.5%	7.5%	2.7%	25%

Table 1: Whitehall C DED, Catchment Area, County and State Population Change 2016-2022:

(Source: CSO.ie)

5.2. Children per Family

The 2022 Census Results revealed that the average number of children per family in the State was 1.34. The CSO 2022 details that the average number of children per family in Artane-Whitehall, Dublin City Local Electoral Area is 1.28.

5.3. Population Age Distribution (5-18 Year Age Cohort)

Projections for future school demand need to consider the number of children expected to attend primary and post-primary school system in the coming years. It is therefore considered appropriate to examine in detail 5-18 year age cohort in the study area as it will illustrate the demand for education within the area.

The 2022 Census Results detail that the population of school children (5-18 years) in the State was 989,904 no children, a decrease of 14.2% compared to the 2016 Census (920,281).

The 2022 Census detail that there were 2,238 no. children in the 5-18 age cohort in the catchment area representing 3.7% of the population. In 2016 the 5-18 age cohort, 2,438 no. children, represented 4.5% of the catchment area. Table 2 below, summarises the population changes for the 5-18 age cohort discussed above.

Catchment Area	2016	2022
Total Population	15,679	16,125
5-18 Age Cohort	2,438	2,238
% of Total Population	4.5%	3.7%

Table 2: Population change 2016 - 2022 (5-18 age cohort)



It is evident from the above that the 5-18 age group cohort population within catchment area has had contrasting fluctuations over the last two Census periods. In percentage terms the 5-18 age cohort population has decreased in the catchment area by c. 8%.

5.4 Conclusions on School Demand

Based on the planning policy documents discussed in this report and the details of the Large-scale Residential Development application subject to this report, it is evident that the population of 5-18 year old is decreasing within the catchment area. This ensures adequate school spaces for future children moving into the area.

6.0. Assessment of School Provision

This section of the Childcare and School Demand Assessment identifies and examines the existing primary and post-primary school facilities in a defined 2 km radius of development site; and considers the expected demand to be generated by the development.

To establish a baseline of existing capacity it is necessary to first identify each of the existing school facilities in the study area. This was undertaken through a comprehensive desktop research which used publicly available information and sources. These sources include for information available from:

- Primary school Enrolment Figures 2023/2024 (<https://www.gov.ie/en/collection/primary-schools/>)
- Post-Primary School Enrolment Figures 2023/2024 (<https://www.gov.ie/en/collection/post-primary-schools/>)

