

**PART 8 SERVICE DEPARTMENT REPORTS**

**SITE: BALALLY, SANDYFORD, DUBLIN 16**

## **1.0 HOUSING DEPARTMENT**

### **Context for the proposed Part 8**

The Social Housing PPP programme consists of the design, construction, financing and maintenance of approximately 3,000 homes in five project bundles of social housing developments on sites around Ireland to be delivered by Public Private Partnership (PPP). The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The Design Team has advanced proposals on behalf of the National Development Finance Agency (NDFA) in consultation with Dún Laoghaire-Rathdown County Council. The units are to be delivered using an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the Part 8 consent), builds, finances and maintains the social housing units on behalf of the local authority subject to a contract. The maintenance and upkeep services are provided for a period of 25 years after construction. After this the units are returned to the local authority in good, pre-defined, condition.

The sites for this project always remain in State ownership and are made available to the PPP Company by way of a license. As the model is 'availability-based', the private sector partner is responsible for ensuring that units are available for occupation. The local authority is the landlord and is responsible for nominating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme.

Bundle 5 includes ten sites, two of which are in the administrative area of Dún Laoghaire-Rathdown County Council. Each site includes a mixture of housing typology (for example apartment, duplex, detached or semi-detached house) and site development works. The subject site at Balally, Sandyford, Dublin 16, proposes the development of 62 no. one, two and three bedroom apartment units.

### **Description of proposed Part 8 Development**

The proposed development includes 62 no. apartment units in a 5-6 storey building over undercroft area, including 31 no. one bed units; 21 no. two bed units; and 10 no. three bed units; 1 no. community facility of 249m<sup>2</sup> at upper ground level. Energy Centre at sixth floor level and an external plant area set back at fifth floor roof level. Undercroft area at lower ground level comprising (a) 1 no. ESB substation (b) car and bicycle parking; (c) bin storage; (d) bulk storage area; and (e) supporting mechanical, electrical and water infrastructure, Landscaping works including provision of (a) communal open space; (b) new pedestrian and cycle connections linking Blackthorn Dive with Cedar Road; and (c) public realm area fronting onto Blackthorn Drive. All associated site development works including (a) vehicular access off Cedar Road; (b) pedestrian and cycle access off Blackthorn Drive; (c) public lighting; (d) varied site boundary treatment; and temporary construction signage

## 2.0 ARCHITECTS DEPARTMENT

**Comment 1:** It is acknowledged that the design Architects have amended the design of the 2-Bedroom UD apartment. Please submit a detailed floor plan for review of Compliance with UD Homes Guidelines.

**Response 1:** Detailed plan shall form part of Part 8 submission with narrative in the Design Statement

**Comment 2:** The 3D views that were provided in the Architectural Design Statement: Architects Design Statement Image 10 View looking West from Intersection at Drummartin Link Road along Blackthorn Drive, Architects Design Statement Image 13: View looking west from Drummartin Link Road.

The UD Homes Guidelines call for the layout of the buildings, roads and streets, and position of signage in a new development should make it easy for everyone to find their way around.

In the view provided, taken from Blackthorn Drive and the Drummartin Link Road, the proposed entrances to the main stair cores have little or no presence. Similarly, when looking at the southern elevation there is no indication as to where the approach to the main stair core is located. Site navigability would be challenging to find for those visiting the building, whether or not they had and impairment to their sight.

Providing signage/ additional features to augment the presence of the entrances seems a less than ideal solution to this issue. Please provide details of what features you propose along with potential amendments to the design to improve navigability and wayfinding in the Development.

**Response 2:** The CGIs shown form part of the verified views pack, and are to primarily illustrate the visual impact on its context. Therefore, the northern entrance is located behind the existing fence and hedge in the foreground.

We have reviewed both the approaches and entrances to the 2 main residential cores into the building as follows-

Core 1: South has been reconfigured so that the main entrance point is now at the front of the block adjacent to an updated entrance into the Community Room. This caters for Part M accessibility as there is an internal slope that brings you from the door to the upper level where the lift and stair is located. This has been achievable by the removal of the proposed creche, allowing internal space to be reconfigured to allow this access from the front. Accordingly, the access route that ran along the eastern facade of the building has been removed as well as the external steps. The front flight of steps are now repositioned, centred on the main entrances to the south elevation providing greater legibility.

