



**NOTIFICATION TO ATTEND MEETING OF THE HOUSING SPC  
TO BE HELD IN THE BY REMOTE VIDEO CONFERENCING VIA - ZOOM  
ON WEDNESDAY 9 DECEMBER 2020 AT 11.00 AM**

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**AGENDA**

**WEDNESDAY 9 DECEMBER 2020**

	<b>PAGE</b>
1	Minutes of meeting dated Wednesday 11th November and matters arising
2	Chairpersons Business
	See point i
	i) Correspondence No Correspondence received
3	Update on Working Groups
	See points i-iii
	i) Rent Review Working Group
	ii) Public Housing Working Group Update to follow
	iii) Services for Senior Citizens Working Group
4	Presentation on Emmet Road Regeneration Project (incl. Cost Rental)

To follow

- 5 Potential EU Funding Opportunities Housing and Community Development
- 6 Labre Park Redevelopment Update
- 7 Lord Mayor's Taskforce on Homelessness
- 8 AOB

# Housing SPC Minutes

**HOUSING STRATEGIC POLICY COMMITTEE MEETING**

**WEDNESDAY 11<sup>TH</sup> NOVEMBER 2020**

**ATTENDANCE**

**COUNCILLORS**

Mary Callaghan

Hazel Chu

Donna Cooney

Kevin Donoghue

Daithi Doolan

Pat Dunne

Anthony Flynn

James Geoghegan

Alison Gilliland - Chairperson

Briege MacOscar

Tina MacVeigh

Máire Devine

Cieran Perry

Catherine Stocker

Colm O'Rourke

**Other Councillors in attendance**

Mary Freehill

**EXTERNAL MEMBERS**

Pat Greene – DSC

Karen Murphy - ICSH

Claire McManus - JFOC

Mike Allen – Focus Ireland

Liam Kelly WRA

**Apologies**

Aine Wellard - VVI

Mick O'Reilly - ICTU

**Dublin City Council Officials**

David Dinnigan, Executive Manager

Eileen Gleeson, Executive Manager

Mary Hayes, Executive Manager

Dymphna Farrell, Senior Executive Officer

Christy McLoughlin, Administrator

## **1. Minutes of meeting dated Wednesday 14<sup>th</sup> October**

**Agreed** : Minutes Agreed

## **2. Chairperson's Business**

### i. Correspondence

No correspondence received

### ii. Working Groups Update

The first meeting of the Services for Older people group is currently scheduled for Thursday 26<sup>th</sup> November @ 10:00. Terms of Reference provided to members.

## **3. Housing Management Update**

### i. Housing Supply Report

Dave Dinnigan, Executive Manager provided update.

The following considerations were raised;

- Central Government Budget Figures
- Updates were provided for the following areas;
  - St. Michael's Estate, Jamestown Crt Senior Citizens Site, Springvale, Sarsfield, Connaught St, O'Rahilly Sq, Herberton/Rialto & Cherry Orchard sites
- The roles of external organisations including the Land Development Agency, AHBs
- Cost Rental Pilot Schemes
- Long Term Leasing
- Waiting List Figures – meeting demand with current supply streams, particularly for single individuals
- Funding & Delivery Models
- Cost Analysis

**Agreed** : St Michael's Estate presentation at a future SPC meeting

ii. Report On Homelessness

Eileen Gleeson, Executive Manager provided a synopsis of report

Members thanked the DRHE for their work in meeting the challenges that the complexity of homelessness presents

The following considerations were raised

- Cold Weather Strategy
- Covid Budget % recoup from Central Government
- HAP Payments & HAP Process – National Scheme
- Statistical Breakdown
- Success of Prevention Strategies
- Place Finder Function
- Housing Support Officers
- Housing First Update
- Outreach programme
- Services and provision for women
- Sensitive discussion needed regarding deaths within the homelessness system
- Lease Termination
- Private Rental Accommodation issues
- Emergency Accommodation
- Homeless Hubs
- Homeless List Priority figure clarification
- Status of families transferred from homeless accommodation to AirBnb accommodation

**Agreed** : Report Noted

**Agreed** : Defer point 3 iii until after point 4 on agenda

**4. Lord Mayor's Task Force on Homelessness**

The Lord Mayor provided a verbal update on the work of the Task Force on Homelessness covering the task force's weekly meetings discussing prevention, wrap around services, day services, children's services, procedures and protocols with regard to homeless services. The Lord Mayor also indicated that the Task Force had met with service users, and representatives from those providing services including the Ana Liffey Drug Project and the Alice Leahy Trust.

**Agreed** : N/A

### 3. iii Housing Strategy for New City Development Plan

David Dinnigan, Executive Manager provided a presentation on the key issues for consideration in a new housing strategy within the context of the new City Development Plan.

