



In compliance with the provisions of Section 179 of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) and in compliance with the provisions of the Local Government Act 2001 and pursuant to the requirements of the above, notice is hereby given of Dublin City Council's intention to carry out the following works:

Application No: 3118/24

Proposal: LAW: Planning and Development Act 2000 (as amended) Planning and Development Regulations 2001 (as amended) - Part VIII

Pursuant to the requirements of the above, notice is hereby given of:
The proposed redevelopment of St. Anne's Court and associated external works situated at All Saints Park, Raheny, Dublin 5.

The existing site currently comprises of 5 no. two-storey housing blocks providing 61 older persons bedsits and a community room, which form St. Anne's Court Senior Citizens Complex.

The proposed development on the 0.58 Ha site, which will be managed by Dublin City Council, comprises of:

- Demolition of five two storey apartment buildings containing 61 bedsit units on site.
- Construction of 102 no. 1-bed apartments for 'Older Persons' comprising of 96 no. 1-bed 2-person units Universal Design Apartments and 6 no. 1-bed 2-person Universal Design Plus apartments in a 4-storey perimeter block including a communal room and a secure landscaped courtyard.
- Provision of public and private open spaces; ancillary structures and associated site infrastructure works/ supporting infrastructure, landscaping, public lighting, revision to access, pavements, boundary treatments and all other necessary enabling works, roads and services.
- Construction of new ESB substation.

Plans and particulars of the proposed development may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy for a period of 4 weeks from 31/01/2024 during public opening hours at the offices of Dublin City Council, Public Counter, Planning and Property Development Department, Block 4, Ground Floor, Civic Offices, Wood Quay, Dublin 8, Monday-Friday 9.00am to 4.30pm.

The plans and particulars are also available for inspection online on Citizen Space <https://consultation.dublincity.ie>

The Local Authority has concluded following preliminary examination that there is no real likelihood of the proposed development having

significant effects on the environment and therefore an EIA is not required.

Applicant: Dublin City Council-Housing & Community Services Department

Location: Saint Anne's Court, Raheny, Dublin 5

Site Notice: In order at indicated locations, 26-Feb-2024

Pre Part 8 Planning Report: Response by Planning Department on 29-Jan-2024. That report informs this Part 8 Planning Report.

Proposed Development:

- Demolition of five no. 2 storey apartment buildings containing 61 no. bed sits on site and
- Construction of 102 no. 1-bed apartments for 'Older Persons' comprising of 96 no. 1-bed 2-person units Universal Design Apartments and 6 no. 1-bed 2-person Universal Design Plus apartments in a 4-storey perimeter block including a communal room and a secure landscaped courtyard.
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- Construction of new ESB substation.

Site Location and immediate Area

The subject site is located to the north of Saint Anne's Park and south west of Raheny Village Centre. The site was developed by Dublin Corporation (Dublin City Council) in the 1970's with five two storey blocks of 61 number bedsit type units with walk up access on ground floor and deck access to the upper floor units. The blocks are set out within planted areas and with parking provided to the interior of the site accessed from All Saint's Park to the west.

To the north of the site is Cara Hall Community Centre which is the local community centre catering for various local residents activities. To the northeast of the site is a school campus comprised of three individual schools 'Naiscoil Ide primary school', 'Scoil Assaim' and 'Scoil Aine'. To the west of the site lies a small public park, All Saints Park, forming an adjunct to the main Saint Anne's Park to the south and linking with Rectory Park to the north. There are then houses beyond to the west on Wade's Avenue which are approximately 140m distant.

To the south of the site is a laneway that runs along the back of the existing residential and primarily commercial properties facing onto All Saints Park. The laneway serves as a delivery route for the commercial shops. The commercial & residential units are two story units with pitched roof in a residential vernacular. Number 4 is a three storey corner residential building in the ownership of Dublin City Council.

To the east of the site and most immediate to the site is a terrace of dwellings set back behind a treed margin with their front elevations approx. 35m from the site boundary.

The site is situated in a residential area where the predominant materials are brick, render, pebble dash, and concrete canopies. The surrounding context is mainly comprised of two-

story storey residential buildings with large front gardens, and the general character of the area features a lush landscape topography with a significant number of mature trees. The original avenues of the estate remain mostly intact, adding to the sense of maturity and established residential uses. The existing schools and Cara Hall community centre exhibit varying materials, from render to brickwork.

The site is 0.53ha in size and currently accommodates 61 no. bedsits in 5 no. two storey, red-bricked blocks in a grassland setting with associated hardstanding for off-street car parking. The existing bedsits are 25 sq.m in size.

**Planning Context:
Zoning & Policy – Dublin City Development Plan 2022 - 2028**

The site is designated under the Z1 Zoning Objective with the accompanying land use objective “To protect, provide and improve residential amenities” under the Dublin City Development Plan 2022 – 2028”.



As per Section 14.7.1 of the Dublin City Development Plan 2022 – 2028, the vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure, and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.

‘Residential’ is a land-use that is ‘Permissible’ under the Z1 zoning objective. As per Section 14.3 of the Development Plan a permissible use is one which is generally acceptable in principle in the relevant zone, but which is subject to normal planning considerations, including the policies and objectives outlined in the plan.

Planning Assessment

Proposal

The proposed development comprises, in summary, 102 no. one bed units in a four storey perimeter block layout.

<u>Site Summary</u>	Site Area	0.58 Ha
	Total Dwellings	102
	Density/Dwelling	176 UPH

Documentation

The application contains the following supporting reports:

- Architectural Report
- Transport Report
- Landscape report
- Energy & Sustainability Report
- Site Lighting Report
- Verified Views
- Drainage and Water main planning report
- Flood Risk Assessment
- Construction and Demolition Management Plan
- Tree Survey Report
- Invasive Alien Plant Species Report
- Appropriate Assessment
- Sunlight & Daylight report

Principle

Residential development and an associated community/communal room are ‘Permissible Uses’ under the Z1 zoning which applies to the site. The development is therefore acceptable in principle.

Plot Ratio and Site Coverage

The indicative site coverage and plot ratio standards are set out Appendix 3 of the Dublin City Development Plan 2022 – 2028 where the indicative site coverage standard is 45%-60% and indicative plot ratio standard is 1.0-2.5 for ‘Outer Employment and Residential Area’.

The proposed development has a stated site coverage of 42% and the proposed plot ratio is 1.52.

Both are acceptable to this department.

Density

Dublin City Development Plan 2022 - 2028 Density Standards are set out in Appendix 3 and as a 'general rule' support for a density range of 60 – 120 unit per hectare for sites in the outer suburbs such as this one is supported.

The site size is stated as 0.58ha. With 102 no. units proposed on the site this would result in a density of 176 units per hectare.

It is noted that the density proposed is higher than the top of the density range set out in Appendix 3 of the Development Plan.

However, the Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities 2024 sets out indicative density ranges for specific urban areas under Table 3.1 and indicates acceptable density ranges for Dublin City-Urban Neighbourhoods of 50dph to 250dph. The scheme is therefore fully compliant with this guidance.

Having regard to percentage of one-bed units (100%) proposed, the proposed density is fully acceptable in an established residential area, on an underutilised, serviced site, well-served by good public transport links and in very close proximity and within short walking distances of local services and indoor and outdoor amenities / recreational spaces, including St. Anne's Park and local neighbourhood shops adjacent. In addition the scheme is serving a specific end user as supported housing for elder citizens who have a requirement for a certain unit type.