Core 2 north is accessed at the lower ground floor level given the fall across the site. We have created a splayed wall effect which creates a sheltered porch area external to this entrance with textured brickwork on the play was well as natural stone above the entrance in the same finish as core 1. This area also provides the access point for cyclists into the secure storage space.

**Comment 3:** It is very difficult to determine what the accessible route is on the Ground floor plan; see below.

The ramp seems circuitous; with the starting point of the ramp being visually divorced and physically remote from the entrance to the building. We would be concerned that this approach is not in compliance with Universal Design Principles, which note:

“Wherever possible, the top and bottom of a ramp should be adjacent to the top and bottom of an associated flight of steps.

The location of stepped and ramped routes should be clearly obvious. Where steps and ramps are provided to gain access to a building entrance, they should both be clearly visible from the approach route.”

Similarly, the Irish Wheelchair Association guidelines state:

The route to the principal entrance of a building, from all areas, including the car parking area, should be clearly identified and well-lit.

The steps and ramps should be as close as possible to each other.”

1 Building for Everyone: A Universal Design Approach

2 Best Practice Access Guidelines 4-Designing Accessible Environments – Irish Wheelchair Association

**Response 3:** See response 2 above.

**Comment 4:** Finally, it is noted in the Architects response that the eastern elevation of the building is considered to be one of the two principal elevations of the apartment block. Were this is the case, we would have concerns over the quantum of dead frontage / Blank facade and building service areas proposed on this principal elevation. Though the Design Statement suggests “maximum passive supervision is provided” in actual fact there is very little engagement with the public realm at the lower ground floor level. There is therefore no direct passive observation of the pedestrian circulation route from the north/ Mapels Road to the Apartment entrances.

As with previous comments, it is also not clear from the elevation where the entrances to the building are.

**Response 4:** See responses above regarding entrances and approach. The façade facing Maple/ Cedar Road to the north accommodates the main point of vehicular access to the undercroft as well as a portion of external parking. Also there are access points for the ESB substation located at the corner. It is submitted that while there aren't apartments at lower ground floor level here, it will be an active area with residents parking and accessing vehicles. Additionally, there are 5 storeys of apartments (10 apartments in total) above overlooking this area.

The entrance at lower ground floor level with its splayed wall feature will be visible as one turns the corner from the northern façade as described above.

To enhance the supervision of the eastern flank of the block, we have created a plinth of enlarged terraces serving the upper ground level apartments bringing these closer to the sloped route running alongside the building. As well as increasing the private amenity spaces of these units, it also increases the area internally of the secure bicycle storage room below.

#### **4.0 COMMUNITY & CULTURAL DEVELOPMENT**

No objection to the proposed development.

#### **5.0 FORWARD PLANNING INFRASTRUCTURE**

No objection to the proposed development.

#### **6.0 INFRASTRUCTURE & CLIMATE CHANGE**

##### **6.1 CAPITAL PROJECTS**

**Comment 5:** Capital Projects recommend further consideration of northern boundary treatment of proposed development at Cedar Road to ensure adjoining public realm prioritises all levels of pedestrian and cyclists across the proposed vehicular and service access at Cedar Road. This may include ensuring a continuous safe delineated footway/cycle way connecting route to Kilmacud Luas from Blackthorn Drive development frontage. Currently there appears to be no footpaths in vicinity of proposed Cedar Road access or existing scout hall.

**Response 5:** The proposal on MOR Drawing is provided to achieve a safe entrance exit / entrance to the site for pedestrians to the East and to the West of the site. The complication which prevents the simple agreement with the requirements of DLRCoCo is that there is currently no footpath along the South side of Cedar Road. More importantly there is a major level difference in the ground levels along Cedar Road immediately East of the Site which makes it impractical to lay a footpath to the East of the site i.e. along the front of the Scout Hall. Hence it is proposed that a safe route for pedestrians is along the South side of the Scout Hall building which would then enter the Site near the North -East corner of the building- thereby removing pedestrians from the East site of the Site entrance.

