

April 2020

Statement of Response to An Bord Pleanála Pre-Application Consultation Opinion



Proposed Strategic Housing Development
Palmerstown SHD
Lands at Palmerstown Retail Park,
Kennelsfort Road Lower, Palmerstown, Dublin 20

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Table of Contents

1.0	Introduction	2
2.0	Items Requiring Further Consideration and Amendment	2
2.1	Item No. 1 – Development Strategy	2
2.2	Item No. 2 – Residential Amenity	4
2.3	Item No. 3 – Pedestrian/Cyclist Permeability and Car Parking	6
2.4	Item No. 4 – Drainage	7
3.0	Requested Specific Information	10
3.1	Item No. 1 – Impact on Residential Amenity	10
3.2	Item No. 2 – Architectural Report	10
3.3	Item No. 3 – Phasing Plan	11
3.4	Item No. 4 – Taking in Charge Drawing	12
3.5	Item No. 5 – Materials and Finishes	12
3.6	Item No. 6 – Landscaping	12
3.7	Item No. 7 – Resident Support Facilities	13
3.8	Item No. 8 – Management and Operation for BTR Scheme and Building Lifecycle Report .	14
3.9	Item No. 9 – BTR Legal Agreement	14
3.10	Item No. 10 – Housing Quality Assessment	15
3.11	Item No. 11 – Childcare Assessment	15
3.12	Item No. 12 – Quality Audit and Mobility Management Plan	17
3.13	Item No. 13 – Noise Impact Assessment	17
3.14	Item No. 14 – Operational Waste Management Plan	18
3.15	Item No. 15 – Microclimate Study	18
4.0	Notification of Authorities	18
5.0	Conclusion	19

1.0 Introduction

This Statement of Response accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20.

Following consultation with South Dublin County Council under Section 247 of the Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted in October 2019, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request in November 2019. The pre-application consultation meeting was then held at the offices of An Bord Pleanála on 11th December 2019.

On 9th January 2020, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-305801-19.

Having regard to the above, the opinion states that An Bord Pleanála *“has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”*

The opinion further states that, *“An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.”*

It must be noted that this application for a proposed Strategic Housing Development at Palmerstown Retail Park, Kennelsfort Road Lower, Palmerstown, Dublin 20, is the result of a detailed design review of the proposed development by the applicant and design team following the Board’s opinion, and further pre-application consultation with internal departments of South Dublin County Council and Irish Water, prior to the formal lodgement of the application.

The statement now sets out a response to An Bord Pleanála’s pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

2.0 Items Requiring Further Consideration and Amendment

2.1 Item No. 1 – Development Strategy

Further consideration and/or justification of the documents as they relate to:

- *The alignment, scale, massing and articulation of blocks, particularly when viewed along the R148. In this regard, the prospective applicant should satisfy themselves that the design strategy provides for the optimal architectural response to the site. The proposed development shall have regard to inter alia, national policy including the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009.*

- *The design, depth, and disposition of the blocks, particularly of Block A and in its interface with the public realm, proximity to the basement ramp and the amenity of internal units.*
- *Block C in terms of its impacts to the residential properties to the north and interface with public open space.*
- *The quality of the proposed open spaces and public realm particularly in terms of overshadowing, wind tunnel effects and the standard of amenity.*
- *The landscaping proposals; details of boundary treatment; treatment of public plaza at Kennelsfort Road.*
- *Finishes and materials and treatment of balconies along the R148.*

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

At this juncture, it is important to note that the proposed scheme submitted at Stage 2 to the Board, has been subject to a number of amendments due to recommendations from the relevant consultants and the issues raised at the Stage 2 Pre-Application Consultation meeting. These include the redesign of Block A resulting in the creation of two smaller blocks; one of the blocks (now known as Block C) has been set back further north from the road to provide a large southerly pocket of open space as discussed during the Stage 2 meeting and a reduction in height of this block by two floors has also been proposed such that shadowing is not an issue; a café is now proposed in Block A adjoining the ancillary residential facilities; screening of the basement ramp has been proposed in the form of an attractive flowering pergola; etc. Downey Architecture have prepared an 'Architectural/Urban Design Statement' which includes details of the proposed development and the design evolution during this consultation period.

The design and layout of the proposed scheme alongside its interaction with the public realm, has been developed as a result of the collaborative work of the design team and the response to a number of issues raised during Pre-Application Consultations. The layout of the scheme responds to the site's location and surrounding environment as well as the exploitation of its optimum orientation. The main strategy embedded in the design approach from the outset was to increase connectivity and enhance existing links via a vehicular access created to connect Kennelsfort Road Lower to Old Lucan Road. The playground and public green areas were developed as a response to improve community recreation, while providing a basement car park in order to preserve the surfaces to public/semi-public green areas thus rendering the proposed scheme relatively car free. The building heights gradually increase from 3 storeys to 8 storeys to visually connect with the height of the existing built environment as well as responding to the site's increasing depth from east to west.

Digital Dimensions have carried out a detailed analysis of the proposed development and its potential impact on the residential amenity of existing and future residents in terms of daylighting, sunlight and overshadowing. This detailed analysis is contained within the report titled 'Daylight and Sunlight Analysis Report' and is submitted as part of the application.