The site would also accommodate a significant increase in the number of units available for elder citizens (61 no. units to 102 no. units) as well as greatly improving the residential amenity of each unit in replacing bedsit type units with one bed apartments.

Height, Design, Massing and Layout

Policy SC23 (Design Statements) of the Development Plan requires that Design Statements shall be submitted for all large scale residential (+50 units) in accordance with the principles set out in Chapter 15. A Planning Report prepared by Grafton Architects has been submitted with the application. This also serves as a Design Statement as Section 4 Design Proposal outlines the scheme and the philosophy behind the design approach.

Section 4.2 Site Strategy sets out the design approach:

The proposal focuses on the following -

- Intensification of the site: increasing from 61 bedsit units to 102 one bed 1/2 person units.
- Demolition of the existing blocks (required by the brief)
- Creation of a new private landscape for residents.
- Maintaining as many existing trees as feasible while maintaining density.
- Providing a secure residences for 'Older Persons Living'.
- Providing UD & UD + accommodation for all residents.
- Provision of a new community centre for residents.
- Provide 100 % dual aspect units.
- Providing a dual primary access solution
- Utilizing the existing network of access points used by the residents
- Providing deck access to upper levels
- Providing green & blue roofs, and utilizing SUDS within the landscape strategy

- Providing activities within the landscape strategy to be enjoyed by all residents.
- Ensuring a safe, accessible and neighbourly public realm to the external faces of the project.
- Proposing the realignment of the lane way to the south of the site.
- Proposing the activation of the 'Pocket Park' to the south of the site.

With regard to scale and massing, the scheme is comprised of four no. four storey blocks, arranged around the perimeter of the site. This approach allows for many of the existing trees to be retained and creates a focal point to the scheme at its centre – the communal garden.

Each of the blocks has a height of approximately 16m. The prevailing height in the immediate area is predominantly two-storey with some exceptions, including Cara Hall Community Centre on the adjacent (Z9-zoned site); Nai-Scoil Ide and Scoil Aine and Raheny District Garda Station which are all single-storey.

The 4-storey/16-m height is not considered excessive on this site which is located at generous distances from the closest two-storey dwellings i.e. No's 1-15 (odd only) All Saints Road. 35 metres (minimum) is proposed as a separation distance between the side /east of the site and the front facades of these aforementioned dwellings. The east facade of the eastern block is also separated by a roadway from the adjacent dwellings with wide verges which are well vegetated with attractive, mature trees on both sides. Issues of privacy, overbearance or overlooking of any residential properties would not be considered to be material or undue as a result of the height or layout of the proposed development given the distances involved as well as the contribution of mature vegetation of the existing residential area surrounding the site.

The Planning and Property Development Department considers the height as proposed acceptable.

The design and layout of the proposed development is essentially 4 no. 4 storey apartment blocks with deck access surrounding a communal amenity space in the centre of the development and with accesses to the courtyard at each corner. The layout with 4 no. blocks on a centralised courtyard provides a focal point to the scheme while maintaining privacy distances within the interior of the site. In order to avoid a potentially monotonous elevational presence to each of the site boundaries each block bows inward at its centre and draws away from the adjacent boundary. This results in each block having an obtuse curve to its street elevation which plays off the rectilinear site boundaries and allows for landscaping forward of the building line which adds to the pleasant setting of the scheme.

The blocks have a simple modernist form, flat roofed to parapet, a rhythmic and consistent fenestration pattern with slabs of blank elevation at block ends. The buildings all use one main facing material, see Materials below, to the upper floors with the ground floor a brick plinth anchoring the blocks. The visual interest is provided by the clean lines and the use of the bowed facades in conjunction with the existing mature deciduous trees with the blocks forming a backdrop to the vibrancy of the natural elements.

In addition Photomontages have been submitted, prepared by Pederson Focus Ltd dated 27-Jul-2023. These demonstrate the contrasts between the existing buildings and the proposed development. While the new scheme is significantly different in appearance, materials and height to the current scheme it is not of such scale as to be negatively visually obtrusive. There is a clear difference in presence, however, the fact that the site has street frontages to three sides and good separation distance from existing structures means the block sets its own scale while, at four storeys, it is not overscaled for its suburban location. The bowing of each façade also contributes to the animation and interest of the scheme. The presence of significant numbers of mature trees on the perimeter of the site, which are to be retained, also

allows the scheme to integrate with its context by providing partial screening of the body of the blocks.

Materials:

The planning report submitted with the application sets out how the materials have been selected in Section 4.4 Expression + Materiality.

The design finishes have taken account of the surrounding materiality and character of the area. The design allows for the retention of existing mature trees on the site with the form of the building bowing in order to minimize the impact on the tree roots.

The Design Statement outlines *“proposed materiality of the project is deliberately quiet using reference materials from the surroundings such as pebble dash / nap renders, concrete elements and brickwork. The combination of these materials has been explored with the outcome of a single story brick plinth in which a 3 storey pebble / nap render element sits. The divider between these two materials is an grit blast finished concrete strata. The window opens are simple in their appearance utilising a corner window to the balcony side to gain additional light into the bedroom area. The Living room balcony screen is raised on a slight plinth allowing for a bench or plants to be placed alongside. The inner walls of the balcony are a nap render finish to maximise the light penetration into each unit. The balcony is recessed into the block with a painted mild steel handrail. The deck materiality is predominately nap render finish with corner glazing into the dining / kitchen area. The heat pump is enclosed within the thermal envelope of the project with external grade louvered doors to access them. The deck floor finish is granulated surface on concrete slab. Precast Concrete Columns and Painted steel handrails surround the decking. It is proposed that the entry doors to the apartments will be coloured to allow for visually impaired residents to recognise easily”*.

The choice of materials and their use pays homage to the existing vernacular but using these materials in a modern idiom. The parapet edge would be pre-cast concrete coping, the main facing finish would be wet dash render with nap render to detail areas at the balcony recesses with the balcony enclosures being painted galvanised steel and windows clad in anodised aluminium. Pre-cast concrete banding would be used to cap a ground floor plinth of buff brick. Each material is hard wearing and requires relatively little ongoing maintenance. The use of buff brick at ground level uses the strongest material in the area where most activity occurs.

The Planning and Property Development Department is generally satisfied with the materials proposed, in particular the simplicity of the design and the inclusion of a ground floor brick plinth, which adds variation and a higher level of quality to the material choice at ground floor.

Separation Distances / Overbearance / Overlooking

As per Section 15.9.17 of the development plan traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis.

The recently issued Section 28 Guidelines Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, January 2024– SPPR 1 (Separation Distances) reduces this to a 16 metre distance, or below in certain circumstances.

In this proposal separation distances between opposing windows of apartment blocks on all levels are far in excess of 16 metres with between circa 37 metres and over 60 metres. The

distances are generous allowing for enhanced privacy and residential amenity levels for all units.

As per Section 15.9.18 of the Development Plan 'overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to surrounding context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance.

Distances between opposing windows from the apartments and the closest two-storey houses on All Saints Road to the east are over 35 metres (with rows of mature trees in the public domain between). Privacy levels currently enjoyed by existing dwellings in the area will, therefore, not be impacted upon as a result of this development.

As a result of the design, layout, modest 4-storey height and generous separation distances between the new scheme and the adjoining and adjacent residential development in the area, there will be no negative impacts in terms of overbearance or undue overlooking of private residential spaces.

