

***Modifications to Previously
Approved Development SHD
ABP-305563-19 at
Fortunestown Lane &
Parklands Parade, Saggart,
Co. Dublin***

Applicant:
Greenacre Residential DAC



PLANNING REPORT
(LRD STAGE 3)

May 2024

CONTENTS

1.0	INTRODUCTION	1
1.1	PURPOSE OF REPORT	1
1.2	LRD DEFINITION	1
1.3	STRUCTURE/ METHODOLOGY OF REPORT	2
1.4	PROPOSED DEVELOPMENT WITHIN THE OVERALL PLANNING POLICY FRAMEWORK	2
2.0	PROPOSED DEVELOPMENT	4
2.1	THE SITE	4
2.3	PLANNING HISTORY	6
2.4	PROPOSED DEVELOPMENT	6
3.0	STATEMENT OF RESPONSE TO LRD OPINION.....	9
3.1	S.247 CONSULTATION WITH SDCC.....	9
3.2	RESPONSE TO LRD OPINION	9
4.0	DEVELOPMENT PLAN ZONING AND POLICY.....	15
4.1	LAND USE ZONING	15
4.2	MAP BASED OBJECTIVES	16
4.3	POLICY OVERVIEW	17
5.0	SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENTS – GUIDELINES FOR PLANNING AUTHORITIES 2024	22
5.1	DENSITY	22
5.2	QUALITY URBAN DESIGN AND PLACEMAKING	25
5.3	DEVELOPMENT STANDARDS FOR HOUSING	28
6.0	SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS – GUIDELINES FOR PLANNING AUTHORITIES 2023	29
6.1	DESIGN STANDARDS FOR NEW APARTMENTS.....	29
6.2	UNIT MIX / DEVELOPMENT PLAN POLICY H1 OBJECTIVE 12	31
7.0	OTHER DEVELOPMENT MANAGEMENT STANDARDS	33

7.1	OVERVIEW ASSESSMENT	33
7.2	GENERAL RESIDENTIAL STANDARDS	33
7.3	COMMUNITY AND SOCIAL INFRASTRUCTURE AUDIT	35
7.4	PART V	39
7.5	ROADS AND TRANSPORTATION	39
7.6	WATER SERVICES.....	41
7.7	SURFACE WATER DRAINAGE	41
7.8	PUBLIC LIGHTING	42
7.9	CLIMATE ACTION AND ENERGY	42
7.10	CONSTRUCTION MANAGEMENT.....	42
7.11	WASTE MANAGEMENT	42
7.12	ARCHAEOLOGY AND BUILT HERITAGE	43
7.13	ECOLOGY AND APPROPRIATE ASSESSMENT	43
7.14	ENVIRONMENTAL ASSESSMENT	43
8.0	DEVELOPMENT PLAN STATEMENT OF CONSISTENCY	44
9.0	CONCLUSION.....	45

1.0 INTRODUCTION

1.1 PURPOSE OF REPORT

This Planning Report has been prepared on behalf of Greenacre Residential DAC (Applicants) to accompany an application to South Dublin County Council for development on lands at Fortunestown Lane and Parklands Parade, Saggart, Co. Dublin.

The proposed development comprises modifications to a previously permitted Strategic Housing Development (Reg. Ref. ABP-305563-19). South Dublin County Council have determined that the current application will be assessed under the Large-scale Residential Development (LRD) procedure.

1.2 LRD DEFINITION

This application is therefore a Large-scale Residential Development (LRD) made pursuant to the *Planning & Development (Amendment) (Large-scale Residential Development) Act 2021*. The LRD Act is supported by the *Planning and Development (Large-scale Residential Development) Regulations 2021* which prescribes the procedural and administrative arrangements relating to LRDs.

The LRD Act defines ‘Large-scale Residential Development’ (LRD) as follows:-

‘Large-scale residential development’ means a development that includes—

(a) the development of 100 or more houses,

(b) the development of student accommodation that includes 200 or more bed spaces,

(c) both the development of 100 or more houses and of student accommodation, or

(d) both the development of student accommodation that includes 200 or more bed spaces and of houses,

where the LRD floor space of—

- 1. in the case of paragraph (a), the buildings comprising the houses,*
- 2. in the case of paragraph (b), the student accommodation,*
- 3. in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation, is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;’*

The LRD Act defines ‘**LRD floor space**’ as: -

‘LRD floor space, in relation to a building or part of a building, means the area ascertained by the internal measurement of the floor space on each floor of a

building or part of a building (including internal walls and partitions), disregarding any floor space provided for –
(a) the parking of vehicles by persons –
(i) occupying or using the building or the part of the building,
(ii) for a purpose incidental to the primary purpose of the building or part of the building,
and
(b) ancillary residential services, including gyms and childcare facilities.’

1.3 STRUCTURE/ METHODOLOGY OF REPORT

The purpose of this report is:

1. To provide background information on the site and the proposed development.
2. To provide the planning authority with the relevant information on the project having regard to the information requirements of the primary legislation and the forms prescribed in the regulations.
3. To outline how the development complies with the relevant zoning, policies and development standards contained in the Development Plan.
4. To identify where specific design and technical matters are addressed in other reports submitted as part of the current application and to indicate how the development has been designed to incorporate these inputs. A full list of the supporting reports is included within the ***Schedule of Planning Application Contents*** attached to the BMA Planning Cover Letter.

In addressing the above, this Planning Application Report provides an overarching summary of the proposed development to support a grant of planning permission for the proposal.

1.4 PROPOSED DEVELOPMENT WITHIN THE OVERALL PLANNING POLICY FRAMEWORK

The national and regional plans provide top-down spatial planning context and guidance and have informed the local Development Plan. Therefore, it is not intended to recite the contents of these plans other than to the extent that they are mentioned in the local Development Plan or are of direct relevance to the proposed development.

Section 28 Ministerial Guidelines are also an important part of the overall planning framework and a factor in the design of the proposed development. In accordance with the provisions of Section 34 of the Planning and Development Act 2000 (as amended), when making a decision in relation to an application for development covered by the guidelines, the planning authority is required to have regard to the policies and objectives of the Guidelines. The planning authority is also required to apply Specific Planning Policy Requirements (SPPRs).

In the context of an LRD application, the relevant Section 28 Guidelines are:

- Section 28 Guidelines for Planning Authorities – Sustainable Residential Development and Compact Settlements (January 2024)
- Section 28 Guidelines for Planning Authorities - Design Standards for New Apartments (July 2023)
- Section 28 Guidelines for Planning Authorities - Regulation of Commercial Institutional Investment in Housing (July 2023)
- Urban Development and Building Height Guidelines for Planning Authorities, 2018
- Design Manual for Urban Roads and Streets - 2019
- The Planning System and Flood Risk Management - Guidelines for Planning Authorities (Nov 2009)
- Guidelines for Planning Authorities - Part V of the Planning and Development Act, 2000 (and Implementation Manual and subsequent updates).

2.0 PROPOSED DEVELOPMENT

2.1 THE SITE

The application site of c.4.2ha is located at Fortunestown Lane and Parklands Parade Saggart, Co. Dublin and comprises an undeveloped site sloping from south to north.

The site is bound by the Luas Red Line, Saggart Luas Stop and Fortunestown Lane to the south. The Carrig Court and Cuil Duin residential developments are situated to the east. Parklands Parade and the Parklands housing development within the applicant's ownership are located to the north extending as far as Bianconi Avenue. An undeveloped site within third party ownership is located to the west with Garter Lane located further to the west.

Access to the site is currently provided from Fortunestown Lane via Parklands Parade located along the eastern and northern boundaries of the site and west of the Cuil Duin development.

The site comprises Phase 2 of an overall development of 23.9ha with Phase 1 located directly to the north.

Phase 1, known as "Parklands" and comprising 526no. units and public parks totalling 5.1ha, was permitted in 2018 under Reg. Ref. ABP-300555-18 and is currently under construction.

Phase 2, to be known as "Parklands Pointe" and comprising 488no. apartments in 5no. Blocks with non-residential floorspace (1,985sq.m) at ground floor level within Blocks B and C, was permitted in February 2020 under Reg. Ref. ABP-305563-19 and is due to commence construction later in 2024.

The current application relates to Phase 2, "Parklands Pointe" and seeks to provide an additional 86no. apartments increasing the total number of units within Phase 2 from 488no. to 574no. apartment units. Overall, Phase 1 permitted and Phase 2 proposed will accommodate a total of 1,100no. houses and apartments.

Figure 2.1 below illustrates the location and extent of the current application site.



Figure 2.1: Location and Extent of Current Application Site

2.3 PLANNING HISTORY

The following permissions are relevant to the current application: -

- **Reg. Ref. ABP-305563-19 – Parklands Phase 2:** A 10-year permission was granted for 5no. 5 storey blocks, with 9 storey element, accommodating 488no. 1, 2 and 3 bed apartments and non-residential floorspace in the form of a creche, community space and retail/ commercial floorspace. This is the permission proposed to be modified.
- **Reg. Ref. ABP-300555-18 – Parklands Phase 1:** Permission granted for 526no. dwelling units (459no. terraced units and 67no. duplex/ apartments), parks, vehicular access and pedestrian links. The site of this development, known as Parklands, is located directly to the north of the current application site and is currently under construction.

2.4 PROPOSED DEVELOPMENT

The proposed development will consist of modifications to the development permitted under Reg. Ref. SHD ABP-305563-19 which comprised 488no. apartments and 1,985sq.m of non-residential floorspace within 5no. blocks (Blocks A to E) ranging in height from 5 to 9 storeys.

The proposed modifications relate to the previously permitted 5 storey Blocks C, D & E only. The modifications consist of an additional storey on each block and reconfiguration of the previously permitted floor levels to provide an additional 86no. apartment units and a total of 396no. apartments and 752sq.m of non-residential floorspace in lieu of the previously permitted 310no. apartments and 896sq.m of non-residential floorspace within Blocks C, D & E.

Overall, the permitted Blocks A & B and the modified Blocks C, D & E will accommodate 574no. apartments and 1,841sq.m of non-residential floorspace.

2.4.1 Proposed Numbers And Types Of Houses

Blocks A and B remain unchanged and are due to commence construction in 2024.

The proposed Blocks C, D and E comprise: -

Block C: 6-storey block accommodating 129no. units (26no. 1 bed units, 84no. 2 bed units and 19no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square.

Block D: 6-storey block accommodating 140no. units (32no. 1 bed units, 90no. 2 bed units and 18no. 3 bed units).

Block E: 6-storey block accommodating 127no. units (48no. 1 bed units, 65no. 2 bed units and 14no. 3 bed units).

Blocks C, D and E increase in height from 5 to 6 storeys generally from that previously permitted. The total number of units increases from 310no. to 396no. comprising 106no. 1 bed units, 239no. 2 bed units and 51no. 3 bed units.

The total gross floor area of apartment accommodation within Blocks C, D and E comprises 37,184sq.m.

2.4.2 Childcare Facilities

The permitted development (ABP-305563-19) includes a creche of 431sq.m within Block B. No modifications are proposed to Block B or the creche within the current application.

2.4.3 Other Uses

The proposed non-residential floorspace is located at ground floor level within Block C and comprises 3no. retail/ commercial units totalling 555sq.m and a licensed café/ bar / restaurant unit of 197sq.m.

The total gross floor area of residential and non-residential accommodation within the current application is 37,936sq.m.

2.4.4 Key Statistics

KEY STATS	BLOCKS C, D & E		BLOCKS A, B, C, D & E	
	Permitted	Proposed	Permitted	Proposed
No of Units:	310	396	488	574
Unit Mix:	75no. 1beds (24%)	106no. 1beds (27%)	118no. 1beds (24%)	149no. 1beds (24%)
	204no. 2bed (60%)	239no. 2bed (60%)	327no. 2bed (67%)	362no. 2bed (63%)
	31no. 3beds (14%)	51no. 3beds (13%)	43no. 3beds (9%)	63no. 3beds (11%)
Total GFA:	30,563sq.m	37,936sqm	48,495sq.m	55,868sq.m
LRD GFA	29,667sq.m	37,184sqm	46,510sq.m	54,027sq.m
Non LRD GFA	896sq.m	752sqm	1,985sq.m	1,841sq.m
LRD GFA as % Of Total GFA	97%	98%	96%	97%
Housing Density¹	136units/ha	159units/ha.	136units/ha	159units/ ha

¹ The residential density is calculated based on the overall net site area of 3.6ha including Blocks A, B, C, D and E. A total of 178no. apartments are permitted within Blocks A and B. Including the proposed modifications to Block C, D and E to provide 396no. apartments, the total number of units on site will be 574no and the net

Plot Ratio²:	1.14	1: 1.33	1.14	1.34
Site Coverage:	16%	18%	27%	27%
Building Height:	5 storeys	6 storeys	5 – 9 storeys	6 – 9 storeys
Car Parking Spaces:	265no. spaces	342no. spaces	418no. spaces	482no. spaces

residential density will be 159 units per ha increasing from the permitted 134 units per ha under Reg. Ref. ABP-305563-19.

² Plot ratio is calculated based on the overall gross site area of 4.2ha.

3.0 STATEMENT OF RESPONSE TO LRD OPINION

3.1 S.247 CONSULTATION WITH SDCC

A pre-application consultation meeting (Section 247) was held on 04/04/2023 (ref. LRDP002/23). The feedback from the planning authority was generally positive and has been considered within the proposals enclosed. The SDCC LRD Opinion Report (see below) includes the minutes of the S.247 preplanning consultation meeting.

3.2 RESPONSE TO LRD OPINION

An LRD Meeting was held on 26/01/2024 and SDCC's LRD Opinion Report was issued on 15/02/2024 (ref. LRDP004/23). A copy of the Opinion Report is attached within **Appendix A**.

The LRD Opinion concludes that the submitted particulars etc. do constitute a reasonable basis for making an LRD planning application, subject to further consideration and amendment based on the recommendations in the report.

The recommendations by SDCC are contained in 10no. bullet points in the Conclusions and Recommendations Section (pages 19 to 20) of the LRD Opinion Report. **Table 3.1** contains the applicant's response to the recommendations within the 10no. points.

Table 3.1 Applicant's Response to SDCC Conclusion and Recommendations	
SDCC Conclusions & Recommendations	Applicant's Response
1. <i>A statement of response to the issues in the LRD Opinion.</i>	This section of the Planning Report is the applicant's response to the issues in the LRD Opinion.
2. <i>A statement that in the applicant's opinion, the proposal is consistent with the relevant objectives of the South Dublin County Development Plan 2022 – 2028.</i>	A review of relevant Development Plan zoning and policy is contained within Section 4.0 of this report. Section 8.0 below contains a statement on consistency with the Development Plan.
3. <i>The amendment application for an additional 86 dwellings and amendments to existing permitted dwellings is an application of scale. The provision of supporting amenities, services and infrastructure must comply with the current policy framework. The applicant cannot rely on the details of the permitted scheme as justification for the forthcoming application. Similarly, the applicant cannot rely on development outside the red-line boundary to support this forthcoming application.</i>	Noted. The current application replies only on development within the red-line boundary to comply with Development Plan and Section 28 Guidelines requirements with regard to supporting infrastructure and services.

<p>4. <i>The pre-planning documents submitted lack clarity in terms of distinguishing between the permitted scheme and the amendment proposal, this should be remedied at application stage.</i></p>	<p>All documents now included within the application provide clarity with regard to the permitted and proposed developments.</p>
<p>5. <i>Justification of the increase in height and density proposed based on the provisions of the South Dublin County Development Plan 2022 – 2028, in particular Appendix 10 ‘Building Height and Density Guide’, and the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ which came into effect in January 2024. Justification of the density of the development should also be based on the context and setting of the site, including up-to-date accessibility data for the site, in particular Luas capacity.</i></p>	<p>The Architectural Design Statement [Darmody Architecture] contains an assessment of the proposed increase in building height against the criteria contained in the Appendix 10 of the <i>South Dublin County Development Plan 2022 – 2028</i>.</p> <p>Refer to Section 5.0 below for an assessment of the proposed development in the context of the ‘<i>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)</i>’.</p> <p>Up-to-date analysis of the frequency and capacity of public transport serving the site, including the Luas, is contained within the Traffic and Transport Assessment [DBFL].</p>
<p>6. <i>The improvement and expansion of the childcare facility to Block B in line with the recommendations of the SDCC Childcare Committee as a means of uplifting the overall quality of the proposals and reducing the Planning Authority’s concerns about the amenity of the development for prospective residents, in particular in relation to the quantum of public open space for the residents of the additional 86 dwellings should be considered.</i></p>	<p>Section 7.3 of this Planning Report addresses childcare provision to serve the proposed development.</p>
<p>7. <i>Public realm improvements are required to demonstrate that the required on-site quantum of public open space (15%) is provided along with proposals to ensure compliance with policy for 2.4ha per 1000 population, as it pertains to the additional 86 units. The use of roof terraces to provide additional communal open space should be explored. The re-designation of some permitted communal open space as public open space and the abutting of these open space typologies is acceptable subject to clarity of how these spaces are being amended, counted and classified.</i></p>	<p>Compliance with Section 28 Guidelines and Development Plan standards in relation to public open space is addressed in Section 7.2 of this Planning Report.</p> <p>Refer to Landscape Design Statement [Cunnane Stratton Reynolds] for details of location, extent and design of public open space.</p>
<p>8. <i>The amenity value of permitted public and communal open space should be maximized and this enhancement of quality of these open spaces should be clearly demonstrated.</i></p>	<p>Refer to Landscape Design Statement [Cunnane Stratton Reynolds] for details of the amenity value within the proposed public and communal open spaces.</p>

9. <i>Flow route analysis and conveyance plan required to inform SuDS strategy at the site which maximises above ground, natural, attenuation. While it is accepted that SuDS measures at the site have been permitted under SHD3ABP-305563-19, there is an opportunity to enhance and upgrade these proposals, to increase the level of above ground SuDS included within the scheme, minimise piping and incorporate additional green and blue landscape features to manage surface water. This is particularly important given the sites location within Flood Zones A and B.</i>	Refer to Infrastructure Design Report [DBFL] for details of the proposed surface water strategy including SuDS proposals. A Flood Risk Assessment Technical Note [JBA Consulting] is also enclosed.
10. <i>A revised Site-Specific Flood Risk Assessment is required to address the introduction of an additional 86 no. dwellings into Flood Zones A/B, notwithstanding the permitted footprint of any parent permission. The SFRA should exclude the consideration of flood risk intervention measures as these cannot be considered to alter a site's flood risk status as per the Flood Risk Guidelines for Planning Authorities. The Flood Risk Assessment must have a climate change allowance of +20%.</i>	Refer to enclosed Flood Risk Assessment Technical Note [JBA Consulting].

The LRD Opinion Report identifies Specified Information required in addition to Article 23 of the Planning and Development Regulations, as per Article 16(A)(7).

Table 3.2 below lists the Specified Information and the applicant's response.

Table 3.2 Applicant's Response to Specified Information	
Specified Information	Applicant's Response
1. Permitted drawings, including floor plans and elevations, of all blocks for which amendment is sought.	As agreed at the LRD Meeting, a copy of the permitted drawings is provided at A3 for comparison purposes. Refer to Architectural Drawings [Darmody Architecture].
2. Housing Quality Assessment a. Detailed floor plans for all apartment types, colour coded for size, including sq.m of all rooms, storage areas and private amenity spaces along with key dimensions.	Refer to Housing Quality Assessment [Darmody Architecture].
3. Schedule of Accommodation a. To include adequate information in relation to the calculation of Development Contributions.	Refer to Schedule of Accommodation [Darmody Architecture].

b. Section in Planning Report to demonstrate compliance with, or robust justification for not complying with, Policy H1 Objective 12.	Refer to Planning Report , Section 6.2 [BMA Planning].
4. Architect's Design Statement a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan) b. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide	Refer to Architectural Design Statement [Darmody Architecture]. Note: The Architectural Design Statement also includes a Permeability Plan, details of the proposed 6 th storey setback to Blocks C, D and E, details and justification for the proposed materials and finishes.
5. Detailed CGI's of development during summer and winter (trees with and without leaves). a. CGI's should include baseline, permitted and proposed views.	Refer to Aerial, Verified Views and CGIs [3DDB].
6. Elevations of all sides of all buildings, including elevations of internal courtyards.	Refer to Architectural Drawings [Darmody Architecture].
7. Details of proposed elevational materials, minimising the use of render and prioritising high quality, durable materials, in particular at key locations fronting the Luas.	Refer to Architectural Design Statement [Darmody Architecture].
8. Full basement plan for the area under Blocks A and B and Blocks C, D and E. Where a connection or other alterations are proposed that would impact the basement under Blocks A and B, this must clearly be stated on the notices and in the description of development.	Refer to <i>Architectural Drawings</i> [Darmody Architecture]. For clarity, there is no connection between the basement below Blocks A and B and the basement below Blocks C, D and E. No amendments are proposed to the basement below Blocks A and B.
9. Traffic and Transport Assessment a. Updated to include current public transport routes serving the site. b. Capacity study of routes serving the site. c. All drawings within report to be consistent with final proposal.	Refer to Traffic & Transport Assessment Report [DBFL].
10. Sunlight and Daylight Analysis incorporating any changes to the scheme resulting from this Opinion.	See Daylight & Sunlight Assessment Report [3D Design Bureau].
11. Green Infrastructure Plan, to include: a. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County. b. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site.	Refer to Landscape Design Statement and Landscape Drawings [Cunnane Stratton Reynolds].

<ul style="list-style-type: none"> c. Indicate how the development proposals link to and enhance the wider GI Network of the County. d. Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site. e. Proposals for identification and control of invasive species where appropriate, for the site. 	
12. Green Space Factor Calculations – required for proposed scheme and can include separate calculations sheet for permitted development.	Refer to Landscape Design Statement Cunnane Stratton Reynolds].
13. Landscape Scheme, to include: <ul style="list-style-type: none"> a. Planting plan: <ul style="list-style-type: none"> i. Location of species, types of plants, planting sizes and proposed numbers/densities, ii. Implementation timetables, iii. Proposals for future maintenance/management. 	Refer to Landscape Design Statement and Landscape Drawings [Cunnane Stratton Reynolds].
14. Taking in Charge Plan	Refer to Architectural Drawings [Darmody Architecture].
15. Layout Plans, not less than 1:200 scale to show: <ul style="list-style-type: none"> a. Pedestrian and cycle routes throughout the development ensuring cycleways are compliant with the most recent cycle design manual from the NTA. b. Vehicle access points detailing dimensions, sight lines, DMURS compliance and measures to prioritise pedestrian and cycle movements at these points. c. Autotrack detailing the altered basement layout and visibility splay of vehicles exiting the basement level. d. Location of the refuse collection points and associated autotrack/swept path analysis where relevant. e. Location of 20% EV charging car parking spaces f. A total of 5% Mobility Impaired Car Parking Spaces 	Refer to Traffic and Transport Assessment [DBFL] and related drawings.
16. SUDs Strategy, to include: <ul style="list-style-type: none"> a. SUDs Design details b. Flow route analysis for site. c. Comprehensive surface water conveyance plan for the site d. Drawing showing how much surface water is attenuated in m3. 	Refer to Infrastructure Design Report [DBFL].