The following considerations were raised

- Tenure and Affordability
- 2020 Pipeline Social Housing figures
- Land Scarcity and Land Acquisition
- Construction Costs
- Social housing demands/Housing list figures by bed-size
- Rental Data
- Collaboration/Partnerships
- Typologies
- Universal design
- Place Making
- Central Government Policy
- Planning Legislation
- Estate Management
- Regeneration and use of difficult sites and spaces over shops
- Community Engagement
- Local Area Committee Consultation
- Forecasting for special housing needs
- Covid 19 Impact
- EU Funding Opportunities

**Agreed** : Presentation Noted

### 5. AOB

Land Mapping Update requested

**Agreed** : December SPC meeting date/time to be confirmed

**Cllr. Alison Gilliland**  
**CHAIRPERSON**



## **Response from Housing Management on Working Group Report in relation to Public Housing**

Management in the Housing Department would like to thank the Strategic Policy Committee (SPC) Chairperson and all the members for working intensively on, and compiling this report. It is very appropriate that the Housing SPC in the largest local Authority in the country and where the existing Housing supply issue is most acute should seek to proactively influence national housing policy and to highlight the unique situation position that Dublin city is in in relation to high costs around housing.

We believe that it is also very important to be strategic about what the city is seeking from Government on housing and to focus in the main on aims that are achievable and take some account of the financial/economic implications of recommendations made.

There is no clear definition of Public Housing in Ireland because over the years in the main, it has been just Private Housing and Social Housing with very little in between and we therefore welcome the efforts made over recent months by the SPC Working Group in arriving at a proposed definition. In basic terms, we see Public Housing as:

1. Traditional Social Housing
2. Affordable Purchase Housing
3. Affordable Rental Housing

### **Social Housing:**

The provision of social housing by Local Authorities in Ireland has been a mainstay element of National Housing Policy going back to the early 1900's. Such housing is fully funded by Government and is constructed and allocated by Local Authorities (and Approved Housing Bodies in more recent years). Rent is based on the income of the tenant and therefore there is a very significant state subsidy (indirect) towards this form of housing. The new Long Term Leasing scheme has given us a welcome opportunity to source social housing from the private sector. Because of the continuing shortage and the very high waiting lists, it is clear that this form of housing will have to be our main focus over the coming years.

### **Affordable Purchase:**

Dublin City Council last provided/developed Affordable Purchase housing back in 2009. We are currently awaiting the final details of a new affordable scheme from the Department of Housing but in the meantime, we have identified a number of sites in the city and have started the Planning, Design and Public Procurement process. The ultimate affordable purchase cost is dependent on the cost of constructing the unit, and some form of subsidy from Government is essential to bring the original construction cost down to an affordable level. This is very difficult in the Dublin City context where construction costs are very high, in particular if developed directly by the City Council. It is essential in our view that the ultimate Site Services Fund be significantly higher in Dublin City otherwise any reasonable degree of affordability will not be achieved.

If our construction costs are now running at over €400 k it would require significant further interventions to bring purchase prices down to say between €250k €300k. There is a possibility there may be an element of shared equity arrangements in the new scheme that would be very welcome. If Dublin City is to provide a significant level of affordable housing then we have to seriously consider the implications and risk of the large borrowings required to fund such developments.

### **Cost Rental:**

The Government will shortly introduce a new National Cost Rental Scheme that will represent a new and welcome element of Public Housing. Like affordable purchase, the ultimate rent levels charged will be related to the original cost (The rents must pay for the costs involved including construction, management fees, sinking fund etc.) with the Government paying a Site Services grant in order to achieve greater affordability. Again, whoever is developing such housing (DCC or AHB or LDA) will have to borrow to fund the development/construction and take on the repayments on such loans. The level of Services Site Fund from Government presently at €50 k will not be sufficient to bring rents down to a level that is generally expected. Another option on reducing repayments/level levels is for the required loans to be borrowed over a longer-term of time say 35 or 40 years. We understand this option is being considered by the Department of Housing.

While we are committed to the development of a significant new Cost Rental scheme at Inchicore and we are currently liaising with the European Investment Bank (EIB) on the required borrowing, we do need to consider carefully the financial implications and risk involved and certainly if we are going to take on other large developments of this type. We think it is essential that the City Council proactively engage with Approved Housing Bodies and the Land Development Agency as partners on the future development of Cost Rental model of housing in Dublin City. It is extremely unlikely that Government will consider any long-term or continuous subsidy to the model of cost rental and therefore the idea of an income-based cost rental scheme like social housing is an unrealistic aspiration in our view.

### **Summary:**

We very much respect and value the good work carried out by the SPC Working Group on the development of a definition for Public Housing in Dublin City and for the various proposals that have come from this work, and we do agree that more radical approaches are required. But it is also important that management should outline what the current national policy on housing is and give some detail on the models of delivery that are in place and that are currently being actively considered for implementation in the near future particularly in relation to affordable purchase and cost rental housing.