Unit Mix

Section 15.9 of the Development Plan sets out the standards for apartments, including unit mix (15.9.1). The residential mix of 100% of units designed as 1-bedroomed units can only be considered in certain circumstances including where there is a verified need for a particular form of housing e.g. for older persons, subject to the adjudication of the Housing and Community Services Department.

The unit mix as proposed is acceptable in this instance having regard to the Housing and Community Services Department's need for such a mix as set out in the Project Brief Section 1.4 of the Planning Report which states the City Council aspires to achieve a high quality scheme for 'Older Person Living' designed to Universal Design standards as set out in "Universal Design Guidelines for Homes in Ireland" published by the National Disability Authority.

It is noted that the Saint Anne's Court Redevelopment Proposal April 2020 which accompanies the application stated at that time that *the site has been identified as one of a number of DCC holdings, which may have potential to contribute to Dublin City Council's projections for housing need identified in Dublin City Council's Development Plan 2016-2022 and 'Housing Options for aging population, prepared by the Department of Housing Planning and Local Government and the Department of Health.*

That document considered several design options in form, scale, phasing and layouts. This included potential typologies for family units of two to three bedrooms. Ultimately none of the originally considered layouts were chosen and the decision was made for provision of solely one bed units to serve elder citizens only.

Housing Quality Assessment / Schedule of Accommodation

All proposals for residential development should include a schedule of apartment accommodation that details the number and type of apartments and associated individual floor

areas and also identify the proposed floor areas that are 10% bigger than the minimum floors areas; the detail of the proposed amenity space and storage space associated with each apartment; the detail of the aspect of each apartment

The Planning Report includes a Schedule of Accommodation (Section 6.2) which sets out the floor areas and overall standard of each unit.

In summary the scheme provides:

- 102 no. units in total
- 83 no. universally designed units of 54sq.m
- 13 no. universally designed units of 58sq.m
- 6 no. universally designed UD+ units of 61sq.m

	Targ et Area Sq.m	Standar d UD / UD+	Propos ed Area	No. of Units	No. of Dual Aspe ct	Targ et Total Area	Propose d Total Area	% Difference
1 Bed 2P	45	UD	54	83	83	3,735	4,482	120%
1 Bed 2P	45	UD	58	13	13	585	754	129%
1 Bed 2P	45	UD+	61	6	6	270	366	136%
Total				102	102	4,590	5,602	122%

The three apartment types are scheduled, all 1B2P, 96 UD and 6 UD+. All units provide adequate storage, private open space and general accommodation.

Floor areas:

All 102 no. units are proposed as 1-bed units either of Universal Design or Universal Design Plus (UD +) layout. The 6. No. apartments designed as UD + are proposed at ground floor level with two each to the north and east blocks and one each to the west and south blocks. All units are over minimum areas by a minimum of 20%.

With regard to individual unit layouts aggregate living areas and bedroom sizes are all in excess of the standards set out in Quality Housing for Sustainable Communities with the 84 no. 54sq.m units being 25sq.m for living and 13sq.m for bedroom spaces, the 13 no. 58sq.m units being 26sq.m and 14sq.m respectively and the 6 no. UD+ 61sq.m units being 31sq.m and 16sq.m respectively.

In addition to the minimum floor areas of 50% of all apartments in new schemes having to exceed minimum floors areas by 10% it is an Objective of Dublin City Council, as per QHSNO11 Universal Design, *that that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019*

This development is proposed as a Universal Design development and the Planning Statement confirms that *“all apartments within the scheme as per project brief are required to achieve universal design standards as a minimum requirement.....The apartments and the scheme as a whole achieve full universal design standards”*.

The planning authority welcomes same.

Private Open Space

Section 15.9.7 of the Dublin City Development Plan and Appendix 1 of Apartment Guidelines state that 5 sq.m of private amenity space (minimum) is required for 1 bed apartment units. A minimum depth of 1.5 metres is required for balconies in one useable length.

At ground floor each of the own door units have terraces facing into the communal garden while also having small “front gardens” to their front entranceways.

Each balcony to the upper floors is accessed via the living space with views outward towards the surrounding streets. The balconies are generally c.1.3m deep and 3m-3.3m in width with each in excess of the 5sq.m standard. Additionally each dwelling unit would have a bench outside their front doors in the entry space to the unit on each landing with views into the communal garden. This approach allows residents to have a semi-private outdoor space which interacts with neighbours and the wider scheme.

Communal Amenity Space

For a residential apartment scheme 5 sq.m. per one bed apartment is required as per Appendix 1 of Sustainable Urban Housing : Design Standards for New Apartments : Guidelines for Planning Authorities (DoHGLH, December 2022). In this instance a minimum of 510 sq.m of communal amenity space would be required.

Upon measurement by the planning authority it has been found that the proposed communal amenity space measures some c.1450 sq.m (this figure excludes the circulation pathways around the space and any areas not designed for recreational use) with an additional community room of 170 sq.m proposed in the south-west corner of the scheme at ground floor level. This quantum of communal amenity space is generous and welcomed and will assist in creating an excellent level of residential amenity for future residents of the scheme.

While the quality of communal space has been detailed throughout the documentation the actual quantum of communal open space does not seem to be to hand for the Planning Department. A tally performed by the Planning Department suggests the area of the communal garden inward of decks/access would be c.1,872sq.m including paths through the garden. In the absence of an apparent total area the calculation by the Planning Department strongly suggests the communal garden is more than sufficient to cater for the outdoor recreational needs of future occupiers.

In order to meet recommended minimum standards a new amenity space should experience in excess of two hours sunlight on March 21st for at least 50% of its area.

In terms of sunlight penetration into this central courtyard Figure 56 of the Daylight and Sunlight availability Assessment shows that 63% of the proposed Central Courtyard will receive more than 2 hours of sunlight. The study does not explicitly state that the date is 21st March i.e. the required date. The assumption has been made by this planner that the date is March 21st and not June 21st, when sunlight levels would be higher.

It was recommended in the Pre-Part 8 report by the Planning Department that the relevant date be made explicit in all the relevant final part 8 Application documentation and in particular, in the Daylight and Sunlight Availability Assessment to ensure full confidence in findings. This request has not been addressed, however, in the wider context of the proposal, it is clear the communal space is extensive and meets relevant standards of overall quality whether the sunlight value was measured on 21st March or 21st June.

With regard to landscaping and layout the no report has been received by the Parks, Biodiversity and Landscape Division – the division will provide comments separately to the applicant.

Public Open Space:

The following are the requirements for Public Open Space as set out in the city development plan. The recently published Section 28 guidelines stipulate the same requirements for public open space.

Policy GI 28 New Residential Development – of the Dublin City Development Plan

To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.

Section 15.6.12 - *The planning authority will seek the provision of public open space in all residential schemes (see Section 15.8.6) and commercial developments in excess of 5,000 sq. m.*

Table 15-1: Public Open Space Requirements for Residential Development

Landuse / Zoning	Requirement (minimum)
Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%

15.8.7 Financial Contributions in Lieu of Open Space

Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park. In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective.

In a report titled Addendum 1 to Planning Report City Architect's Department it is stated:
The redevelopment proposals for the existing senior citizens residential site explored several options to optimise the residential density, provide legible streetscape and deliver environmental and amenity improvements. The focus was on creating the most sustainable development. The total of the existing site was taken up with private communal space and residential development. The current proposal does the same.

The new private communal space and public realm is significantly enhanced. The public open space is the same as in the original development of the 200 acres of the housing estate and the majority of that is on the doorstep of this particular site. The option to enhance the existing pocket park to the south of the site has been taken. This proposal was agreed at the internal town hall meeting and was welcomed at the public town hall meeting in the village.