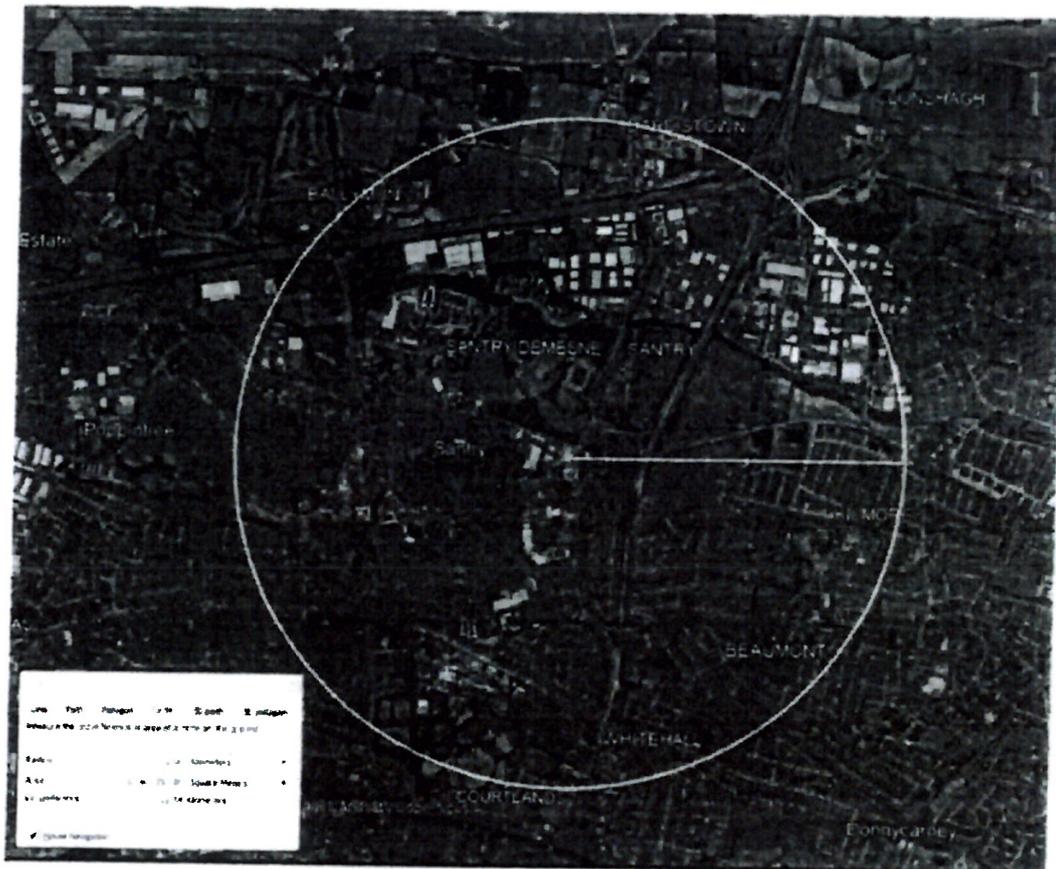


Figure 6: 2km Radius from subject site.

6.1. Existing Primary Schools



The Department of Education and Skills provides details on enrolment figures for all primary schools on an annual basis which are available from their website, www.education.ie. Based upon the defined 2 km radius, the Department of Education and Skills records show that there are a total of 8 no. primary schools within a 2 km radius of the subject site, as detailed in Figure 7 below.



Figure 7: Existing Primary School Facilities within 2km of subject site.

The enrolment figures for the identified primary schools were obtained from the Department of Education and Skills. Details of existing primary schools found within a 2 km radius of the subject site, their enrolment figures for the 2023 / 2024 academic year can be found in Table 3 below.

Number	Name	Type	2023 / 2024 Enrolment	Distance from Subject Site
1	Gaelscoil BhaileMunna	Mixed	172	1.2 km
2	St. Paul's Special School	Mixed	54	4.7 km
3	St. Fiachra's Senior National Catholic School	Mixed	642	3.4km
4	St. David's Boys National School	Boys	268	3.8km
5	HolyChild National School	Mixed	483	3.3 km
6	HolyChild Boys National School	Mixed	483	3.2 km
7	North Dublin National School Project	Mixed	216	4.4 km
8	Corpus Christi G.N.S.	Girls	397	4.7 km
Total			2715	

Table 3: Existing Primary School Facilities

It is evident from above that there are 8 no. primary schools within the designated catchment area of the development site which have a total existing enrolment of 2,715 no. students.



Details of the existing primary school identified and its enrolment figures for the 2023 / 2024 academic year can be found in Table 3 above. Enrolment figures for individual schools were sourced from the Department of Education website (<https://www.gov.ie/en/collection/primary-schools/>).

The demand for primary school places created by a development is projected on the basis that an average of 12% of the population are expected to present for primary education as per the methodology of the 'The Provisions of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of the Environment, Heritage and Local Government' guidance (DEHLG, 2008 and assuming an average household occupancy of 2.48 persons per dwelling in Dublin City, as per the 2022 Census statistics). The table below discounts the 102 no. proposed 1-bedroom dwellings due to the likelihood of these units being occupied by young childless couples or single workers.

It should be noted however that the development proposal caters for a mix of residential dwellings which provides for 1, 2 & 3 bedroom units. The proposed mix is put forward so that the development is capable of supporting persons at all stages of the lifecycle particularly young couples seeking to get onto the property ladder and older persons who may be looking to downsize. It is therefore reasonable to assume that not all the proposed dwellings will accommodate families with children of primary school going age. Taking the above into account, the population generated from 2 bed and 3 bed apartments (c. 538 persons). It is assumed that 65 no. children (12%) generated from the proposed development will need primary school education.

No. of Dwellings (minus Studios + 1 bed units)	Average Household Size	Projected Population	Projected Primary School Attending Population
217	2.48 persons	538 persons	65 (12%)

Table 4: Projected Primary School Attending Population

The 8 no. existing primary schools identified in the Childcare and School Demand Assessment have a current enrolment of c. 2, 715 no. students or an average of c. 339 no. students in each school year (i.e., junior & senior infants and 1st- 6th class). It is therefore considered reasonable to estimate that a combined number of c. 339 no. students will graduate from the primary school system each year amongst the 8 no. identified primary school.