<ul style="list-style-type: none"> e. Revised report showing surface water attenuation calculations for proposed development. f. Revised calculation reports showing increased surface water attenuation provided and show calculations for same. Examine if additional surface water attenuation can be provided in green areas and by means of SuDS (Sustainable Drainage Systems). g. If underground tanks present, why these cannot be excluded from the design. h. SUDs Layout identifying the different types of SUDs features. i. Demonstrate adherence to SDCC SUDs guidance. j. Drawing showing plan and cross-sectional views of all SuDS features. 	
17. SUDS Management Plan	Refer to Infrastructure Design Report [DBFL].
18. Confirmation of Feasibility from Irish Water	Refer to Infrastructure Design Report [DBFL].
19. Appropriate Assessment Screening Report	Refer to Screening Report for Appropriate Assessment [Openfield].
20. Environmental Impact Assessment Report (EIAR) or Screening Report as necessary	Refer to EIA Screening Report [BMA Planning].
21. Building Lifecycle Report	Refer to Building Lifecycle Report [GRDAC].
22. Community and Social Infrastructure Audit	Refer to Section 7.3 of this Planning Report.
23. Part V Proposals	Refer to Section 7.4 of this Planning Report [BMA Planning].

4.0 DEVELOPMENT PLAN ZONING AND POLICY

4.1 LAND USE ZONING

The *South Dublin County Development Plan 2022-2028* is the statutory Development Plan for the area.

The zoning for the subject site is: Objective RES-N: *'To provide for new residential communities in accordance with approved areas plans'*. See Figure 4.1 below.

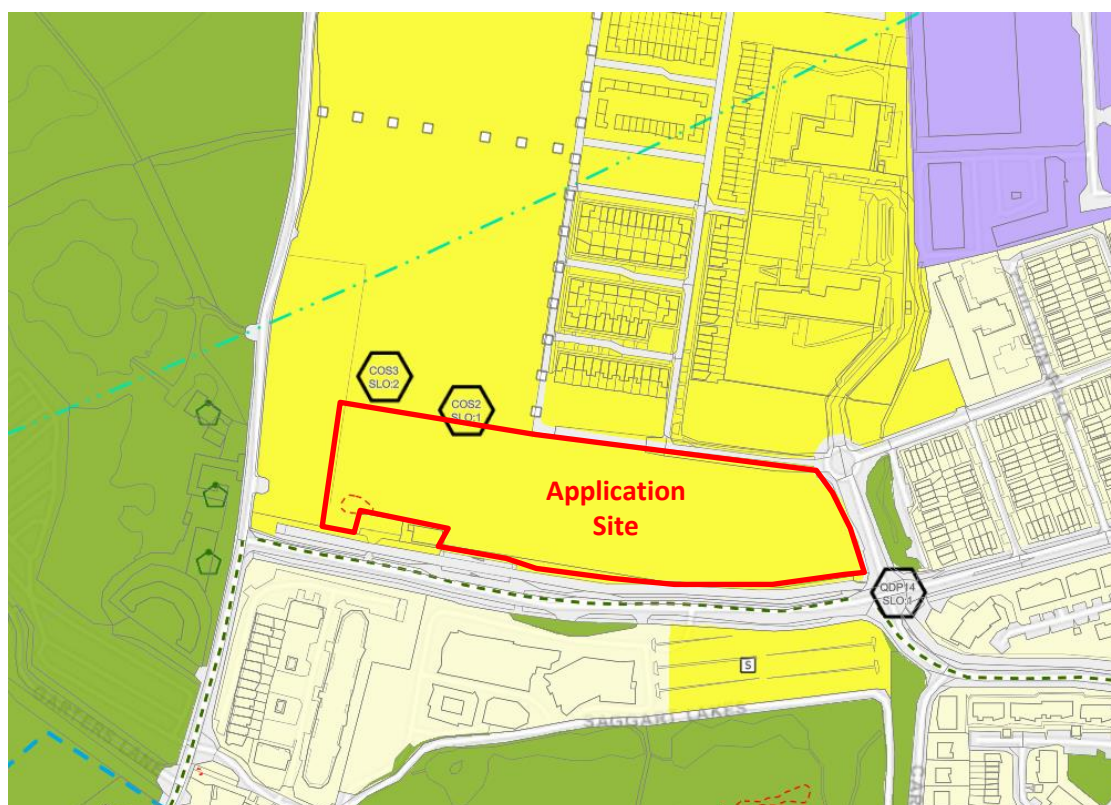


Figure 4.1: Development Plan Zoning

All the uses proposed to be modified within the current application – residential, restaurant/ café, retail/ commercial – are Permitted in Principle within the RES-N zoning objective.

Regarding proposed non-residential uses and justification for same; the location, scale, mix and range of proposed non-residential uses are as sought and permitted under “Frameworks 5: Saggart – Cooldown Commons” of the *Fortunestown Local Area Plan 2012*.

The development includes a mix of non-residential uses at ground floor level within Blocks B and C fronting onto and providing activity and animation to the permitted Local Square. This Local Square provides direct pedestrian and cycle access to Saggart Luas stop and was identified as a local node of activity within the LAP 2012.

In accordance with the Level 5 designation, the Local Square adjoining Saggart Luas Stop provides a mix of local shops and service units to serve the neighbouring residential areas the “Saggart – Cooldown Commons” neighbourhood.

Table 4.1 provides a breakdown of the permitted non-residential uses within Block B and the proposed non-residential uses within Block C.

A range of unit sizes are proposed to cater for a variety of retail/ shop and local service uses. In addition, the proposed units include a range of floor to ceiling heights from 3.0m to 5.5m, providing further flexibility with regard to the nature and scale of non-residential uses that can be accommodated at this location. In the event that larger or small units are required, the proposed units can be amalgamated or sub-divided subject to separate planning applications.

Table 4.1 Permitted and Proposed Non-Residential Floorspace and Uses		
Block	Units & Use	Area Sq.m
B (Permitted – No Change)	2no. Retail/ Commercial	472sq.m
	1no. Community Use	186sq.m
	1no. Creche	431sq.m
C (Proposed – Current Application)	3no. Retail/ Commercial	555sq.m
	Café/ Bar/ Restaurant	197sq.m
Total		1,841sq.m

4.2 MAP BASED OBJECTIVES

There are three map based objectives on the lands directly adjoining the application site.

QDP14 Objective 1:

To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines.

COS2 SLO 1:

That Citywest / Fortunestown areas are provided (from within their own community) public, purpose built and suitable amenities including:

- Library;
- Community centre and a community café;
- Accessible playgrounds / playspaces, teenspaces and youth amenities (such as a skate park);
- Designed green spaces including a managed public park with adequate, accessible public seating and that can host festivals and community events;
- Greater biodiversity in the area and more tree coverage;
- Adequate numbers of pitches and clubhouses / pavilions for sports;
- Adequate public childcare and afterschool facilities;
- School sites.

COS3 SLO 2:

To deliver a community centre / community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan.

The design and layout of the permitted and proposed developments on the current application site follows the plan-led approach as required by QDP14 Objective 1. The development follows the frameworks established within the now lapsed Fortunestown Local Area Plan. Refer to Table 5.4 below for consideration of how the development follows the plan led approach.

The map-based objectives COS2 SLO1 and COS3 SLO 2 are concerned with the provision of social infrastructure in tandem with the delivery of residential development at City/ West Fortunestown. This issue is addressed in detail within Section 7.3 of this Planning Report.

4.3 POLICY OVERVIEW

The following is a summary of the main policy provisions of the *Development Plan* insofar as it relates to the subject lands and proposed residential development.

Chapter	Relevant Policies & Objectives	Overview
Chapter 1 Introduction, Strategic Vision and Climate Action	NA	Chapter 1 of the Development Plan establishes the Strategic Overview for development within the County and refers to higher order regional and national planning policy sources.
Overview Assessment The development of residential accommodation on lands zoned for that purpose is in accordance with the Strategic Vision of the Development Plan.		
Chapter 2 Core Strategy and Settlement Strategy	<i>Policy CS1: Strategic Development Areas</i> - CS1 Objective 1. <i>Policy CS6: Settlement Strategy – Strategic Planning Principles</i> - CS6 Objectives 1, 2, 4, 5 and 6.	Chapter 2 sets out the Development Plan policy in relation to Core Strategy and Settlement Strategy. The Development Plan Core Strategy seeks to prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Areas Strategic Plan (MASP). The MASP residential growth areas within South Dublin are identified as Fortunestown, Kilcarberry, Clonburris and Adamstown. It is an objective of the Development Plan Settlement Strategy to promote compact growth and to support high quality infill development in existing urban built up areas by achieving a target of at least 50% of all new homes to be located

		within or contiguous to the built-up area of Dublin City and Suburbs.
<u>Overview Assessment</u> The current application will deliver additional residential accommodation on a site identified as a “residential growth area” at Fortunestown, in close proximity to existing public transport networks and amenities. The proposed development is therefore consistent with the strategic planning context and the Core Strategy in the Development Plan.		
Chapter 3 Natural, Cultural and Built Heritage	<i>Policy NCBH1: Overarching.</i> <i>Policy NCBH2: Biodiversity.</i> <i>Policy NCBH3: Natura 2000 Sites.</i> <i>Policy NCBH4: Proposed Natural Heritage Areas.</i> <i>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas Policy.</i> <i>NCBH10: Invasive Species.</i>	This chapter contains the Development Plan policies and objectives that seek to protect, conserve and enhance the County’s natural, cultural and built heritage.
<u>Overview Assessment</u> The need to protect and conserve the existing natural habitat has informed the design and layout of the proposed development. There are no items of cultural or built heritage significance on the site.		
Chapter 4 Green Infrastructure	<i>Policy GI1 Overarching</i> <i>Policy GI2 Biodiversity.</i> <i>Policy GI3 Sustainable Water Management.</i> <i>Policy GI4 Sustainable Drainage Systems.</i> <i>Policy GI5 Climate Resilience.</i> <i>GI5 Objective 4 Green Space Factor.</i> <i>Policy GI6 Human Health and Wellbeing.</i> <i>Policy GI7 Landscape, Natural, Cultural and Built Heritage.</i>	This chapter sets out the Green Infrastructure Strategy for the County by reference to the strategic themes of biodiversity, sustainable water management (riparian corridors, SuDs), climate resilience (urban greening, Green Space Factor, tree planting), recreation and amenity and landscape.
<u>Overview Assessment</u> The green infrastructure strategy for the current application site is established under the parent permission. The current application includes modifications that reflect the policies and objectives of the Development Plan 2022 – 2028. New and additional assessments required by the Development Plan, such as Green Space Factor, have also been completed and included with this application.		
Chapter 5 Quality Design and Healthy Place Making	<i>Policy QDP1 & QDP2 Successful and Sustainable Neighbourhoods.</i> <i>Policy QDP3 Neighbourhood Context</i> <i>Policy QDP4: Healthy Placemaking</i>	This chapter sets out the policies and objectives that will ensure quality design and the development of connected and attractive neighbourhoods within the county.

	<p><i>Policy QDP5: Connected Neighbourhoods</i></p> <p><i>Policy QDP6: Connected Neighbourhoods</i></p> <p><i>Policy QDP7: High Quality Design – Development General.</i></p> <p><i>Policy QDP8: Building Height and density Guide.</i></p> <p><i>Policy QDP9: High Quality Design - Building Height and Density</i></p> <p><i>Policy QDP10: Mix of Dwelling Types.</i></p> <p><i>Policy QDP11: Materials, Colours and Textures.</i></p> <p>QDP14 SLO1: Local Area Plans (LAP) - Citywest/Fortunestown.</p>	
<p><u>Overview Assessment</u></p> <p>The Development Plan and relevant Section 28 Guidelines policies and standards guiding the layout of neighbourhoods and design of housing have informed the proposed site layout, built form and residential accommodation. Further details in relation to compliances with standards is detailed in Sections 5.0, 6.0 and 7.0 of this Report. Regarding QDP14 SLO1; the layout of the permitted development now proposed to be modified, has been guided by the Frameworks established in the Fortunestown LAP 2012 – refer to Section 5.0 below.</p>		
<p>Chapter 6</p> <p>Housing</p> <p><i>Policy H11 Privacy and Security.</i></p>	<p><i>Policy H1 Housing Strategy and Interim Housing Need and Demand Assessment</i></p> <p><i>H1 Objective 12 (Unit Mix).</i></p> <p><i>Policy H2 Supply of Housing.</i></p> <p><i>Policy H7 Residential Design and Layout.</i></p> <p><i>Policy H8 Public Open Space.</i></p> <p><i>Policy H9 Private and Semi-Private Open Space.</i></p> <p><i>Policy H10 Internal Residential Accommodation.</i></p>	<p>This chapter provides policies and objectives that seek to ensure the delivery of high quality, well-designed homes within the county focusing on the mix and type of housing provided and ensuring a high standard of residential accommodation and amenity.</p>
<p><u>Overview Assessment</u></p> <p>The issue of mix and H1 Objective 12 (Unit Mix) is addressed within Section 6.2 of this report. Details of layout and design, including compliance with standards, is provided within floor plans and supporting Housing Quality Assessment enclosed with the application.</p>		
<p>Chapter 7</p> <p>Sustainable Movement</p>	<p><i>Policy SM1 Overarching – Transport and Movement.</i></p> <p><i>Policy SM2 Walking and Cycling.</i></p>	<p>Chapter 7 contains policies and objectives that promote walking, cycling and use of public transport and a decrease in the use of the private car.</p>

	<i>Policy SM3 Public Transport.</i> <i>Policy SM5 Street and Road Design.</i> <i>Policy SM6 Traffic and Transport Management.</i> <i>Policy SM7 Car Parking and EV Charging.</i>	
<u>Overview Assessment</u> Details of access proposals for all modes and public transport provision and capacity within the vicinity of the site is provided within the current application. The design and layout of the proposed development also promotes movement via Active Travel modes by creating legible pedestrian and cycle routes and making cycle parking and facilities clearly available to future residents and visitors to the development.		
Chapter 8 Community Infrastructure and Open Space	<i>Policy COS2: Social/Community Infrastructure.</i> <i>COS2 SLO1 CityWest/Fortunestown</i> <i>COS3 SLO2 CityWest/Fortunestown</i> <i>Policy COS5 Parks and Public Open Space – Overarching.</i> <i>Policy COS7: Childcare Facilities.</i> <i>Policy COS11: Arts and Cultural Facilities.</i> <i>COS11 Objective 3 (physical artistic feature).</i>	Chapter 8 sets out policies and objectives that will provide for the development of community infrastructure within neighbourhoods and thereby facilitate ease of access and encourage people to walk and cycle to these facilities. For the purposes of the Development Plan, community infrastructure comprises community centres and halls; libraries and cultural facilities; places of worship and burial grounds; educational, healthcare and childcare facilities; and play, sports and recreational facilities including greenways.
In accordance with the Fortunestown LAP 2012 and the previous and current Development Plans, including COS2 SLO1 and COS3 SLO2, the applicant has provided a range of community infrastructure and open space facilities in tandem with residential development. See Section 7.3 below for further details.		
Chapter 9 Economic Development & Employment	Not applicable.	Not applicable.
Chapter 10 Energy	Policy E3: Energy Performance in Existing and New Buildings.	Chapter 10 provides strategic policies and objectives aimed at reducing carbon emissions and promoting efficient energy systems across all sectors within the county. The policies and objectives are arranged under the headings of Energy Planning (Section 10.1) and Energy Measures (Section 10.2).
<u>Overview Assessment</u> The energy efficient and energy performance of the proposed buildings has been a key input into the design and layout of the proposed development as demonstrated within the		

enclosed architectural, daylight/ sunlight, engineering and energy strategy assessments included with the application.		
<u>Chapter 11</u> Infrastructure and Environmental Services	<i>Policy IE3: Surface Water and Groundwater</i> <i>Policy IE4: Flood Risk</i>	This chapter seeks to ensure the availability of high-quality infrastructure networks and environmental services in the County to support development and place-making.
<u>Overview Assessment</u> The issues of surface water management, including the integration of SuDs measures, and flood risk were addressed in detail within the original permission on the site. These issues are reappraised in the context of the proposed modifications and the updated Development Plan standards and additional measures have been incorporated where possible into the design and layout of the building and wider public realm proposal.		
<u>Chapter 12</u> Implementation and Monitoring		This chapter sets out development standards and criteria to support development in an orderly and efficient manner.
<u>Overview Assessment</u> A full appraisal of the Development Plan standards and criteria relating to the proposed development is contained within Section 7.0 below.		

5.0 SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENTS – GUIDELINES FOR PLANNING AUTHORITIES 2024

These Guidelines were published in January 2024 in response to the National Planning Framework's National Strategic Outcome that seeks to provide for compact growth including a target of 50% of new housing growth in the five cities within the existing built-up footprint, on infill or brownfield lands.

To achieve compact growth, the Guidelines state that it will be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible locations, particularly in city centres and close to public transport nodes and interchanges.

The Guidelines are implemented by establishing suitable residential density ranges based on settlement size and area type and having regard to accessibility to public transport. In addition, revised development standards for housing are recommended to enable innovation in layout and design and contribute to compact urban growth.

5.1 DENSITY

5.1.1 Establishing Density Range

Section 3.0 of the Guidelines provides a methodology for establishing residential density based on settlement and area types and having regard to accessibility and local character.

Tables 3.1 to 3.7 of the Guidelines identify five settlements and four sub-areas to which density ranges (dwelling per hectare – “dph”) are applied. The City and Metropolitan Areas are further divided into three sub-category areas. These are summarised in Table 5.1 below.

Table 5.1 Settlements, Area types and Density Ranges (Net)				
Settlement	Area 1	Area 2	Area 3	Area 4
1. Cities and Metro.³	Centre	Urban Neighbourhoods	Suburban/Urban Extension/ Edge	Village
Dublin & Cork	100 – 300 dph	50 – 250 dph	40 – 80 dph Up to 150 dph at 'accessible' location	-
Limerick, Galway & Waterford	100 – 250 dph	50 – 200 dph	35 – 50 dph Up to 100 dph at 'accessible' location	-

³ The National Planning Framework identifies the five cities of Dublin, Cork, Limerick, Galway and Waterford. The Metropolitan Areas are identified in the relevant Regional Spatial and Economic Strategy.

Metro Towns & Villages	50 – 150 dph	Up to 100 dph	Not below 25 dph
2. Regional Growth Centres ⁴	50 – 150 dph	35 – 50 dph Up to 100 dph at 'accessible' location	-
3. Key Towns & Large Towns ⁵	40 – 100 dph	30 – 50 dph Up to 80 dph at 'accessible' locations	-
4. Small & Medium Towns ⁶	Respond to Established Context	25 – 40 dph	-
5. Rural Towns & Villages ⁷	Respond to Established Context		

The Guidelines recommend that the above density ranges are refined having regard to two steps: -

1. Consideration of proximity and accessibility to services and public transport
2. Considerations of character, amenity and the natural environment.

Regarding accessibility, Table 3.8 of the Guidelines identifies four categories of accessibility. These are reproduced within Table 5.2 below.

Table 5.2 Accessibility
<p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> • Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' 12 stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
<p>Accessible Location</p> <ul style="list-style-type: none"> • Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
<p>Intermediate Location</p>

⁴ Identified in the NPF and RSES.

⁵ 5,000 + population.

⁶ 1,500 – 5,000 population.

⁷ >1,500 population.

<ul style="list-style-type: none"> • <i>Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and</i> • <i>Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.</i>
<p>Peripheral</p> <ul style="list-style-type: none"> • <i>Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.</i>

Regarding considerations of character, amenity and natural environment, the Guidelines seek to ensure that the quantum and scale of the proposed development can integrate successfully into the receiving environment by: -

- Responding in a positive and proportionate way to the receiving context through site responsive design.
- Assessment of the impact on the environment including historic built and landscape heritage and the environment and protected habitats and species in the context of the Environmental Impact Assessment and Habitats Directives.
- Consideration of the impact on amenities of existing residential properties in proximity to the site having regard to privacy, daylight and sunlight and microclimate.
- Ensuring that water supply and wastewater networks can service new development.

5.1.2 Net Density of Proposed Development

On the basis of the forgoing, the residential density range for the current application site is established have regard to the following: -

- The current application site at Fortunestown Lane, Saggart, Co. Dublin is located within the Dublin Metropolitan Area and is best described as an “Urban Neighbourhood”.
- The site is directly adjoining and therefore within 1km, of an existing high-capacity urban transport node in the form of Saggart Luas Stop on the Luas Red Line.
- The enclosed suite of reports and assessments confirms that the proposed development can integrate successfully without any likely significant impact on the built and landscape heritage, the receiving environment and protected sites and with no significant adverse impact on existing or proposed residential amenity. It has also been confirmed that there is adequate capacity within the water supply and wastewater networks to serve the proposed development.

Therefore, the density range appropriate for the application site is **50 – 250 dph (net)**.

The permitted development within Blocks A to E comprises 488no. units on a net site area of 3.6ha giving a permitted net residential density of 136 dph.

The addition of 86no. units will increase the total number of units to 574no. giving a proposed net residential density of 159 dph. The proposed net residential density of 159 dph is within the appropriate range of 50 – 250 dph.

In the wider context, Table 5.3 below provides an overview of the permitted and proposed residential densities across the individual phases at Parklands - Phase 1 housing and Phase 2 apartments sites.

Within the combined Phases 1 and 2, the residential density will increase from 59/ha to 64/ha which is also within the appropriate range of 50 – 250 dph.