It is essential that we all continue to promote the reality of the unique position Dublin City is in, when it comes to development of any type of housing and the clear need for national housing strategies and policies to specifically take account of this unique position.

**Brendan Kenny**

**Deputy Chief Executive**

**9<sup>th</sup> December 2020**

**David Dinnigan**

**Director of Housing Delivery**



# EMMET ROAD



MIXED USE DEVELOPMENT – SOCIAL & COST RENTAL ACCOMMODATION

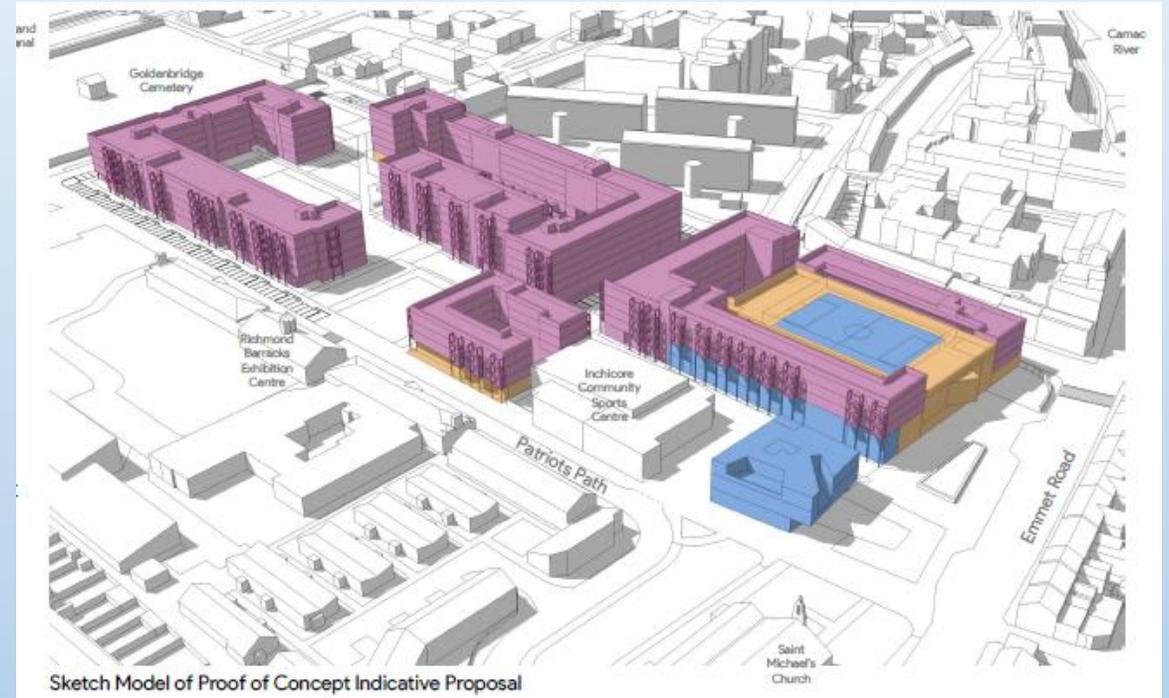
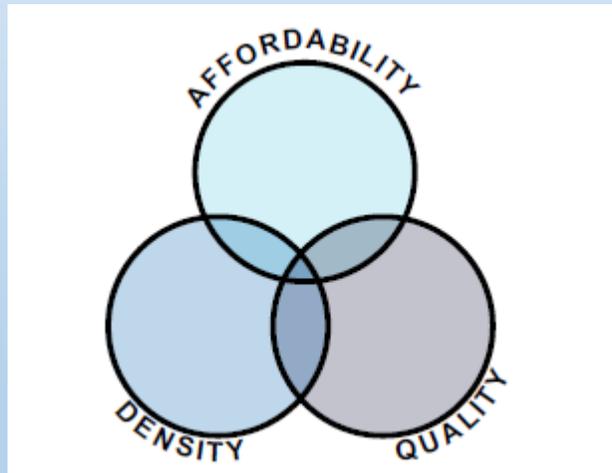
SPC PRESENTATION - DECEMBER 2020

# 2019 - DEVELOPMENT FRAMEWORK PLAN



# PROOF OF CONCEPT

## Optimum Model of Development





# PART A – SETTING THE SCENE

- Receiving Environment
- Transport Overview
- Infrastructure
- Development Context

# PART B – FRAMEWORK BRIEFING

- Commercial
- Community
- Residential
- Public Open Space
- Landscaping
- Energy & Sustainability