In relation to open spaces, the proposed landscape design provides for an attractive high-quality landscape for people to live in and move through whilst enhancing the biodiversity value and ecological function of the green infrastructure network. The open space areas have been designed to provide both passive and active recreational amenities, with two main areas within the scheme

designated for children's play with play equipment for all ages. The location of these areas and overall landscaping proposals follow recommendations provided by the wind consultants and acoustic consultants and are in accordance with best practice guidance. The proposed plaza fronting onto Kennelsfort Road Lower and the visitor parking spaces at the site's entrance guarantee easier permeability to the proposed café and overall development. It is important to emphasise that the café element proposed as part of the scheme aims to attract a local walk-in catchment from the future residents of the proposed scheme as well as existing residents of the Palmerstown area. It is considered that the provision of the enhanced pedestrian and cycle facilities at the site's entrance on Kennelsfort Road Lower and an improved public realm will facilitate this new pedestrian travel desire line into the site.

For further information in this regard, please refer to the drawings and documentation prepared by Downey Architecture and the landscape drawings and report prepared by Jane McCorkell Landscape Architect which are submitted as part of this SHD application.

2.2 Item No. 2 – Residential Amenity

Further consideration and/or justification of the documents as they relate to:

- *Clarity regarding the extent of dual aspect units and extent of north facing single aspect units.*
- *The internal amenity of apartments in terms of sunlight and daylight penetration, particularly Block A.*
- *The potential impact of the development on the residential amenities of properties to the north, notably 4 and 5 Roseview.*
- *Amenity of residential units fronting onto terraces and units not served by balconies from the principle living area.*
- *Quality and location of residential support facilities and amenities having regard to the fact that it is a proposed BTR development;*

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

In response to this item, it is submitted to the Board that the proposed development fully accords with the 'Sustainable Urban Housing Design Standards for New Apartment Guidelines 2018' with regards to dual aspect units. Section 3.17 of the guidelines notes that it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations. The proposed development now provides for 50% dual aspect units with no single aspect north facing units proposed. The clear identification of dual aspect units on submitted floor plans in accordance with the provisions of the 'Sustainable Urban Housing Design Standards for New Apartment Guidelines 2018' are set out on Drawing No. PL-200 titled 'Dual Aspect Plans Blocks A, B, C, D & E' prepared by Downey Architecture which is enclosed with the architectural planning pack accompanying this application.

Following discussions during the Stage 2 meeting, a number of design changes were made to the proposed scheme to address the concerns raised at the meeting. These include the redesign of Block A resulting in the creation of two smaller blocks; one of the blocks (now known as Block C) has been

set back further north from the road to provide a large southerly pocket of open space as discussed during the Stage 2 meeting and a reduction in height of this block by two floors has also been proposed such that shadowing is not an issue; the reconfiguration of apartments in terms of access to balconies, etc. The redesign of Block A is such that an acceptable level of internal amenity of apartments has been achieved in terms of sunlight and daylight penetration. For further information, please also refer to the 'Daylight and Sunlight Analysis Report' prepared by Digital Dimensions; and the 'Architectural/Urban Design Statement' prepared by Downey Architecture which includes details of the proposed development and the design evolution of the proposed scheme.

As previously mentioned, Digital Dimensions have carried out a detailed, independent analysis of the proposed development and its potential impact on the residential amenity of existing and future residents in terms of daylighting, sunlight and overshadowing. This detailed analysis is contained within the report titled 'Daylight and Sunlight Analysis Report'. It assesses the sunlight and light from the sky to existing building, gardens and open spaces. Furthermore, the report also reviews the compliance of living rooms and bedrooms in the proposed development subject to this SHD application.

The 'Daylight & Sunlight Analysis Report' shows that the houses in Rose View and on the Old Lucan Road would not be impacted by the proposed development. It is considered within the report that the design of the proposed scheme was optimised with regard to the BRE Guidelines, the blocks are sufficiently spaced apart, and there should be no noticeable loss of available light to the surrounding residential dwellings. Furthermore, the houses at Rose View and No. 15 Kennelsfort Road Lower will see an improvement over the existing conditions due to the demolition of the structures close to the boundaries allowing more access to the sky. The report concludes that any impact from the proposed development will be negligible and that the proposed development meets the pertaining BRE Guidelines. There should be no noticeable loss of available light to the surrounding residential dwellings, as there will be minimal impact from the proposed development on the amenities of neighbouring properties in relation to daylight and sunlight. The proposed apartment units are considered to be of good quality in terms of light and sunlight in the amenity areas proposed. All living rooms and bedrooms in the units assessed exceed the minimum ADF (Average Daylight Factor). The proposed development therefore meets the recommendations set out in the BRE Guidelines and BS8208 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting. For further information in this regard, please refer to the 'Daylight & Sunlight Analysis Report' prepared by Digital Dimensions which is submitted as part of this SHD application.

The 'BTR Operational Management Plan' and 'BTR Market Justification Report' prepared by LIV Consult provide details on the quality, management and operation of the residential facilities, whilst also providing an evidence-based justification for the provision of a centralised hub of facilities in Block A of the scheme. Please refer to the enclosed 'Architectural/Urban Design Statement', 'Housing Quality Assessment', the 'BTR Market Justification Report' and the 'BTR Operational Management Plan' for further information in this regard.

2.3 Item No. 3 – Pedestrian/Cyclist Permeability and Car Parking

Further consideration and/or justification of the documents as they relate to:

- *Quality of public realm and particularly future pedestrian and cyclist connections through to the Lucan Road. Clarity should be provided regarding any upgrade works proposed to the right of way including public lighting. In the absence of appropriate pedestrian and cyclist connections, full justification for the proposed through route should be provided including an assessment of traffic safety.*
- *Extent of car parking having regard to the guidance set out under SPPR 8.*

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

AECOM Consulting Engineers have prepared a detailed 'Traffic & Transport Assessment' within which is included a response to the Board's Pre-Application Consultation Opinion. This is located within Appendix A of the aforementioned report.

