

FINGAL COUNTY COUNCIL

PLANNING & STRATEGIC INFRASTRUCTURE DEPARTMENT PRELIMINARY PLANNING REPORT

Register Reference:	Part XI/007/24.
Proposed Development:	32 no. residential dwellings & associated site works at Park Road, Kenure, Rush, Co. Dublin.
Location:	Park Road, Kenure, Rush, Co. Dublin.
Proposing Department:	Architects Department.
Application Type:	Part XI.

Site Location and Description:

The application site is a greenfield site measuring approx. 1.09 hectares; located north and west of Park Road and south of Palmer Road, Rush, Co. Dublin. The site is bounded to the north by Palmer Road, to the east/south-east by agricultural fields and greenhouses, to the south-west by Park Road and to the south-west/west by agricultural fields.

The site is generally flat with a slight, gentle, fall from the north-west to the south-east. There is an existing ditch along the eastern boundary; while the remains of an old stone wall, likely related to the former grounds of the Kenure House Estate, are present along the south-west boundary. Several trees are scattered sporadically throughout the site with a relatively short, mature, hawthorn hedgerow growing outside of the south-west boundary wall at Park Road.

In the wider vicinity, St. Maurs GAA Club grounds is situated approx. 230 metres to the west, with existing residential housing estates commencing approx. 50 metres to the south-east. There is a tract of undeveloped 'CI' – 'Community Infrastructure' zone lands to the south-west, on the opposite side of Park Road, which is currently subject to a live planning application for primary and post-primary schools. Lands further to the north and west are generally rural in nature; while lands further to the east and south are generally comprised of built-up residential areas.

Proposed Development:

Residential Mix

The proposed development is a residential development consisting of 32 no. dwellings comprised of 20 no. duplex apartment units and 12 no. terraced houses.

The 20 no. duplex apartment units are arranged in 4 no. duplex apartment blocks (Blocks A, B, C & D). Block A is a two-storey building while Blocks B, C & D are two-storey buildings with three-storey corner elements. The proposed duplex apartment unit mix is comprised of the following:

- 7 no. one bed/two person apartments;
- 7 no. two bed/three person apartments;
- 3 no. two bed/four person apartments;
- 3 no. three bed/five person duplex apartments.

The 12 no. two-storey, three bed/ five person, houses are comprised of 10 no. mid-terrace houses and 2 no. end-terrace houses.

Density

The gross site area is approx. 1.09 hectares; however, the net developable site area is approx. 0.9054 hectares. The proposed development therefore has a net density of approx. 35 dwellings per hectare (dph).

Private Open Space

Private open space for each dwelling is provided in the form of rear gardens for the houses and private ground floor terraces and first floor balconies for the duplex apartment units.

Communal Amenity Space

In addition to the private open space provision, residents of each of the 4 no. duplex apartment blocks are provided with shared communal amenity space areas. The total provision of shared communal amenity space proposed within the development is approx. 479 sq.m.

Public Open Space

The proposed development also provides for an approx. total of 1,390 sq.m. Class 2 public open space, delivered in two parcels as follows:

- Approx. 700 sq.m. situated in the south-east of the development, adjacent to Block D, and;
- Approx. 690 sq.m situated in the north of the development, adjacent to Block A.

The public open space provision equates to approx. 15.3% of the net developable site area.

Parking Arrangements

The proposed development provides for 54 no. car parking spaces which are located across 4 no. communal parking bays. The car parking provisions include for 10 no. accessible car parking spaces and 12 no. EV charging spaces. Additionally, 3 no. motorcycle parking spaces are also provided within the proposed development.

The proposed development provides a total of 129 no. bicycle parking spaces comprised of 119 no. long-stay spaces and 10 no. short-stay visitor spaces. Secure, long-stay, bicycle storage structures are provided in the front gardens of the houses; while the duplex apartment units are provided with a mix of secure bicycle storage structures within, or near, the secure communal amenity space areas and/or to the rear of the dwellings at ground floor level. Short-stay visitor bicycle parking is provided in the form of Sheffield cycle stands in two locations near Block A and Block D.