# PART C – PROOF OF CONCEPT

- Design Strategy
  - Heights
  - Unit numbers
  - Block layout
  - Landscaping
  - Mobility Strategy...
- Implementation
- Costs

# COST RENTAL

Cost Rental looks to create a new model of **secure** and **quality housing** that remains **sustainably affordable over time**

**Rents** charged cover the cost of *delivering, financing & maintaining* the homes.

Making **Cost Rental** more **Affordable**:

- Provision of low cost *public owned sites*
- Design with *long term maintenance* in mind
- *State subvention* (SSF)
- Availability of *low cost, stable finance*, paid back over a *long period of time*

# COST DRIVERS

## Construction

- Shape of a building
- Net to gross ratio
- Units per core
- Min. floor areas
- Dual Aspect

## Additional fees

- Professional
- Legal
- Statutory
- Management & Maintenance
- Lifecycle Costs
- % Rental Voids
- Financing - Interest Rates /Term of Loan
- Project Timescale – Inflation
- Project Phasing

# COST RENTAL - KEY FINANCIALS

- Estimated unit cost- c.375k,
- Estimated number of units- 400
- Total Cost- c. €150 Million
- Loan Repayments for DCC – c.€7.2 Million annually- c.€600k monthly
- c.€600k over 400 units = c.€1,500 as monthly rental per unit.
- (SSF) Serviced Site Fund of €50k would reduce this to c.€1,300 per month.

**Higher SSF /Longer Loan Term would reduce it further**

# 2020 - ARCHITECT LED INTEGRATED DESIGN TEAM

Bucholz McEvoy <https://www.bmcea.com/>

## Multi-disciplinary team

- Planners
- Engineers
- Archaeologists
- Quantity Surveyors
- Conservation & Landscape Architects
- Fire Safety
- Energy & Sustainability.....

# STAGE 1 - FEASIBILITY DESIGN STAGE

- Evaluating Key Aspects
- Researching Site History
- Information Gathering
- Identify Site Constraints & Opportunities

## **Community Consultation**

- Inchicore Regeneration Consultative Forum (IRCF)
- Site visits
- Schools Workshops
- Meeting local youth groups, community groups, individuals
- Attending Local Projects, Local Events

# PART 10 – PLANNING APPLICATION

## Environmental Impact Assessment Report (EIAR)

- Population & Human Health
- Biodiversity
- Land / Soil / Water / Air
- Climate
- Material Assets
- Cultural Heritage
- Landscape

## ADDITIONAL EXPERTISE:

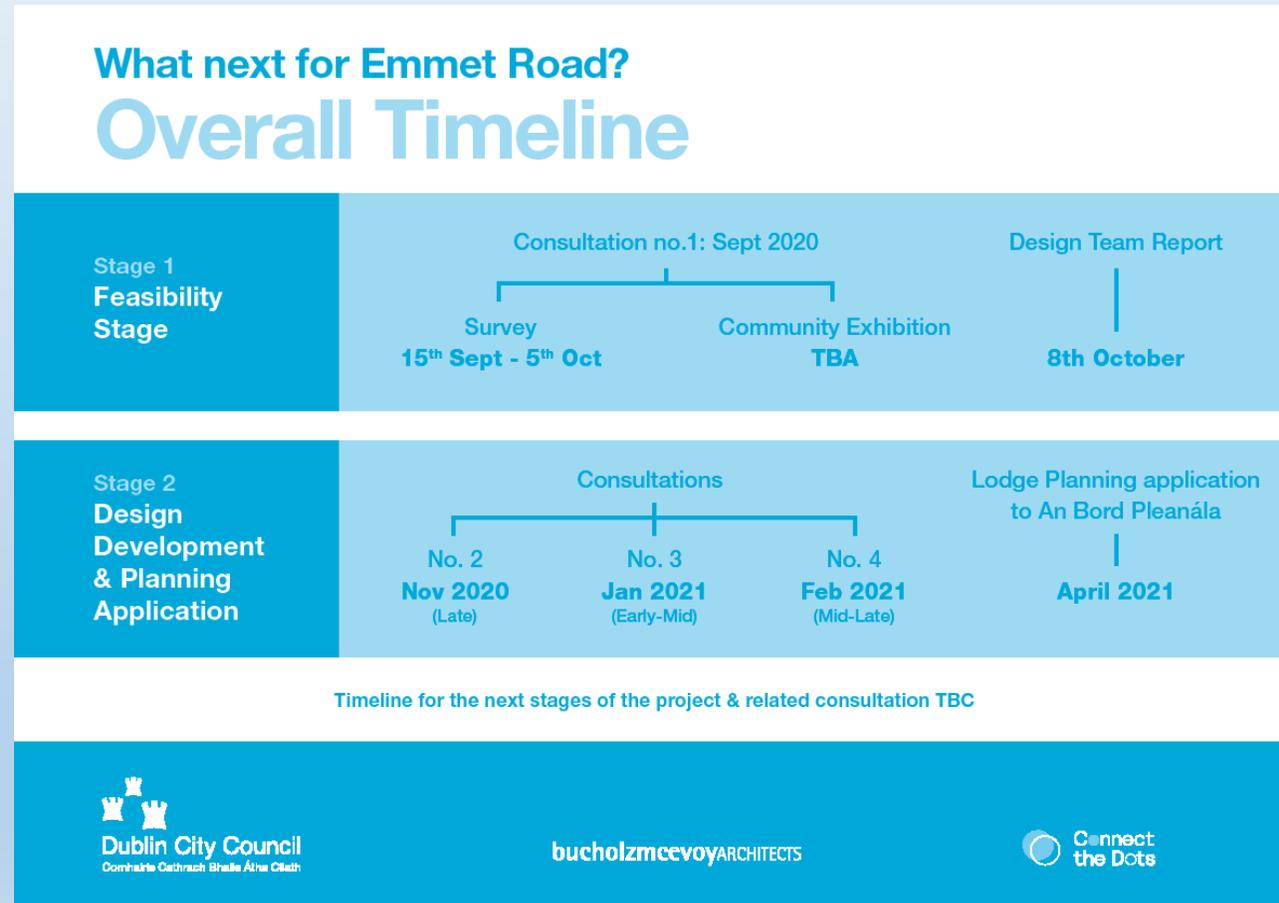
### Cushman & Wakefield - Residential Property Advisors