There were areas of open space which were spaces left over after planning. Now the private communal space is meaningful and really useable.

No public open space is therefore proposed as is the current site condition.

Section 28 Ministerial Guidelines – Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, January 2024 also deal with the issue of Public Open Space as follows: Policy and Objective 5.1 – Public Open Space *“In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application sit.*

It is noted that that the area is currently very well served in terms of public open space and is within walking distance of St. Ann’s Park, a flagship parkland. Given the Ministerial Guidelines above allow the discretion of the Planning Authority in regard to requiring public open space and given that the existing scheme does not provide public open space and is a scheme of elder housing with a considered and logical block layout which emphasises the communal garden at its centre it is considered in this instance that providing public open space is not warranted and its requirement would be detrimental to the design and amenities to be provided to the residents.

Communal Room:

As per Policy QHSN48 (Community and Social Audit) of the Development Plan *all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development (Section 15.8.2 of Chapter 15: Development Standards also refers).*

The Community and Social Audit finds the area well served by a diversity of facilities and clubs.

A communal room with an area of 170 sq.m is proposed at ground floor level of the west residential block at its southern end. The space has access via a lobby entrance to the public street as well as external access via the communal courtyard. The space also has access to WC while a second room is indicated as having mains water and therefore potential for use as a kitchenette. The Pre-Part 8 planning report raised the possibility of allowing the wider community access for community event and suggested this should be explored and the outcome of same detailed in the Final Part 8 documentation.

Section 4.13 of the Planning Report describes the Community Centre and states *the location enables the community centre to work for both Public and Private where residents in the surrounding community can come to visit and share time with the residents within the community of the project. There is a dedicated set down area for the Community Centre to allow ease of drop off and collection of residents. The space includes a small kitchenette and disabled W.C.*

No details have been provided with regard to how the space would be managed and how the wider public might access it. The space is welcome in principle and it is considered reasonable to require agreement with Planning with regard to how the space is operated in the interest of proper planning and sustainable development.

Micro Climate

As per 15.9.16 Microclimate (Daylight and Sunlight, Wind and Noise) of the development plan all apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. The assessment should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.

The proposing department has submitted a Daylight and Sunlight Assessment. No assessment of wind or noise has been submitted. The planning authority would not have concerns regarding noise and it is considered highly unlikely wind impacts will arise from the development.

As per Section 15.9.16.1 (Daylight and Sunlight and Appendix 16 - A best practice guide for the assessment) of the Development Plan it is stated that good daylight and sunlight contribute to making a building energy-efficient; it reduces the need for electric lighting, while winter solar gain can reduce heating requirements. Daylight animates an interior and makes it attractive and interesting, as well as providing light to work or read by.

A daylight and sunlight assessment is required for apartment schemes to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.

As Per Section 5.3.7. of Sustainable Residential Development and Compact Settlement Guidelines (January 2024) "The provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties. (b) In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.

In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

A Sunlight Daylight Assessment has been submitted (prepared by ARUP) with the documentation.

In terms of performance of the development itself the study submitted assessed the following metrics:

- Target Illuminance (Et)
- Exposure to Sunlight (EtS)
- Quality of Views
- Protection from Glare
- Sunlight in Amenity Areas (SiAA)

And found the following:

Effect on Existing Surrounding Environment

- The effect of the proposed development on all surrounding existing properties can be classified as negligible.

Performance of the Proposed Development with All Trees Removed

- 100% of units meet the minimum recommendation for Exposure to Sunlight.
- 100% of units meet the minimum recommendation for Quality of View.
- 88% of rooms meet the minimum recommendation for Target Illuminance.
- 100% of units meet the minimum recommendation for Protection from Glare.
- 100% of relevant external spaces meet the minimum recommendation for sunlight in Amenity Areas

Performance of the Proposed Development with Select Trees Retained

- 80% of units meet the minimum recommendation for Exposure to Sunlight.
- 100% of units meet the minimum recommendation for Quality of View.
- 60% of rooms meet the minimum recommendation for Target Illuminance.
- 100% of units meet the minimum recommendation for Protection from Glare.
- 100% of relevant external spaces meet the minimum recommendation for sunlight in Amenity Areas.

The Sunlight Assessment, in summary concludes that “When considering the trees and their impact on quality of natural light experienced in the proposed development, retaining the trees will offer the following benefits:

- Increased privacy and quality of view to the outside.
- Improved acoustics and less risk of windy conditions.
- Enhanced experience of shadows, temporal contrast and visual interest, three items associated with how people rate the quality of space.
- Better passive shading, lower life cycle carbon and a nature orientated site solution

Based on the above results and the wider criteria in the body of the report and elsewhere, it is the opinion of the applicant that the results with trees retained constitute the most appropriate holistic design solution for the site.

From the results submitted it is noted that the proposal does not achieve 100% compliance for exposure to Sunlight and Target illuminance for the 102 no. units with results of 80% and 60% achieved respectively. However, under the provisions of the Development Plan, and recently issued Section 28 ministerial guidelines, it is recognised that the overall quality of the design and layout of the scheme must be weighed up against the overall measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution (Section 5.3.7 of the 2024 guidelines refer). In this instance the retention of the trees is a much preferred solution over their removal.

Policy outlines that where a development is falling below the minimum daylight provisions recommended in relevant standards, the applicant is required to provide a justification for the design. The applicant has set out the following to address the issues:

- There is a clear aspiration from the applicant to retain as many trees on the site as is possible. This has a knock-on impact to daylight performance, but the applicant considers that retention

of these trees is the correct design solution when wider design and policy aspirations are considered.

- In the ground floor bedrooms, there is an obvious requirement to balance access to illuminance with privacy of the occupant. Whilst a number of these rooms will not meet minimum target illuminance recommendations, they are all connected to an apartment with kitchens / living rooms that have appropriate of access to direct sunlight and a quality view. Furthermore, the planning authority notes significant additional compensatory measures that have not been highlighted by the applicant in the documentation such as the very generous quantum and high level of quality of communal open space available to all residents; the provision of a dedicated communal room for residents; generous size of residential units; provision of private front gardens for ground floor units and the high level of ongoing management/assistance provided by the Local Area Team as set out in the Management Strategy.

The planning authority notes that the results provided in the Daylight and Sunlight study do not identify which corresponding apartments the results in the accompanying table pertain to and furthermore the details contained within all the figures are difficult to read. It was recommended that this issue be addressed in the final Part 8 documentation to provide clarity and ease of reference and assessment, however, this does not appear to have been acted upon and the same issues of legibility remain. Having said that, while the detail is not readily discernible the global picture both textually and graphically is one where the great majority of units have satisfactory levels of illumination to at least one orientation and it is considered that overall the presence of existing trees is beneficial, that the communal garden is a valuable amenity and that residents would be able to choose from two aspects within their unit to avail of natural light.

The study submitted assessed the following adjacent and adjoining properties:

1. Cara Hall, 2. Athletics Club, 3. Naí Scoil Íde, 4. 1-15 All Saints Park, 5. 1-9 All Saints Drive, 6. Unit 1-5 All Saints Park.

The study found that “no properties that experience effects outside of the guidelines given in BR 209 (2022). All properties in the existing surrounding environment will experience a negligible impact when using the classification system described in appendix H of BR 209 (2022)”.