The development proposal consists of 321 no. apartment units, it is assumed that 65 no. primary school spaces will be needed in the catchment area for future residents. Given that c. 339 no. student will graduate each year from the 8 no. existing primary schools, it is evident that there are adequate spaces for the 65 no. children to attend local primary schools near the proposed development.

Handwritten calculations and notes:
 321 total units
 102 = 1 bed
 199 = 2 bed + 3 bed
 199 x 2.48 = 494
 199 x 3 = 597
 494 + 597 = 1091
 1091 x 12% = 130.92
 131 (rounded)
 131 + 339 = 470

6.2. Existing Post-Primary Schools

The Department of Education and Skills provides details on enrolment figures for all post-primary schools on an annual basis which are available from their website, www.education.ie. Based upon the defined 2 km radius, the Department of Education and Skills records show that there is a total of 5 no. post-primary schools within a 2km radius of the subject site, as detailed in Figure 8 below.



Figure 8: Existing Post-Primary School Facilities within 2 km of subject site.

As with the primary school facilities, there is little publicly available information on the number of existing vacancies in individual schools. Therefore, while enrolment figures were obtained from the Department of Education and Skills. Details of existing post-primary schools found within a 2 km radius of the subject site, their enrolment figures for the 2023 / 2024 academic year can be found in Table 5 below.

Number	Name	Type	2023 / 2024 Enrolment	Distance from Subject Site
1	St Aidans CBS	Boys	722	2.6 km
2	St. Mary's Secondary School	Girls	834	5.1 km
3	Ellenfield Community College	Mixed	112	2.8 km
4	Coolock Community College	Mixed	174	2.4 km
6	Rosmini Community College	Mixed	82	4.1 km
	Total	-	1,924	-

Table 5: Existing Post-Primary School Facilities

It is evident from above that there are 6 no. post-primary schools within the designated catchment area of the development site which have a total existing enrolment of 1,924 no. students.

Details of the existing post-primary school identified and its enrolment figures for the 2023 / 2024 academic year can be found in Table 8 above. Enrolment figures for individual schools were sourced from the Department of Education website (<https://www.gov.ie/en/collection/post-primary-schools/>).



The Provisions of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of the Environment, Heritage and Local Government guidance (DEHLG, 2008) does not provide a methodology for calculating the demand for school places in secondary schools and states that the procedure for establishing demand for new second-level schools is, in some cases, more complex. Notwithstanding this, it is assumed here that the identified primary school going population of the development would be matched by the secondary school going population. It is expected that c. 320 no. post-primary pupils will graduate each year into third level education. (1,924 no students evenly distributed across 6 post-primary school years – 1st year to 6th year).

Based on all the foregoing, it is considered that the expected post-primary school population generated by the development proposal can be adequately meet by existing post-primary schools in the vicinity of the development site.

7.0. Overall Conclusions

This School Demand Assessment is put forward in support of the proposed Large-scale Residential Development on on lands at junction of Santry Avenue and Swords Road, Santry, Dublin 9. The report aimed to outline the existing range of educational services in the vicinity of the development proposal; describe the expected demand for these services to be generated by the development proposal; and offer insights into the future capacity of the existing facilities.