As part of the proposed scheme, it is envisioned that the proposed pedestrian/cycle connection onto Old Lucan Road via Palmerstown Business Park will provide pedestrians/cyclists with a shorter and more direct link between Old Lucan Road and Kennelsfort Road, allowing for a reduction in travel distance of approximately 100m in comparison to the existing condition. The existing right of way between the subject site through the Palmerstown Business Park, provides a connection to the Old Lucan Road. The provision of this connection will enable residents/visitors travelling to/from the subject site to utilise the Lucan Road access 24 hours a day.

It is important to note that, while it does not form part of this SHD application, enhanced public lighting will be provided within Palmerstown Business Park within the coming months (in advance of occupation of the subject site). The provision of this enhanced public lighting, designed to the appropriate standards by Fallon Design M&E Engineering, within Palmerstown Business Park will improve safety and personal security for all road users (pedestrians/cyclists/vehicles) travelling between the site and the Old Lucan Road. A design for the provision of potential upgrades within the Business Park has been prepared by the design team (refer to drawing PR224738-ACM-00-00-DR-CE-00-0002 submitted with this application as part of the engineering pack).

The proposed development provides for a total of 125 no. car parking spaces (120 no. spaces at basement level and 5 no. spaces at surface level) which includes 26 no. Electric Vehicle (EV) charging points, 5 no. visitor parking spaces, 5 no. mobility impaired spaces, 2 no. car club spaces and 10 no. motorbike parking spaces. In addition, 276 no. cycle parking spaces will be provided (250 no. spaces at basement level and 26 no. at surface level). The proposed car parking provision has been designed to cater for the expected car parking demand of the site whilst also considering the residential amenity of prospective residents. It is determined that the proposed quantum of 0.5 of a car parking space per apartment unit is sufficient to cater for the anticipated demand of perspective residents of the site.

The assessment of the subject site indicates that due to the proposed scheme, the lands will be highly accessible to pedestrians and cyclists from the adjacent Kennelsfort Road Lower and the nearby Old Lucan Road. It also concludes that the proposed development achieves filtered permeability, primarily for walking and cycling at the two site access locations on Kennelsfort Road Lower and Old Lucan Road.

Please refer to the enclosed 'Traffic & Transport Assessment' and relevant documentation prepared by AECOM Consulting Engineers for further details in this regard.

2.4 Item No. 4 – Drainage

Further consideration and/or justification of the documents as they relate to:

- *Clarity regarding presence of culverted stream on the site and whether this requires diversion to facilitate the development.*
- *Detailed assessment of the surface water attenuation volumes required to facilitate the development.*
- *Site specific soil tests and whether SuDS measures can be designed to promote infiltration and surface water run off to ground.*
- *Detailed SuDS design.*
- *Response to the technical requirements of the Water Services Department of South Dublin County Council as detailed in their report dated the 14th of November 2019.*

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

AECOM Consulting Engineers have prepared a detailed response to address this item in full. This response is fully detailed in the Infrastructure Report and associated drawings which accompany this planning application.

South Dublin County Council (SDCC) provided record drawings which indicate the existence of a 225mm diameter surface water sewer entering at the north-west and crossing the site, discharging to the south-east corner to an existing 750mm diameter surface water sewer at the R148 – Kennelsfort Road Lower junction. It is proposed to discharge the proposed surface water network by gravity to the existing manhole (ID_4105) to the south-east of the proposed development, at the existing junction with Kennelsfort Road Lower and the R148 (Drawing no. PALM-ACM-00-00-DR-CE-50-0501).

The proposed surface water has been designed using Innovyze MicroDrainage software in accordance with the 'Recommendations for Site Development Works for Housing Areas' design guide. A model was developed with a M5-60 of 16.500mm, a Ratio (R) of 0.276 and rainfall intensity of 50mm/hr. A return period of 5 years was used throughout the design. AECOM Consulting Engineers retrieved information in relation to the Soil Index for the proposed development, which has been identified as Type 3, with Soil Index of 0.37. It is also noted that landscaping area was taken into account for the modelling of the surface water network. The overall landscaping area is 7,190m². A runoff coefficient of 30% was taken into account. Therefore, the landscaping area that has an impact of the proposed surface water network is 2,157m².

In order to design the proposed surface water network and to estimate the required storage volume on site, a breakdown of areas was prepared. It is proposed to construct an attenuation storage tank (Stormtech MC4500) on site with a Hydrobrake at downstream manhole, limiting outflow at the restricted rate (Q_{bar}). The proposed attenuation tank has an overall storage volume of 426m³ (with a stone porosity of 43%), attenuating the surface water runoff from the overall impermeable area on site.

As part of the proposal, it is intended to divert the existing surface water sewer within the site. As discussed with South Dublin County Council, there are proposed 2 no. diversions of the existing surface water network:

1. *The decommissioning of the surface water pipework (involving the existing 225mm, 300mm, 600 and 675mm sewers) on site and the diversion into the proposed drainage network.*
2. *The decommissioning of 58m of the existing 600mm concrete sewer which is connecting to manhole ID_3103 from the western side, and diversion on the grass area to the south of the site.*

In order to carry out the decommissioning of the main surface water network, AECOM have carried out an analysis of the existing network capacity and flow, to estimate the impacts of the proposed development. As part of the analysis, it has been assumed that the existing branch is servicing an overall Catchment Area of approximately 1.96ha. The Catchment Area, being part of the existing industrial estate, has been considered entirely impermeable, to provide for the most onerous of runoff rates for the development.