Aspect

All apartments are designed as dual aspect with the second aspect facing onto a deck access / circulation gallery which is bounded with metal steel railings of mid-rise height which allows for greater levels of sunlight and daylight to penetrate onto the deck access and windows of the apartments facing into it. The deck entryways to units also have benches at their threshold which allows residents to sit and enjoy the view over the communal garden. Having regard to the age profile of the residents and the overall layout and design of same, the deck access arrangement is acceptable in this instance.

Floor to Ceiling Heights

Ground floor units are required to have a floor to ceiling height of a minimum of 2.7m in height and upper floors a minimum of 2.4metres (3.20 – 3.25 and SPPR 5 of the apartment guidelines and 15.9.4 of the city development plan refers). The apartments exceed these standards in all cases.

Community Safety Strategy

As per Objective QHSNO15 (Community Safety Strategy) of the development plan, all housing developments over 100 units shall include a community safety strategy for implementation.

Such a Community Safety Strategy has been submitted with the documentation. The strategy sets out the policy context for such a document and takes guidance from the Design for Safety and Security contained in Quality Housing for Sustainable Communities 2007.

The Strategy sets out the design approach as follows:

The redevelopment has been designed to promote safety and security and avoid anti-social behaviour by:

- Maximising passive surveillance of streets, open spaces, play areas and surface parking.
- Avoiding the creation of blank façades, dark or secluded areas or enclosed public areas.
- Eliminating leftover pockets of land with no clear purpose.
- Providing good lighting on the perimeter of the site and within the courtyard, meeting DCC Public Lighting requirements and UD lux levels.
- Providing a clear distinction between private and communal or public open space, including robust boundary treatment.
- Enabling residents to watch over the entrance to their home and front doors are overlooked from other houses or from well-trafficked public areas.
- Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds.
- Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead.
- Using materials in public areas which are sufficiently robust to discourage vandalism.
- Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths. Some existing trees will have their crowns raised and thinned as set out in the arborist's report.

Concern was expressed in the Pre-Part 8 report by this department with regard to the security of the South Block as it relates to the lane to the rear of the retail parade on All Saints Park. The Safety Statement indicates this area would be managed by passive surveillance, CCTV and by the use of a low wall, boundary planting and the set back of the block from the boundary.

The Development Plan explicitly states that gated communities will be resisted within the city and there is a general presumption against such communities in order to promote permeability and accessibility in the urban area. Where a gated scheme is proposed, the applicant must demonstrate the operational management strategy for the development and clearly set out the functionality of the gate mechanism proposed. The ongoing management and maintenance of the development will need to be demonstrated to avoid any situations where the mechanism malfunctions.

An Operational Management Statement has been provided from the North Central Area Office stating that following redevelopment of the site the complex would continue to be operated by the Local Area Team. Existing arrangements in place such as cleaning, waste management, open spaces and landscape, and older person's liaison would continue to be provided. Additionally new arrangements would be put in place for lifts servicing, access control, CCTV, water management, fire, mobility management, and electrical services.

While gated developments are clearly not considered acceptable in the majority of instances in this case, having regard to the age-profile of future residents and their stronger tendency to be one-person households coupled with the permeability in the immediate area, including on

all four sides of the site, the gating of the proposal is acceptable and complies with the provisions of the Development Plan.

Conservation:

While the proposed development lies in relatively close proximity to St. Anne's Park (red hatch conservation area), it will not have any discernible visual or other impacts on same. The site does not contain any protected structures, nor is it located within an Architectural Conservation Area or Conservation Areas as such no Conservation issues or concerns arise. A report has been received from the Conservation Section stating same.

Climate Action and Energy Statement

The Dublin City Development Plan 2022-2028 (table 15-1 refers) requires that a Climate Action and Energy Statement (Including District Heating) be submitted as part of any application for 30 or more residential units.

A Climate Action and Energy Statement, November 2023, prepared by ARUP, has been included as part of the documentation. – Climate Action and Energy Statement within which the main aim has been set out as *“to meet or exceed the sustainability and energy targets and overheating risk assessment set by the Irish Building Regulations, Technical Guidance Document Part L 2022 – Conservation of Fuel and Energy - Dwellings. This report looks at how the design team have reviewed the proposed development and identified opportunities to implement nearly Zero Energy Buildings (nZEB) solutions to reduce the energy demand from building services and meet the targets of Part L 2022 for Dwellings. To that end several passive and active strategies described in detail in Section 4 were implemented. Primary energy sources were also evaluated to identify the most suitable solution for the development. As stipulated in the Part L 2022 for Dwellings, a DEAP (Dwelling Energy Assessment Procedure) assessment was conducted to evaluate the primary energy consumption and carbon emissions associated with the operation of the dwellings and verify they are in line with the current regulation. All the building services options presented in this report under Section 4 for each building type of the development have demonstrated compliance with Part L 2022 for Dwellings.*

The report concludes *“that the energy performance of the St Anne's Court Development will meet or exceed all statutory requirements and deliver on targets set out in the analysis brief. As demonstrated in this report, the operational and embodied carbon of the centralised systems are less than that of the decentralised systems option considered. Comparatively the variance in end use energy associated with each of the technologies considered is marginal. The life cycle costs of the centralised options are significantly greater than that of the decentralised system and are economically prohibitive. Regarding district heating, the technical, environmental, and economic examination of the development's district heating potential, show there are no significant heat sources situated within a reasonable proximity to the proposed development, making this not a feasible alternative. There may be an option to allow district heating at the site, albeit given the low heat demand density in the area, a district energy connection is unlikely to be economically viable and easily accessible over the working lifespan of the planned energy systems. As the most viable solution has been demonstrated to be the decentralised ASHP option, the scheme as planned will not be considered District Heating Enabled however, space could potentially be provided such that a centralised system could be provided in future at a time when District Heating becomes available. Our conclusion and recommendation demonstrated by this report is to continue with the preferred option of the decentralised system”.*

The statement is comprehensive and concludes that the energy performance of the St Anne's Court Development will meet or exceed all statutory requirements and deliver on targets set out in the analysis brief.

Drainage

Drainage Planning, Policy and Development Control (DPPDC) in a report dated 29-Feb-2024 state no objection to the proposed development and recommend a set of conditions to be attached to any grant of permission.

Transportation

Transportation Planning Division in a report dated 13-Mar-2024 has stated no objection to the proposed development and recommends a set of conditions.

Archaeology, Conservation and Heritage

The City Archaeologist in a report dated 11-Mar-2024 has commented on the scheme with regard to archaeological significance, expresses no particular concerns with regard to the development and recommends a set of conditions should a grant of permission be forthcoming.

In regard to architectural conservation while no report has been provided by the City Conservation Architect it is noted that an email of 13-Oct-2023 during pre-Part 8 stage stated no conservation concerns.

Demolition of Existing Structures

The reuse of buildings rather than their demolition contributes to sustainability through retaining the embodied energy of buildings and reducing demolition waste. As per Chapter 3 – Climate of the Development Plan.

Action of the Development Plan - Another key mitigation measure in relation to the built environment is to ensure that proposals for substantial demolition and reconstruction works can be justified having regard to the 'embodied carbon' of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.

It was noted in the Pre-Part 8 Planning Report as unfortunate that the Climate Action and Energy Statement prepared by ARUP did not include details on the embodied carbon impact of the demolition of the 61 no. residential units on site.