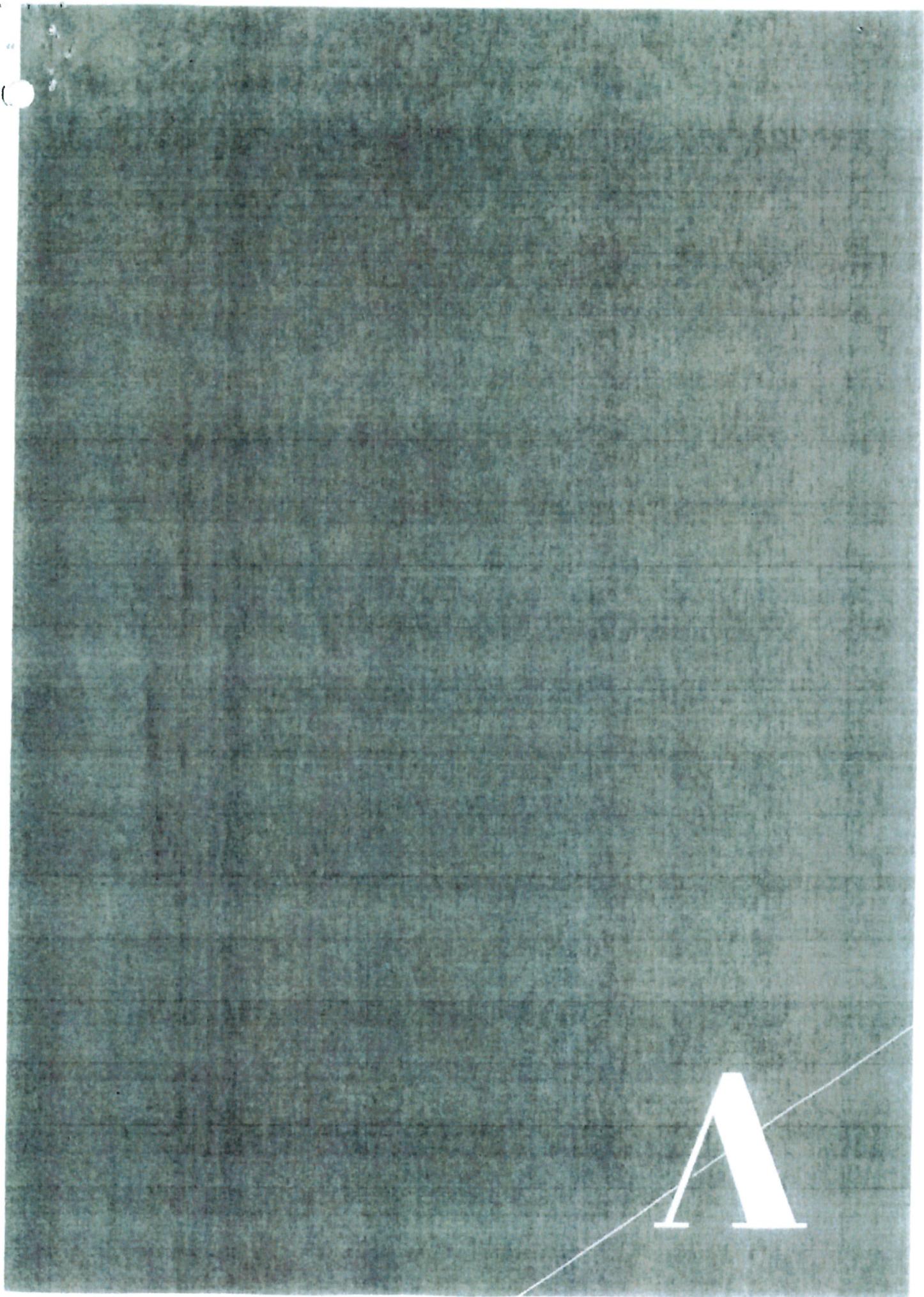
As per the recommendations of planning policy guidelines discussed in Section 5 of this report, a full demographic analysis has been conducted together with an assessment (Section 6) of the existing primary school and post-primary school facilities in the area and has provided a clear evaluation of the future demand that will arise as a result of the development proposal.

The proposed development consists of 321 no. dwellings comprised of:

- 104 no. 1 bed apartments
- 198 no. 2 bed apartments
- 19 no. 3 bed apartment.

In relation to primary and post primary education, national and local planning policy guidance recommends that 12% of the population generated from the proposed development are expected to seek primary education. It is assumed that 65 no. children will be future residents of the proposed development. The existing primary and post-primary schools have adequate spaces for future residents of the proposed development.

Having regard to this School Demand Assessment, it is considered that the proposed development represents efficient and sustainable development of the site and complies with the zoning objectives attached to the site, specifically the requirement to provide for necessary educational facilities to support the new residential community.