On the West side of the entrance, the safe access / exit for pedestrians would be via the footpath along the South side of the Cedar Road and the directly South between the proposed trees and the car parking spaces and safely to the pedestrian crossing along the North side of the proposed buildings.

## **6.2 ENVIRONMENTAL ENFORCEMENT**

No comments received from department

## **6.3 ESTATES OFFICER**

No objection to the proposed development.

## **6.4 TRANSPORTATION PLANNING**

**Comment 6:** A footpath should be provided on either side, with the junction tightened insofar as possible and the STOP line to the rear of the footpath. This arrangement would facilitate future improvements and access to the adjacent site without impacting the scheme

**Response 6:** As per Response 5 above

## **6.5 ACTIVE TRAVEL**

No objection to the proposed development.

## **6.6 CLIMATE ACTION OFFICER**

No comments received from department

## **7.0 MUNICIPAL SERVICES**

### **7.1 BIODIVERSITY OFFICER**

No objection to the proposed development, subject to;

**Recommendation:** All recommendations of the Ecological Impact Assessment will be implemented.

**Reason:** For the enhancement and benefit of biodiversity and align with National and County policies.

**Recommendation:** No vegetation clearance will take place during the bird breeding season (March 1<sup>st</sup> – Sept 1<sup>st</sup>)

**Reason:** To protect breeding birds during the bird breeding season.

**Recommendation:** A Final Landscape Plan and species lists will be agreed with DLR Parks and Biodiversity officer prior to commencement of the proposed development and will provide:

a. The inclusion of bird bricks, boxes and callers including for swifts will be provided in the Final Landscape Plan with input from a suitably qualified ecologist in consultation with DLR Biodiversity Officer.

b. The inclusion of a hedgerow with diverse native species will be detailed in the Final Landscape Plan with sufficient buffer and space from hardstanding areas, in consultation with DLR Parks and Biodiversity Officer.

c. Green roof areas will be examined for the provision of biodiversity elements where feasible.

**Reason:** To ensure the appropriate design of the landscape plan including for biodiversity.

**Recommendation:** A lighting will be designed and provided to avoid light spill and light pollution to the landscaped areas of trees and/or hedgerow.

**Reason:** To ensure that the newly created landscaped areas in particular those for biodiversity are not impacted by light pollution.

## 7.2 DRAINAGE PLANNING

Comment Drainage Planning have no objection in principle to the proposed development subject to the following conditions. The applicant is requested to discuss and agree the proposed conditions with drainage planning at detailed design stage.

Prior to commencement of development, the applicant shall submit to the Planning Authority (Drainage Planning) for its written approval revised analysis of the allowable outflow for the site as well as the attenuation volumes proposed. The following issues are noted in the Engineering Report that need to be addressed:

The applicant has proposed Cv values of 0.84 for Winter and 0.75 for Summer however, however reduced runoff rates have been proposed. Appendix 7: Sustainable Drainage System of the County Development Plan 2022-2028 requires that if the applicant proposes to use their own reduced run-off rates, then the default Cv values should be amended to a value of 1.0. Maintaining the default Cv values in conjunction with reduced run-off rates for contributing areas reduces the surface water run-off during hydraulic simulations, resulting in inaccurate simulation results which may lead to under sizing of the drainage system and attenuation storage required. The applicant is requested to clarify if reduced run-off rates for contributing areas have been applied and if so to update the surface water management strategy/calculations as required.

The applicant has used a Soil Type 1, which suggests good infiltration, however one infiltration test failed to produce a result due to failure of the water to infiltrate. The applicant is requested to revise the allowable outflow calculation for the site based on

site specific data including soil type and SAAR. The system shall not have an overflow unless deemed necessary by soil infiltration testing results. Any overflow shall be limited to QBAR (calculated using site specific data) or 2l/s/ha, whichever is greater, subject to the orifice size of the flow control device not being less than 50mm in diameter. Note that in the interest of clarity where the calculated QBAR rate for the site is less than 2 l/s/ha then a minimum value of 2 l/s/ha should be applied, not a flat rate of 2 l/s i.e. the outfall discharge rate should be calculated based on the lowest flow rate achievable for a 50mm Unit Outlet Diameter on the proposed flow control device using an appropriate method such as the Hydro International online Optimum Design Tool. This may result in a change to the attenuation volumes required.