The Report further noted *A document entitled St Anne's Court Feasibility April 2020 was received by email on 24.01.2024 from the proposing department in response to my concerns raised on this issue. However it does not deal with the issue of demolition of the existing buildings on site and the environmental sustainability of same. It is assumed that this issue has been looked at in detail over the years that that project has been in progress and that the omission of such detail to the planning department is an oversight. It is, therefore, recommended that the issue of the demolition of the existing building (x 5) be addressed in the application documentation and a clear rationale for the demolition of same, and the*

overriding benefits of new build vs demolition be justified in terms of environmental sustainability and embodied carbon issues. This could take the form of an addendum to an existing report.

It would appear that the recommendation to provide information on the embodied carbon of the existing buildings has not been addressed which is unfortunate. The Planning Department must continue to consider the scheme as noted above, and assume this element has been taken into account. Whether or not this is the case it is clear that the replacement of 61 no. substandard bedsit type units with 102 no. modern units in blocks with greater levels of insulation, energy efficient heating and an increase in density would be a positive improvement on the existing situation and in this instance the replacement of the existing buildings, while incurring a carbon increase in the demolition process and the loss of embodied carbon from the original build, and resulting in the creation of further carbon in the new build, would result in a superior building which would have a longer build life and would be constructed to modern standards and efficiencies.

Community, Arts and Cultural Space

Objective CUO25 (SDRAs and large Scale Developments) of the Dublin City Development Plan requires that *“All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector”.*

This is a proposal for a development with a gross floor area of 9,451sq.m and nett floor area of 6,400sq.m.

The calculation of the 5% figure referred to above is based on useable spaces i.e. net space; and not circulation spaces, lift shafts etc. that do not constitute active spaces in the scheme. Having regard to the figures provided above, Objective CUO25 is not applicable to this proposal.

Childcare Facility / Schools

Section 15.8.4 (Childcare) of the city development plan requires that one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units be provided in all new mixed use and residential schemes.

However, having regard to the age profile of the residents (older persons) and the percentage of one-bed units in the scheme (100%) the scheme is discounted for the purposes of the

provision of a childcare facility. For the same reasons, no issues with schools/educational facilities arise in the area as a result of the development.

External Prescribed Bodies

- Uisce Éireann / Irish Water submission dated 13-Mar-2024 states that the scheme is feasible without water or wastewater infrastructure upgrade by UE and requests that the following conditions be attached to any grant:
 1. The applicant shall sign a connection agreement with Uisce Éireann prior to any works commencing and connecting to the Uisce Éireann network.
 2. Uisce Éireann does not permit any build over of its assets and separation distances as per Uisce Éireann Standards Codes and Practices shall be achieved.
 - (a) Any proposals by the applicant to build over/near or divert existing water or wastewater services subsequently occurs, the applicant shall submit details to Uisce Éireann for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Uisce Éireann prior to connection agreement.
 3. All development shall be carried out in compliance with Uisce Éireann Standards codes and practices.

Third Party Submissions

Six submissions were received by the Planning Authority within the statutory period. These submissions were made by residents of Saint Anne's Court and All Saints Park and by a solicitor based in Coolock Village.

One submission is supportive of the proposal.

Issues raised relate to tenancy, scale and appearance, height, parking and access, the need to carry out an Environmental Impact Assessment, lack of consultation, impact on daylight and sunlight and breakup of the community.

Tenancy, occupancy and legal issues are not planning matters and are presumably for the applicant department to resolve if relevant. The scheme is comfortably subthreshold for carrying out EIA and requiring same is unwarranted as discussed below. The applicant has satisfactorily demonstrated the scheme would not impact unduly on existing dwellings and it is considered that height, daylight and sunlight, parking and traffic have been dealt with in the assessment above. The submissions are noted.

Appropriate Assessment

Under Article 6 (3) of the EU Habitats Directive and Regulation 30 of SI NO.94/1997 "European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000 (as amended).

A Natura 2000 Impact Screening Report (dated 25th August 2023, prepared by NME Ecology) has been submitted as part of the documentation. This document provides information to support an Appropriate Assessment screening exercise, including: a description of the proposed development, a map and list of European sites in the surrounding area, a review of potential source-pathway receptor links, and an appraisal of the suitability of the habitats for birds associated with nearby SPAs. The report finds that "*with regard to Article 42 (7) of the*

European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), it can be excluded on the basis of objective scientific information following screening, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site. On this basis, the assessment can conclude at Stage 1 of the Appropriate Assessment process, and it is not necessary to proceed to Stage 2. In accordance with the OPR 2021 guidance, we note that no mitigation measures have been considered when reaching this conclusion.”

The Planning and Property Development Department have carried out a screening exercise and have concluded that there would be no significant negative effects on any Natura 2000 site as a result of the proposed development. As a result, a Stage 2 Appropriate Assessment would therefore not be required.

Environmental Impact Assessment

The proposal was subjected to an EIA Screening Exercise and report submitted - Environmental Impact Assessment Screening Report (September 2023) prepared by Enviroguide – has been submitted as part of the documentation. This document provides information to support an Environmental Impact Assessment screening exercise. The report concludes that *“Having regard to the nature and scale of the Proposed Development on an urban site served by public infrastructure, and the absence of any significant environmental sensitivities in the area, it is concluded that, by reason of the nature, scale and location of the subject site, the Proposed Development would not be likely to have significant effects on the environment and a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development”.*

The Planning and Property Development have carried out a screening exercise and found that an Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development.

Conclusion

The proposed development provides a greatly improved residential amenity to existing residents by replacing bedsit type units with properly proportioned dual aspect one bed apartments while also significantly increasing the number of residential units provided on site. The scheme allows for a greater density than currently is the case on a zoned and serviced urban site close to both public transport and local amenities. The scheme also provides a greater level of communal open space while avoiding the creation of undue impacts on existing properties. The provision of a community room would benefit the wider community and integrate the new building into the social fabric of the area. Finally the design is of a high standard in form and materials and would make a positive impact on the visual and residential amenities of the area.

The proposed development is considered consistent with the Dublin City Development Plan 2022-2028 and with the proper planning and development of the area. It is recommended that the proposed development be submitted for the approval of the elected members.

Recommendation:

Reasons & Considerations

Having regard to the nature and scale of the proposed development it is considered that the proposed development would not seriously injure the residential amenities of the area and, subject to compliance with the conditions set out below, it is considered that the proposed development accords with both the current Dublin City Development Plan 2022-2028 and the proper planning and sustainable development of the area.

It is recommended that the Elected Members approve the proposed development and the proposing Department should have regard to the following recommendations:

Uisce Éireann

- a) The proposing department shall sign a connection agreement with Uisce Éireann prior to any works commencing and connecting to the Uisce Éireann network.
- b) Uisce Éireann does not permit any build over of its assets and separation distances as per Uisce Éireann Standards Codes and Practices shall be achieved.
- c) Any proposals by the proposing department to build over/near or divert existing water or wastewater services subsequently occurs, the proposing department shall submit details to Uisce Éireann for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Uisce Éireann prior to connection agreement.
- d) All development shall be carried out in compliance with Uisce Éireann Standards codes and practices.

Transportation Planning Division

a. Prior to commencement of development, the proposing department shall submit revised drawings for the written agreement of the Planning Authority demonstrating the following:

- i. The location and design of 66no. bicycle parking spaces including 3no. Accessible / larger bicycle spaces. Based on the demographic of the proposed, two-tier spaces are unacceptable.
- ii. Demonstrate how all routes to bicycle parking spaces are a minimum of 1.2m in width to facilitate universal design bicycles.
- iii. The bicycle parking spaces shall be sheltered, well lit and secure.
- iv. All bicycle spaces shall be placed in a sheltered and secure location and designed to allow both frame and wheel to be locked. All bicycle infrastructure shall be in place prior to occupation of the proposed units.