In accordance with the Greater Dublin Regional Code of Practice for Drainage Works, the runoff will be limited to the calculated Qbar rate. A further analysis was carried out to estimate the existing surface water runoff from the remaining portion of the Catchment Area, originally considered to estimate the overall existing runoff from the existing branch. As per the original analysis, this area has been considered impermeable for its overall extents (0.688ha). From the results of this analysis, it was possible to calculate the existing runoff of the existing network, which will be diverted as part of the proposed development.

The estimated runoff from this area is 112l/s, and this has been added as additional baseflow in the calculation for the proposed surface water network. Based on that, the existing and remaining flow from the existing northern commercial unit (112l/s), will be added to the estimated Qbar from the proposed development (5.35l/s), resulting to an overall surface water runoff of 117.35l/s, which represents an improvement if compared with the current situation, with a discharge of 235.7l/s. It is proposed to connect the proposed surface water network via a 450mm diameter sewer with a gradient of 1:200, with a capacity of 227.8 l/s. therefore, there is adequate capacity within the proposed sewer in order to cater the combined flow from the proposed development and the diverted network. It is also noted that the proposed diverted sewer will be located 3m away from the proposed ESB substation as per SDCC requirements.

As part of the items raised by South Dublin County Council in the Water Department Report (Item 1.1 of Report Reg. Ref. No. SHD2ABP-305801-19), it was requested to provide further information regarding the status of the existing 600mm sewer on site, connecting to manhole ID3103 from the western side. In order to establish if the existing 600mm concrete sewer is currently in use, 2 no. CCTV surveys were carried out and results forwarded to South Dublin County Council as requested. The first CCTV survey was carried out during rainfall on 20th February 2020 by Greenday Environmental. It is noted that in the previous days before the survey was carried out, heavy rain was recorded in Dublin. The weather station located in Phoenix Park (approximately 2.50km away) recorded the “wettest” February since recording started 1850. The mean rainfall for the month of February for the Phoenix Park station during previous years was 51.3mm; in February 2020, 141.5mm of rainfall were recorded, which represents an increase of 257% increase. The CCTV survey could not survey the overall extent

of the pipe due to debris encountered along the line. The survey was stopped at 37.9m. It is noted that during the survey, towards upstream direction, the status of the pipe is clearly dry. The findings of the CCTV survey were considered not sufficient by SDCC and further investigation was required, with the request of a SDCC Drainage Inspector to witness the survey.

A second CCTV survey was carried out on 3rd April 2020, witnessed by Graham Murphy, Drainage Inspector of SDCC, as requested by the Local Authority. Prior to the survey being undertaken, the existing 600mm sewer had been water-jetted to clean the sewer from the debris inside and allow a further survey. The CCTV Camera Rover was able to travel approximately 9m further (approximately 46m of total survey). Concrete debris were encountered, obstructing approximately 40% of the section. As the CCTV could not inspect further than the blockage, it was not possible to establish the status of the sewer. It is important to note that historical maps and existing record drawings were retrieved and consulted, as well as planning drawings of adjacent lands. It has been established that no western lands are served by the existing 600mm sewer. Please refer to Appendix C of the enclosed 'Infrastructure Report' for CCTV survey reports.

However, it is now proposed to decommission 58m upstream of the existing 600mm sewer and divert it via a proposed 600mm sewer (in order to have same capacity within the network) along the green strip to the north of the R148, running parallel to the existing 450mm sewer. The proposed diversion will be 5m away from the proposed Blocks as per South Dublin County Council requirement. For further details please refer to Drawing No. PR224738-ACM-00-00-DR-CE-00-0500 titled 'Existing Drainage Layout and Proposed Diversions' prepared by AECOM Consulting Engineers.

The proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS) in accordance with the guidelines of the GSDS and the SuDS Manual CIRIA C753. These documents promote the use of a variety of alternative measures in the design of sustainable drainage systems, which take into account quantity, quality and amenity aspects of the urban drainage system. The aim of proposing sustainable drainage systems is to replicate the natural characteristics of the greenfield runoff minimising the environmental impact. SuDS are designed to manage water quantity reducing/preventing the likelihood of flooding from the proposed development and to maximise opportunities and benefits from surface water management.

As part of the surface water drainage proposal, several SuDS measures are provided as part of the scheme in order to treat surface water runoff, to replicate the greenfield runoff and minimise the environmental impact. The proposed SuDS systems chosen for the proposed development include permeable paving, geo-cellular storage tank, bio-retention systems (at each planter location), filter drain, green roofs, tree pits, and petrol interceptor. These measures are indicated on the enclosed Drawing No. PR224738-ACM-00-00-DR-CE-00-0502 titled 'Proposed SuDS Layout' prepared by AECOM Consulting Engineers.

In light of the above, it is considered that AECOM Consulting Engineers have prepared a detailed response which addresses this item in full. For further information in this regard, please refer to the aforementioned response which is fully detailed in the 'Infrastructure Report' and associated drawings, all of which accompany this planning application.