- Design advise
- Management & Operational Budgets
- Market Demand Analysis

### Connect The Dots - Stakeholder & Community Engagement Experts

- Ensure meaningful, inclusive & equitable consultation – providing innovative solutions
- Working in collaboration with IRCF

# PUBLIC CONSULTATION



# PUBLIC CONSULTATION (SEPT – NOV 2020)

## What next for Emmet Road?

Emmet Road Development (formerly St Michael's Estate) in Inchicore – Mixed Use Residential Development – Co-st Rental & Social Accommodation.



**What's next?**  
September 15th & October 6th 2020, Dublin City Council with support from our Architect led Design Team (Bucholz McEvoy) & consultation partner (Connect the Dots), will be organising the 1st phase of public consultation. This will involve a survey & exhibition with the aim of creating opportunities for you, the local community, to share your insights and ideas. These consultation activities form the 1st of a 4-phase consultation process that will run on into Spring 2021.

**How can you have your say?**

- Via online survey <https://surveys.connectthedots.ie/emmet-road/>
- Via a phone in service 01 222 2538
- Via hard copy versions of the survey that can be picked up and dropped back at the Library (temporarily relocated at Richmond Barracks)

**Timeline**

**Stage 1 Feasibility Stage**

- Consultation no.1 - Sept 2020
- Survey running in multiple formats from 15th September - 6th October
- Community Exhibition - Date TBA
- Stage 1 Report - 6th October

**Stage 2 Design development & Planning Application**

- Consultation no. 2 - expected in late November 2020
- Consultation no.3 expected in early-mid January 2021
- Consultation no.4 expected in mid-late February 2021
- Planning application to An Bord Pleanála - April 2021

**Timeline for the next stages of the project & related consultation - TBC**

**What are we aiming to achieve in this first phase of consultation?**

- How the new development site can be well-integrated into the wider Inchicore / Kilmarnham areas;
- Your aspirations for the site and wider area;
- Key local amenities / services you use (and what's missing);
- Exploring how the site development's design can enhance the safety and security of the area;
- Your ideas on how the development can support the goal of making Inchicore village more accessible, connected, and easy to get around (especially by foot, bicycle and public transport).

**How to stay in touch?**  
Please keep an eye for further announcements and full project timeline on our project webpage <http://www.dublincity.ie/HLI>



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**bucholzmcEvoy architects**

**Connect the Dots**

## What next for Emmet Road Development?



**The new Emmet Road Project Office at 6 Tyrconnell road, Inchicore, is up and running. This is now the location for the most up-to-date project information. The display of design layers will be available in the window from the 21st November, and we would like you to give us your comments and feedback via our worksheet (information available below on how to access this). Please remember to adhere to current social distancing guidelines when visiting.**

**Display of Design Layers:**

**When:** From the 21<sup>st</sup> of November

**Where:** The window front of 6 Tyrconnell Road, Inchicore (the Emmet Road designated project office)

**What:** Please see the window display for directions to the online worksheet platform and information on where to get a hard copy version of the online worksheet. The Display will remain until the next phase of consultation in January. The deadline for worksheet responses: 21<sup>st</sup> of December.