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**An Roinn Pleanála & Forbairt Maoiné, Bloc 4, Urlár 3 ,
Oifigi na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8**

**Planning & Property Development Department, Dublin City Council,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8**

T: (01) 222 2288
E. planningsubmissions@dublincity.ie

To Whom It May Concern,

The Planning Authority wishes to acknowledge receipt of your **submission/observation** in connection with the above planning application. It should be noted that the Dublin City Council as the Planning Authority will consider this application strictly in accordance with the provisions of the Dublin City Development Plan. The contents of your submission/observation will be considered by the **Case Officer** during the assessment of the above application, and you will be notified of the decision in due course.

- All queries should be submitted to the e mail address shown above.
- Please note that a request for Further Information or Clarification of Further information is not a decision.
- **You will not be notified**, if Further Information or Clarification of Further information is requested by the Planning Authority.

Please also note that a weekly list of current planning applications and decisions is available for inspection at the planning public counter.

Opening Hours 9 a.m. - 4.30 p.m. Monday to Friday (inclusive of lunchtime)

A weekly list of planning applications and decisions is available for inspection at all Dublin City Council Libraries & on **Dublin City Council's website**. www.dublincity.ie.

Yours faithfully,

FOR ADMINISTRATIVE OFFICER

**An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3,
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8**

**Planning & Property Development Department, Dublin City Council,
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John Nolan
134, Santry Close
Dublin 9
D09PF57

IMPORTANT: Please retain this letter. You will be required to produce it should you wish to appeal the decision issued by the Planning Authority to An Bord Pleanála in relation to this development

PLAN NO.
DATE RECEIVED:
LOCATION :
PROPOSAL :

LRD6044/24-S3A

18-Apr-2024

The junction of Santry Avenue and Swords Road, Santry, Dublin 9
Permission for a Large-Scale Residential Development (LRD) on this site, c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref.s. 2713/17 (as extended under Ref. 2713/17/X1), 2737119 & 4549/22). The proposed development provides for 321 no. apartments, comprised of 104 no. 1 bed, 198 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to thirteen storey buildings, over basement level, with 3 no. retail units, a medical suite / GP Practice unit and community /arts & culture space (total c.1, 460sq.m), all located at ground floor level, as well as a one storey residential amenity unit, facing onto Santry Avenue, located between Blocks A & D. The proposed development consists of the following:(1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4, 196.8m²) (2) Construction of 321 no. 1, 2, & 3 bed apartments, retail units, medical suite /GP Practice, community/arts & culture space, and a one storey residential amenity unit in 4 no. buildings that are subdivided into Blocks A-G as follows: Block A is a 7-13 storey block, consisting of 51 no. apartments, comprised of 22 no. 1 bed, 23 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132sq.m & c.172sq.m respectively). Adjoining same is Block B, which is a 7 storey block, consisting of 38 no. apartments, comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. retail unit (c.164sq.m) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130sq.m). Refuse storage areas are also provided for at ground floor level. Block C is a 7 storey block, consisting of 53 no. apartments, comprised of 14 no. 1 bed & 39 no. 2 bed dwellings. Adjoining same is Block D which is an 8 storey block, consisting of 44 no. apartments, comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed

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dwelling. Ground floor, community/arts & culture space (c. 583sq.m) is proposed in Blocks C & D, with refuse storage areas also provided for at ground floor level. Block E is an 8 storey block, consisting of 49 no. apartments, comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F, which is a 7 storey block consisting of 52 no. apartments, comprised of 13 no. 1 bed & 39 no. 2 bed dwellings. Ground floor, community/arts & culture space (c.877sq.m) is proposed in Blocks E & F. Block G is a 7 storey block, consisting of 34 no. apartments, comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level. (3) Construction of a 1 storey residential amenity unit (c. 166.1sq.m) located between Blocks A & D. (4) Construction of basement level car park (c.5, 470.8sq.m), accommodating 161 no. car parking spaces, 10 no. motorbike parking spaces & 672 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 33 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level. (5) Public open space of c. 1, 791sq.m is provided for between Blocks C-D & E-F. Communal open space is also proposed, located between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit, totalling c.2, 986sq.m. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels. (6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17). (7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc. An Environmental Impact Assessment Report has been prepared in respect of the proposed development. The application together with the Environmental Impact Assessment Report may be inspected online at the following website set up by the applicant: www.santryavenuelrd.ie

Note: Submissions/Observations may be made on line at:

<https://www.dublincity.ie/residential/planning/planning-applications/object-of-support-planning-application>