3.0 Requested Specific Information

3.1 Item No. 1 – Impact on Residential Amenity

Full and complete analysis and drawings that detail the impact of the proposed development on the residential amenity of existing residents in relation to daylighting, overshadowing and overlooking. Specific attention should be paid to proposed accommodation and interactions with existing development to the north along Rose View.

Digital Dimensions have prepared a detailed 'Daylight & Sunlight Analysis Report' for the proposed development in order to assess the potential impact the proposed scheme would have on the surrounding built environment and on the amenities of existing properties in relation to daylight, overshadowing and overlooking.

The 'Daylight & Sunlight Analysis Report' shows that the houses in Rose View and on the Old Lucan Road would not be impacted by the proposed development. It is considered within the report that the design of the proposed scheme was optimised with regard to the BRE Guidelines, the blocks are sufficiently spaced apart, and there should be no noticeable loss of available light to the surrounding residential dwellings. Furthermore, the houses at Rose View and No. 15 Kennelsfort Road Lower will see an improvement over the existing conditions due to the demolition of the structures close to the boundary allowing more access to the sky. The report concludes that any impact from the proposed development will be negligible.

The results of this assessment find that there will be minimal impact from the proposed development on the amenities of neighbouring properties in relation to daylight and sunlight. Additionally, the proposed apartment units are considered to be of good quality in terms of light and sunlight in the amenity areas proposed. All living rooms and bedrooms in the units assessed exceed the minimum ADF (Average Daylight Factor). The proposed development therefore meets the recommendations set out in the BRE Guidelines and BS8208 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting.

For further information in this regard, please refer to the 'Daylight & Sunlight Analysis Report' prepared by Digital Dimensions which is submitted as part of this SHD application.

3.2 Item No. 2 – Architectural Report

An architectural report accompanied by photomontages of the proposed development should outline the design rationale for the proposed building height, scale and massing including detail on the design iterations considered. Photomontage images from a number of key approach roads to the development site and from the Liffey Valley Special Amenity Area Order should be provided.

An 'Architectural/Urban Design Statement' has been prepared by Downey Architecture which outlines the design rationale for the proposed development and provides further details on the design considerations for the proposed scheme, as well as a comparison with the granted development (Reg. Ref. SD09A/0021, ABP Ref. PL06S.234178) on the subject lands and the previously refused SHD application (ABP Ref. ABP-302521-18).

The height, scale and massing of the proposed scheme is a result of a thorough assessment of the subject lands as well as the pertaining policies and guidelines. It is submitted that the proposed development seeks to create a high-quality and attractive urban neighbourhood at a strategically located and underutilised site. The enclosed 'Architectural/Urban Design Statement' provides for additional details on the design rationale for the scheme, which has evolved to respond to the distinct qualities of Palmerstown Village and surrounding environs.

The proposed building heights respond to the existing built environment in the immediate vicinity of the subject site, as well as future development opportunities of the area. The proposed heights for the scheme gradually increase from 3 to 8 storeys in order to visually connect with the surrounding environs, as well as following the increasing depth of the site from Kennelsfort Road Lower to the west of the lands. It is thus considered that the proposed development provides for an appropriate design and layout that responds to its context and seeks to create a well-defined and visually interesting boundary to the busy Chapelizod Bypass, which is a site-specific feature influencing the overall design of the scheme.

Digital Dimensions have prepared a 'Photomontages Report' which shows the existing view, the previously refused scheme and the new proposed scheme. The verified views are from various approach roads and locations in proximity to the application site including views from the wider road network and indeed the Liffey Valley SAAO. In addition to this, a 'Visual Impact Assessment Report' prepared by ARC Consultants and enclosed as part of the application, confirms that the subject site is capable of absorbing the proposed height strategy and thus is considered appropriate for this strategic location in close proximity to Dublin City and adjacent a public transport corridor.

For further information in this regard, please refer to the enclosed 'Architectural/Urban Design Statement' prepared by Downey Architecture, the 'Photomontages Report' prepared by Digital Dimensions and the 'Visual Impact Assessment Report' prepared by ARC Consultants.

3.3 Item No. 3 – Phasing Plan

A phasing plan for the proposed development.

Downey Architecture has prepared a Phasing Plan for the proposed scheme which is submitted as part of the planning application. This Plan can be located within the architectural drawings and documentation pack. This drawing provides information as to the proposed phasing of the development, from demolition of the existing buildings on site and site clearance/excavation works through to the proposed phasing of the buildings' construction. It is proposed to phase the development as follows:

1. (A) Demolition of structures on site and site clearance works;
(B) Excavation and construction of basement;
2. Construction of Block A;
3. Construction of Block B;
4. Construction of Block C;
5. Construction of Block D; and,
6. Construction of Block E.

For further information in this regard, please refer to Drawing No. PL-011 titled 'Proposed Phasing Plan' prepared by Downey Architecture. An 'Outline Construction & Demolition Waste Management Plan' has also been prepared by AECOM Consulting Engineers for the proposed development and accompanies this planning application.

3.4 Item No. 4 – Taken in Charge

A site layout plan showing which, if any, areas are to be taken in charge by the Planning Authority.

Downey Planning can confirm that the main road/street network within the application site is proposed to be Taken in Charge by South Dublin County Council as set out and indicated in green on the enclosed Drawing No. PL-005 titled 'Taken in Charge Drawing' prepared by Downey Architecture. It is submitted that the communal open space areas are to be privately managed and maintained by the Management Company. Please refer to the submitted Taken in Charge drawing enclosed with the application for further details. This drawing can be located within the architectural drawings and documentation pack.