**Contact:** [emmet.road@dublincity.ie](mailto:emmet.road@dublincity.ie) / 01 222 2222

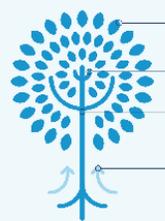
**View the Website:**



**Design Layers**

Bucholz McEvoy, the design team Architects for Dublin City Council's Emmet Road Site, have prepared a display of their design thought process, through the use of five layers. The information within these layers provides insight into the design principles at the feasibility stage, and the research and findings to date. We are keen to get your thoughts and ideas to feed into the overall design process.

- Climate Resilient
- Time Affordability over time
- Private Healthy Homes
- Semi-Public Connected Living Community
- Public Attractive Vibrant Neighbourhood



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**bucholzmcEvoy architects**

**Connect the Dots**

General Consultation Update:  
There are still open for the initial community survey (deadline 6th Nov). The results of this are feeding into the design process and a report will be made public before Christmas. Keep an eye on the website. As a result of the completion of Consultation, an outdoor community exhibition on the Emmet Road site has been provisionally rescheduled to January 2021. Keep an eye on the website for updates.

# PROJECT OFFICE 6 TYRCONNELL ROAD, INCHICORE



# DELIVERY & FUNDING

## Delivery Strategy

- DCC providing the site to facilitate the development
- DCC developing the site procuring a contractor
- Subject to the planning procedure as set out in **Part 10, Section 175** of the Planning and Development Act 2000 (as amended).

## Funding Strategy (subject to approvals)

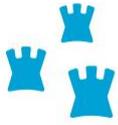
- **30 % Social units** - Department of Housing, Planning and Local Government (DHPLG)
- **70 % Cost Rental** – European Investment Bank (EIB)

# NEXT STEPS

PUBLIC CONSULTATION	NOVEMBER – APRIL 2021
STAGE 1B DESIGN DEVELOPMENT	NOVEMBER – APRIL 2021
LODGE PLANNING APPLICATION	APRIL 2021

*PLANNING APPROVAL PROCESS MIN. 6MTHS*

**THANK YOU**



## **LABRE PARK REDEVELOPMENT**

### **Introduction**

Labre Park, on the Kylemore Road in Ballyfermot, Dublin 10 is located to the south-east of Kylemore Park, between Kylemore Park Industrial Estate (to the north) and the Grand Canal and Gallblack Stream (to the south). Access to the existing site is from Kylemore Road with the estate road ending in a cul-de-sac. Labre Park is Dublin City Council's (DCC) oldest Traveller group housing scheme, established in 1967 and was the first site built specifically for Travellers by a Local Authority in Ireland. It is one of 3 Traveller specific accommodation sites available to Travellers on the Southside. Kylemore Grove lies adjacent to Labre Park and consists of 8 houses built in 1995, 3 of which were rebuilt in 2016 under Phase 1 of the Labre Park Redevelopment.

38 families currently live in Labre Park. There are 20 existing houses comprised of Kylemore Grove (8) and Labre (14 houses on the right hand side of the estate road). Including 2 extensions to existing houses, this will leave 16 families awaiting permanent accommodation.

#### **a. Redevelopment of Labre Park**

In 2014, it was proposed that Clúid Housing Association (Clúid) would act as development agent for the redevelopment of Labre Park and be appointed by DCC to manage the design and construction programme. Phase 1 of the Redevelopment was the rebuilding of 3 houses in Kylemore Grove by DCC, which completed in 2016.

Clúid would manage the completed scheme under a service level agreement while DCC retained ownership of the scheme. Clúid and the Ballyfermot Travellers Action Project (BTAP) would consult with the residents in Labre Park and gather information on the housing needs of families. Walsh & Associates were appointed by Clúid to design a development based on the consultation outcomes and in line with planning and design regulations to meet the housing needs of the Traveller community in Labre Park.

The consultation completed in December 2016 with residents agreeing on the type of accommodation to be provided e.g. bays, bungalows, two story houses semidetached etc. At that time there were 45 families living in Labre Park. Further consultations regarding play space, fire safety, road safety and community centre/space took place at later stages. It was also agreed over the course of the consultation that the existing accommodation would also be refurbished as part of the redevelopment.

Information sessions were provided from stakeholders which included and informed the final Plan:

- The Fire Safety Officer on the layout of the scheme
- Local Gardaí on anti-social behaviour

- Architects and the feedback received from residents
- Dublin City Council's Play Development Officer
- Labre Park residents on Traveller Culture
- Clúid Housing's Housing Management Team and Property Services Team.

A final plan was agreed in March 2018 and was brought before the South Central Area Committee where approval was given to begin the pre Part 8 process.