Table 5.3 - Permitted and Proposed Residential Density					
		Permitted		Proposed	
Phase	Net Area ha	Units	Density	Units	Density
Phase 1	13.5ha	526	39/ha	526	39/ha
Phase 2	3.6ha	488	136/ha	574	159/ha
Phases 1 & 2	17.1ha	1,014	59/ha	1,100	64/ha

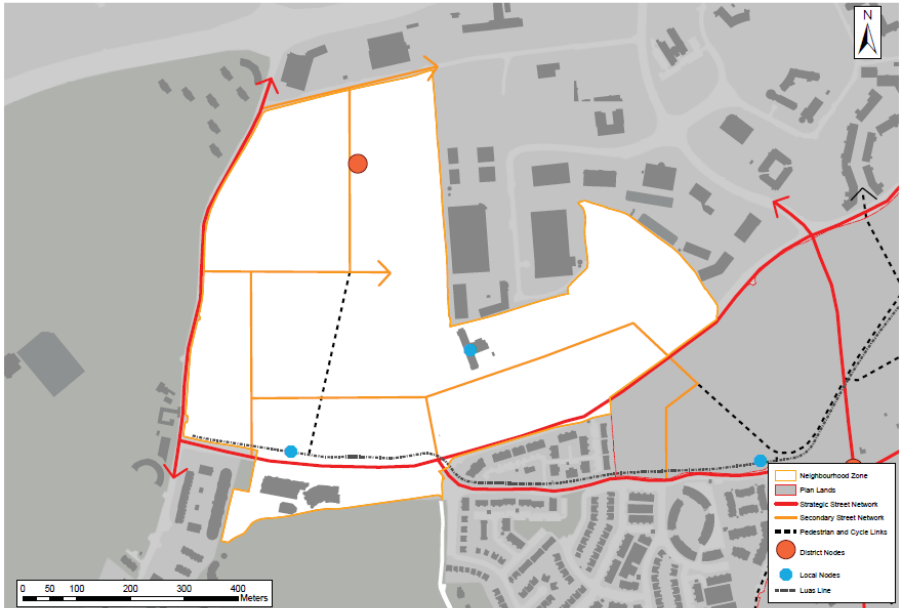
5.2 QUALITY URBAN DESIGN AND PLACEMAKING

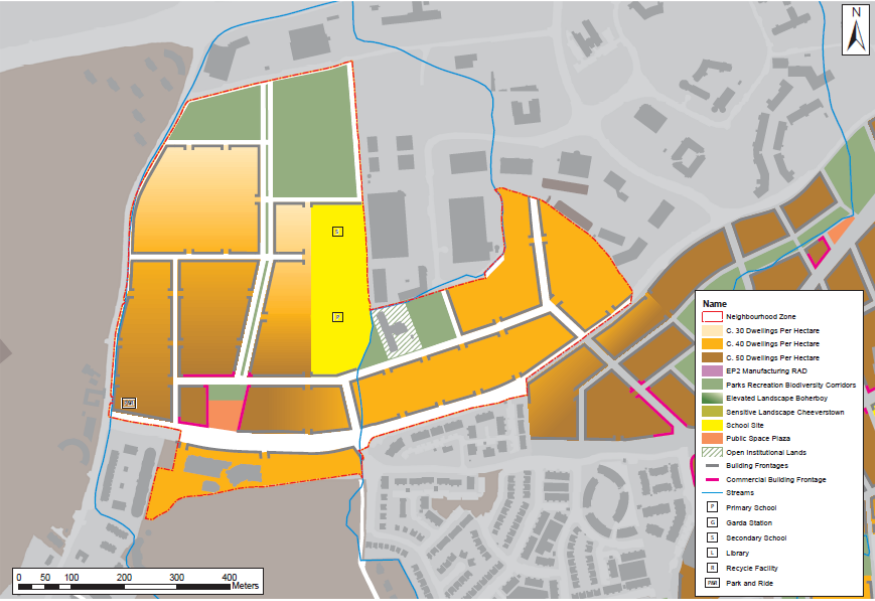
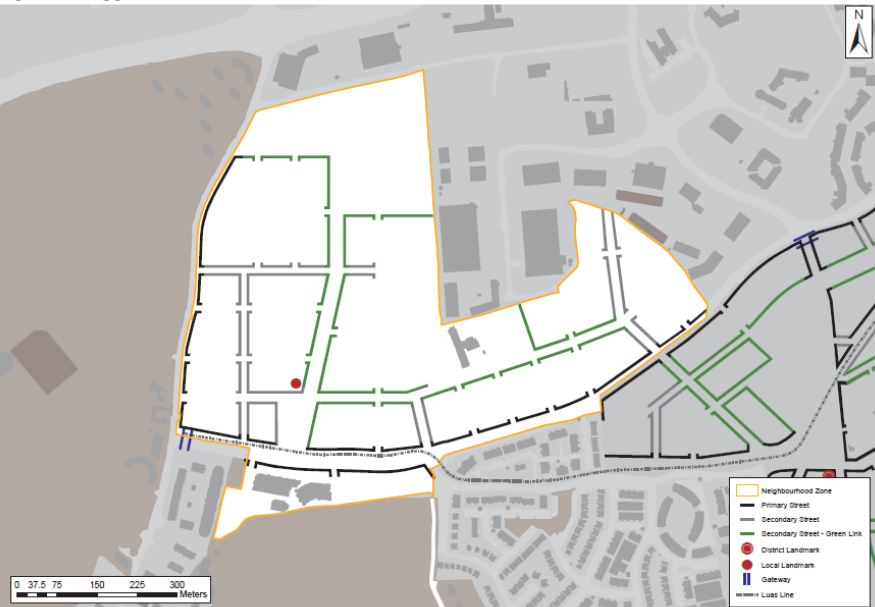
Section 4.0 of the Guidelines sets out a site analysis process and establishes key indicators for quality urban design and place making in relation to compact residential developments. Appendix D of the Guidelines provides a 'Design Checklist' to assist in the application of the referenced key indicators.

The **Architectural Design Statement** [Darmody Architecture] sets out the site analysis and design process for the current application site and utilises the 'Design Checklist' to confirm that quality design and urban placemaking has informed the design and layout of the proposed development.

The following Table 5.4 considers the key indicators from a planning perspective.

It should be noted also that the permitted development at this location was laid out and planned in accordance with the land use, accessibility and movement and green infrastructure frameworks for the "Saggart-Cooldown Commons Neighbourhood" contained in the *Fortunestown Local Area Plan 2012*. While the LAP has since expired, the frameworks and resulting planning permissions have established a high quality of design and place making that is carried forward within the current application for modifications.

Table 5.4: Key Indicators of Quality Design and Placemaking		
Guidelines Indicator	Key	Response
Sustainable and Efficient Movement (Section 4.4 (i))		<p>The design and layout of the development is guided by the Accessibility and Movement Strategy for the ‘Saggart- Cooldown Commons’ neighbourhood within the <i>Fortunestown LAP 2012</i> – see figure below. As per the LAP strategy, the current application site and links are focused on the local node at Saggart Luas Stop. Links are provided to the existing and permitted strategic and secondary road networks and pedestrian and cycle routes at Fortunestown Lane, Citywest Avenue and Bianconi Avenue. All of the proposed routes are designed in accordance with DMURS. Car parking is minimized generally within the development in accordance with the Compact Settlements Guidelines and the Development Plan. At surface level cycle and pedestrian routes and cycle parking are clearly identified to encourage and facilitate Active Travel modes.</p> <p><i>Fig. 6.22 Saggart-Cooldown Commons Accessibility & Movement Strategy</i></p>  <p>Source: South Dublin County Council</p>
Mix and Distribution of Uses (Section 4.4 (ii))		<p>The mix and distribution of uses within the application site follows that of the framework established under the <i>Fortunestown LAP 2012</i> – see “Land Use and Density Framework” below. The envisaged land use strategy being implemented on site and through this proposed modification comprises a primarily residential development with a “public plaza” enclosed and animated by ground floor non-residential and commercial uses all linking directly to Saggart Luas Stop. The density strategy involves increasing residential density from north to south with the highest density development at the southern end of the site adjacent to Saggart Luas Stop.</p>

	<p><i>Fig. 6.25 Saggart-Cooldown Commons Land Use & Density Framework</i></p>  <p>Source: South Dublin County Council . Note: See Explanatory Note for Framework Maps in Section 6.0</p>
<p><i>Green and Blue Infrastructure (Section 4.4 (iii))</i></p>	<p>Following the land use strategy above, the current application site is focused around “local square” linking to a “District Park” to the north via the existing Parklands Boulevard. While there are no natural or built features worthy of note on the site the proposed development does include a range of public and communal open spaces with walking and cycle routes and play equipment. The surface water and flood mitigation strategy as previously permitted on the site, is maintained and supplemented with additional SuDs measures and nature based solutions where possible.</p>
<p><i>Public Open Space (Section 4.4 (iv))</i></p>	<p>Refer to Section 7.2 below.</p>
<p><i>Responsive Built Form (Section 4.4 (v))</i></p>	<p>The built form on the site is guided by the “Built Form Framework” in the <i>Fortunestown LAP 2012</i> and as permitted under the original application on this site. The principles of the built form including the “primary and secondary streets”, “local square”, and “local landmark” are maintained within the current application.</p> <p><i>Fig. 6.24 Saggart-Cooldown Commons Built Form Framework</i></p>  <p>Source: South Dublin County Council . Note: See Explanatory Note for Framework Maps in Section 6.0</p>

5.3 DEVELOPMENT STANDARDS FOR HOUSING

To enable greater innovation in housing design, the Guidelines have reviewed and updated the standards in statutory development plans in relation to separation distances, private open space, public open space, car parking and bicycle parking. Guidance is also provided in relation to the issues of operation and management of developments and daylight.

The above standards and issues are tabulated and assessed against the proposed development within Table 5.5 below.

Table 5.5 Development Standards for Housing		
Requirement	Comment	Complies Y/N
Separation Distances (SPPR 1)	The separation distances between the proposed blocks are 22m or greater and are therefore more than the 16m separation distance identified in the Guidelines.	Y
Private Open Space for Houses (SPPR 2)	The proposed development is an apartment scheme. All of the proposed apartments include private open space in accordance with the Apartment Guidelines 2023 – refer to Housing Quality Assessment [Darmody Architecture].	Y
Public Open Space (Policy and Objective 5.1)	See Section 7.2 below.	Y
Car Parking (SPPR 3)	Car parking is provided in accordance with the Compact Settlement Guidelines and Development Plan standards. Refer to Section 7.5.2 below.	Y
Bicycle Parking and Storage (SPPR 4)	Cycle parking is provided in accordance with the Apartment Guidelines and the Development Plan. Refer to Section 7.5.3 below.	Y
Operation and Management of the Development	Refer to Building Lifecycle Report [GRDAC].	Y
Daylight	Refer to Sunlight, Daylight and Shadow Analysis Report [3DDB].	Y

6.0 SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS – GUIDELINES FOR PLANNING AUTHORITIES 2023

These Guidelines were published in July 2023 and form an update to guidelines previously published and updated in 2015, 2018 and 2020. The overall purpose of these Guidelines is to achieve a high-quality apartment development and significantly increase the overall level of apartment output. The Guidelines apply to all housing developments that include apartments.

6.1 DESIGN STANDARDS FOR NEW APARTMENTS

The Guidelines provide design parameters and standards across all aspects of apartment developments. These are tabulated within Table 6.1 and assessed against the design and layout of the proposed units within the current application.

Table 6.1 Design Standards for New Apartments		
Requirement	Comment	Complies Y/N
Unit Mix (SPPR1 and 2)	The proposed Blocks C, D and E provide 27% 1 bed units, 60% 2 bed units and 13% 3 bed units. Combined with the permitted Blocks A and B, the overall development of Blocks A to E will provide 26% 1 bed units, 63% 2 bed units and 11% 3 bed units. On that basis the proposed development does not exceed 50% maximum specified in SPPR 1 of the Guidelines. SDCC has completed a Housing Needs Demand Assessment (HNDA) which has informed Policy H1 Objective 12 of the Development Plan. The requirements of this policy and the proposed unit mix are considered in Section 6.2 below.	Yes
Apartment Floor areas (SPPR 3)	All apartments are above the minimum space requirements for apartments and the majority of the units exceed the minimum standard by 10%.	Yes
Dual Aspect Ratios (SPPR 4)	50% of the apartments are dual aspect. This is in accordance with the Apartment Guidelines. There are no single aspect, north facing units within the proposed development.	Yes
Floor to Ceiling Height (SPPR 5)	Ground level floor to floor heights are at least 2700mm ensuring all apartments avail of good natural light and aspect.	Yes
Lift and Stair Cores (SPPR 6)	The apartments are all arranged with not more than 12 units per core.	Yes
Internal Storage	All apartments are provided with internal storage – refer to Housing Quality Assessment [Darmody Architecture].	Yes
Private Amenity Space	All apartments are appointed with private amenity space in the form of balconies and terraces which in all cases exceeds the minimum standards.	Yes
Communal Facilities	No communal facilities are provided for residents of the apartments. A creche is provided within the permitted Block B.	Yes
Refuse Storage	Bin stores are provided at basement level and the bins will be collected from designated points.	Yes
Communal Amenity Space	Applying the communal amenity spaces standards from Appendix 1 of the Apartment Guidelines 2023, the proposed Blocks C, D and E incorporating 106no. 1 bed units, 239no. 2 bed units and 51no. 3 bed units will require 2662sq.m of communal open space. Overall, the permitted Blocks A and B and proposed Blocks C, D and E require 3846sq.m of communal open space. The communal amenity space for the apartments is provided in the central courtyards and the area provided exceeds the minimum standards prescribed. Refer to Green Infrastructure Strategy Drawing for tabulation and identification of public open space [Cunnane Stratton Reynolds].	Yes

Childrens Play	Play equipment is integrated into the design and layout of the proposed communal spaces within each block. Additional play ground and pitch facilities are provided within the permitted District Park within the Parklands development.	Yes
Car Parking	Car parking is provided in accordance with the Compact Settlement Guidelines and Development Plan standards. Refer to Section 7.5.2 below.	Yes
Bicycle Parking	Cycle parking is provided in accordance with the Apartment Guidelines and the Development Plan. Refer to Section 7.5.3 below.	Yes
Building Lifecycle Report	A Building Lifecycle Report was submitted with the original application and is updated and resubmitted to reflect the modifications to Blocks C, D and E.	Yes

6.2 UNIT MIX / DEVELOPMENT PLAN POLICY H1 OBJECTIVE 12

Following on from the recommendations of the SDCC ‘*Housing Strategy and Housing Needs Demand Assessment*’, Policy H1 Objective 12 of the Development Plan requires proposals for residential development to provide a minimum of 30% 3-bedroom units. A lower provision may be acceptable where the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA.

Table 5.5 provides a breakdown of the proposed unit mix within the permitted Blocks A and B and proposed Blocks C, D and E.

Table 5.5 – Unit Mix Permitted Blocks A & B and Proposed Blocks C, D and E				
Block	1 Bed Units	2 Bed Units	3 Bed Units	Total Units
A	23	83	8	114
B	20	40	4	64
C	26	84	19	129
D	32	90	18	140
E	48	65	14	127
Total	149 (26%)	362 (63%)	63 (11%)	574

A lower provision of 3 bed units on the current application site is justified for the following reasons: -

- **Specific Demand:** There is a specific demand and requirement for a high density development and associated unit mix on the site having regard to the Section 28 Guidelines relating to both Design Standards for New Apartments and Compact Settlements both of which recommend higher density development at “urban

neighbourhoods” adjoining high capacity public transport. There is also strong and specific demand from private renters, private purchasers and South Dublin County Council Housing Department for 1 and 2 bedrooomed units in the Fortunestown and Citywest area.

- **Prevailing House type:** The prevailing house type within 10 minute walk of the current application site is 2 and 3 storey own-door units comprising primarily 3 and 4 bedrooms houses and 2 and 3 bedrooomed duplexes. These include the Parklands housing development under construction to the north and the established neighbourhoods of Cuil Duin and Carrig Court to the east, Carrigmore to the south east and Saggart to the south west. The proposed development will provide a wider mix of dwelling types, supporting a greater mix of tenure within a highly accessible location.
- **Socioeconomic, Population and Housing Data:** The population and housing data contained within Section 2.5 of the Development Plan 2022 – 2028 identifies very significant population growth (+260%) and a significant fall in housing vacancy (-46%) within Saggart over the periods to 2006 – 2016 and 2011 – 2016 respectively. Both are indicators of very strong housing demand and Development Plan projections (Table 4, page 39) and HNDA projected housing requirements (Table 45, page 58) indicate that this housing demand will remain over the period to 2028.

The proposed unit mix is also justified when considered in the context of the overall unit mix achieved within the combined Phase 1, Parklands (permitted) and Phase 2, Parklands Pointe (proposed) as set out within Table 5.6 below.

Table 5.6 – Unit Mix within Permitted Phase 1 and Proposed Phase 2					
	1 Bed	2 Bed	3 Bed	4 Bed	Total
Phase 1	0	67	262	197	526
Phase 2 (Proposed)	<u>149</u>	<u>362</u>	<u>63</u>	<u>0</u>	<u>574</u>
Total	<u>149</u>	<u>429</u>	<u>325</u>	<u>197</u>	<u>1100</u>
% Mix	14	39	30	18	100

This table confirms that the overall development of 1,100 units across Phase 1 and the proposed Phase 2 will achieve a unit mix of 30% 3 bed units. Furthermore, the combined 3 and 4 bed units within Phase 1 and the proposed Phase 2 amounts to 48% of the overall development at Parklands and Parklands Pointe.

On the basis of the forgoing, the proposed units mix within Blocks C, D and E is justified at this location having regard to the identified demand, prevailing house type within the area and the socioeconomic, population and housing data set out in the Development Plan and HNDA. The provision of a mix of 48% 3+ bedroom units within the overall development at Parklands and Parklands Pointe is also a significant supporting consideration.

7.0 OTHER DEVELOPMENT MANAGEMENT STANDARDS

7.1 OVERVIEW ASSESSMENT

Chapter 12 – Implementation and Monitoring – of the Development Plan sets out the development standards and criteria that arise from the policies and objectives of the Development Plan against which applications for development will be assessed.

The relevant development management standards within Chapter 12 and those not already considered in Sections 4.0, 5.0 and 6.0 above, are addressed in this section.

7.2 GENERAL RESIDENTIAL STANDARDS

Building Height (12.5.3)

The *Urban Development and Building Height – Guidelines for Planning Authorities 2018* set out national planning policy guidelines on building heights in relation to urban areas and seek to establish a more performance criteria driven approach that planning authorities should apply within their statutory development plans.

In response to these Guidelines, the *South Dublin County Development Plan 2022 – 2028*, Appendix 10 contains “*South Dublin County’s Building Height and Density Guide*”. To demonstrate the overall positive benefits and justify the scale of increased height being proposed, applicant’s are required to: -

1. Provide a detailed analysis of the existing context.
2. Demonstrate that the proposed height increase is contextually appropriate.

The current application is for modifications to the permitted Blocks C, D and E comprising 3no. 5 storey blocks. Blocks A and B are predominantly 5 storey blocks with a 9-storey element. The proposed modifications will add an addition storey to each of Blocks C, D and E to provide 3no. 6 storey blocks.

The **Design Statement** [Darmody Architecture] provides the contextual analysis for the proposed development utilising the toolkit detailed within Appendix 10 of the Development Plan. The Design Statement and CGI’s (3D Design Bureau) demonstrate how the proposed additional storey is contextually appropriate for the site and the proposed development.

Public Open Space (12.6.10 and 12.8.2)

Public open space in residential schemes refers to open spaces that form part of the public realm within a residential development and is required to be provided as a minimum

percentage of the site area. This is distinct from public parks that are generally provided on the basis of population projections and identified in Local Area Plans or Strategic Development Zones. In the context of the current application for residential development, the requirement is to provide public open space as a minimum percentage of the site area.

Policy Objective 5.1 of the Sustainable and Compact Settlements Guidelines requires that Development Plans provide for public open space at a rate of not less than a minimum of 10% and not more than 15% of the net site area.

The *South Dublin County Development Plan 2022 – 2028* public open space standards are provided in Table 12.22 as follows: -

Table 12.22: Minimum Public Open Space Standards

Land Use	Public Open Space Standards (Minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

On the basis of the above, the minimum public open space requirement on the current (RES-N) site is 15% of the net site area.

The current application site, Blocks A to E, has a net site area of 3.6ha. This gives a minimum requirement for 5,400sq.m (15%) public open space provision on site. Public open space of c.13,300sq.m (37%) is provided within the site and therefore exceeds the 15% minimum requirement within the Guidelines and the Development Plan for the current application. Similarly, c.2,700sq.m of public open space is provided within the Blocks C, D and E site of 1.76ha and therefore meets the 15% requirement. Refer to **Green Infrastructure Strategy Drawing** [Cunnane Stratton Reynolds] for tabulation and identification of proposed public open space.

While the provision of public parks is beyond the scope of this application and outside the requirements of the Sustainable and Compact Settlements Guidelines, it is noted that the applicant has made a significant contribution to public open space/ parks provision within the wider "Saggart – Cooldown Commons Neighbourhood" in the context of the Fortunestown Local Area Plan 2012.

This includes provision of: -

- A District Park of 4.3ha with playing pitches etc. at the northern end of Parklands Boulevard.

- A District Park of 0.43ha west of Parklands Boulevard.
- A Neighbourhood Park of 0.24ha centrally within the Parklands site and east of Parkland Boulevard.
- 3no. Pocket Parks totalling 0.12ha within the Parklands development.

Combining all of the on-site and neighbouring elements of public open space provided by the applicant, the public open space requirements of the Compact Settlement Guidelines and the Development Plan are achieved.

7.3 COMMUNITY AND SOCIAL INFRASTRUCTURE AUDIT

Section 12.8 of the Development Plan sets out the requirements for the provision of community infrastructure including community centres, healthcare facilities, childcare, education, public art, places of worship and burial grounds.

The planning authority's LRD Opinion also sought the submission of a Social Infrastructure Audit and this audit is completed below utilising the headings from Section 12.8 of the Development Plan.

Community Centres (12.8.1)

Existing community centres in the area are located within the established developments to the east of the current application site and include Ard Mor Community Centre⁸ and the Community Room, City West Shopping Centre⁹.

In addition, there is a permitted community centre located c.100m directly to the east of the current application site. Under Reg. Ref. SD22A/0398 permission was granted to Greenacre Residential DAC for a creche (613sq.m) and community facility (997sq.m) at Cuil Duin Avenue. The applicant is currently working with South Dublin County Council to bring forward the development of this facility.

The permitted Block B within the current application site includes a community facility of c.186sq.m. located centrally within the development fronting on the local square. The applicant is satisfied to work with South Dublin Co Co to agree the details of the operation and management of this facility.

On the basis of the above, in addition to existing community facilities in Fortunestown and Citywest, the applicant has obtained planning permission for c.1,200sq.m of community facility floorspace and this will be delivered in tandem with the development at Blocks A to E.

⁸ 2 Ard Mor Drive, Fortunestown, Dublin 24.

⁹ Unit 1B, Citywest Shopping Centre, Citywest Road, Citywest, Dublin 24.

Healthcare Facilities (12.8.3)

There are existing medical practices within the Citywest and Fortunestown area including Citywest Medical at Unit 5 Citywest Shopping Centre, Swiftbrook Medical Centre at Fortunestown Lane, Citywest and Saggart Medical Centre, Main Street, Saggart. There are also a number of established pharmacies in the area including McCabe's Pharmacy, Citywest and Saggart Pharmacy, Castle Court, Saggart.

Should additional need arise, the permitted and proposed 5no. retail/ commercial units within Blocks B and C are suitable for medical or pharmacy uses.

Early Childhood Care and Education Facilities (12.8.4)

There are a number of existing childcare and preschool services in the Fortunestown and Citywest areas including Jonix Educational Services, Carrig Court, Fortunestown; Cocoon Childcare, Belfry Hall, Citywest; Stepping Stones, Belfry Crescent Citywest and Links Childcare, Old Naas Road, Citywest.

As detailed above, the applicant has also obtained planning permission (Reg. Ref. SD22A/0398) for a creche of 613sq.m gross floor on lands directly to the east of the current application site and is currently working with South Dublin Co Co. to deliver this facility.

Policy Objective COS7 Objective 2 of the Development Plan requires the provision of childcare facilities in accordance with the standards contained within the *Childcare Facilities Guidelines for Planning Authorities 2001* which recommend one childcare facility with a minimum of 20 places for each 75 units for new residential development. Any variation to this standard is required to be justified having regard to factors such as the type of residential units proposed, emerging demographic profile and availability of existing childcare services in the vicinity.

The *Sustainable Urban Housing: Design Standards for New Apartments (July 2023)* state that one-bedroom or studio type units should not generally be considered to contribute to a requirement for childcare provision.

Combined, the permitted Blocks A and B with 178no. apartments and the proposed Blocks C, D and E with 396no. apartments, will provide a total of 574no. apartment units. Excluding the 43no. 1 bed units permitted within Blocks A and B and the 106no. 1 bed units proposed within Blocks C, D and E, childcare facilities will be required for 425no. 2 and 3 bed apartment units within the proposed development.

Applying the Childcare Facilities Guidelines 2001 standard of one childcare facility with a minimum of 20 places for each 75 units, the proposed development of 425no. units will require a childcare facility with capacity for 113 childcare spaces $((425/75) * 20 = 113)$.

The permitted Block B includes a creche of 431sq.m. No amendments are proposed to the permitted creche under the current application.