Access and Roads

The proposed development provides for one vehicular access point from Park Road at the south-west of the development. Off-street communal parking is also provided at Palmer Road in the north of the development, adjacent to Block A.

The proposed development provides for two road typologies. The initial stretch of the internal vehicular access road (orientated west-east and commencing at the proposed vehicular access at Park Road) is designed with regard to the east-west urban street previously envisaged by the (now expired) Kenure Rush Local Area Plan (2009). The design of this road typology will allow for potential future connections to existing residential estates to the east and Park Road to the west. This road typology provides for footpaths, cycleways and grass verges on each side of the carriageway. The secondary stretch of the internal vehicular access road (orientated south-north and commencing at Block C) has been designed as a shared surface/home-zone area.

While no vehicular access route is proposed from the north, pedestrian and cyclist permeability is provided to Palmer Road from the shared surface/home-zone area via a shared pedestrian and cycle track traversing the public open space in the north of the development.

Other

The proposed development also includes for associated site and infrastructural works including the provision of water services, foul and surface water drainage and associated connections, SuDS (Sustainable Drainage Systems) features and all site enabling and development works, landscaping works, plant, PV panels, storage, boundary treatments, ESB substations, lighting, servicing, signage, and all site development works above and below ground. The proposed development will be serviced by Uisce Éireann, ESB, EIR, GNI and VM utilities, all of which are readily all available. Public lighting to pavements adjacent to and within the development will be designed and installed to the standards of the Public Lighting Section of Fingal County Council's Operations Department.

Fingal Development Plan 2023 – 2029 Considerations:

Zoning Objective

Under the Fingal Development Plan 2023-2029, the site is designated for the 'RA' – 'Residential Area' land-use zoning objective. 'RA' zoned lands have an objective to: *'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure'*.

The vision for 'RA' zoned lands is to: *'Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.'*

Green Infrastructure Maps

The site is located in a 'Highly Sensitive' 'Coastal' character type area.

Policies and Objectives

The Development Plan identifies Rush as a 'Self-Sustaining Town'. The following 'Self-Sustaining Town' objectives of the Development Plan are considered relevant to the proposed development:

- **Objective CSO52 – Safe and Convenient Road, Pedestrian and Cycle Systems:** *'Ensure all Self-Sustaining towns benefit from safe and convenient road, pedestrian and cycle systems which promote permeability, accessibility, and connectivity between existing and new developments.'*
- **Objective CSO58 – Rush as a Vibrant Town:** *'Facilitate the development of Rush as a vibrant town and retain its market gardening tradition.'*
- **Objective CSO62 – Maintenance of Distinct Physical Separation – Lusk, Rush and Malahide:** *'Ensure that existing and future development within the settlements of Lusk, Rush and Malahide is consolidated within well-defined town boundaries to maintain their distinct physical separation.'*

Given the nature of the proposed development, the following objectives of the Development Plan are also considered relevant:

- **Objective CSO17 – Mixture of House Types:** *'Promote high quality residential development which meets the needs of all stages of the life cycle through an appropriate mix of house type and local amenities.'*
- **Objective CSO18 – Infill Spaces on FCC Owned Lands (Residential):** *'Where feasible, that infill spaces on residential zoned lands in the ownership of Fingal County Council, are used to build social houses to increase our housing stock.'*
- **Objective SPQH01 – Sustainable Communities:** *'Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 (and any superseding document) and companion Urban Design Manual – A Best Practice Guide, DEHLG 2009 and the Design Manual for Urban Roads and Streets (DMURS) (as revised).'*
- **Objective SPQH06 – Universal Design Approach:** *'Promote and facilitate a Universal Design for all developments.'*
- **Objective SPQH09 – Consolidated Residential Development:** *'Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.'*