### **b. Pre Part 8 Planning Application**

The pre-Part 8 Planning process consists of the compilation of a Design and Architectural package which is sent to the Planning section for comment. Included in this package are soil and sample surveys, Mechanical/Electrical Engineer Reports, Civic and Structural Engineer Reports which, in this case, included a Site Specific Flood Risk Assessment. Walsh & Associates were retained by Clúid to provide the necessary documentation that would support a Part 8 application.

In May 2019, the Planning Department reviewed the documentation provided and the pre Part 8 package was sent to all technical DCC departments/sections and other stakeholders for comment.

A number of issues were identified regarding fire safety, access, roads & traffic and drainage. These were all resolved with mitigations. Below is detailed the Flood Risk Assessment issue which has not been resolved despite a number of attempts by the Traveller Accommodation unit and Clúid to try to sufficiently respond to the risks identified during the technical department consultation process.

### **c. Flood Risk Assessment**

The most contentious issue regarding the redevelopment plans was the drainage and flood risk management of the proposed development. From July 2019 to October 2020 a number of mitigation measures were put forward at meetings with Dublin City Council's Drainage Services and its Flood Projects and Water Framework Directive Division.

In essence the issues identified were:

- All of Labre Park, including the existing houses, is in an area of high flood risk.
- The proposed development in Labre Park, including the existing houses, is in an area designated Flood Zone A. The Gallblack stream which runs to the south of Labre Park and adjoining lands lie within Zone A of the Camac River System Floodplain. The area is undefended in terms of flooding, contains a stream that is prone to flooding periodically and further south of the location is the Grand Canal which could also have a lesser impact on any proposed development.

### **Definition of Flood Zones**

**Zone A:** High probability of flooding: This zone defines areas with the highest risk of flooding from rivers (i.e. more than 1% probability or more than 1 in 100) and the coast (i.e. more than 0.5% probability or more than 1 in 200).

**Highly vulnerable**, including residential properties, essential infrastructure and emergency service facilities.

**Zone B: Moderate probability of flooding:** This zone defines areas with a moderate risk of flooding from rivers (i.e. 0.1% to 1% probability or between 1 in 100 and 1 in 1000) and the coast (i.e. 0.1% to 0.5% probability or between 1 in 200 and 1 in 1000).

**Less vulnerable**, such as retail and commercial and local transport infrastructure.

**Zone C: Low probability of flooding:** This zone defines areas with a low risk of flooding from rivers and the coast (i.e. less than 0.1% probability or less than 1 in 1000).

Water compatible, including open space, outdoor recreation and associated essential infrastructure, such as changing rooms.

The objective of the 'Planning System and Flood Risk Management' is to integrate flood risk management into the planning process, thereby assisting in the delivery of sustainable development. For this to be achieved, flood risk must be assessed as early as possible in the planning process.

Paragraph 1.6 of the Guidelines states that the core objectives are to:

- avoid inappropriate development in areas at risk of flooding;
- avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off;
- ensure effective management of residual risks for development permitted in floodplains;
- avoid unnecessary restriction of national, regional or local economic and social growth;
- improve the understanding of flood risk among relevant stakeholders; and
- ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The guidelines aim to facilitate “the transparent consideration of flood risk at all levels of the planning process, ensuring a consistency of approach throughout the country”. Strategic Flood Risk Assessments therefore become a key evidence base in meeting these objectives.

In the case of Labre Park/Kylemore Road, the most notable floods have taken place in May 2001, March/September 2008, October 2011 and October/November 2016 following heavy rainfall. A further flood in 2005 was the result of a blockage of the Gallblack stream at the culvert to the west of Labre Park. This is significant in that the increased rainfall over the last twenty to twenty five years which has impacted greatly in the Labre Park/Kylemore Road area of Ballyfermot should now be determined as 20-30 year events as against the current norm of 100 year events given the frequency of flooding at that location.

**Site Specific Flood Risk Assessment (SSFRA)** – The purpose of site or project specific flood risk assessment is to consider all types of flood risk associated with the site and propose appropriate site management and mitigation measures to reduce flood risk to and from the site to an acceptable level.

An SSFRA for Labre Park was prepared by DBFL Consultant Engineers for Clúid and proposed various measures to address the flood risk, but acknowledged (section 7.6) that residual risks remain that require mitigation measures such as evacuation and erection of flood barriers.