The applicant's design team have reviewed the design and layout of the permitted creche in the context of the comments from SDCC Planning Department and South Dublin Childcare Committee contained in the LRD Opinion.

In response, Darmody Architecture provide an alternative indicative layout within the permitted creche identifying how the permitted 431sq.m can accommodate the required 113no. childcare spaces – refer to **Appendix B**. As per the 2001 Guidelines, a minimum of 2.32sq.m per child is provided exclusive of administration, staff, circulation etc. areas. This layout is indicative and the final internal layout and fitout will be subject to the specifications and requirements of the selected operator.

On the basis of the foregoing, there are established and permitted childcare facilities within the wider Fortunestown and Citywest areas to cater for the childcare needs of those areas. It is the applicant's submission that the permitted creche within Block B provides sufficient childcare spaces to cater for the proposed overall development of 425no. 2 and 3 apartment units within Blocks A to E.

Education Facilities (12.8.5)

There are a number of primary educational facilities located within close proximity to the site, including two schools within 100m of the site, Citywest Educate Together National School and Citywest & Saggart Community National School, on lands which were made available to the Department of Education by the applicant, Greenacre Residential DAC.

Additional schools in Fortunestown and Citywest area include Gaelscoil Lir and Rathcoole ETNS primary schools and Colaiste Pobail Fola secondary schools all located directly to the south of the application site on Fortunestown Lane. Scoil Aoife Citywest and St. Aidan's Community School are located to the east of Citywest Road.

Having regard to the above provision and the applicant's delivery of school sites in accordance with the Fortunestown Local Area Plan 2012, the proposed development will be adequately served by existing schools within the catchment and there is no requirement for a new school to serve this development.

Objectives COS2 SLO1 and COS3 SLO2

The following map based objectives are also relevant to the application site and relate to the provision of social infrastructure within and adjoining the application site.

COS2 SLO 1:

That Citywest / Fortunestown areas are provided (from within their own community) public, purpose built and suitable amenities including:

- Library;
- Community centre and a community café;
- Accessible playgrounds / playspaces, teenspaces and youth amenities (such as a skate park);
- Designed green spaces including a managed public park with adequate, accessible public seating and that can host festivals and community events;
- Greater biodiversity in the area and more tree coverage;
- Adequate numbers of pitches and clubhouses / pavilions for sports;
- Adequate public childcare and afterschool facilities;
- School sites.

COS3 SLO 2:

To deliver a community centre / community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan.

Over the course of the last 6 years, the applicant has made provision for purpose built amenities in accordance with the *Fortunestown Local Area Plan 2012* and more recently the *South Dublin County Development Plan 2022 – 2028*. This includes the provision of lands for schools, local and small parks, childcare facilities and community floorspace under the following permissions: -

1. Reg. Ref. SD16A/0255: - The applicant made lands available to the Department of Education and Skills directly to the north east of the current application site. 2no. primary schools have been constructed on these lands and are fully operational, serving the Fortunestown and Citywest neighbourhoods.
2. Reg. Ref. ABP-300555-18: - The Parklands development located directly to the north of the current application site includes a district park (4.3ha), 2no. neighbourhood parks (0.24ha and 0.42ha) and 3no. pocket parks (300sq.m each). The district and neighbourhood parks provide active and passive open spaces including playing pitches and play facilities.
3. Reg. Ref. ABP-305563-19: - Block B within the permitted development includes ground floor units permitted as community space (186sq.m) and a creche (431sq.m).
4. Reg. Ref. SD22A/0398: - Permission granted for creche and community facility of 1,610sq.m at Cuil Duin Avenue, located directly to the east of the current application site.

All of the above confirms the applicant's commitment to provide purpose built and suitable amenities in tandem with residential development in accordance with COS2 SLO1 and COS SLO2.

7.4 PART V

The original application allocated 10% (49no. units) within the overall development of 488no. units on site for social housing in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended). In accordance with Condition 16 of Reg. Ref. ABP-305563-19, the applicant will enter into an agreement with the local authority in respect of Part V and the allocated 49no. units within the permitted Block A.

The proposed modifications to Blocks C, D and E provides an additional 86no. apartments which gives rise to a requirement for an additional 17no. units (20%) to satisfy Part V. As part of the current application, a further 17no. units are allocated to Part V within Block A.

For completeness, the combined 66no. Part V units are identified within the Part V Proposal within this application. The Part V proposal also includes preliminary Part V costing, Part V Schedule of Units and plans of the proposed units.

7.5 ROADS AND TRANSPORTATION

7.5.1 Traffic and Transport Assessment / Mobility Management (12.7.2 & 12.7.3)

DBFL Consulting Engineers have prepared a ***Traffic and Transportation Assessment*** (TTA) to form part of the application.

7.5.2 Car Parking Standards (Section 12.7.4/ Table 12.26)

Table 12.26 of the Development Plan outlines the car parking requirements (maximums) for new developments. Within Zone 2¹⁰ areas such as Parklands, the standards are 0.75no. car spaces per 1 bed unit, 1no. car parking space per 2 bed unit and 1.25no. car spaces per 3+ bed unit.

The permitted development at Parklands Pointe apartments provided car parking to serve the apartments within Blocks C, D and E at a rate of 0.72 per unit. It is the applicant's intention to maintain this ratio of car parking provision within the modified Blocks C, D and E.

¹⁰ The Development Plan 2022 - 2028 identifies two zones for the purposes of car parking standards.

'Zone 1: General rate applicable throughout the County.

Zone 2 (Residential): More restrictive rates for applications within town and village centres, lands zoned REGEN, and brownfield/ infill sites within Dublin City and Suburbs settlement boundary within 400-500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service).'

No amendments are proposed to the separate basement beneath the permitted Blocks A and B.

A total of 342no. car parking spaces are proposed to serve Blocks C, D and E of which 332no. spaces are provided at basement level and 10no. spaces are provided at street level. A total of 333no. spaces (including 33no. visitor spaces) are provided for the residential element. 9no. spaces are provided for the retail and café uses. Excluding visitor spaces, the proposed car parking ratio is 0.78 spaces per residential unit. Further details in relation to car parking provision are contained in the ***Traffic & Transportation Assessment*** [DBFL].

Electric Vehicle Parking

EV requirements for multi-unit residential developments are provided within Section 12.7.5 of the Development Plan and requires charging points at 20% of proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces. The proposed development includes EV car parking spaces in accordance with the Development Plan requirement.

7.5.3 Bicycle Parking (Section 12.7.1/ Table 12.23)

Table 12.23 of the Development Plan provides the bicycle parking standards (minimum) for new developments. For residential development the standards are: -

	<u>Long-stay</u>	<u>Short-stay</u>
• Residential	1 per bedroom	1 per 2 apartments
• Café/ Restaurant	1 per 5 staff	1 per 10 seats
• Retail Conv./ Comp.	1 per 5 staff	1 per 50sq.m GFA

Applying the above standards to the proposed residential and non-residential elements in Blocks C, D and E gives a requirement for a total of 954no. spaces including 741no. long-stay spaces and 213no. short-stay spaces.

A total of 962no. cycle parking spaces are provided at basement level and externally adjoining within Blocks C, D and E.

942no. spaces are provided for the residential element including 744no. long term spaces and 198no. short term spaces. The remaining 20no. cycle parking spaces are provided for the non-residential element and include 4no. long stay and 16no. short stay spaces.

7.6 WATER SERVICES

Foul Drainage

The foul drainage connection will be as per the permitted scheme and connects to the approved foul drainage network within the Parklands housing development. A confirmation of feasibility Uisce Eireann is enclosed in the **Infrastructure Design Report** [DBFL Consulting Engineers].

Water Supply

The proposed development will connect to the permitted 200mm diameter watermain within the Parklands Housing Development. Further details are included the **Infrastructure Design Report** [DBFL Consulting Engineers].

7.7 SURFACE WATER DRAINAGE

The permitted development on the application site includes SuDS measures including green roofs, permeable paving, grasscrete at the fire tender access and a 'drainage layer' beneath the podium deck. These SuDS features are retained within the proposed development at Blocks C, D and E.

Further details of the surface water design details are provided within the **Infrastructure Design Report** [DBFL Consulting Engineers].

A Site Specific Flood Risk Assessment (SSFRA) by JBA Consulting including detailed hydraulic modelling was submitted with the parent permission for Blocks A to E. That SSFRA confirmed that:

- The development at Parklands Pointe apartments will not significantly increase the risk of flooding elsewhere.
- The development (building FFL) is raised above the 1% AEP event including climate change and freeboard to minimise the risk to people and property as far as is possible. Flood flows are managed by an open channel drain diversion which routes any overland flows around the site in the channel. Improvements to the culvert entrance will improve the hydraulics and reduce the residual risk.
- Residual risk is managed by the setting of appropriate finished floor levels, building placement and landscaping on site.
- The development meets the standard of typical residential development design.

The SSFRA has been reviewed in the context of the current proposal for an additional 86no. units. JBA Consulting provide a Technical Note updating the SSFRA. The Technical Note confirms that the above conclusions remain valid.

7.8 PUBLIC LIGHTING

Public lighting proposals were integrated into the design and layout of the permitted development. EDC Consulting Engineers have prepared a pack of public lighting information and this is enclosed. The public lighting layout and design will be agreed with the planning authority in accordance with Condition 10 of Reg. Ref. ABP-305563-19.

7.9 CLIMATE ACTION AND ENERGY

The Development Plan requires the submission of an Energy Efficiency and Climate Change Adaption Design Statement for residential and commercial developments in excess of 10 residential units and/ or 1000sq.m commercial floor space.

An *Energy Efficiency and Climate Change Adaption Design Statement* [EDC Consulting Engineers] is enclosed.

7.10 CONSTRUCTION MANAGEMENT

A Construction Management Plan will be prepared and submitted in compliance with Condition 21 of the parent permission Reg. Ref. ABP-305563-19. This Construction Management Plan will be updated to reflect the revised Blocks C, D and E following a grant of permission for same, if required.

7.11 WASTE MANAGEMENT

A construction and demolition waste management plan will be submitted in response to Condition 19 of Reg. Ref. ABP-305563-19. The C&D waste management plan can be updated to reflect the revised Blocks C, D and E following a grant of permission for same if required.

An Operational Waste Management Plan will be prepared and submitted in response to Condition 18 of Reg. Ref. ABP-305563-19. This report can also be updated to make provision for the additional units within Blocks C, D and E.

7.12 ARCHAEOLOGY AND BUILT HERITAGE

An Archaeological Assessment was completed as part of the original Blocks A to E application. That assessment confirmed that the site has been the subject of a high level of disturbance in recent years and is considered to possess a very low archaeological potential. As a result, no adverse impacts are predicted upon the archaeological resource as a result of the proposed development.

There are no protected structures on the site and the site is not within or in the vicinity of any Architectural Conservation Areas (ACA). A review of the Sites and Monuments (SMR) Record of designated architectural heritage structures within the area confirms that there are no recorded archaeological monuments in the general vicinity.

7.13 ECOLOGY AND APPROPRIATE ASSESSMENT

An **AA Screening Report** [Openfield Ecological Services] is prepared and submitted with the current application. That Report concludes that significant effects are not likely to arise, either alone or in combination with other plans or projects, to any SAC or SPA.

7.14 ENVIRONMENTAL ASSESSMENT

An **EIA Screening Report** [BMA Planning] is prepared and submitted. This report concludes that the proposed development, by itself or in combination with other projects, is not likely to have significant effects on the environment, and that accordingly, an Environmental Impact Assessment is not required. The information provided in the EIA Screening Report can be used by the competent authority, to assist with its determination of the need or otherwise for an Environmental Impact Assessment for the proposed development.

8.0 DEVELOPMENT PLAN STATEMENT OF CONSISTENCY

Section 32B(2)(ga) of the Act requires a statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan or local area plan.

As detailed above, the consistency of the subject development with the relevant statutory development has been examined and it is considered that the proposed development is consistent with the Development Plan in terms of the following considerations: -

- **Zoning:** The zoning objective that applies to the subject site (Objective RES-N) includes Residential as a “permissible” use and is therefore consistent with its development as a Large-scale Residential Development as proposed in this planning application.
- **Specific Objectives:** Specific Local Objectives COS2 SLO 1 and COS2 SLO 2 relating to community infrastructure apply to the Parklands site at Fortunestown Lane. This report details the multiple permissions the applicant has obtained for the provision of community infrastructure including parks, childcare facilities, a community centre facility and 2no. primary schools. The permitted development also includes a creche and a community facility, both within Block B, and these remain unchanged by the current application. Insofar as there are specific objectives that relate to the general area, the proposed development is consistent with and does not prejudice the achievement of these objectives.
- **Policy:** The development of the current application site for a residential development of the nature and scale proposed is consistent with the policy framework set down in the Development Plan which promotes consolidation and densification of the existing built area based on proper planning and sustainable development principles. In particular, the policies reflect national, regional and sectoral plans and guidelines which promote housing/ apartment standards, sustainable transportation and climate action measures. This is confirmed by the existing Parklands Phase 2 permission on the site for a high density residential development.
- **Development Management Standards:** The current application is consistent with the Development Management Standards detailed in the Development Plan in relation to specific residential design standards, open space, parking, SUDs and other technical requirements.

9.0 CONCLUSION

For the reasons outlined above, we seek a grant of permission in this instance and we look forward to your decision in due course.

BMA PLANNING

APPENDIX A

SDCC'S LRD Opinion Report

**LRD OPINION REPORT
FOR
PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT AT
FORTUNESTOWN LANE AND PARKLANDS PARADE, SAGGART**

Procedural Notes

This Opinion Report relates to a Large-Scale Residential Development (LRD) Meeting held on the 26th of January 2024.

As per s32D of the Planning and Development Act 2000 as amended, the purpose of this report is to form an LRD opinion as to:

- (1) whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an LRD planning application.
- (2) If it is considered that the documents submitted for the purposes of the meeting do not constitute a reasonable basis on which to make an LRD planning application:
 - a) the areas, or the issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application, and
 - b) any issues that, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make the application.

In addition to the above, and under Article 16A(7) of the Planning and Development Regulations 2001 as amended, this report may advise the applicant of specified information required to be supplied in the final planning application, in addition to the requirements of Article 23 of those regulations.

As per section 32E of the 2000 Act, neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its functions under that Act or any regulations under that Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Proposed Development

The development provides for the **amendment of permitted development SHD3ABP-305563-19**. The amendments will consist of **modifications to permitted apartment blocks C, D and E to include an additional storey on each block** and reconfiguration of the permitted floor levels (layouts) to provide an **additional 86 no. apartments**, increasing from a permitted 310 no. apartments to a **proposed 396 no. apartments**.

The amendments proposed include the following:

- Block C: **6-storey block** comprising:
 - 129 no. apartments as follows:
 - **24 no. 1-bedroom units,**
 - **84 no. 2-bedroom units, and**
 - **21 no. 3-bedroom units.**
 - 3 no. retail/commercial units (555 sq.m), and
 - 1 no. café/bar/restaurant unit (197 sq.m)
- Block D: **6-storey apartment block** comprising:

- 140 no. apartments as follows:
 - **30 no. 1-bedroom units,**
 - **90 no. 2-bedroom units, and**
 - **20 no. 3-bedroom units.**
- Block E: **6 -storey apartment** block comprising:
 - 127 no. apartments as follows:
 - **46 no. 1-bedroom units,**
 - **65 no. 2-bedroom units, and**
 - **16 no. 3-bedroom units.**
- All associated communal amenity spaces and private amenity spaces comprising terraces/balconies.
- Modifications to the permitted single level basement below Blocks C, D and E to accommodate:
 - **332 no. car parking spaces,**
 - Cycle parking spaces,
 - Bulky item storage,
 - Bin storage areas, and
 - 2 no. vehicular accesses from Parklands Parade.
- External ground level areas include:
 - 10 no. car parking spaces,
 - Cycle parking,
 - Public lighting,
 - ESB substations, and
 - All landscaping and boundary treatments, surface water drainage features and all associated site works.

Development Statistics

Stats for Blocks C, D and E	LRD Stage 2	
	LRDOP004/23	
	Permitted	Proposed
Total Units (Apartments)	310	396
Bedrooms	576	749
Unit Mix (Apartments)		
1-Bed	75 (24%)	100 (25%)
2-Bed (4 Person)	204 (66%)	239 (60%)
3-Bed	31 (10%)	57 (14%)
Total Units	310	396
Unit Mix (Blocks A, B, C, D and E)		
1-Bed	118 (24%)	143 (29%)
2-Bed (4 Person)	327 (67%)	362 (63%)
3-Bed	43 (9%)	69 (12%)
Total Units	488	574
Development Stats		
Site Area (Gross)	4.237 Ha.	4.237 Ha.
Site Area (Net)	3.6 Ha.	3.6 Ha.

Stats for Blocks C, D and E	LRD Stage 2	
	LRDOP004/23	
	Permitted	Proposed
Density	134 uph	159 uph
Building Height	5 – 9 Storeys*	6 Storeys
Gross Floor Area (Blocks C, D & E)	30,563 sq.m	38,228 sq.m
GFA (Blocks A, B, C, D & E)	48,495 sq.m	56,160 sq.m
Plot Ratio (Blocks C, D & E)	Not Stated	Not Stated
Plot Ratio (Blocks A, B, C, D & E)	1.14	1.33
Site Coverage (Blocks C, D & E)	18%	16%
Site Coverage (Blocks A, B, C, D & E)	27%	26%
Dual Aspect	152 (49%)	198 (50%)
Amenity Space (Blocks A, B, C, D & E)		
Public Open Space	1.321 Ha.	1.369 Ha.
POS as % of Site	Not Stated	Not Stated
Ha. per 1,000 of Population	Not Stated	Not Stated
Communal Open Space	3,057 sq.m	3,016 sq.m
Non-Residential Uses – Blocks C, D & E		
Creche	<i>Provided in Block B (431 sq.m)</i>	
Retail / Commercial Units	708 sq.m	555 sq.m
Café / Bar Restaurant	188 sq.m	197 sq.m
Total Non-Residential Floor Area	896 sq.m	752 sq.m
Parking		
Car Parking (Residential)	Not Stated**	331 Spaces
Car Parking (Non-Residential)	Not Stated**	9 Spaces
Car Sharing	Not Stated**	2 Spaces
Total Car Parking	Not Stated**	342 Spaces
Cycle Parking (Resi. Long Stay)	Not Stated**	748 Spaces
Cycle Parking (Non-Resi Long Stay)	Not Stated**	Not Stated
Cycle Parking (Resi. Short Stay)	Not Stated**	199 Spaces
Cycle Parking (Non-Resi Short Stay)	Not Stated**	18 Spaces
Total Cycle Parking	Not Stated**	965 Spaces
Parking Ratios		
Residential	0.79	0.8
Cycle Parking (Residential)	Not Stated	Not Stated

* Block B incorporates a 9-storey element

** Figures not given in isolation for Blocks C, D & E for direct comparison purposes

For ease of comparison, the applicant should provide two Schedules of Accommodation. One Schedule should provide a breakdown of the full apartment scheme, Blocks A, B, C, D & E, permitted and proposed. A second Schedule of Accommodation should be provided for permitted and proposed development Blocks C, D and E only. This will allow for complete ease in assessing the differences between the schemes and ensuring that all proposals appropriately meet the requirements of the Development Plan and other relevant policy and

guidance documents, as well as clarity for third-parties examining the application. The applicant should provide information on the items not stated above, for clarity, in their **final application**.

Description of Site and Surroundings:

Site Area: stated as 4.2 Ha (gross) / 3.6 Ha (net).

Site Description:

The application site is situated to the immediate north of Fortunestown Lane, northeast of Saggart. The lands are currently undeveloped, previously providing the site compound and storage for development to the north. The Luas red line terminates at the Saggart stop, adjacent to the site at its southern boundary.

The surrounding area is characterised by new residential development to the north (soon to be completed development permitted under SHD3ABP-300555-18), residential development to the east and south, and lands associated with the Citywest Hotel and Convention Centre to the west.

LRD Process

A s.247 (Stage 1) pre-application consultation for this site was held on the 4th of April 2022. The record of the consultation is included in the appendices of this report.

A s32C (Stage 2) LRD Meeting was held on the 26th of January 2024. The record of the consultation is included in the appendices of this report.

SEA Screening

Indicates overlap with:

- Camac River Primary GI Corridor
- Flood Zone A
- Flood Zone B
- Aviation Safeguarding:
 - Bird Hazards - Casement
 - Inner Horizontal Surface - Dublin
- Solar Safeguarding: Baldonnell Solar Safeguarding Zone

Transportation Proposals on, or in close proximity to (100m), the site:

- Cycleways-Fortunestown Lane Garter Road to Citywest Ave
- Cycleways-Rathcoole to Saggart
- Cycleways-Fortunestown Lane Citywest Ave to Fortunestown Way
- Road Proposals - Six Year-Various Streets within the Fortunestown LAP lands.

Record of Protected Structures Within 100m of Site:

- 422, Range of rubble stone outbuildings, c.1820
- 292, Tower House, Walled Stable Yard, Outbuildings, Gateways (RM)

Planning History

The relevant planning history is contained in the appendices.

In summary, permission was granted for 488 no. apartments at the subject site under **SHD3ABP-305563-19**. This consultation is in relation to amendments to this permission.

Relevant Policy

A list of relevant national, regional, and local policies is included in the appendices.

Consultation Reports Received

Water Services	Appendix 5
Irish Water	Appendix 6
Housing Procurement	Appendix 7
Roads	Appendix 8
Public Realm	Appendix 9

ASSESSMENT

The main issues for consideration, as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD, are:

- Principle of Development – Zoning and Council Policy;
- Quality Design and Healthy Placemaking
- Housing and Residential Amenity
- Open Space and Green Infrastructure
- Sustainable Movement (Roads)
- Infrastructure and Environmental Services
- Environmental Considerations

Principle of Development – Zoning and Council Policy

The subject site is zoned ‘RES-N’ – *‘To provide for new residential communities in accordance with approved area plans.’* Residential development is permitted in principle under this zoning objective. Other relevant permitted in principle uses under this zoning include:

- Childcare Facilities
- Community Centre
- Public House
- Restaurant / Café
- Shop – Local
- Shop – Neighbourhood

The Fortunestown Local Area Plan expired on 13th May 2022. Development at the site was previously considered with regard to this plan. As the current proposal seeks to amend permitted development, the expiration of the LAP is not considered to prevent consideration of development at the site, and assessment of the development will be undertaken with regard to the policies and objectives of the South Dublin County Development Plan 2022 – 2028, and all relevant national and regional policy and guidance documents.

The subject site is identified as a Housing Capacity Site under Figure 9 of the CDP and is therefore recognised as having the capacity to accommodate residential development.