3.5 Item No. 5 – Materials and Finishes

A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes and frontages including the maintenance of same. The treatment/screening of exposed areas of basement ramps should also be addressed. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the overall development. The documents should also have regard to the long term management and maintenance of the proposed development.

Downey Architecture have prepared a 'Materials & Finishes Report' and a 'Building Lifecycle Report' for the proposed development which provide detailed information on the proposed materials and finishes for the scheme as well as the maintenance and management of the proposed development in this regard. In addition, the architectural drawings and 'Architectural/Urban Design Statement' prepared by Downey Architecture also provide details on the proposed palette of materials for the buildings. For further information in this regard, please refer to the 'Materials & Finishes Report', 'Building Lifecycle Report' and the 'Architectural/Urban Design Statement' prepared by Downey Architecture, all of which are submitted as part of this SHD application.

The materials proposed for the open spaces, paved areas, site boundaries, etc., including the pertaining maintenance specifications, are fully detailed on the landscape drawings and report prepared by Jane McCorkell Landscape Architect. For further information in this regard, please refer to the enclosed landscape drawings and documentation (Landscape Report) prepared by Jane McCorkell Landscape Architect.

3.6 Item No. 6 – Landscaping

Landscaping proposals including an overall landscaping masterplan for the development site. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture

including public lighting and boundary treatments should be submitted. The plan should provide full clarity regarding the areas of private, semi-private and public open space and should indicate clearly how the interface between the curtilage of private and public open space is defined. Where apartment units front onto public open space/terraces, appropriate screening and planting should be provided.

A detailed landscaping proposal has been prepared by Jane McCorkell Landscape Architect and is enclosed with this SHD application. The landscape plans, landscape details and landscape report submitted as part of the overall landscape pack provide details of the high-quality landscaping and green infrastructure proposals for the proposed scheme.

The landscape design strategy for the scheme aims to create a high-quality landscape for the residents to engage with, and an attractive landscape for people to live in and move through, whilst enhancing the biodiversity value and ecological function of the green infrastructure network. The design approach also aims to repair habitat fragment and provide for regeneration of flora and fauna where existing landscape lacks. It is intended to reduce the amount of hardscape by incorporating certain elements of green infrastructure, new tree planting, woodland style planting, mixed ornamental planting and raised planters positioned in areas of hard landscape. The open spaces proposed as part of the scheme are designed to be multifunctional and to provide both passive and active recreational facilities. The proposed development includes an approximate of 2,539 sq.m. of public open space, as well as c.2,753 sq.m. of communal open space. There is extensive tree planting and indigenous hedge planting proposed as wind mitigation measures, which also act as buffer and natural source for clean air within their surrounding environment. The ground floor units are provided with a privacy buffer screening consisting of 1.5m wide privacy planting along private amenity spaces.

Please refer to the enclosed plans and documentation prepared by Jane McCorkell Landscape Architect for further details in this regard.

3.7 Item No. 7 – Resident Support Facilities

A report which addresses the provision, both qualitative and quantitative, of resident support facilities and resident service and amenity areas within the overall scheme and on a block by block basis, having regard to both Section 5 (sections 5.1-5.12) and SPPR 7 & SPPR 8 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018.

Downey Architecture have prepared an 'Architectural/Urban Design Statement' and a 'Housing Quality Assessment' which indicates the qualitative and quantitative aspects of resident service and amenity areas for the proposed development. This documentation demonstrates how the proposed scheme complies with the pertaining Apartment Guidelines standards and should be read in conjunction with the 'BTR Operational Management Plan' and 'BTR Market Justification Report' prepared by LIV Consult which provides details on the management and operation of these facilities, and the evidence-based justification for providing a centralised hub of facilities in Block A of the scheme. Please refer to the enclosed 'Architectural/Urban Design Statement', 'Housing Quality Assessment', the 'BTR Market Justification Report' and the 'BTR Operational Management Plan' for further information in this regard.

3.8 Item No. 8 – Management and Operation for BTR Scheme and Building Lifecycle Report

Proposals for the management and operation of the proposed development as a 'Build-to-Rent' scheme in accordance with Specific Planning Policy Requirement No. 7 of the 2018 Guidelines on Design Standards for New Apartments, including detailed proposals for the provision and management of support facilities, services and amenities for residents. A Building Lifecycle Report in accordance with section 6.13 of the guidelines should also be submitted. The plan shall also address the management and maintenance of public spaces and access to the development.

LIV Consult, in conjunction with the applicant, have prepared a 'BTR Operational Management Plan' for the proposed development which is enclosed as part of this application. The LIV Group was established in 2008 to provide corporate residential management services for the banking sector, specialising in Block Management, Facilities Management and Lettings. LIV transitioned into the UK's Build-to-Rent (BTR) sector in 2014 and has since been the first to introduce a dedicated operating model that defines every stage of a development from acquisition to operation. In 2016, LIV Consult was created to provide bespoke and specialist consultancy advice to the BTR market in the UK and internationally and is currently advising on the development of more than 35,000 BTR homes in developments from high-rise apartment communities to suburban masterplans. LIV's market-leading operational model is informed by the consultancy's wealth of experience, and currently has delivered operational management on nearly 3,000 BTR homes including both urban and suburban developments.