A revised Flood Risk Assessment was submitted on the 31<sup>st</sup> January 2020. On the 6<sup>th</sup> of February the Flood Projects and Water Framework Directive Division raised a number of issues with that report. Broadly these include,

1. *DBFL has assessed the flood risk from the Grand Canal onto the southern portion of the site and have determined that the likelihood of flooding from the Canal at this point is 'remote'. As a minimum, DBFL would need to analyse typical and high canal levels to prove that flooding of the Gallinstown stream from the Canal is unlikely.*
2. *The flood risk assessment doesn't appear to directly address the fact that the proposed development includes a high wall between the Gallblack Stream and the proposed new houses. The exact line of the proposed wall and its proposed height need to be clarified. A flood route which floods an adjoining main roadway is not likely to be favoured by Roads and Traffic. Can they provide more information on this? Is this an existing flow path? And what happens to the water after it enters the public road?*
3. *The calculation of the necessary compensatory storage refers only to the 1% AEP but gives no indication as to what is the likely impact of the previously discussed boundary wall on the flood regime for storm events that have a lesser probability than the 100 year event. This risk needs to be addressed, as highlighted to DBFL at the last meeting. Specifically, they must establish the impact of the proposed development in an estimated 1,000 year flood event. As part of this exercise, they would need to include an assessment on the potential impact on neighbouring and downstream properties as well as an assessment on the site itself...as per the guidelines.*
4. *The compensatory storage is referred to in the report as 'level for level', in accordance with the OPW Guidelines, but neither the report nor the drawings clarify how this is to be achieved by the reprofiling of an area that is already part of the floodplain.*
5. *An outfall to stream from an underground attenuation system is shown and a flap valve is mentioned. DBFL has highlighted previously difficulties with the maintenance of the nearby culvert. There is no mention of any proposed maintenance regime for the proposed flap valve, nor is the flood risk associated with an absence of maintenance assessed for potential impacts.*
6. *The report refers to the Water Framework Directive and we are interest in finding out how the following aspects of that piece of legislation are addressed in the proposals:*
  - a. *There is a requirement to maintain a riparian corridor along all watercourses included in the City Development Plan. This is typically 10-15m on either side. Even from a practical point of view, a clearance of 3m between the top of the bank and such a substantial wall seems entirely insufficient.*
  - b. *The presence of waste on the site and any excavation of it can have impacts on the nearby watercourse and on the Camac River downstream. The proposed 'compensatory storage' is shown in an area where it is believed that an historical dump was located. The potential placement of deeper water over what is presumably an unlined dump has potential to cause increased contamination to both groundwater and the stream. Ordinarily a consultant would demonstrate that no infiltration into waste would result from proposals to develop a site. The lowering of ground at this location will also result in increased flooding during more frequent storm events. This would also potentially have the effect of increasing the infiltration of water into waste, increasing the environmental risks.*

Clúid attempted (with their engineers) to mitigate the very serious issues raised by the Flood Projects and Water Framework Directive Division and submitted a revised SSFRA. In April 2020 the division acknowledged the significant improvement in the SSFRA but advised that:

*"At this point, given the complex nature of the existing flood plain and the associated properties including Labre Park, it would appear as though a full and proper understanding cannot be achieved in the absence of a full-catchment modelling*

*exercise, given the potential for flooding and the perceived impacts due to the proposed development in Zone A at this location. A contract that includes the development of a full-catchment model is currently underway, managed by Dublin City Council in partnership with the Office of Public Works and South Dublin County Council.*

*It is the opinion of the Flood Projects and Water Framework Directive Division that if a planning application was lodged on the basis of the documents submitted thus far for this site, the determination would be likely to be as along the following lines:*

***The proposed development is in an area that is at risk of flooding and the full extent of the flood risks and possible mitigation measures, if any, cannot be fully determined at present such that the Site Specific Flood Risk Assessment complies with the Ministerial Guidance. A determination on this proposed development is premature pending the outcome of the Camac River Flood Alleviation Study that is currently underway.***

*Several recently submitted applications for proposed developments within Zone A of the Camac River System Floodplain have been similarly regarded.”*

Communication continued and by October, consultations with senior engineers suggested that they are unlikely to have an objection to the refurbishment of existing buildings that previously had Planning Permission, or to building new accommodation on the site where previous buildings had stood, subject to certain precautions that will ease flood risk concerns.

## **Recommendations for Moving Forward**

The above details the current status of the redevelopment. The question is what we do now. There remains the option for redevelopment on the right hand side of Labre Park to cater for the majority of families. This will require developing additional new site(s) or housing options (including temporary lettings until additional culturally appropriate sites can be developed) as the number of families will exceed what is possible to build on the existing footprint.

As agreed with residents and Councillors, we will not proceed until all stakeholders have had a chance to consider the current position in full.

We have proposed putting in place a Regeneration Committee with an Independent Chair such as that which successfully oversaw the redevelopment of Charlemont Street flats. This would involve residents of Labre as part of the **oversight** as well as the **consultation**. I am not yet clear if residents wish to proceed with this proposal and I certainly believe it would not work without Traveller representation from Labre Park. We are open to alternative suggestions.

In the meantime, Dublin City Council and Clúid Housing Association are ready to work in close collaboration with the residents of Labre Park to agree a path forward.

Mary Hayes  
Executive Manager