Policies and Objectives of Specific Relevance to Fortunestown

- **QDP14 SLO 1:** *To ensure the sustainable long-term growth of Citywest that continues to promote and facilitate the development of the Citywest / Fortunestown area in accordance with the phasing set out in the Fortunestown Local Area Plan 2012-2022 (as extended) or any superseding LAP, and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.*
- **COS2 SLO 1:** *That Citywest / Fortunestown areas are provided (from within their own community) public, purpose built and suitable amenities including:*
 - *Library;*
 - *Community centre and a community café;*

- *Accessible playgrounds / playspaces, teenspaces and youth amenities (such as a skate park);*
 - *Designed green spaces including a managed public park with adequate, accessible public seating and that can host festivals and community events;*
 - *Greater biodiversity in the area and more tree coverage;*
 - *Adequate numbers of pitches and clubhouses / pavilions for sports;*
 - *Adequate public childcare and afterschool facilities;*
 - *School sites.*
- **COS3 SLO 2:** *To deliver a community centre / community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan.*
 - **COS5 SLO 2:** *To require the provision of public open space and to ensure that the location, layout, and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands.*

The applicant should ensure that the **final application** fully justifies the level of non-residential uses and design of open space proposed, considering the increase in population that would arise from the development, and how this meets the relevant objectives of the Development Plan. The applicant may consider providing details of how ground floor units could be converted/amalgamated in the future, including potential non-residential layouts, to provide for an increase in non-residential uses based on future demand.

Quality Design and Healthy Placemaking

Urban Design and General Layout

The layout of the proposed development remains relatively unchanged from the original SHD application, which was considered appropriate by the Planning Authority in their assessment of SHD3ABP-305563-19. The primary amendments sought relate to the height and internal layouts of Blocks C, D and E, as well as the external elevations of these 3 no. blocks.

The development is roughly rectangular in shape with 5 no. apartment blocks arranged linearly, Blocks A – E. This consultation relates to amendments to blocks C, D and E. The blocks are located to the north of the red line Luas, with Saggart Luas stop located to the south of Block B.

Blocks C, D and E, subject of this amendment, are located centrally and to the east of the scheme, fronting Fortunestown Lane to the south and Parklands Parade to the north. Vehicular access to basement level car parking is provided at the north of the site, via Parklands Parade, at Blocks C and D. There are numerous pedestrian and cycle routes to and through the site, and these should be clearly marked on a permeability plan as part of the **final application**.

Communal and public open spaces are located between each block, and as central courtyards to each block, with good levels of passive surveillance and active frontage provided by ground floor commercial units where included.

The SDCC report prepared for ABP in relation to the SHD scheme concluded that *'Notwithstanding the concerns raised with the height and density of the proposal, in design terms when viewed in isolation, it is considered that overall, the scheme is well designed from an urban design perspective. The proposal would create good areas of open space between the proposed blocks included the public square with good connections between the neighbouring developments and the focal point of the LUAS stop.'* The Planning Authority maintains this position.

The **final application** should seek to provide for and demonstrate how public realm enhancements connected with this forthcoming amendment application have uplifted and enhanced the design of the scheme. Basement vehicular accesses should clearly prioritise pedestrian and cycle crossing and discourage vehicles from inappropriately pulling out into the path of vulnerable users. Detailed elevations should be provided for all elevations of all blocks to be amended, including elevations fronting internal courtyards. Where specific colours and materials are intended for elevational treatments and finishes, these should clearly be shown. The applicant should ensure that high quality materials are used throughout and minimise the overcomplication of elevational treatments proposed.

Building Height and Density

The applicant is seeking to increase the permitted height of Blocks C, D and E from 5 storeys to 6 storeys. The fifth storey of the permitted blocks was setback on the southern elevation, minimising the appearance of the building's heights. The applicant should consider a similar design as part of the amendment.

The applicant has provided a range of CGI's and verified photomontages of the existing circumstances as well as the permitted and proposed scheme. This allows for easy assessment and comparison of the development and should be included as part of the **final application**.

The density of the development would increase from a permitted 134 units per hectare to 159 units per hectare. It was noted at the preplanning meeting that the Fortunestown Local Area Plan envisaged a much lower density for the lands. While this LAP is no longer in effect, the applicant must consider how the site and surrounding areas can deliver necessary infrastructure and services to meet the demands of an increasing population. This may result in additional non-residential units being included in the scheme as appropriate. As part of the **final application**, the applicant will be required to justify the increased density, having regard to the recently published *'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities'* which came into effect in January 2024.

The applicant is proposing an increased use of render, and this should be avoided, especially on prominent elevations to the south, fronting the Luas. High quality and durable materials are favoured (Policy QDP11), and the over complication of material use is considered to detract from the attractiveness of the scheme. The Planning Authority considers the contrast of two brick tones and a zinc finish to the top storey appropriate. The applicant should minimise the use of render for elevations as part of the **final application**.

For the final application the applicant should provide a robust justification for increasing the development's density based on current and forthcoming public transport and active transport routes, including up to date information on the rollout of anticipated BusConnects routes. The applicant should address the provisions of Appendix 10 of the Development Plan, 'South Dublin County's Building Height and Density Guide' and Section 5.2.1 of the Development Plan and

utilise the guidance contained within the '*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*' in finalising the density of the scheme.

Sunlight and Daylight

The applicant has provided a Daylight & Sunlight Assessment Report which has assessed the development on the most current BRE Guidelines (2022), with reference to previous editions, and other guidance documents, where relevant. The assessment has been undertaken for a range of appropriate dates and with and without trees. This report concludes that the majority of the development is in compliance with the relevant guidelines. Impacts to existing dwellings, and permitted Block B, has been shown to be broadly in line with the permitted scheme.

For the **final application**, the applicant should ensure all new/amended dwelling units are in compliance with the relevant guidelines. While some relaxation of the standards is permissible, development should always strive to provide the best amenity value for future occupants, not just in terms of minimum sizing requirements, but also daylight/sunlight which can have a significant impact on the health and wellbeing of occupants. The final assessment submitted should account for any alterations to the development on foot of this Opinion Report.

Housing and Residential Amenity

Residential Accommodation

The applicant has not provided a Housing Quality Assessment so it has not been possible to determine that the proposed development would comply with '*Sustainable Urban Housing: Design Standards for New Apartments*' (2022), in relation to internal residential accommodation.

The applicant is proposing to amend the internal layouts at all levels of Blocks C, D and E. the use of deck access for some apartments is considered an acceptable way to improve activity and passive surveillance of communal areas and increase the number of dual aspect units provided. Units appear to be well designed and provide a cohesive layout. The applicant should ensure that all bathrooms are appropriately accessible from central circulation spaces, where not provided as additional en-suites, and that all private amenity spaces are accessed primarily from living areas and not bedrooms. Appropriate separation distances are achieved between units.

The final application must include a detailed Housing Quality Assessment which demonstrates full compliance with the relevant guidelines, on foot of any alterations to the scheme that are implemented as a result of this opinion. This HQA must detail apartment areas, storage provision, private open space provision and how each unit accords with the Development Plan standards, and standards of relevant guidelines. Individual floor plans of each unit type should be provided, in detail, with the sq.m and key dimensions of all rooms shown as well as storage areas and private amenity spaces clearly defined and sq.m/dimensions stated. Wardrobe space will not be counted towards storage provision. Where separate storage is provided in bedrooms, separate space for a wardrobe/chest of drawers must still be available within the room.

Single and Dual Aspect

50% of units would be dual aspect, in line with the '*Sustainable Urban Housing: Design Standards for New Apartments*' (2022) which encourages 50% provision of dual aspect in schemes where there is greater freedom in design terms to do so. There appears to be a single aspect north facing unit on the first floor of Block C.

Though this may be a drafting error, the applicant should ensure that all drawings are scrutinised prior to submission to ensure all drawings are consistent and no single aspect north facing units are proposed. The applicant should note that, to be considered dual aspect, access or a window opening must be provided to both aspects to facilitate cross ventilation. The applicant should review the development to ensure all dual aspect units meet this requirement and make amendments where necessary. Provision of dual aspect below 50% will not be considered acceptable.

The Final Application should show that the apartments in the scheme comply with the *'Sustainable Urban Housing: Design Standards for New Apartments'* (2022) requirements for dual aspect in apartments, and the provision of dual aspect units should be maximised. In addition, no single aspect north facing units should be provided, and the proposal of such is considered unacceptable by the Planning Authority.

Unit Mix

The unit mix for Blocks C, D and E (permitted and proposed) is as follows:

	Permitted		Proposed		Change / Increase	
Unit Size	No.	%	No.	%	No.	%
1 bed	75	24%	100	25%	25	33%
2 Bed (4)	204	66%	239	60%	35	17%
3 Bed	31	10%	57	14%	26	84%
Total	310		396		86	

The proposed development does not meet the minimum 30% requirement for 3-bedroom units under the South Dublin County Development Plan 2022 – 2028, as per Policy H1 Objective 12. Fifty seven 3-bedroom units are proposed as part of these amendments, accounting for an 84% increase in the number, but only 14% of units. In total across all 5 blocks, the proposed development would provide 69 no. 3-bedroom units, 12%.

The final application should demonstrate compliance with Policy H1 Objective 12 of the South Dublin County Development Plan 2022 – 2028. Where the applicant does not intend to comply with this objective, a robust rationale and defence of the unit mix will be required. For ease and transparency, as stated previously, 2 Schedules of Accommodation should be provided, showing the permitted and proposed mix for the blocks to be amended (C, D and E), and for the entire development (A, B, C, D and E).

Communal Open Space

The applicant has stated that 3,016 sq.m of communal open space would be provided, in central courtyard areas for each block. It is not clear whether these areas are enclosed, to ensure access only to residents, or if there are no barriers to public access, effectively rendering these areas as additional public open spaces.

Given the location of open space areas, and the orientation of buildings, all open spaces are provided with ample passive surveillance. In addition, landscaping has been appropriately designed to provide privacy screening to ground floor residential units.

The applicant should make clear in the **final application** how communal open spaces are to be managed as priority spaces for residents. The Planning Authority does not object, in theory, to the provision of joint communal/public open spaces, as long as residents' interests are prioritised. The applicant could consider the provision of communal roof terraces, to ensure secure, private, communal open space is provided, as well as integrated communal/public open spaces at ground level.

Public Housing / Part V

The Housing Department has advised that the applicant will be required to submit proof of date of purchase of the site in order to confirm the percentage Part V obligation for the development. Their report states it is the Council's preference to acquire units on site, and that agreements can only be made in respect of permitted developments. The applicant will be required to engage directly with the Housing Department regarding their proposal for Part V, noting that further proposals are subject to review, and no agreement can be made prior to costing a permitted scheme.

Childcare Provision

A 431 sq.m creche is permitted within Block B, included within the red line boundary but without any amendments sought to this building. The applicant states that this creche has the capacity to accommodate in excess of the minimum no. childcare spaces required to serve the amended development (if permitted). While no alterations are proposed to the creche, the South Dublin Childcare Committee (SDCCC) have provided the following comments:

SDCCC note that the planning application LRDOP005/23 finds that the proposed floor plans submitted do not align with Tusla Early Years Regulations recommendations under the Childcare Facilities Guidelines for Planning Authorities 2001 and the Universal Design Guide. Our examination of the plans revealed the following concerns.

- *SDCCC identifies the following potential requirement for childcare places for the entire development of 574 housing units in total excluding 118 one bedroom apartment gives a total of 456 units requiring childcare provision which equates to $(456/75)*20 = 121.6$ childcare places .*
Appendix 2 Application of the Standard of One Childcare Facility per 75 Dwellings in New Housing Areas, SDCCC note that: "If an assumption is made that 50% approximately of the housing area will require childcare, then in a new housing area of 75 dwellings, approximately 35 will need childcare.
- *The positioning of the larger sleep room along the main corridor, immediately after the reception, contradicts the recommendations outlined in the Universal Design Guide. According to the guide, sleep rooms should be situated away from high-noise areas within the building. Additionally, the plans lack information regarding whether there are viewing panels in the wall separating the baby room from the sleep room.*
- *Universal Design Guide: Dedicated sleeping rooms should be located away from noisy or busy parts of the setting. They should be directly accessible to the main children's room to enable high levels of staff supervision. Supervision will be enhanced by glazed doors and panels between the sleeping room and the main room that provide staff views into the sleeping room.*
- *As per the plans, there isn't a designated milk sink in the kitchen, which is essential when considering the ages of the children utilizing the service.*
Universal Design Guide: A milk kitchen with sink, fridge, and storage areas (this may be located in the main kitchen depending on the size of the setting)

- *There isn't any available storage space which is insufficient considering the creche's overall size.*
Universal Design Guide Internal Storage In addition to storage located directly within children's rooms, a general storage area accessed by a corridor or common space such as the entrance or reception area should be considered for buggy/ car seat storage.
- *The plans do not designate a disabled toilet.*
Universal Design Guide: An accessible toilet should be located close to the waiting area and should be clearly visible and identifiable for all users.
- *The plans do not include a kitchen.*
As per Regulation 22: Food and Drink Adequate quantities of food and suitable portion sizes are available for children. The food is suitable for the age and stage of development of the child, and there is enough food supplied to cover the number of hours the child is in the care of the service. Children in Full Day Care – that is, for more than 5 hours – have at least two meals and two snacks offered to them, one of which is a hot meal. If a child does not want the food offered for any reason, a healthy alternative is offered.
- *There is no offering for the 2-3 age group.*
- *The Early Childhood Care and Education Programme (ECCE) is a free universal two-year preschool programme available to all children within the eligible age range. The programme is free and available to all children who have turned 2 years and 8 months of age by 31st August, and not be older than 5 years and 6 months of age on or before 30th June, of the programme year. In 2021/22, 107,711 children benefitted from the ECCE programme with 95% of the eligible cohort availing of at least one year of the ECCE programme. Early Childhood Education and Care (europa.eu).*
- *The plans do not provide the size of the outdoor play area. Plans also do not indicate they type and height of the safety fencing to ensure no access to the creche outdoor play area by members of the public. SDCCC would like for it to be considered for trees to be planted to ensure the children's privacy as the outdoor area is overlooked.*
- *While the Childcare Act 1991 (Early Years Services) Regulations 2016 do not have a recommended minimum outdoor space, based on International research the National Children's Nurseries Association (2002) suggests that consideration be given to 9m² per child.*
- *No laundry room indicated on the plans.*
Universal Design Guide Laundry and utility areas are an essential part of ELC settings and will typically contain a washing machine, dryer, or airing cupboard. An area for cleaning equipment and products may be included in this room or be stored in a separate room. The cleaning area should contain a large sink and draining board, a lockable storage area, and a low-level sluicing sink. The laundry and utility should not be accessible to children, and it should be separate from the kitchen or food preparation area.
- *The plans do not indicate staff toilets.*
Regulation 29 Premises Adequate and suitable sanitary facilities. Adult toilet and wash-hand basin. Separate, adequate, hygienic, and soundly constructed toilet facilities are provided for staff. A minimum of one toilet and one wash-hand basin is provided for every 8 staff.

Although there are several childcare providers in the immediate area, the supply does not meet the current demand and have no additional capacity currently, Citywest and Saggart, Lucan and Adamstown are area's in particular that parents find it most difficult to secure childcare places.

Given the requirements under The Child Care Act 1991 (Early Years Services) Regulations 2016, Childcare Facilities Guidelines for Planning Authorities 2001 and the Universal Design Guidelines for Early learning and care settings SDCCC consider that planning permission is not feasible with the current creche layout plans.

As Block B is included within the red line boundary of the application site and given the scale of the increase in dwelling units to the forthcoming amendment application, the applicant address the above issues as part of a **final application**, to ensure that childcare facilities at the site are appropriate for the requirements of the South Dublin Childcare Committee and meet all necessary regulations. In particular, the improvement and expansion of the childcare unit to Block B may potentially reduce the Planning Authority's concern about the absence of any increase in the quantum of communal and public open space arising from this amendment application for an additional 86 dwellings to the subject site and represents an **opportunity** for the prospective applicant.

Open Space and Green Infrastructure

The Public Realm Department's report is included in full at Appendix 9. The main concerns raised by the Public Realm Section are as follows:

1. **Green Infrastructure** - *The applicant has not demonstrated compliance relevant SUDS Policies within the CDP 2022-2028 and with SDCC Sustainable Drainage Explanatory Design & Evaluation Guide 2022 Sustainable Drainage Systems - SDCC. The applicant needs to demonstrate how they have contributed to the protection or enhancement of Green Infrastructure through the provision of green infrastructure elements as part of the development proposals. The applicant must provide a GI Plan as part of the landscape proposals.*
2. **SUDS** - *The applicant needs to demonstrate compliance with relevant policies relating to SUDS as set out in the CDP 2022-2028. The Applicant is required to submit a SUDS Layout Plan including a Flow Route Analysis. Development proposals should provide suitable drainage measures in compliance with the South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, 2022. The focus should be on natural SUDS features and above ground attenuation. Sustainable Drainage Systems include devices such as swales, permeable pavements, filter drains, storage ponds, green roofs, suds tree pits. Detailed natural SUDS Strategy required for the proposed development.*
3. **Public Open Space Provision** - *It is not clear whether the development meets the overall standard for public open space of 2.4 hectares per 1,000 population and whether that applicant has provided the required open space provision for the additional 86 units as required by the CDP 2022-2028.*

The above points are noted and should be addressed by the applicant in the **final application**. The Planning Authority is aware of the absence of a supporting Development Contribution Scheme and having regard to Section 8.7.4 Delivery of Public Open Space and Contributions in Lieu and COS5 Objective 5-7, however proposals to address this element of the CDP are invited. The Planning Authority will continue to implement its policy provisions in relation to minimum on-site public open space provision of 15% for new residential development on lands zoned 'RES-N', as per COS5 Objective 4 and in accordance with details set out in Table 8.2 and Table 12.22.

Additionally, the s32C meeting addressed the following issues:

- Green Space Factor worksheet linked to Green Infrastructure plan required.

Quantum of Public Open Space

The South Dublin County Development Plan 2022 – 2028 policy on public open space requires a minimum 15% provision of public open space on ‘RES-N’ lands but, in addition, seeks a contribution towards, or provision of, 2.4 Ha. of quality public open space per 1,000 persons. The applicant states 1.369 ha (13, 690 sq.m) of public open space would be provided. The Planning Authority does not agree that the applicant’s assertion that, as the proposed development is an amendment to permitted development, the development does not represent new residential development. The applicant should address the provision of 15% on-site public open space in connection with the additional 86 dwellings. The sites land use zoning is ‘RES-N’ regardless of whether there is residential development at the site or not and as such the applicant is required to comply with all policies and objectives relating to this site’s zoning.

The Public Realm report states that, in the **final application**, the applicant should *‘submit in table form the percentage (%) and area in sq.m the of the proposed private, semi-private and public open space provision within the site. The applicant should demonstrate compliance with the South Dublin County Development Plan 2022-2028 (for the additional 86 dwellings) in relation to open space.’*

On review of the landscape proposals provided, and based on feedback from the preplanning meeting, the applicant is advised to find opportunities where possible to increase the amount of public open space provided as part of the development. The applicant should also find opportunities to enhance the quality of existing permitted public open space to cater for the additional future population to the 86 dwellings. In addition, improvements to the design of SuDS throughout the site should be provided.

As stated elsewhere, applicant is reminded that the proposed amendments will be assessed under the policy framework in place at the time of the assessment/decision. On this basis, while regard may be had to the permitted scheme and the basis for its design, the obligation of the applicant to comply with current policy in relation to SuDS, open space provision and green infrastructure cannot be eliminated. It is the planning authority's opinion that the amendments to add 86 dwellings are significant in scale.

For the **final application**, the applicant should ensure that the breakdown of public open space is clearly provided, on drawings and in tabular form, and that all areas included towards the 15% public open space requirement provide a tangible amenity benefit. Additional proposals to meet the 2.4ha per 1000 requirement to the CDP are also invited. The applicant should note that re-designation of some of the provision of communal open space could allow for additional public open space areas at ground level, providing the quantum of communal open space complies with the Apartment Guidelines and clear distinction is made between proposed communal open space and public open space.

Layout of Public Open Space

The general layout of open space remains largely unchanged from previous applications and meetings. The applicant refers to public open space provided throughout the subject site and wider blue line landholding, Parklands Phase 1. In assessing the layout and acceptability of public open space proposals and other policy requirements, the Planning Authority can only consider and assess those areas included in the red line boundary.

The site layout plan submitted indicates public open space provided as 2 north-south connection spaces, between Blocks C and D and Blocks D and E. These areas provided landscaped routes to public space at the south of the red line landholding adjacent to the Luas. This layout remains unchanged from the previous application and is acceptable.

The site layout plan and landscape masterplan submitted include red hatching over a large portion of the site which is stated as not part of consideration for the amendment application. It is not clear why these areas are excluded, and the applicant should address this as part of the **final application**.

The Planning Authority recommends that for the **final application**, the applicant focuses on increasing open space, maximising the useability of all areas indicated for open space and providing suitable upgrades to the landscaping and amenity value of these spaces to cater for additional population.

Sustainable Drainage Systems

As per the South Dublin County Development Plan 2022 – 2028 underground attenuation should only feature in new developments as a last resort, when ground or higher-level features have been exhausted, in particular natural features. It is noted that underground attenuation was permitted under the parent permission (SHD3ABP-300563-19), but the applicant should seek the opportunity to increase the level of above ground, natural, SuDS proposed, to improve the sites above ground attenuation capacity, enhance green and blue infrastructure and make the scheme compliant with the current policy framework of the County. The Planning Authority accepts that some features may not be easily amended, but the applicant should seek opportunities to improve the SuDS provision for the site where possible. The applicant should note that the use of underground attenuation under public open space is unacceptable and will not be supported. If any underground attenuation is shown under areas indicated as public open space, their contribution to POS percentages will be discounted.

The Water Services Report is included in full at Appendix 5. In summary, the report states the following will be required as part of the final application:

- Flood risk assessment study,
- Drawing showing the footprint of development overlaying all of the site including areas of Flood Zone A and B,
- Clear and sufficient attenuation calculations – a report showing attenuation in m3 for Phase 1 and Phase 2,
- 20% increased factor for Climate Change when assessing surface water attenuation,
- Attenuation of surface water close to source and not piped over long distances.

The Public Realm Section indicate a revised SuDS strategy is required, with an emphasis should be placed on above ground, natural SuDS. Furthermore, they state the requirement for a conveyance plan, to address the management and conveyance of surface water runoff from the site.

It is noted that the proposal is currently seeking to increase a permitted development by 1 storey, there are concerns with the landscaping and SuDS scheme permitted. While the Planning Authority may be considered limited in the scope with which they can require a complete revision of the permitted scheme, as the applicant is seeking to alter the apartment buildings at all levels, the scheme could be considered to be providing new apartment buildings, which would allow for the revisitation of the SuDS arrangements associated with these blocks and associated open space areas.

The applicant is strongly encouraged to improve the SuDS arrangements for the site, with regard to minimising surface water runoff, in particular given the sites location within Flood Zones A and B, where vulnerable development is not encouraged.

The final application should provide robust details of all SuDS for the scheme, minimise, and omit where possible any inclusion of underground attenuation and address the requirements of both Water Services and Public Realm. The SuDS strategy should be informed by a flow route analysis of the site and conveyance plan, prepared by a suitably qualified professional, and the applicant should be able to show that the scheme maximises the potential use of natural SUDs features, including those which have a wet or dry amenity use, such as tiered detention basins. A comprehensive SuDS Management Plan will also be required. Where amendments to the permitted strategy cannot be facilitated, the applicant is required to provide a robust justification for the strategy proposed.

Flood Risk

A significant portion of the site is indicated to be located within Flood Zone A and Flood Zone B. The Strategic Flood Risk Assessment, prepared as part of the 2022 Development Plan, states that existing open spaces in Flood Zones A and B should be retained to maintain flood storage areas.

Water Services have raised concerns with the flood risk assessment submitted. As noted by both Public Realm and Water Services, the applicant has only allowed for climate change allowance of 10% when, per OPW guidance, this should be +20%. The applicant should note that in assessing for flood risk to the additional 86 no. dwelling units, flood defences should not be considered as they only reduce flood risk, they do not eliminate the risk entirely.