The enclosed 'BTR Operational Management Plan' provides specific details on how the development will be accessed, managed and maintained, as well as the experience for residents, ensuring that a successful community is thus facilitated through design and operations. The Plan indicates that a comprehensive community staffing strategy will be delivered to curate spaces and community events, including gym workouts, yoga and fitness classes, games area, library area, cinema nights, regular curated social events, regular residents' meetings, among others.

Downey Architecture have prepared a 'Building Lifecycle Report' for the proposed scheme which demonstrates compliance with Apartment Guidelines standards and is enclosed as a separate document with this planning application.

For further information in this regard, please refer to the 'BTR Operational Management Plan' prepared by LIV Consult and the 'Building Lifecycle Report' prepared by Downey Architecture submitted as part of this SHD application.

3.9 Item No. 9 – BTR Legal Agreement

A proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains in use as Build-to-Rent accommodation, and which imposes a requirement that the development remains owned and operated by an institutional entity and that similarly no individual units are sold or rented separately. The proposed agreement shall be suitable to form the basis for an agreement under section 47 of the Planning

Act between the Planning Authority and the owner of the site and it shall bind the owner and any successors in title for a minimum period of at least 15 years.

Leman Solicitors, on behalf of the applicant, have prepared a draft legal covenant for the proposed development in accordance with legislative requirements, and this is submitted as part of this SHD application. This legal covenant will be finalised upon a final grant of permission. Please refer to the enclosed document prepared by Leman Solicitors for further details in this regard.

3.10 Item No. 10 – Housing Quality Assessment

A Housing Quality Assessment which provides the details regarding the proposed apartments set out in the schedule of accommodation, as well as the calculations and tables required to demonstrate the compliance of those details with the various requirements of the 2018 Guidelines on Design Standards for New Apartments including its specific planning policy requirements. Full clarity on the extent of actual dual aspect units and number of north facing single aspect units should be provided.

Downey Architecture have prepared a 'Housing Quality Assessment' which is submitted as part of this SHD application and provides further details on the proposed schedule of accommodation, including the pertaining calculations and tables as per the 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines. A Dual Aspect drawing (drawing no. PL-200) has also been prepared by Downey Architecture to demonstrate the extent of actual dual aspect units within the scheme. Please refer to the enclosed drawing, the 'Housing Quality Assessment' and 'Architectural/Urban Design Statement' prepared by Downey Architecture for further information in this regard.

3.11 Item No. 11 – Childcare Assessment

Childcare demand analysis and likely demand for childcare places resulting from the proposed development, if any.

Downey Planning have prepared a comprehensive 'Childcare Provision Assessment Report' which is enclosed as part of this SHD application. As part of the assessment, Downey Planning carried out a survey of the registered childcare facilities located within 2km of the subject site in order to determine the level of spare capacity available within the identified childcare facilities and the type of services available within Palmerstown and surrounding environs. The results from this survey established that there is an overall spare capacity of 8 no. childcare spaces within the area.

The 'Childcare Facilities Guidelines for Planning Authorities', DEHLG (2001) provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. It is worth noting that this is a planning guidance document only, and therefore any standards set down in relation to relevant childcare legislation take precedence.

As stated in Section 3.3.1 of the Guidelines and in relation to new housing areas, *"a standard of one childcare facility providing for a minimum of 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site."*

In addition to the above, Appendix 2 of the Childcare Facilities Guidelines states that any modification to the indicative standard of one childcare facility per 75 dwellings should have regard to:

1. *“The make-up of the proposed residential area, i.e. an estimate of the mix of community the housing area seeks to accommodate.*
2. *The results of any childcare needs analysis carried out as part of a county childcare strategy or carried out as part of a local or action area plan or as part of the development plan in consultation with county childcare committees, which will have identified areas already well-served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.”*

Section 4.7 of the ‘Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018) states the following in relation to the Childcare Guidelines:

“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, [...] the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”

The proposed development at Palmerstown provides for 250 no. ‘Build-to-Rent’ apartment units comprising 134 no. 1 beds and 116 no. 2 beds. As per the calculations provided within the enclosed report, the proposed development will generate a potential requirement for 4 no. childcare spaces.

It is thus considered that the level of potential childcare spaces generated by the proposed development can be adequately accommodated by the existing facilities in the surrounding area. Furthermore, it is worth noting that the accessibility of future occupants to employment centres outside of the Palmerstown area allows them to choose a childcare facility located closer to their place of employment, which in turn results in less demand for Palmerstown.

An assessment of the local area shows that there are 8 no. childcare facilities located in close proximity of the subject site with an overall available capacity of 8 no. childcare spaces. It is important to note that there are 2 no. childcare facilities with ‘Unknown’ capacity representing a potential additional capacity within the area. Indeed, South Dublin County Childcare Committee indicated that there are 20 no. available spaces within the existing childcare facilities in the area. The ‘Childcare Provision Assessment Report’ submitted as part of this SHD application concludes that given the nature and scale of the proposed development, the quantum of available childcare spaces within the 8 no. registered childcare facilities within the vicinity of the subject site, there is sufficient spare capacity to cater for the estimated future demand arising from the proposed development.

In light of the above, the omission of a childcare facility from this residential development is considered appropriate due to existing availability of childcare spaces and planned childcare facilities in the area, the demographics of the area within which the subject site is located, as well as the characteristics and scale of the proposed development and the potential demand generated by the

proposed residential scheme. For further information in this regard, please refer to the enclosed 'Childcare Provision Assessment Report' prepared by Downey Planning.