The above changes, following agreement, shall be installed and available for use prior to operation of the proposed development.

b. The proposed road marking changes to the public road indicated on 'proposed on-street parking and loading layout' drawing must be indicative. The proposing department shall submit a Traffic Service Request for any changes to road marking and signage (Dublin City Council website). No car spaces / loading space indicated shall be designated for the development and must be for public use only.

c. (i) Prior to occupation, the proposing department shall prepare Mobility Management Plan (MMP) for the written agreement of the Planning Authority to reduce demand for and use of cars by increasing the attractiveness and practicality of other modes of transport for residents on site.

(ii) The mobility management plan shall outline the communication strategy for car parking in the area including how future residents are told of the zero car parking provision on-site.

(iii) The Mobility Manager/Travel Coordinator for the proposed development shall be appointed to oversee and co-ordinate the roll out of the plan. The Mobility Management Coordinator shall set modal targets and coordinate annual mobility monitoring to the satisfaction of the planning authority following the commencement of the development.

The information shall be submitted to the planning authority at the end of each year for consideration and placement on the public file.

d. Prior to commencement of development, and on appointment of a main contractor, a Demolition Management Plan shall be submitted to the planning authority for written agreement. This plan shall be implemented in full during the course of demolition phase of the development, shall provide details of:

i. Intended demolition practice for the development, demolition, including traffic management, hours of working, noise and dust management measures and off-site disposal of construction waste and access arrangements for labour, plant and materials, including location of plant and machine compound etc. The Traffic Management Plan for demolition shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The Demolition Management Plan, including Traffic Management Plan, shall be agreed prior to commencement of development. The appointed contractor shall Works Control Division during demolition phase.

e. Prior to commencement of development, and on appointment of a main contractor, a Construction Management Plan shall be submitted to the planning authority for written agreement. This plan shall be implemented in full during the course of construction of the development, shall provide details of:

i. Intended construction practice for the development, demolition, including traffic management, hours of working, noise and dust management measures and off-site disposal of construction waste and access arrangements for labour, plant and materials, including location of plant and machine compound etc. The Traffic Management Plan for construction shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport. The Construction Management Plan, including Traffic Management Plan, shall be agreed prior to commencement of development. The appointed contractor shall liaise with DCC Road Works Control Division during construction period.

f. No part of the proposed building, either above or below ground level (including foundations or balconies) shall overhang the existing or proposed public road.

g. Any works to the public road to be carried out under Road Opening Licence. Improvements to the public road to support the development, including safe pedestrian crossings with the existing pedestrian network, shall be delivered by the proposing department. All works, including materials and finishes shall be carried out in accordance with Dublin City Council's Construction Standards for Roads and Streets.

City Archaeologist

A. No construction or site preparation work may be carried out on the site until all archaeological requirements of the Planning Authority are complied with.

B. The project shall have an archaeological assessment (and impact assessment) of the proposed development, including all temporary and enabling works, geotechnical investigations, e.g. boreholes, engineering test pits, etc., carried out for this site as soon as possible and before any site clearance/construction work commences. The assessment shall be prepared by a suitably qualified archaeologist and shall address the following issues.

i. The archaeological and historical background of the site, to include industrial heritage.

ii. A paper record (written, drawn, and photographic, as appropriate) of any historic buildings and boundary treatments, etc.

iii. The nature, extent and location of archaeological material on site by way of archaeological testing &/or monitoring of the removal of overburden.

iv. The impact of the proposed development on such archaeological material.

C. The archaeologist shall forward their Method Statement in advance of commencement to the Planning Authority.

D. Where archaeological material is shown to be present, a detailed Impact Statement shall be prepared by the archaeologist which will include specific information on the location, form, size and level (corrected to Ordnance Datum) of all foundation structures, ground beams, floor slabs, trenches for services, drains etc. The assessment shall be prepared on the basis of a comprehensive desktop study and, where appropriate/feasible, trial trenches excavated on the site by the archaeologist and/or remote sensing. The trial trenches shall be excavated to the top of the archaeological deposits only. The report containing the assessment shall include adequate ground-plan and cross-sectional drawings of the site, and of the proposed development, with the location and levels (corrected to Ordnance Datum) of all trial trenches and/or bore holes clearly indicated. A comprehensive mitigation strategy shall be prepared by the consultant archaeologist and included in the archaeological assessment report.

E. No subsurface work shall be undertaken in the absence of the archaeologist without his/her express consent. The archaeologist retained by the project to carry out the assessment shall consult with the Planning Authority in advance regarding the procedure to be adopted in the assessment.

F. One hard copy and 1 digital copy in pdf format containing the results of the archaeological assessment shall be forwarded on completion to the Planning Authority. The Planning Authority (in consultation with the City Archaeologist and the National Monuments Service, Dept. of Housing, Local Government and Heritage, shall determine the further archaeological resolution of the site.

G. The proposing department shall comply in full with any further archaeological requirement, including archaeological monitoring, and if necessary archaeological excavation and/or the preservation in situ of archaeological remains, which may negate the facilitation of all, or part of any basement.

H. The developer shall make provision for archaeological excavation in the project budget and timetable.

I. Should archaeological excavation occur the following shall be submitted to the Planning Authority:

i. A bi weekly report on the archaeological excavation during the excavation and post excavation period.

ii. A preliminary report on the archaeological excavation not later than four weeks after the completion of the excavation.

iii. A final report on the archaeological excavations not later than twelve months after the completion of the excavation

J. Before any site works commence the proposing department shall agree the foundation layout with the Planning Authority.

K. Following submission of the final report to the Planning Authority, where archaeological material is shown to be present the archaeological paper archive shall be compiled in accordance with the procedures detailed in the Dublin City Archaeological Archive Guidelines (2008 Dublin City Council), and lodged with the Dublin City Library and Archive, 138-144 Pearse Street, Dublin 2.

Drainage Planning, Policy and Development Control Section (DPPDC)

- a) The development shall comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
- b) The development shall incorporate Sustainable Drainage Systems (SuDS) in the management of surface water. The proposed green & blue roofs, swales/detention basins, and porous paving shall be implemented in full. Full details of these shall be submitted for approval prior to commencement of the development.

- c) The development is to be drained on a completely separate foul and surface water system with surface water discharging to the public surface water sewer network.
- d) A connection from this development to the public surface water network will only be granted when the proposing department has obtained the written permission of the DPPDC section. All expense associated with carrying out the connection work is the responsibility of the proposing department. Any unauthorised connections shall be removed. Permission of DCC Roads Maintenance Services must also be obtained for any work in the public roadway.
- e) Records of public surface water sewers are indicative and must be verified on site. The proposing department must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the proposing department must immediately contact the DPPDC section to ascertain their requirements. Detailed "as-constructed" drainage layouts for all diversions, extensions and abandonment of public surface water sewers; in an approved format are to be submitted by the proposing department to the DPPDC Section for written approval. Please refer to Section 5 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
- f) All surface water discharge from this development must be attenuated in accordance with the requirements of the DCC's Sustainable Drainage Design and Evaluation Guide 2021.
- g) The outfall surface water manhole and the outfall pipe from this development must be constructed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0. The outfall manhole shall be located within the final site boundary and no overflow will be permitted from this manhole. The orifice plate should be protected against blockage.
- h) All private drainage infrastructure such as, downpipes, gullies, manholes, armstrong junctions, etc. shall be located within the final site boundary. Private drainage infrastructure is not permitted in public areas, or areas intended to be taken in charge.
- i) Full details of any drainage works required to facilitate the upgrade of existing public footpaths and carriageways (relocation of existing gullies, installation of new gullies, etc.) shall be agreed with the DPPDC section prior to commencement of the development.