The applicant has analysed the proposed drainage network with a limited number of storm durations. For completeness, all storm water durations, up to an including 10080 mins should be analysed.

Prior to commencement of development the applicant shall submit to the Planning Authority for its written agreement full details of the blue roof drainage network, with outfall to the public network. The drawings should clearly indicate if the roof drainage goes into the drainage network on the ground, and the proposed tank and if so, has this flow been considered in the design of the attenuation tank. Note a separate discharge may be possible, however the allowable outflow for the entire site should be limited to Qbar or 2l/s/ha, as standard.

Prior to the commencement of development, the applicant shall submit details of the Green Roof to the Planning Authority for its written agreement. The applicant is requested to provide a detailed cross section of the proposed build-up of the green roof, including dimensions and demonstrate that the green roof is designed in accordance with BS EN 12056-3:200 and The SUDS Manual (CIRIA C753). A construction plan and a post-construction maintenance specification and schedule should also be included.

The applicant shall ensure that trees shall not be planted in the area over the attenuation tank. Trees shall be placed at a minimum distance of 2m from the edge of attenuation tanks. Tree protection barriers may be required, depending on the tree species and the expected extent of root spread, to be advised by the landscape architect.

The applicant shall ensure that all drainage works are carried out in accordance with the agreed details and that a post-construction maintenance specification and schedule is implemented on site. Maintenance contractors with specialist training in SuDS care should be used. Thereafter, all elements of the surface water management system shall be maintained at all times in accordance the post-construction maintenance specification and schedule, which shall be included in the site Safety File.



Prior to the surface water connection to the public system, the applicant shall make a submission for the written agreement of the Planning Authority, showing that the attenuation system, including the flow control device, has been installed according to the planning application plans and conditions, and set to the maximum permitted discharge limit. This shall include photo documentation of the installation process, and certification from who installed the system. The applicant shall then facilitate an inspection from the Planning Authority and will proceed to connection if the inspection was deemed satisfactory.

### **7.3 PARKS**

No objection to the proposed development.

### **7.4 ROAD MAINTENANCE**

No objection to the proposed development.

### **7.5 TRAFFIC**

No objection to the proposed development.

## 6.0 PLANNING

**Comment 7:** Note on the recent ABP (LRD23A/0214) refusal (and earlier DLRCC refusal) at the adjoining balally / Blachthorn Shopping centre

Similarly, the details taken from that application seems to show (See 'Indicative Masterplan for adjacent DLR lands...' near end of pictures below) the now subject DLRCC proposed block as previously – notably further set-back away/ north from Blackthorn Road, than is indicated in Figure 10 of the HRA Planning report i.e. unless the Indicative drawing of the DLRCC block shown for info in the Balally shopping centre site application app was wrong – the position shown in the HRA report is now shows it much closer to Blackthorn Drive? (previously indicated as nearly same front building line as existing shopping centre – now indicated as notably forward of it – though otherwise it was annotated then as a taller 8 stories and greater number of units as 70 (currently indicated in HRA report as 5-6 stories and 62 apartments)).

Notwithstanding the comment about 'active street frontage' the ABP reasons for refusal appears to be concerned about the lack of open space, amenity, planting the NC only zone, scale and prominence of car parking (noting - the current subject block shown in figure 10 of the HRA report seems to show a relatively shallow front curtilage and mostly cycle parking/ hardstanding).

**Response 7:** We note the indicative masterplan prepared as part of the adjoining application that was subsequently refused. This had been reviewed at an early stage in this development with DLR and was deemed to be a high-level layout showing the principle of a block in the location shown.

The proposal sets out to create a more appropriate urban response to the site, with a smaller setback, stronger building edge, strong and legible entrance, with quality public realm and cycle parking serving the scheme. Image below-



The setback shown of the DLR block in the indicative masterplan of the refused scheme was informed by that of the existing shopping centre, which is generated by surface car parking to the front. The refused scheme had sought to retain this parking beneath a block elevated on columns presenting an unresolved façade to Blackthorn Drive. See below, Section left, elevation right.