A revised flood risk assessment should be provided taking the above into account with the **final application**. Additional nature-based and climate resilient SUDs measures may go some way to addressing this issue having regard to the permitted footprint of the development for the forthcoming amendment application.

Sustainable Movement (Roads)

The s32C pre-planning meeting addressed the following issues with regards to traffic, access, and movement:

- Clarity needed across documents in terms of parking ratios, what has/hasn't been included for assessment and differences between permitted and proposed development.

The Roads Department has additionally noted the following information will be required as part of the **final application**, summarised below and contained in full at Appendix 8:

1. *To continue cycling/pedestrian routes through development, the applicant should provide layout details at a 1:200 scale of the cycleways ensuring compliance with the most recent cycle design manual from the NTA.*
2. *The applicant shall submit an updated Taking in Charge drawing to include any revisions to the road layout.*
3. *Layouts of the proposed vehicle access points, detailing dimensions, sight lines, DMURS compliance etc.*
4. *The applicant shall submit an Autotrack detailing the altered basement layout.*
5. *The applicant is requested to submit a pedestrian/cycle permeability layout detailing any changes from previous permission, particularly to the south of the development along the LUAS.*
6. *A revised car parking calculation showing consistent floor area figures and parking*

rates.

7. *A revised taking in charge layout showing the public/private areas.*

The Roads Department note that the width of the vehicular basement access appears to be widened from 6.2m to 7m, resulting in a greater crossing distance for pedestrians. The Planning Authority would prefer the width of entrances to be minimised and measures to be provided that clearly prioritise pedestrian and cycle movements across accesses. The **final application** should include such details.

The site is considered to be located in Zone 2 of the county for the purposes of car parking provision. The Roads Department note inconsistencies across the submission regarding the number of car parking spaces. For clarity, as part of the **final application**, the applicant should provide a clear breakdown of all residential and non-residential uses, permitted, and proposed across all 5 no. blocks (A – E). Site layouts and floorplans should clearly indicate all car parking spaces and how these are allocated, whether to residential or non-residential uses, to ensure that across the entire development the needs for each use are being met at an appropriate level within the constraints of the maximum parking rates permissible per the Development Plan or SPPRs to Compact Growth Guidelines. The applicant is also required to indicate how mobility impaired spaces and EV spaces would be allocated.

The basement is proposed to be extended under Block C to provide for the additional car parking required. The basement plan provided only includes the area under Blocks C, D and E only, however, a new connection is indicated into the basement area under Blocks A and B to the west. If such a connection is proposed, a detailed layout for the whole basement area is required. This should be provided with the **final application**, as well as details for the location of refuse collection and corresponding autotrack analysis.

The applicant should address the above, and other relevant items contained in the Roads report, in submitting their **final application**.

Infrastructure and Environmental Services

Irish Water

The Irish Water report states no objection subject to the submission of confirmation of feasibility letters and connection agreements. The applicant notes that a confirmation of feasibility was provided with the permitted SHD application, however, does not appear to have provided a Pre-Connection Enquiry / Confirmation of Feasibility from Irish Water in relation to the amendment development. This should be submitted as part of the **final application**.

Environmental Considerations

Screening for Appropriate Assessment

The **final application** will be screened for appropriate assessment, and an Appropriate Assessment Screening Report should be provided. The applicant should not rely on environmental or ecological surveys that were undertaken more than 2 years prior to the date of submission of the final application.

Environmental Impact Assessment

The proposed development is for 86 no. units, in addition to 488 no. units previously permitted. While the amendment itself is, sub-threshold for the requirement of Environmental Impact Assessment (EIA), the overall development would provide 574 no. units, which would trigger mandatory EIA.

Class 13 of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended) states:

13. Changes, extensions, development, and testing

(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-

- (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and*
- (ii) result in an increase in size greater than –*
 - 25 per cent, or*
 - an amount equal to 50 per cent of the appropriate threshold, whichever is the greater.*

The development would result in the construction of 574 no. units however, the additional 86 no. represents an increase of approximately 18% and is therefore below the threshold requiring EIA to be undertaken. The amendments would not result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of Schedule 5 of the Regulations. On this basis, mandatory EIA is not required however, the application should provide an up to date and appropriately detailed EIA Screening Report, and other necessary documents for the assessment of same, with the **final application**. All data informing these reports must be within the appropriate timescales to be considered current, relevant, data.

CONCLUSION AND RECOMMENDATIONS

Taking into account the discussion held at the s32C LRD Meeting, and the particulars received for the purpose of that meeting, it is the conclusion of the Planning Authority that the submitted particulars alone and in their present form **do constitute a reasonable basis** for making an LRD planning application, **subject to further consideration and amendment** based on the recommendations and assessment contained in this report.

In the event that the applicant proceeds to submit a planning application, the LRD application should include:

- A statement of response to the issues in the LRD Opinion
- A statement that in the applicant's opinion, the proposal is consistent with the relevant objectives of the South Dublin County Development Plan 2022 - 2028.

The above assessment highlights those areas in which the particulars submitted are lacking, or those issues which remain to be reconsidered or addressed by the applicant in any documents submitted with a future planning application. These items are summarised as follows:

- The amendment application for an additional 86 dwellings and amendments to existing permitted dwellings is an application of scale. The provision of supporting amenities, services and infrastructure must comply with the current policy framework. The applicant cannot rely on the details of the permitted scheme as justification for the forthcoming application. Similarly, the applicant cannot rely on development outside the red-line boundary to support this forthcoming application.
- The pre-planning documents submitted lack clarity in terms of distinguishing between the permitted scheme and the amendment proposal, this should be remedied at application stage.

- Justification of the increase in height and density proposed based on the provisions of the South Dublin County Development Plan 2022 – 2028, in particular Appendix 10 ‘Building Height and Density Guide’, and the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ which came into effect in January 2024. Justification of the density of the development should also be based on the context and setting of the site, including up-to-date accessibility data for the site, in particular Luas capacity.
- The improvement and expansion of the childcare facility to Block B in line with the recommendations of the SDCC Childcare Committee as a means of uplifting the overall quality of the proposals and reducing the Planning Authority’s concerns about the amenity of the development for prospective residents, in particular in relation to the quantum of public open space for the residents of the additional 86 dwellings should be considered.
- Public realm improvements are required to demonstrate that the required on-site quantum of public open space (15%) is provided along with proposals to ensure compliance with policy for 2.4ha per 1000 population, as it pertains to the additional 86 units. The use of roof terraces to provide additional communal open space should be explored. The re-designation of some permitted communal open space as public open space and the abutting of these open space typologies is acceptable subject to clarity of how these spaces are being amended, counted and classified.
- The amenity value of permitted public and communal open space should be maximized and this enhancement of quality of these open spaces should be clearly demonstrated.
- Flow route analysis and conveyance plan required to inform SuDS strategy at the site which maximises above ground, natural, attenuation. While it is accepted that SuDS measures at the site have been permitted under SHD3ABP-305563-19, there is an opportunity to enhance and upgrade these proposals, to increase the level of above ground SuDS included within the scheme, minimise piping and incorporate additional green and blue landscape features to manage surface water. This is particularly important given the sites location within Flood Zones A and B.
- A revised Site-Specific Flood Risk Assessment is required to address the introduction of an additional 86 no. dwellings into Flood Zones A/B, notwithstanding the permitted footprint of any parent permission. The SFRA should exclude the consideration of flood risk intervention measures as these cannot be considered to alter a site’s flood risk status as per the Flood Risk Guidelines for Planning Authorities. The Flood Risk Assessment must have a climate change allowance of +20%

Specified Information required in addition to Article 23 of the Planning and Development Regulations (as per Article 16A(7))

The below list advises on particulars required, echoing and in addition to those particulars provided for the purposes of the LRD Meeting, or particular issues which may need to be addressed as part of those particulars. This list is not exhaustive and may not include such particulars as may relate to issues not covered in this report, or otherwise not apparent from the particulars already submitted.

1. Permitted drawings, including floor plans and elevations, of all blocks for which

amendment is sought.

2. Housing Quality Assessment
 - a. Detailed floor plans for all apartment types, colour coded for size, including sq.m of all rooms, storage areas and private amenity spaces along with key dimensions.
3. Schedule of Accommodation
 - a. To include adequate information in relation to the calculation of Development Contributions.
 - b. Section in Planning Report to demonstrate compliance with, or robust justification for not complying with, Policy H1 Objective 12
4. Architect's Design Statement
 - a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan)
 - b. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide
5. Detailed CGI's of development during summer and winter (trees with and without leaves).
 - a. CGI's should include baseline, permitted and proposed views.
6. Elevations of all sides of all buildings, including elevations of internal courtyards.
7. Details of proposed elevational materials, minimising the use of render and prioritising high quality, durable materials, in particular at key locations fronting the Luas.
8. Full basement plan for the area under Blocks A and B and Blocks C, D and E. Where a connection or other alterations are proposed that would impact the basement under

Blocks A and B, this must clearly be stated on the notices and in the description of development.

9. Traffic and Transport Assessment
 - a. Updated to include current public transport routes serving the site.
 - b. Capacity study of routes serving the site.
 - c. All drawings within report to be consistent with final proposal.
10. Sunlight and Daylight Analysis incorporating any changes to the scheme resulting from this Opinion.
11. Green Infrastructure Plan, to include:
 - a. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County.
 - b. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site.
 - c. Indicate how the development proposals link to and enhance the wider GI Network of the County.
 - d. Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site.
 - e. Proposals for identification and control of invasive species where appropriate, for the site.
12. Green Space Factor Calculations – required for proposed scheme and can include separate calculations sheet for permitted development.
13. Landscape Scheme, to include:
 - a. Planting plan:
 - i. Location of species, types of plants, planting sizes and proposed numbers/densities,
 - ii. Implementation timetables,
 - iii. Proposals for future maintenance/management.
14. Taking in Charge Plan
15. Layout Plans, not less than 1:200 scale to show:
 - a. Pedestrian and cycle routes throughout the development ensuring cycleways are compliant with the most recent cycle design manual from the NTA.
 - b. Vehicle access points detailing dimensions, sight lines, DMURS compliance and measures to prioritise pedestrian and cycle movements at these points.
 - c. Autotrack detailing the altered basement layout and visibility splay of vehicles exiting the basement level.
 - d. Location of the refuse collection points and associated autotrack/swept path analysis where relevant.
 - e. Location of 20% EV charging car parking spaces
 - f. A total of 5% Mobility Impaired Car Parking Spaces
16. SUDs Strategy, to include:
 - a. SUDs Design details
 - b. Flow route analysis for site.
 - c. Comprehensive surface water conveyance plan for the site
 - d. Drawing showing how much surface water is attenuated in m³.
 - e. Revised report showing surface water attenuation calculations for proposed development.
 - f. Revised calculation reports showing increased surface water attenuation provided and show calculations for same. Examine if additional surface water

attenuation can be provided in green areas and by means of SuDS (Sustainable Drainage Systems).

- g. If underground tanks present, why these cannot be excluded from the design.
- h. SUDs Layout identifying the different types of SUDs features.
- i. Demonstrate adherence to SDCC SUDs guidance.
- j. Drawing showing plan and cross-sectional views of all SuDS features.

17. SUDS Management Plan

18. Confirmation of Feasibility from Irish Water

19. Appropriate Assessment Screening Report

20. Environmental Impact Assessment Report (EIAR) or Screening Report as necessary

21. Building Lifecycle Report

22. Community and Social Infrastructure Audit

23. Part V Proposals

The Planning Authority has set out its considerations in this report. The applicant is invited to address those issues identified. For more detailed consideration, the technical consultations received are included below in the appendices.

APPENDICES

Contents

Part A – Planning Context

Appendix 1 – Relevant Planning History

Appendix 2 – Relevant Planning Policies

Part B – LRD Process

Appendix 3 – s.247(1A) Meeting Notes

Appendix 4 – s.32C LRD Meeting Notes

Part C – Consultee Reports

Appendix 5 – Water Services

Appendix 6 – Irish Water

Appendix 7 – Housing

Appendix 8 – Roads


Appendix 9 – Public Realm

The Planning Authority has set out its considerations in this report. The applicant is invited to address those issues identified. For more detailed consideration, the technical consultations received are included below in the appendices.



Gormla O'Corrain,
Senior Planner

Date: 15 Feb 2024



Mick Mulhern, Director of
Land Use, Planning &
Transportation

APPENDICES, PART A – PLANNING CONTEXT

Appendix 1 – Relevant Planning History

Subject Site

SHD3ABP-305563-19: 488 apartment units comprising 118 1-bed units, 327 2-bed units and 43 3-bed units arranged in 5 blocks (Blocks A to E) and all associated public open spaces comprising landscaped courtyards and communal amenity spaces and private amenity spaces comprising terraces/balconies. The proposed Blocks A and B and Blocks C, D and E are arranged over separate single levels basements and comprise 5 storey blocks with a 9 storey element in Block B. Non-residential floorspace is proposed in the form of a creche of 431sq.m gross floor area, community space of 186sq.m and 472sq.m of retail/commercial floorspace divided across 3 units at ground floor level within Block B and 708sq.m of retail/commercial floorspace divided across 3 units and 1 café/bar/restaurant of 188sq.m within Block C all fronting onto a proposed landscaped local square located to the north of Saggart Luas stop. Vehicular access to serve the proposed development will be provided from a signalised junction at the south-eastern corner of the site replacing the existing roundabout off Fortunestown Lane and west of Cuil Duin and an east/west distributor road all as permitted under the neighbouring development (ABP Ref. 300555-18). Permission is also sought for 418 car parking spaces including 405 basement level spaces and 13 surface level spaces and a total of 706 cycle parking spaces including 620 basement level spaces and 86 surface level spaces, bin storage areas, ESB substations, public lighting, boundary treatments, surface water drainage infrastructure including modifications to the previously permitted flood conveyancing channel (ABP Ref: 300555-18) and all associated site development and infrastructure works. **Granted, subject to following relevant conditions:**

2. *The development shall be carried out on a phased basis, in accordance with a phasing scheme which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of any development. Specifically:*
 - a. *the proposed phasing programme submitted with the application shall be amended so that the local square/plaza located at the centre of the site linking the LUAS stop to the first phase of permitted development to the north (An Bord Pleanála reference 300555-18 refers), is provided as part of the first phase of the overall residential development. This element of the development shall be completed before any residential unit is occupied.*
 - b. *the measures contained in the site-specific Flood Risk Assessment with specific reference to the flood conveyance channel located at the eastern boundary of the site shall be included in the first phase of development, unless otherwise agreed. Other measures outlined in the Flood Risk Assessment shall be implemented in full.*

Reason: To provide for the orderly and sustainable development of the site and compliance with the provisions of the County Development Plan and Local Area Plan.

7. *No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas, or equipment, unless authorised by a further grant of planning permission.*

Reason: To protect the residential amenities of property in the vicinity and the visual amenities of the area.

Adjoining Lands to the North

SHD3ABP-300555-18: A residential development comprising: 526 residential units and all associated site and development works as follows: - 274 3-bed 2 storey terraced units, 185 4-bed 2 and 3 storey terraced and end of terrace units, 67 2-bed apartment/duplex units (37 2-storey, 2 bed terraced duplexes, 18 1-storey 2 bed terraced apartments and 12 1 storey 2 bed end of terrace apartments). The development also provides for a district park (4.58 ha) and a neighbourhood park (0.71 ha) in accordance with the Fortunestown Local Area Plan 2012. Permission is also sought for 789 car parking spaces, bin storage areas, ESB substations and all associated site development and infrastructural works. Vehicular access to serve the proposed development will be provided via two new access points off Garter Lane and via a new signalised junction at the southeastern corner of the site to replace the existing roundabout off Fortunestown Lane. Provision is made for a future access to Bianconi Avenue. In addition, an interim local square is proposed within the subject site providing a direct pedestrian link from the proposed development to the Saggart Luas stop. Two direct pedestrian links are proposed between the subject site and the adjoining school sites permitted under Reg Ref No SD16A/0255 providing a direct link between the school and the proposed district park and a direct link from the west of the school site to the proposed residential development. Lands identified for future development are located along the southern boundary of the current application site adjacent to Fortunestown Lane/Saggart Luas Stop. These areas will be subject of a future planning application (Phase 2) and will include the final design and layout of the local square. **Permission granted – extended to 30 June 2016 per SHD3ABP-300555-18-EP.**

Appendix 2 – List of Relevant Policies and Objectives

National and Regional Policy Documents of Relevance

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

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

‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ (2024)

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2022).

Urban Development and Building Heights – Guidelines for Planning Authorities’ (2019)

Quality Housing for Sustainable Communities-Best Practice Guidelines, Department of the Environment, Heritage, and Local Government, 2007.

Urban Design Manual; A Best Practice Guide, A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage, and Local Government, (2008).

Design Manual for Urban Roads and Streets Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage, and Local Government, (2009).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Building Research Establishment, (1991).

Transport Strategy for the Greater Dublin Area 2016 -2035 (NTA) National Cycle Manual – National Transport Authority (June 2011)

South Dublin County Development Plan 2022 – 2028

Chapter 2 Core Strategy

Policy CS6: Settlement Strategy – Strategic Planning Principles

CS6 Objective 3: Settlement Strategy

Chapter 3 Natural, Cultural and Built Heritage

Policy NCBH1 Overarching

Policy NCBH2 Biodiversity

Policy NCBH3 Natura 2000 Sites

Policy NCBH4 Proposed Natural Heritage Areas
Policy NCBH5 Protection of Habitats and Species Outside of Designated Areas
Policy NCBH10: Invasive Species

Chapter 4 Green Infrastructure

Policy GI1 Overarching
Policy GI2 Biodiversity
Policy GI3 Sustainable Water Management
Policy GI4 Sustainable Drainage Systems
Policy GI5 Climate Resilience
Policy GI6 Human Health and Wellbeing
Policy GI7 Landscape, Natural, Cultural and Built Heritage

Chapter 5 Quality Design and Healthy Placemaking

Policy QDP1 Successful and Sustainable Neighbourhoods
QDP1 Objective 5: The Plan Approach
Policy QDP 2 Overarching – The Plan Approach
QDP2 Objective 1: The Plan Approach
Policy QDP3 Neighbourhood Context
Policy QDP4: Healthy Placemaking
Policy QDP5: Connected Neighbourhoods
Policy QDP7: High Quality Design – Development General
Policy QDP8 Building Height and density Guide.
Policy QDP9: High Quality Design - Building Height and Density
Policy QDP11: Materials, Colours and Textures
QDP14 SLO1: Local Area Plans (LAP)

Chapter 6 Housing

Policy H1 Housing Strategy and Interim Housing Need and Demand Assessment
H1 Objective 12
Policy H2 Supply of Housing
H2 Objective 6
Policy H7 Residential Design and Layout
Policy H8 Public Open Space
Policy H9 Private and Semi-Private Open Space
Policy H10 Internal Residential Accommodation
Policy H11 Privacy and Security

Chapter 7 Sustainable Movement

Policy SM1 Overarching – Transport and Movement
Section 7.5.2 Cycle South Dublin
Table 7.1 Cycle South Dublin Routes and Projects: Route 17
Policy SM2 Walking and Cycling
Policy SM3 Public Transport
Policy SM5 Street and Road Design
Policy SM6 Traffic and Transport Management
Policy SM7 Car Parking and EV Charging

Chapter 8 Community Infrastructure and Open Space

Policy COS5 Parks and Public Open Space – Overarching

Section 8.7.3 Quantity of Public Open Space

Table 8.2 Public Open Space Standards

Section 8.7.4 Contributions in Lieu

Section 8.7.5 Quality of Public Open Space

Section 8.7.6 Play Facilities

COS5 SLO 2: Parks and Public Open Space

Chapter 11 Infrastructure and Environmental Services

Policy IE3: Surface Water and Groundwater

Policy IE4: Flood Risk

Chapter 12 Implementation

Appendix 4 Green Infrastructure Local Objectives and Case Studies

Camac River Primary GI Corridor

Appendix 10 South Dublin County’s Building Height and Density Guide

APPENDICES PART B – LRD PROCESS

Appendix 3 – s.247(1A) Meeting Notes

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM			
Pre-Planning Ref. No. LRDPP002/23	ADVICE WITHOUT PREJUDICE		Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act
CONSULTATION:	Meeting	Email	
04/04/2022	X		
Full address of subject site	Fortunestown Lane, Saggart		
Name/s of Applicant/s. and/or Agents	Applicant: Greenacre Residential DAC		
Contact Details	Agent: BMA Planning		

DESCRIPTION OF PROPOSAL
<p>Amendments to the permitted development (ABP-305563-19) as follows:-</p> <ul style="list-style-type: none"> Block A: Insertion of an additional intermediate floor level accommodating 24no. apartment units to provide a total of 138no. apartments in lieu of the previously permitted 114no. apartments. Block B: Amendments to the 5th floor level to accommodate 10no. additional apartment units and provide a total of 74no. apartments in lieu of previously permitted 64no. apartments. Block C: Insertion of an additional intermediate floor level accommodating 24no. apartment units to provide a total of 128no. apartments in lieu of the previously permitted 104no. apartments. Block D: Insertion of an additional intermediate floor level accommodating 24no. apartment units to provide a total of 138no. apartments in lieu of the previously permitted 114no. apartments. Block E: Insertion of an additional intermediate floor level accommodating 21no. apartment units to provide a total of 113no. apartments in lieu of the previously permitted 92no. apartments. Blocks A, C, D and E increase in height from 5 to 6 storeys generally with no change to the height of Block B. The total number of units increases from 488no. to 591no. comprising 138no. 1 bed units, 399no. 2 bed units and 54no. 3 bed units with the overall gross floor area increasing from 48,495sq.m to 58,101sq.m. The non-residential floorspace remains unchanged and comprises a creche (431sq.m), community space (186sq.m), 6no. retail commercial units (1,180sq.m) and a café/ bar / restaurant unit (188sq.m) divided across the ground floor levels of Blocks B and C.

- The permitted car parking comprised 418no. spaces including 405no. basement spaces and 13no. surface level spaces. The proposed development comprises 517no. spaces including 504no. spaces and 13no. surface level spaces. Cycle parking spaces will be increased from 620no. spaces to 760no. spaces.

ZONING: The site is zoned Zoning Objective 'RES-N': *'To provide for new residential communities in accordance with approved area plans'*

LAND USE MATRIX: Residential development is permitted in principle under this zoning objective.