3.12 Item No. 12 – Quality Audit and Mobility Management Plan

A detailed Quality Audit to include Road Safety Audit, Access Audit, Cycle Audit and Walking Audit. A Mobility Management Plan.

A detailed Quality Audit has been carried out by Bruton Consulting Engineers, an independent team of Road Safety Auditors, and is enclosed as part of this SHD application. The Quality Audit includes the Road Safety Audit (Stage 1), Access Audit, Cycle and Walking Audit for the proposed development. The issues brought forward in the Audit were acknowledged and addressed by the design team and recommendations taken into consideration for the final design/layout of the proposed scheme. Please refer to the enclosed Quality Audit and pertaining engineering documentation for further details in this regard.

AECOM Consulting Engineers have prepared a 'Mobility Management Plan' (MMP) for the proposed scheme. This MMP demonstrates how the scheme will integrate with the existing network from a mobility management point of view, as well as to minimise potential impacts of vehicular traffic upon the local road network.

The site subject to this SHD application is strategically located and benefits from public transport connections, thus allowing for good accessibility levels for this sustainable mode of travel. It is considered that the proposed scheme improves the accessibility for the lands via walking, cycling and public transport. The assessment carried out by AECOM Consulting Engineers concludes that the proposed development is well placed to promote sustainable travel from the onset.

For further details in this regard, please refer to the enclosed drawings and documentation prepared by AECOM Consulting Engineers.

3.13 Item No. 13 – Noise Impact Assessment

Noise Impact Assessment.

Amplitude Acoustics have prepared a 'Acoustic Report' for the proposed scheme and is submitted under separate cover. This report assesses the acoustic environment throughout the site, both internal and external amenity noise levels were evaluated based on traffic noise levels measured at the subject lands, as well as predicted noise levels based on future traffic growth.

The acoustic assessment conducted by Amplitude Acoustics indicates that, based on the traffic noise model developed and calibrated for the proposed development, the interior noise levels for the scheme are predicted to comply with the pertaining standards provided that the construction requirements are implemented. The external noise levels for the roof garden located in Block A at third floor level are predicted to achieve "Desirable Low Sound levels" through the installation of an appropriately design 3m glazed noise barrier. Additionally, the residential units which include balconies will be provided with local noise screening with balustrades of 1.5m in height, therefore increasing the amenity of these spaces. Overall, the noise levels in general achieve the recommended external amenity noise level.

This report concludes that the implementation of the acoustic design guidance provided enables the proposed scheme to achieve acceptable internal noise levels for the proposed use of the subject site. Please refer to the enclosed 'Acoustic Report' prepared by Amplitude Acoustics for further information in this regard.

3.14 Item No. 14 – Operational Waste Management Plan

Operational Waste Management Plan.

An 'Operational Waste and Recycling Management Strategy' has been prepared for the proposed development and is submitted as part of this planning application within the engineering documentation pack. The 'Operational Waste and Recycling Management Strategy' has been prepared by AECOM Consulting Engineers on behalf of the applicant and outlines the proposed strategy for waste management once the development is occupied. This Strategy aims to demonstrate how the proposed development will utilise sustainable methods for waste and recycling management for the operational phase of the scheme. The proposed plan provides for a convenient, clean and efficient waste management strategy that will enhance the operation of the proposed development and promote recycling.

Please refer to the enclosed 'Operational Waste and Recycling Management Strategy' prepared by AECOM Consulting Engineers for further details in this regard.

3.15 Item No. 15 – Microclimate Study

Microclimate Study.

The applicant engaged RWDI Consultants to prepare a 'Wind Microclimate Assessment Report' for the proposed development. This assessment is based upon analysis of the relevant meteorological conditions adjusted to the site, and a review of the proposed scheme in the context of the meteorological data and surrounding area in order to understand the influence of the proposed development on the quality of the public realm. The evaluation of pedestrian wind comfort has been carried out in accordance with RWDI Comfort Criteria.

The results of the proposed scheme's Wind Microclimate Assessment indicate that the wind conditions at the subject site without any mitigation measures would generally be windier than suitable in several locations, however the assessment was acknowledged and addressed by the design team and thus the recommended wind mitigation measures have been added to the design and overall layout of the proposed development.

Overall, it is anticipated that the proposed development with the adoption of appropriate mitigation measures, where required, would be suitable for the intended pedestrian use. Please refer to the enclosed 'Wind Microclimate Assessment Report' prepared by RWDI Consultants for further information in this regard.

4.0 Notification of Authorities

The Board also requested that pursuant to Article 285(5) of the Planning and Development (Strategic Housing Development) Regulations 2017, the following authorities should be notified in the event of

the making of an application arising from this notification in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- Transport Infrastructure Ireland
- National Transport Authority
- Irish Water
- Irish Aviation Authority
- Department of Defence (Casement Aerodrome)
- Dublin Airport Authority
- South Dublin County Council Childcare Committee

Downey Planning can confirm that the above list of bodies have all been notified of the making of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this SHD application to the Board.

5.0 Conclusion

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the items outlined within An Bord Pleanála's opinion have been fully addressed by the applicant and design team prior to lodgement of this application to An Bord Pleanála.

The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the accompanying documentation.

The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The changes pertaining to the design of the proposed development incorporated into the final scheme proposed are considered to result in a high-quality development now being presented to An Bord Pleanála for approval, and as such it is submitted that the further consideration and amendment of the documents previously submitted now constitute a reasonable basis for an application for strategic housing development.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.