Community Room

Details of the operational management of the community room including operating hours and how the room may be accessed by residents the wider community shall be agreed in writing with the Planning and Property Development Department.

The Area Committee as appropriate were informed of the initiation of the Part 8 planning process for the proposed development and the recommendation of the Planning Department at its meetings on the 15th January 2024 and 15th April 2024 respectively.

The project is being funded by the Department of Housing, Local Government and Heritage.

The project will be delivered in one phase and it is envisaged that construction will begin in Q3 2025 with full project completion and delivery of 102 new homes for older people completed by Q3 2027.

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development.

This report is submitted to the City Council pursuant to Section 179 of the Planning and Development Act, 2000 (as amended).

Resolution:

That Dublin City Council notes the contents of Report No. 105/2024 and hereby approves the contents therein.

Richard Shakespeare

Chief Executive

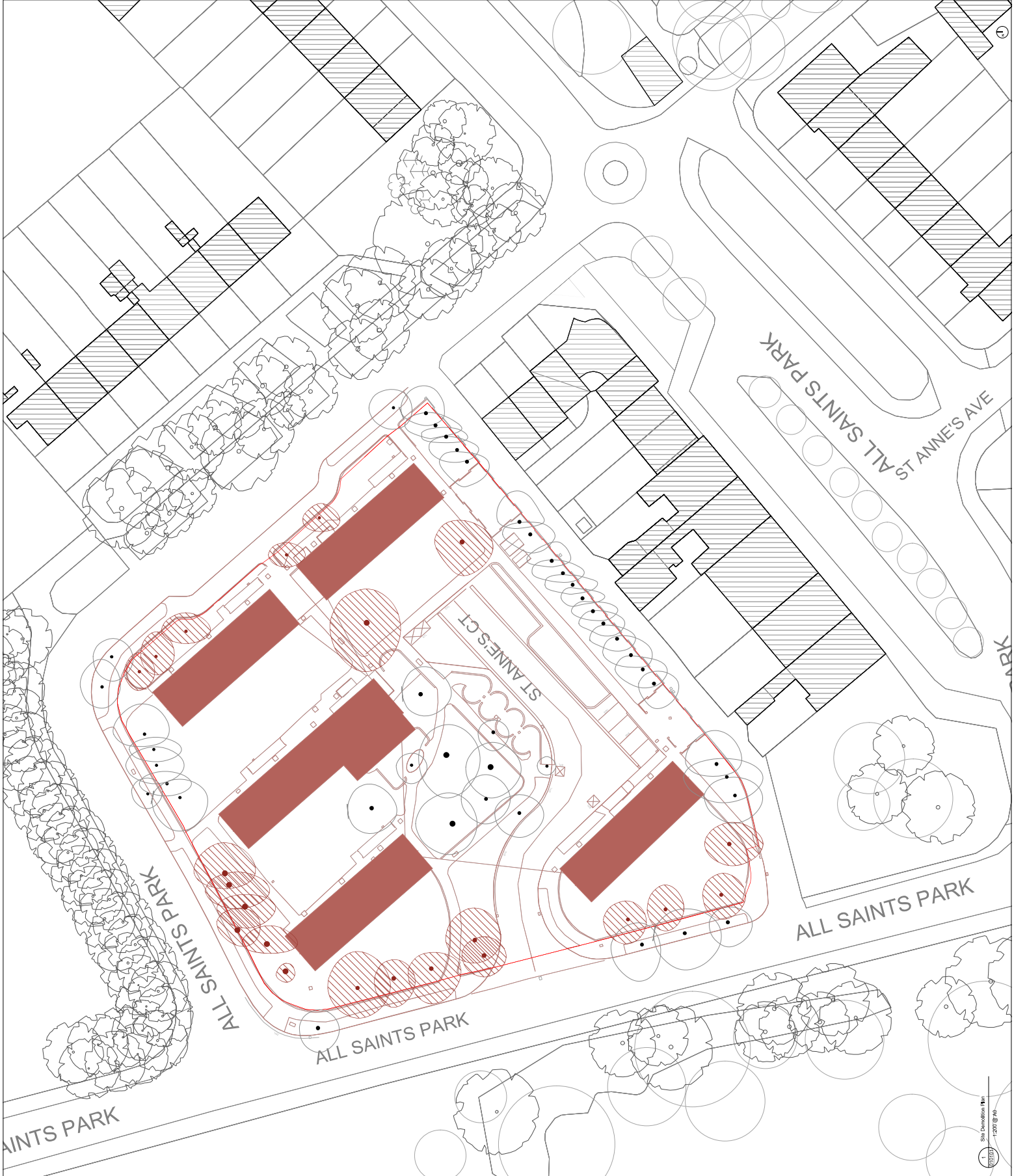
1st May 2024

Consultees

Irish Water, Colvill House, 24 - 26, Talbot Street, Dublin 1

List third party names only:

- Thomas Loomes & Co.
- Michael Harraghy
- Patrick Green
- Elaine Green & Barry Carroll
- Patricia Rafferty
- Elaine McNamara



LEGEND:

- Adjoining Site Boundary
- Building Footprint
- Proposed Building Footprint
- Existing Trees to be Retained

NOTES:

1. All work shall be in accordance with the latest edition of the National Building Code of Canada (NBC) and the Ontario Building Code (OBC).

2. All work shall be in accordance with the latest edition of the National Fire Code of Canada (NFC) and the Ontario Fire Code (OFC).

3. All work shall be in accordance with the latest edition of the National Electrical Code of Canada (NEC) and the Ontario Electrical Code (OEC).

4. All work shall be in accordance with the latest edition of the National Plumbing Code of Canada (NPC) and the Ontario Plumbing Code (OPC).

5. All work shall be in accordance with the latest edition of the National Mechanical Code of Canada (NMC) and the Ontario Mechanical Code (OMC).

6. All work shall be in accordance with the latest edition of the National Fire Protection Association (NFPA) and the Ontario Fire Protection Association (OFPA).

7. All work shall be in accordance with the latest edition of the National Fire Protection Association (NFPA) and the Ontario Fire Protection Association (OFPA).

8. All work shall be in accordance with the latest edition of the National Fire Protection Association (NFPA) and the Ontario Fire Protection Association (OFPA).

9. All work shall be in accordance with the latest edition of the National Fire Protection Association (NFPA) and the Ontario Fire Protection Association (OFPA).

10. All work shall be in accordance with the latest edition of the National Fire Protection Association (NFPA) and the Ontario Fire Protection Association (OFPA).

PROJECT INFORMATION		CLIENT INFORMATION	
Project No.	2024-001	Client Name	St. Anne's Parish
Project Name	All Saints Park	Project Address	1234 St. Anne's Ave
Site No.	AS-001	Project Date	2024-01-15
Scale	1:500	Project Status	Proposed
Author	J. Doe	Project Manager	M. Smith
Checker	J. Doe	Project Engineer	A. Brown
Approver	J. Doe	Project Architect	G. White
Revision	01	Project Designer	G. White