Relevant Planning History	<p><u>Subject Site</u></p> <ul style="list-style-type: none"> • ABP-305563-19: 488no. apartments, creche and retail/commercial floorspace. Permission granted. <p><u>Adjoining Lands</u></p> <ul style="list-style-type: none"> • SHD3ABP-300555-18: 526 residential units and all associated site and development works as follows. Permission granted and extended under SHD3ABP-300555-18-EP
----------------------------------	---

FEEDBACK/OBSERVATIONS OF PROPOSAL

Comment where relevant:	<p>Proposal (as presented):</p> <ul style="list-style-type: none"> • brief presentation of proposal and surrounding context. • Layout the same – no changes • Density – 488 units across Blocks A-E, 134 uph • No change to landscape • Basement level to be amalgamated to improve bike and car parking. <ul style="list-style-type: none"> ○ Inefficiency in separate car parks – link increase bike parking • Increase floorplates by 1 storey, 5-storey shoulder height with setback. • Ratios of units same as previous, 9% 3-beds <p>Key considerations:</p> <ul style="list-style-type: none"> • This should be done as an LRD rather than a section 34 application. • Fortunestown LAP expired so development to be guided by the 2022 development plan. • Justify density based on Development Plan height strategy and with reference to similar development in the area. • Is the creche a sufficient size based on additional units? Are commercial uses proposed sufficient to meet needs of additional population? <ul style="list-style-type: none"> ○ Justify an unchanged creche size etc due to increase in number of apts. Applicants state they are happy to look at proposed increase in creche size pro rata. • No increase proposed to public or communal open space provision – must meet requirements of development plan in this regard. • Unit mix – proportion now for 3 beds, justification required for departure from this objective. • 8 key design principles to be incorporated into Design Statement • Consult with the department of defence in relation to aviation safety items.
--------------------------------	---

	<p>Additional Departmental Advice:</p> <p><i>Roads</i></p> <ul style="list-style-type: none"> • maintain permitted parking ratio. • ensure complying with new CDP 12.23 bike parking & 12.25 car parking standards. • increase in bike parking should be spread throughout site. <p><i>Parks</i></p> <ul style="list-style-type: none"> • Green Space Factor for the site – chapter 4 • Green infrastructure plan • All dev'ts require 2.4ha per 1,000 population, approx. 26.5% of site area required. Demonstrate how this POS would be delivered on site. • SuDS – underground attenuation no longer acceptable, drainage scheme will need to be above ground natural SuDS. • AF: possible to include wider areas as part of 25.5% requirement? Wider district park area? <ul style="list-style-type: none"> ○ LC: can propose/agree a contribution. Scheme not set up yet but agreeing in lieu on some sites. <p><i>Drainage</i></p> <ul style="list-style-type: none"> • SuDS guide – natural SuDS • Flow rout analysis of the site. • Consult with Brian Harkin separately. <p>Please also see the link below to general pre planning guidance which covers a range of topics: https://www.sdcc.ie/en/services/planning/planning-applications/pre-planning-guidance-and-consultation/</p> <p><i>The carrying out of consultations in relation to any proposed development shall not prejudice the performance by the Planning Authority of any other of its functions under the Planning Acts, or any regulations made under the Planning Acts and cannot be relied upon in the formal planning process or in legal proceedings.</i></p>
--	---

Aoife O'Connor-Massingham
Acting Executive Planner

Attendees - SDCC

Jim Johnston – Planning
Aoife O'Connor-Massingham – Planning
Stephen Willoughby – Planning
John McGee – Roads
Tony Mangan – Roads
Laurence Colleran – Parks
Kate Gibney – Housing

Attendees – Applicant

Padraig Power – Applicant

Padraig Kavanagh – Applicant

John Murphy BMA – Agent

Tim Darmody – Darmody Architecture

Alastair Ferrar – Cunnane Stratton Reynolds

John Carr – DBFL Consulting Engineers

Mark McKenna - DBFL Consulting Engineers

Appendix 4 – s.32C Meeting Notes

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM			
Pre-Planning Ref. No. LRDOP005/23	ADVICE WITHOUT PREJUDICE	Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act	
CONSULTATION:	Meeting	Email	
26/01/2024	X		
Full address of subject site	Fortunestown Lane and Parklands Parade, Saggart, Co. Dublin		
Name/s of Applicant/s. and/or Agents	Applicant: Greenacre Residential DAC		
Contact Details	Agent: John Murphy, BMA Planning		

DESCRIPTION OF PROPOSAL
<p>Modifications to the permitted apartment Blocks C, D and E to include an additional storey on each block and reconfiguration of the previously permitted floor levels to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments.</p> <p>The revised blocks will consist of:</p> <ul style="list-style-type: none">• Block C: 6-storey block accommodating 129no. units (24no. 1 bed units, 84no. 2 bed units and 21no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square;• Block D:- 6-storey block accommodating 140no. units (30no. 1 bed units, 90no. 2 bed units and 20no. 3 bed units),• Block E: 6-storey block accommodating 127no. units (46no. 1 bed units, 65no. 2 bed units and 16no. 3 bed units) and all associated communal amenity spaces and private amenity spaces comprising terraces/ balconies. <p>Permission is also sought for modifications to the permitted single level basement below Blocks C, D and E to accommodate 332no. car parking spaces, cycle parking spaces, bulky item storage and bin storage areas with 2no. vehicular accesses provided from Parklands Parade; the ground level areas include 10no. car parking spaces, cycle parking, public lighting, ESB substations, boundary treatments, surface water drainage infrastructure and all associated site development and infrastructure works.</p> <p>No modifications are proposed to the permitted Blocks A and B.</p>

ZONING: The site is zoned Zoning Objective 'RES-N': <i>'To provide for new residential communities in accordance with approved area plans'</i>

LAND USE MATRIX: Residential development is permitted in principle under this zoning objective.	
Relevant Planning History	<p><u>Subject Site</u></p> <ul style="list-style-type: none"> ABP-305563-19: 488no. apartments, creche and retail/commercial floorspace. Permission granted. <p><u>Adjoining Lands</u></p> <ul style="list-style-type: none"> SHD3ABP-300555-18: 526 residential units and all associated site and development works as follows. Permission granted and extended under SHD3ABP-300555-18-EP

FEEDBACK/OBSERVATIONS OF PROPOSAL

Comment where relevant:	<p>Proposal (as presented):</p> <ul style="list-style-type: none"> Follow up to 247 meeting in April 2023. LRD application to amend previously permitted SHD granted in February 2020: <ul style="list-style-type: none"> 5 blocks comprising 488 no. apartments with creche, community floor space and 7 no. retail units. Proposal to amend Blocks C, D and E to provide additional storey and reconfigure blocks to provide 386 apartments in lieu of previously permitted 310 – increase in 86 no. units. Commercial floor space in Block C maintained. Car parking provided at basement level with limited street level spaces. Car parking at same ratio as permitted – 0.8 per unit. Cycle parking provided at basement for long stay and street level to serve commercial/visitors. POS provided in permitted public park and various neighbourhood parks throughout blue line boundary as well as plaza. Communal open space provided in courtyards. Overall site zoned RES-N – aware of need to provide amenities on site in tandem with development. Civils largely as permitted. Build to sell. No change to red line boundary. EV parking provided at 20% and will set out how this is accessed by residents in some form of management plan. No change to TII related lands / Luas impacts. <p>Key considerations:</p> <ul style="list-style-type: none"> JJ: Condition 2 of SHD requiring plaza to be built prior to occupation – is this still on track to be achieved? <ul style="list-style-type: none"> JM: Blocks A and B to commence in next couple of months and plaza will be delivered with these blocks. JJ: general issue in relation to Luas – Fortunestown LAP envisaged much lower density than SHD permitted. Arising from this is issue affecting all sites along the Luas that there's an assumption the Luas can keep delivering. A number of services such as GP services in Fortunestown area creaking at the seams. Some exploration of current capacity, waiting times, for the Luas. Don't want significant increase in density resulting in people in cars/traffic congestion.
--------------------------------	--

	<ul style="list-style-type: none"> • CDP adopted in 2022 provides for requirement in relation to POS – no increase in POS. Concerns on reliance on district park. Should explore this. • Delivery of community centre presumably tied up with delivery of units – at what point is it anticipated this will be delivered? <ul style="list-style-type: none"> ○ JM: permitted floor space in Block B so will be delivered in short term ahead of C, D and E. ○ PP: decision to amalgamate all 3 community centres in one site. • Justification of height & density in relation to CDP, appropriate for this location • Provide adequate CGI's that's realistic that will look like the finished product when it's built. A range of CGI's that are a true representation of what the development will look like when it's constructed. <ul style="list-style-type: none"> ○ JL: brochure of CGI's submitted. ○ JJ: not going to stray into the realm of assessment, just raising this as a general point that's need for application. • Issue regarding landscaping change and surface water drainage issues. • GOC: policy framework under which this application will be assessed is different to what SHD was assessed under, 86 is not minor, is substantial planning application, needs to stack up against 2022 CDP and this is how it will be assessed. Will not try to remake anything that's been previously assessed. Needs to be very clear what's permitted and what's amended, even in description of development, e.g. parking description not clear to member of the public. Need to see how demands of occupants of additional units are being met in terms of POS, community centre, childcare. Severe shortage of childcare spaces in Saggart, will be referred to SDCC childcare committee. • GOC: will need EIA screening, schedule 7A, needs to address project splitting. • GOC: if not delivering more POS, need to see uplift somewhere to justify this. Not enough to rely on parent permission due to scale of application. <ul style="list-style-type: none"> ○ JM: working on basis permitted based on Fortunestown LAP – need to justify on new policy ○ GOC: CDP has raised bar on POS, SuDS etc... significant change in policy framework. • Need to be clear on what the changes are. Will be relying on description of development, if it's not in this, it's not under consideration for permission. Itemise all changes, however small. Want clarity for Council & public. • Scheme to accord with recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities • Submit permitted and proposed drawings for all alterations, clearly indicating areas for amendment, to allow for easy assessment of differences. • Provide clear breakdown of permitted and proposed unit mix for each block and development as a whole, for easy comparison. <p>Additional Departmental Advice:</p> <p><i>Parks</i></p> <ul style="list-style-type: none"> • 86 no. additional units – need to clarify what's being provided in terms of additional POS for those 86 units. <ul style="list-style-type: none"> ○ JM: no additional being provided • Any amendments to existing SuDS proposals?
--	---

	<ul style="list-style-type: none"> ○ JC: site masterplanned. Open nature-based SuDS basin around perimeter of district park that's been sized for this development. ○ OE: surface water being piped from this development to the park? ○ JC: yes ○ OE: what purpose is conveyance channel? ○ JC: low risk of surface water overland flows coming off site from Fortunestown land. Flood risk assessment included. Flows would be intercepted by conveyance channel to stream. ○ OE: part of site in flood zone A? ○ JC: premitigation site in flood zone b but post mitigation all site is in flood zone c. ○ OE: what SuDS features are proposed? ○ JC: site plan unchanged from permitted. All building roofs are green roofs. All basements podium surfaces. Surfaces a mix of permeable and landscaping features. No tree pits in original permission, scope to make some trees tree pits. ○ OE: new CDP policies in terms of SuDS & treating surface water as close to where it falls as possible. Idea of piping it to a large attenuation area is not something we want. ○ AF: will refine design as much as possible in red line to provide additional surface attenuation. A lot of podium landscapes. Will do what we can within constraints of the red line. Assuming that GSF, because its an amendment, would be difficult to make it apply? ○ OE: would still like numbers run on it, still need GSF worksheet linked to GI plan. ○ AF: able to include other elements of original application? ○ OE: might be worth doing both, run one for amendment and for wider site. <p><i>Roads</i></p> <ul style="list-style-type: none"> ● Build to sell or build to rent? ● Discrepancy in parking ratio stated – clarify the difference, what was approved, what extra or less is being provided? ● EV parking – if parking is assigned to apartments need to work out EV charging strategy – how will these be shared between residents. ● Notify any changes that will affect TII/Luas – alterations to the front of the development. ● TTA, assume taking note, are Blocks A & B removed? Not clear what was included. ● Road Safety Audit ● Signalised junction, part of northern development, included in red line, make clear what bit is being added to. ● Highlight refuse collection location, make sure off the public road so it won't interfere with public realm. ● Relocation of access to basement, highlight changes. <ul style="list-style-type: none"> ○ JM: relates to Block B ● Any alterations to pedestrian permeability, make clear. ● Any changes to cycle infrastructure – new cycle manual – must conform to this.
--	--

	<p><i>Drainage</i></p> <ul style="list-style-type: none"> • Outline what's proposed and what's permitted. • Maintain SuDS criteria, attenuate with nature based above ground solutions and minimise any pipes and underground attenuation. <p><i>Housing – Part V</i></p> <ul style="list-style-type: none"> • Advise to contact PartV@SDUBLINCOCO.IE to commence discussion. • JM: Proposing to include all in Block A for easy management. <p>Please also see the link below to general pre planning guidance which covers a range of topics: https://www.sdcc.ie/en/services/planning/planning-applications/pre-planning-guidance-and-consultation/</p> <p><i>The carrying out of consultations in relation to any proposed development shall not prejudice the performance by the Planning Authority of any other of its functions under the Planning Acts, or any regulations made under the Planning Acts and cannot be relied upon in the formal planning process or in legal proceedings.</i></p>
--	--

Aoife O'Connor-Massingham
Executive Planner

Attendees - SDCC

Gormla O'Corrain – Planning
Jim Johnston – Planning
Aoife O'Connor-Massingham – Planning
Michelle Dodrill – Planning
Graham Murhpy – Roads
Padhraic McGillicuddy – Roads
Oisin Egan – Public Realm
Hannah Johnston – Public Realm
Asta Tamosaite – Housing
Brian Harkin – Drainage

Attendees – Applicant

John Murphy – BMA Planning
Pat Power – Greenacre Residential DAC
Padraig Kavanagh – Greenacre Residential DAC
Alastair Ferrar – Cunnane Stratton Reynolds
Nuno Costa – Cunnane Stratton Reynolds
Tim Darmody – Darmody Architecture
Jennifer Lynch – Darmody Architecture
Kabelo Mokoka – DBFL
John Carr – DBFL
Thomas Jennings – DBFL

Appendices Part C – Internal Consultee Reports

Appendix 5 – Water Services Report

Register Reference No.: LRD23A/005/23

Development:

Location: Fortunestown Lane and Garters Lane

Report Date : 23rd Jan 2024

Surface Water Report:

Comments :

1.1 The proposed development is in Flood Zone A and B. The County Development Plan (CDP) 2022 Strategic Flood Risk Assessment found in Adopted Plan, Environmental reports State that:

- highly vulnerable developments should not be permitted in Flood Zone A or B.
- existing open spaces Flood Zone a or B should be retained to maintain flood storage areas.

If residential development deemed essential to be built within Flood Zone A or B lands, a flood risk assessment study should be carried out to show why flood risk conditions within the CDP should not apply to site and determine what mitigation factors are proposed to prevent flooding on site or up/down stream of the site.

1.2 The flood risk assessment is unclear and does not show a foot print of proposed development that overlays a drawing showing Flood Risk A and B for the site.

Maps showing flood Risk A and B can be found on SDCC County Development Plan 2022 Adopted Plan, County Development Plan Interactive Map.

Submit a drawing that shows the foot-print of development overlaying all of site including areas of Flood Zone A and B. Flood Zone A and B should be clearly visible on drawing where proposed development is also shown.

1.3 The attenuation calculations are unclear and insufficient.

The estimated hrdstanding in a previous report 2.65ha is less than proposed hard standing of 3.282 (Gross area unfactored.)

It is unclear how much attenuation was provided for Pase 1 and how much attenuation is required for phase two. It is not sufficient to say that 5,325m³ is provided for both phases. Submit a report to show what attenuation in m³.

is provided in Phase 1 (allowed for in previous planning decision) and Phase 2.

1.4 A 20% increased factor should be taken for Climate Change when assessing surface water attenuation requirements and not 10%.

1.5 Surface water should be attenuated as close to the source of surface water initial source on site and not piped long distances to another area of site. Surface water should be conveyed above ground on nature based surfaces as much as possible.

Examples of SuDS can be found in SDCC website at:

[sdcc-sustainable-drainage-explanatory-design-and-evaluation-guide.pdf](https://www.sdcc.ie/sdcc-sustainable-drainage-explanatory-design-and-evaluation-guide.pdf)

Flood Risk

Comments

Development in an area of flood zone A and B and CDP does not recommend residential developments in such areas. Such areas should be kept free to allow for flooding to occur naturally.

- The Developer shall ensure that there is complete separation of the foul and surface water drainage for the proposed development.
- All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.

Water Report:

Referred to IW.

Foul Drainage Report:

Referred to IW.

Signed: _____
Brian Harkin SEE

Date: _____

Signed: _____
Damien McNulty SE

Appendix 6 – Irish Water

Irish Water's Statutory Response to South Dublin Planning Authority

Planning Application No. LRDOP005/23

Date Lodged with Planning Authority: Thursday 21 December 2023

Development:
Residential Development

Location:
Parklands Pointe Fortunestown Lane

IW Recommendation: Further Information Required

IW Observations:

1 Water

1.1 Submit a confirmation letter of feasibility of proposed development from Irish Water for proposed development.

1.2 Prior to the commencement of development, the applicant or developer shall enter into a water connection agreement(s) with Irish Water
Reason: In the interest of public health and to ensure adequate water facilities.

2 Foul

2.1 Submit a confirmation letter of feasibility of proposed development from Irish Water for proposed development.

2.2 Prior to the commencement of development, the applicant or developer shall enter into a wastewater connection agreement(s) with Irish Water.
Reason: In the interest of public health and to ensure adequate water facilities.

Signed on Behalf of Irish Water: Maria O'Dwyer

Appendix 7 - Housing

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

HOUSING DEPARTMENT

DATE 30th January 2024

Michael Mulhern

Director of Land Use, Planning and Transportation

Dept. of Development, Economic & Transport Planning

FAO: Aoife O'Connor Massingham

Re: Reg Ref: LRDOP005/23

Applicant: Greenacre Residential DAC

Location: Site at the Fortunestown Lane & Parklands Parade, Saggart, Co. Dublin.

Subject to Contract/Contract Denied

Proposal: *Modifications to the permitted apartment Blocks C, D and E to include an additional storey on each block and reconfiguration of the previously permitted floor levels to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments. The revised blocks will consist of: - Block C: 6-storey block accommodating 129no. units (24no. 1 bed units, 84no. 2 bed units and 21no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square; Block D:- 6-storey block accommodating 140no. units (30no. 1 bed units, 90no. 2 bed units and 20no. 3 bed units), Block E: 6-storey block accommodating 127no. units (46no. 1 bed units, 65no. 2 bed units and 16no. 3 bed units) and all associated communal amenity spaces and private amenity spaces comprising terraces/ balconies. Permission is also sought for modifications to the permitted single level basement below Blocks C, D and E to accommodate 332no. car parking spaces, cycle parking spaces, bulky item storage and bin storage areas with 2no. vehicular accesses provided from Parklands Parade; the ground level areas include 10no. car parking spaces, cycle parking, public lighting, ESB substations, boundary treatments, surface water drainage infrastructure and all associated site development and infrastructure works. No modifications are proposed to the permitted Blocks A and B.*

I refer to the above application for planning permission Ref. LRDOP005/23 and I wish to advise that a Part V condition should be attached to any grant of permission for this application.

The Part V submission lodged with this planning application is noted, the developer intends on fulfilling its Part V obligation by providing by additional 8 units in Block A

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the applicant is requested to provide proof of same to the Housing Department.

South Dublin County Council's preference in respect of Part V is to **acquire units on site** and is bound by the planning permissions granted. Therefore, South Dublin County Council can only agree in respect of the actual permitted development. In the event of the granting of planning permission the unit nos., types, location, and

costings in respect of Part V requirement to be agreed with Housing Department subject to approval of the Department of Housing, Planning, Community and Local Government.

Yours Sincerely,

Edel Dempsey
Senior Staff Officer
Housing Procurement Section

Appendix 8 – Roads Department

Proposal

Modifications to the permitted apartment Blocks C, D and E to include an additional storey on each block and reconfiguration of the previously permitted floor levels to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments. The revised blocks will consist of: - Block C: 6-storey block accommodating 129no. units (24no. 1 bed units, 84no. 2 bed units and 21no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square; Block D:- 6-storey block accommodating 140no. units (30no. 1 bed units, 90no. 2 bed units and 20no. 3 bed units), Block E: 6-storey block accommodating 127no. units (46no. 1 bed units, 65no. 2 bed units and 16no. 3 bed units) and all associated communal amenity spaces and private amenity spaces comprising terraces/ balconies. Permission is also sought for modifications to the permitted single level basement below Blocks C, D and E to accommodate 332no. car parking spaces, cycle parking spaces, bulky item storage and bin storage areas with 2no. vehicular accesses provided from Parklands Parade; the ground level areas include 10no. car parking spaces, cycle parking, public lighting, ESB substations, boundary treatments, surface water drainage infrastructure and all associated site development and infrastructure works. No modifications are proposed to the permitted Blocks A and B.

Prior to commencement of any works in the public domain, and in order to comply with The Roads Act 1993 Section 13 Paragraph 10, a Road Opening Licence must be secured from South Dublin County Council, Roads Maintenance Department.

Description

Amendments to a previously permitted permission. The addition of 86no apartments to three blocks. There are alterations to the basement car park layout. No alterations to the road access or surrounding road layout.

Access & Roads Layout:

There are two vehicle access proposed, both where originally approved in the previous permission. One of the access points is to be moved to the west sight lines have been provided, although they have been included on a single drawing. The applicant is requested to provide separate layouts for Autotrack, sight lines and vehicle access (showing corner radii/DMURS compliance, etc.). The previous permission had the width of the access points at 6.2m this application is proposing 7.0m wide accesses resulting in a greater crossing distance for pedestrians. There are changes to the basement car park layout, additional spaces have been inserted in areas used for circulation. The applicant is requested to provide an Autotrack showing vehicle movements around the basement.

Permeability:

The main pedestrian permeability is through the linear park towards the LUAS and Citywest Road. The applicant is requested to provide a layout showing pedestrian routes through the development detailing any changes from the previous permission. The layout should also show and changes to the south of the development that may impact on the LUAS.

The applicant is requested to check the proposed cycle infrastructure is inline with the most recent Cycle Design Manual August-September 2023. And provide a layout detailing any changes required.

Traffic and Transport

The development is located adjacent to a LUAS stop, that would be considered the primary public transport link. There is an hourly Dublin bus service 280m from the development, this would not be considered high frequency/multidirectional.

To determine base line traffic for the development a traffic survey was carried out on Thursday 9th November 2024. Six junctions were selected for the traffic analysis (shown in Figure 1).



Figure 1 Surrounding junctions.

A traffic growth factor has been applied for the opening year of 2026 at 5%, a growth factor for +5 and +15 years has also been applied.

The TRICS has estimated a traffic generation for the development, at 129no two-way vehicle trips during the AM and 115no. trips during the PM peak. The analysis shows that junction 2 (Fortunestown Road/ Citywest Avenue/Citywest Drive) and junction 4 (Parklands Parade/Cuil Duin Avenue/School Access Lane) will have above 5% threshold traffic impacts, requiring additional analysis.

The TRANSYT system was used to study the junctions for the do nothing/do something for +5 and +15 years. A junction that has a degree of saturation below 90% is considered not to be congested. The analysis shows a maximum degree of saturation at 67% showing that the predicted traffic generation will not cause congestion on the two junctions for the years 2026,2031 and 2041.

Car Parking:

The number of parking spaces at the development is 342no. ten of these spaces are on the ground level along Parklands Parade. 332no. spaces are to be provided in the basement area, including two go car spaces. The development would be considered in Zone 2 for parking rates.

100no.1 bed	0.75 per space	=	75no.
239no. 2 bed	1 space	=	239no.
57no.3 bed	1.25 space	=	71no.
Retail 555m ²	1 per 20 sq m GFA	=	22no.
Café 197m ²	1 per 25 sq m	=	8no.
Total			= 415no.

The 342no. is 0.82% of the overall allowable from the county development plan for a development of this type. There are inconsistencies on the amount of retail space across the various submissions, the applicant is requested to provide a single, clear car parking rational calculation for the development.

There are 16no. mobility impaired spaces and 68no. EV spaces. It is not clear if the spaces are to be assigned to residents or not.

Bicycle Parking:

A total of 1016 no. bicycle parking spaces are proposed as part of the subject development. This includes 748 no. long stay cycling parking spaces which are provided at basement level within Blocks C, D and E. A total of 248 no. residential short stay spaces are provided at surface level adjacent to block C, D and E and 20 no. surface level cycle parking are provided for the retail and café. Provision for 3 No. Cargo Bikes is provided at surface level with 1 no. located at each block. The overall proposed cycle parking provision exceeds the development plan.

Taking in Charge:

The applicant has submitted a taking in charge layout drawing, it does show different shading for areas but has no legend showing private/public areas. The applicant is requested to provide a layout showing public and private areas.

Construction Management Plan

A Construction Management Plan should be provided to reflect the revised Blocks C, D and E. a Layout of the location of refuse collection and bin storage locations should be provided.

The following items are suggested:

1. To continue cycling/pedestrian routes through development, the applicant should provide layout details at a 1:200 scale of the cycleways ensuring compliance with the most recent cycle design manual from the NTA.
2. The applicant shall submit an updated Taking in Charge drawing to include any revisions to the road layout.
3. Layouts of the proposed vehicle access points, detailing dimensions, sight lines, DMURS compliance etc.
4. The applicant shall submit an Autotrack detailing the altered basement layout.
5. The applicant is requested to submit a pedestrian/cycle permeability layout detailing any changes from previous permission, particularly to the south of the development along the LUAS.
6. A revised car parking calculation showing consistent floor area figures and parking rates.
7. A revised taking in charge layout showing the public/private areas.

Appendix 9 – Public Realm Department

SOUTH DUBLIN COUNTY COUNCIL



INTERNAL MEMORANDUM

PUBLIC REALM PLANNING REPORT

Proposal:	Modifications to the permitted apartment Blocks C, D and E to include an additional storey on each block and reconfiguration of the previously permitted floor levels to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments. The revised blocks will consist of: - Block C: 6-storey block accommodating 129no. units (24no. 1 bed units, 84no. 2 bed units and 21no. 3 bed units) with 3no. retail/ commercial units (555sq.m) and a café/ bar/ restaurant unit (197sq.m) at ground floor level fronting onto the permitted local square; Block D:- 6-storey block accommodating 140no. units (30no. 1 bed units, 90no. 2 bed units and 20no. 3 bed units), Block E: 6-storey block accommodating 127no. units (46no. 1 bed units, 65no. 2 bed units and 16no. 3 bed units) and all associated communal amenity spaces and private amenity spaces comprising terraces/ balconies. Permission is also sought for modifications to the permitted single level basement below Blocks C, D and E to accommodate 332no. car parking spaces, cycle parking spaces, bulky item storage and bin storage areas with 2no. vehicular accesses provided from Parklands Parade; the ground level areas include 10no. car parking spaces, cycle parking, public lighting, ESB substations, boundary treatments, surface water drainage infrastructure and all associated site development and infrastructure works. No modifications are proposed to the permitted Blocks A and
Location:	Fortunestown Lane & Parklands Parade, Saggart, Co. Dublin.
Applicant:	Greenacre Residential DAC
Reg. Ref:	LRDOP005/23
Report Date:	30/01/2024.
Planning Officer:	AOIFE O'CONNOR MASSINGHAM

Main Concerns:

1. **Green Infrastructure** - The applicant has not demonstrated compliance relevant SUDS Policies within the CDP 2022-2028 and with SDCC Sustainable Drainage Explanatory Design & Evaluation Guide 2022 [Sustainable Drainage Systems - SDCC](#). The applicant needs to demonstrate how they have contributed to the protection or enhancement of Green Infrastructure through the provision of green infrastructure elements as part of the development proposals. The applicant must provide a GI Plan as part of the landscape proposals.
2. **SUDS** - The applicant needs to demonstrate compliance with relevant policies relating to SUDS as set out in the CDP 2022-2028. The Applicant is required to submit a **SUDS Layout Plan including a Flow Route Analysis**. Development proposals should provide suitable drainage measures in compliance with the South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, 2022. The focus should be on natural SUDS features and above ground attenuation. Sustainable Drainage Systems include devices such as swales, permeable pavements, filter drains, storage ponds, green roofs, suds tree pits. Detailed natural SUDS Strategy required for the proposed development.
3. **Public Open Space Provision** - It is not clear whether the development meets the overall standard for public open space of 2.4 hectares per 1,000 population and whether that applicant has provided the required open space provision for the additional 86 units as required by the CDP 2022-2028.

Public Realm Comments:

1. Landscape Scheme

The applicant shall provide:

- (a) A fully detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations in addition the applicant is requested to submit a fully detailed Planting Plan for the development.
- (b) The planting plan shall clearly set out the following: (i) Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate

(ii) Implementation timetables. (iii) Detailed proposals for the future maintenance/management of all landscaped areas. The landscape proposals shall ensure no net loss of existing tree cover within the subject site to which the development applies.

2. Open Space Proposals

The applicant is seeking to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments an increase of 86 units. The applicant is therefore required to provide additional open space as set out in the standards for open space provision within the CDP 2022-2028 to provide for the 86 additional units. If an increase in the open space provision cannot be provided within the red line boundary and a subsequent uplift in the quantity and quality of the public open space and amenities provided under the previously granted layout. Details of the increase in POS provision or subsequent increase in the quantity and quality of the public open space and amenities proposed must be clearly set out and detailed by the applicant.

For all developments with a residential component there is a requirement to achieve the overall standard of 2.4 ha per 1,000 population. The applicant is requested to submit in table form the percentage (%) and area in sq.m the of the proposed private, semi-private and public open space provision within the site. The applicant should demonstrate compliance with the South Dublin County Development Plan 2022-2028 in relation to open space.

3. GREEN INFRASTRUCTURE

All planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission. The development proposals shall be accompanied by a Green Infrastructure Plan which shall be submitted as part of the suite of Landscape Plans that are required for a development. Plans shall include the following information:

- Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County.
- Site survey and analysis, identifying existing GI Infrastructure and key assets within the site.
- Indicate how the development proposals link to and enhance the wider GI Network of the County.

- Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site.
- Proposals for identification and control of invasive species where appropriate, for the site.

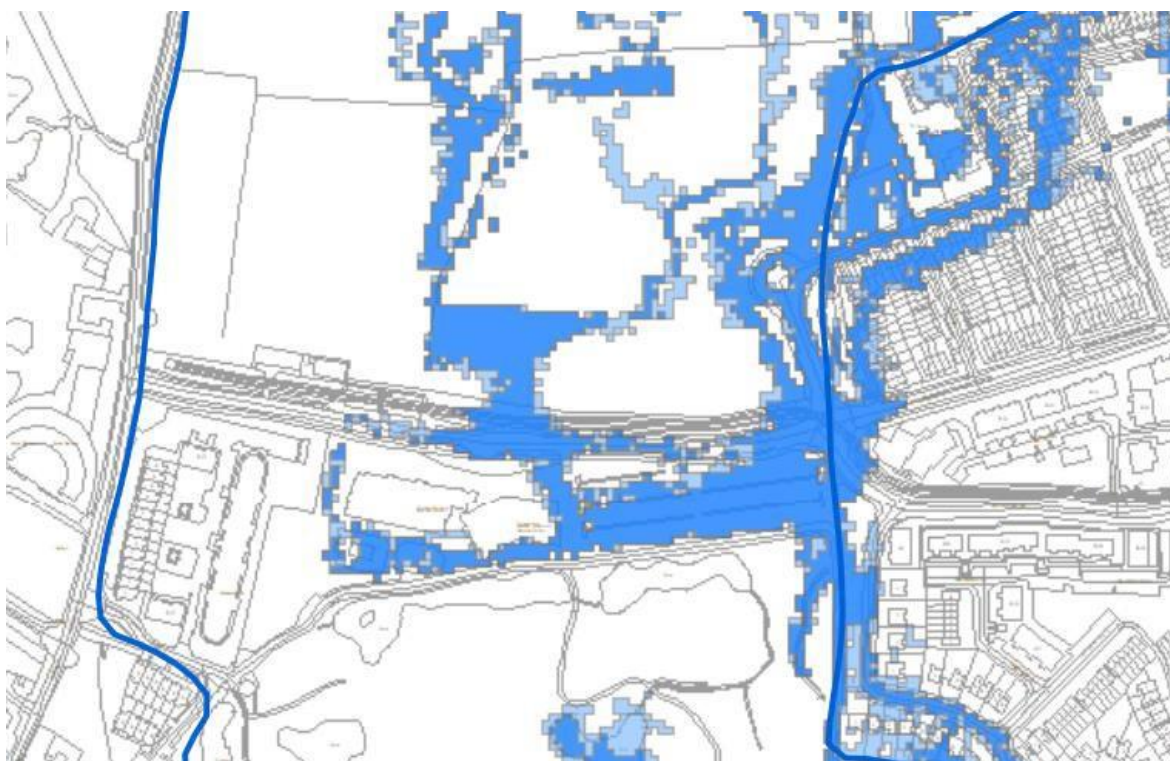
4. Flood Risk Assessment

The applicant has stated in their submitted Infrastructure Design Report prepared by DBFL that:

“The proposed amendments which are the subject of this application do not affect flood risk or the mitigation measures proposed in the Flood Risk Assessment provided with the parent permission. Therefore, it is considered that the findings of the report are unchanged by the proposed amendments. Following the implementation of the mitigation measures proposed in the FRA, the development area is in Flood Zone C (Low Risk of Flooding) which is appropriate for residential development.”

However, having reviewed South Dublin County Development Plan Strategic Flood Risk Assessment Report and associated SFRA Maps a significant area of the proposed development appears to be in Flood Zone A. in addition as stated in the South Dublin County Development Plan Strategic Flood Risk Assessment Report; Development in Flood Zone A should consist of water compatible development only. Highly Vulnerable Development shall not be permitted in Flood Zone A or B. In addition, the applicant has stated in their submission that they have climate change allowance of 10% under their flood risk assessment where the OPW states there should be a flood climate change allowance of +20% in Flood Parameters for Mid-Range and High End Future Scenarios.

SFRA Flood Zone Mapping Sheet 14 of 26:



The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2022-2028 and with best practice guidelines and recommends the following be submitted by the applicant:

1. Landscape Scheme

In relation to the proposed landscape scheme the applicant is requested to submit the following information:

- a)** A fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations in addition the applicant is requested to submit a fully detailed Planting Plan for the development.
- b)** The planting plan shall clearly set out the following:
 - (i) Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate
 - (ii) Implementation timetables.
 - (iii) (Detailed proposals for the future maintenance/management of all landscaped areas

- c) The Plans should indicate what areas would be proposed to be taken in charge by SDCC in the future and which would be privately maintained.

2. Open Space Proposals

For all developments with a residential component there is a requirement to achieve the overall standard of 2.4 ha per 1,000 population. The applicant is requested to submit in table form the percentage (%) and area in sq.m the of the proposed private, semi-private and public open space provision within the site. The applicant should demonstrate compliance with the South Dublin County Development Plan 2022-2028 in relation to open space.

The applicant is seeking to provide to provide a total of 396no. apartments in lieu of the previously permitted 310no. apartments an increase of 86 units. The applicant is therefore required to provide additional open space as set out in the standards for open space provision within the CDP 2022-2028 to provide for the 86 additional units. If an increase in the open space provision cannot be provided within the red line boundary and a subsequent uplift in the quantity and quality of the public open space and amenities provided under the previously granted layout. Details of the increase in POS provision or subsequent increase in the quantity and quality of the public open space and amenities proposed must be clearly set out and detailed by the applicant.

4. SuDS

In relation to the proposed Surface Water Drainage proposals the applicant shall provide the following:

- Demonstrate the treatment train, biodiversity value and amenity value of the SuDS proposals for the catchment in the residential areas.
- submit construction details in plan and cross sectional and details of gradients/side slopes of proposed Sustainable Drainage Systems (SuDS) features for the development. As per Section 12.11 (iii) of CDP 2022-2028 only exceptional cases and at the discretion of the Planning Authority, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. The Development should seek to maximise the use of permeable surfaces, as well as opportunities for stormwater attenuation and storage through SuDS and limit the use of underground attenuation and storage. The applicant

shall submit a revised drawing in plan and cross-sectional view showing additional SuDS which removes the requirement for underground attenuation tanks such as:

- Green / Blue Roofs
- Swales
- Green areas
- Permeable Paving
- Tree Pits

3. SUDS Management Plan

A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.

4. Conveyance Plan

The developer shall submit a comprehensive surface water conveyance plan, including detailed drainage design and calculations, prior to the commencement of construction. This plan must be prepared by a qualified professional and should address the management and conveyance of surface water runoff from the development site. The plan should comply with local regulations and best practices for sustainable drainage, minimizing the risk of flooding and ensuring the effective conveyance of surface water. Approval from the local water authority must be obtained before any construction activities begin."

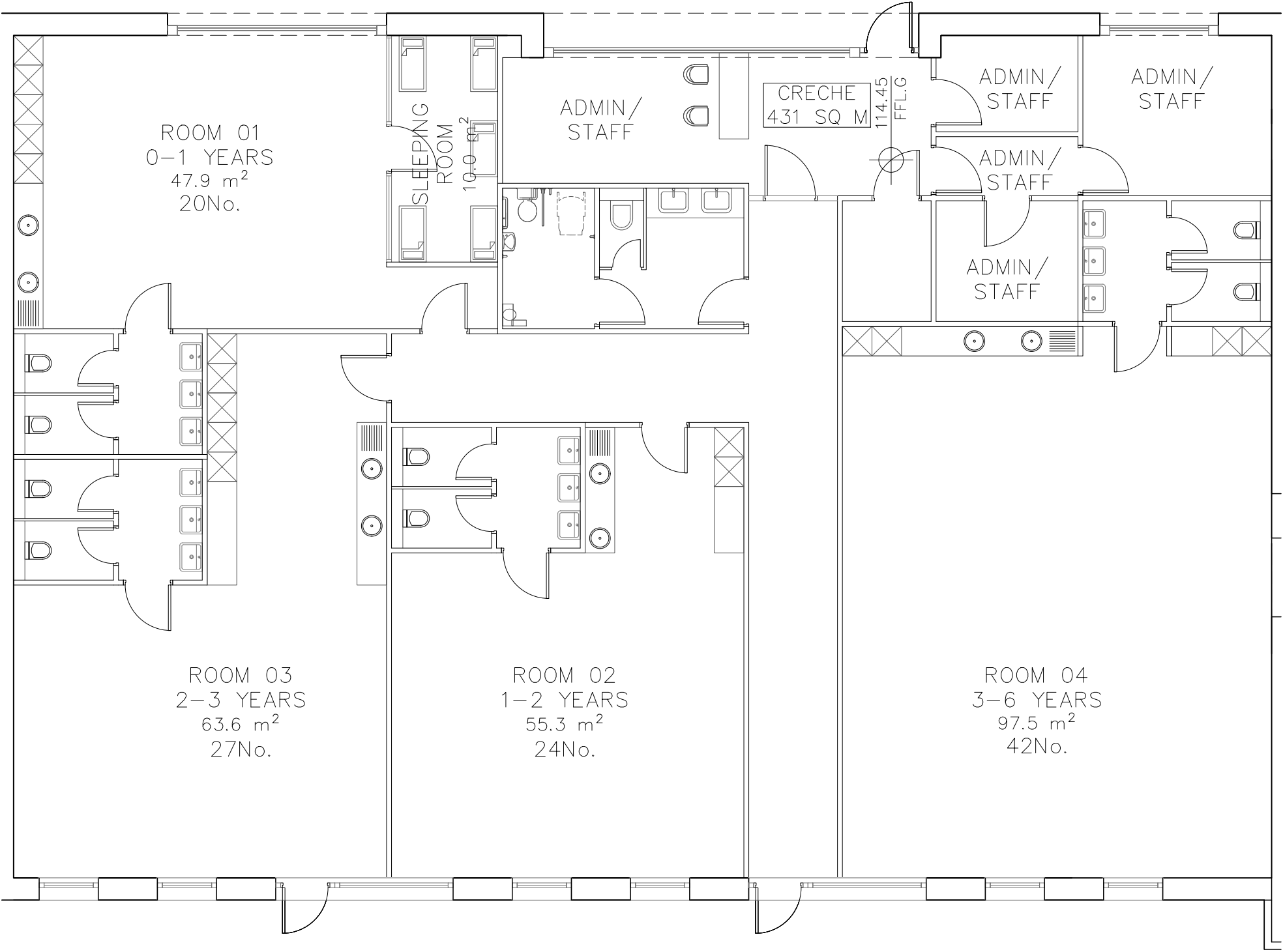
Prepared By: Oisín Egan
Executive Parks Superintendent

Endorsed By: Laurence Colleran
Senior Executive Parks Superintendent

APPENDIX B

Block B Creche Layout (Indicative)

No amendments proposed to permitted creche.
Layout illustrated is indicative only and subject to operator's specific requirements

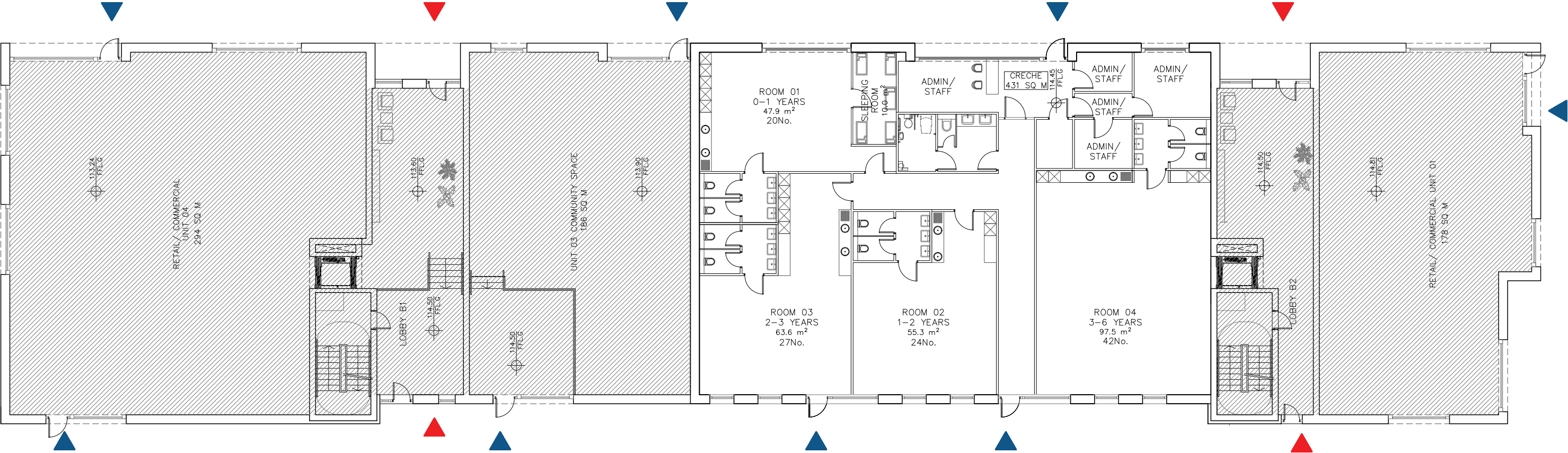


1 Creche - Proposed Floor Plan
PA150 1:100

ISSUED FOR INFORMATION ONLY, NOT FOR CONSTRUCTION

<p>NOTES:</p> <p>Do not scale from this drawing.</p> <p>Any discrepancies found on site to be reported to Darmody Architects immediately.</p> <p>Any discrepancies found on drawings to be reported to Darmody Architects immediately.</p> <p>Refer to engineers drawings for structural details.</p> <p>All dimensions sized to blockwork.</p>																					
	Rev.	Description.	Date.	Initials.	DRAWING KEY		SCALE BAR		DRAWING KEY		NORTH POINT		creative innovative flexible		darmody architecture		Project: Modifications to Parklands Pointe Apartments SHD ABP-305563-19 Fortunestown Lane & Parklands Parade, Saggart, Co.Dublin.				
					No amendments proposed to permitted creche. Layout illustrated is indicative only and subject to operator's specific requirements".		0 05								91 Townsend Street, Dublin 2 353 1 672 9907 info@darmodyarchitecture.com darmodyarchitecture.com		Title: Creche Proposed Floor Plan				
	XREF'S CAD REF.												Rev. No.		Scale	Date	Dm. By	Chkd. By	Issue	Dwg. No.	Job No.
														1:100 @ A3		08/04/2024	Adam Brzostek	Tim Darmody	INFORMATION	PA-150	23040-1

No amendments proposed to permitted creche.
Layout illustrated is indicative only and subject to operator's specific requirements





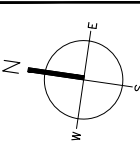
1

Creche - Proposed Floor Plan

PA151

1:200

ISSUED FOR INFORMATION ONLY, NOT FOR CONSTRUCTION

<div>NOTES:</div> <div>Do not scale from this drawing.</div> <div>Any discrepancies found on site to be reported to Darmody Architects immediately.</div> <div>Any discrepancies found on drawings to be reported to Darmody Architects immediately.</div> <div>Refer to engineers drawings for structural details.</div> <div>All dimensions sized to blockwork.</div>					DRAWING KEY		SCALE BAR		DRAWING KEY		NORTH POINT		<div><div><div>■ creative innovative flexible</div><div></div><div>darmody architecture</div><div>91 Townsend Street, Dublin 2 353 1 672 9907 info@darmodyarchitecture.com darmodyarchitecture.com</div></div><div><table><tr><td>Rev. No.</td><td>Scale</td><td>Date</td><td>Dm. By</td><td>Chkd. By</td><td>Issue</td></tr><tr><td></td><td>1:200 @ A3</td><td>08/04/2024</td><td>Adam Brzostek</td><td>Tim Darmody</td><td>INFORMATION</td></tr></table></div></div> <div><div>Project: Modifications to Parklands Pointe Apartments SHD ABP-305563-19 Fortunestown Lane & Parklands Parade, Saggart, Co.Dublin.</div><div><table><tr><td>Title.</td><td>Creche Proposed Floor Plan</td></tr><tr><td>Client.</td><td>Greenacre Residential DAC</td></tr><tr><td>Dwg. No.</td><td>PA-151</td><td>Job No.</td><td>23040-1</td></tr></table></div></div>	Rev. No.	Scale	Date	Dm. By	Chkd. By	Issue		1:200 @ A3	08/04/2024	Adam Brzostek	Tim Darmody	INFORMATION	Title.	Creche Proposed Floor Plan	Client.	Greenacre Residential DAC	Dwg. No.	PA-151	Job No.	23040-1
	Rev. No.	Scale	Date	Dm. By	Chkd. By	Issue																											
		1:200 @ A3	08/04/2024	Adam Brzostek	Tim Darmody	INFORMATION																											
	Title.	Creche Proposed Floor Plan																															
	Client.	Greenacre Residential DAC																															
Dwg. No.	PA-151	Job No.	23040-1																														
Rev.	Description.	Date.	Initials.	No amendments proposed to permitted creche. Layout illustrated is indicative only and subject to operator's specific requirements".																													
XREF'S CAD REF.																																	
Rev. No.		Scale	Date	Dm. By	Chkd. By		Issue																										
		1:200 @ A3	08/04/2024	Adam Brzostek	Tim Darmody		INFORMATION																										