- **Objective SPQHO10 – New Residential Development:** *‘Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centres where infrastructural capacity is readily available, and along existing or proposed high quality public transport corridors and active travel infrastructure in a phased manner, alongside the delivery of appropriate physical and social infrastructure. Active travel options should also be considered while liaising with the National Transport Authority and Transport Infrastructure Ireland to ensure public transport options to and from new developments to local amenities such as shops and libraries.’*
- **Objective SPQHO11 – Housing Need:** *‘Ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including marginalised groups within our communities, including but not limited to, Traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types, typologies and tenures provided in appropriate locations and in a manner appropriate to specific needs.’*
- **Objective SPQHO12 – Fingal Settlement Strategy:** *‘Ensure that all proposals for residential development accord with the Fingal Settlement Strategy and are consistent with Fingal’s identified hierarchy of settlement centres.’*
- **Objective SPQHO22 – Accessible Housing:** *‘Fingal County Council recognises the importance of social inclusion and aims to make 30% of social housing should be fully accessible and built with a universal design approach which will mean that the property will be flexible and changed as needed over the course of the occupants lifetime.’*
- **Objective SPQHO31 – Variety of Housing Types:** *‘Encourage the creation of attractive, mixed use and sustainable residential communities which contain a wide variety of housing and apartment types, sizes, tenures and typologies in accordance with the Fingal Housing Strategy, the HNDAs with supporting community facilities, amenities and services.’*
- **Objective SPQHO33 – New Residential Development and Energy Efficiency:** *‘Ensure new residential development incorporates energy efficiency measures and promotes innovative renewable energy opportunities, for example by passive solar design, natural ventilation, and vegetation (green roofs etc) on buildings and makes most effective and sustainable use of water, aggregates and other resources.’*
- **Objective SPQHO34 – Integration of Residential Development:** *‘Encourage higher residential densities where appropriate ensuring proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area with a target minimum amount of 15% (except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply) amount of green space, tree coverage and public space associated with every residential area.’*
- **Objective SPQHO35 – Private Open Space:** *‘Require that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 14 Development Management Standards.’*
- **Objective SPQHO36 – Public open Space:** *‘Public open space provision in new residential developments must comply with the quantitative and qualitative standards set out in Chapter 14 Development Management Standards.’*

- **Objective SPQHO38 – Residential Development at Sustainable Densities:** *‘Promote residential development at sustainable densities throughout Fingal in accordance with the Core Strategy, particularly on vacant and/or under-utilised sites having regard to the need to ensure high standards of urban design, architectural quality and integration with the character of the surrounding area.’*
- **Objective IUO16 – OPW Flood Risk Management Guidelines:** *‘Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments to be considered for all new developments within the County. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.’*
- **Objective DMSO3 – Local Authority Development:** *‘Ensure Local Authority development proposals are subject to environmental assessment, as appropriate, including Screening for Appropriate Assessment and Environmental Impact Assessment.’*
- **Objective DMSO4 – Key Principles to consider in the achievement of Healthy Placemaking:** *‘The design and layout of a development, the public realm and supporting infrastructure should incorporate Universal Design insofar as is feasible.*
 - *Development should be well-designed and attractive to all users including children, people with disabilities, the elderly as well as accommodating cyclists and pedestrians.*
 - *The relationship between the proposed scheme and its site context, including between proposed buildings and the adjoining streets, existing site features, pedestrian and cycle paths, as well as levels of active and passive surveillance should be carefully considered.*
 - *There must be meaningful interaction between individual units within the scheme and the public realm.*
 - *Creation of areas of distinction where communities can foster a sense of identity, irrespective of scale.*
 - *Importance of the public realm as an area for passive and active use where the community can congregate.*
 - *High quality finishing materials to proposed buildings and to the public realms, including seating, lighting, landscaping, tree planting, and green infrastructure.*
 - *Consideration of shelter, sunlight/daylight and shadowing.*
 - *The provision of safe environments for all users where the principles of DMURS are utilised and active travel modes such as walking and cycling are favoured over car use.’*
- **Objective DMSO5 – Design Statement:** *‘All medium to large scale planning applications (in excess of 5 residential units or 300 sq m of retail/ commercial/office development in urban areas) or as otherwise required by the Planning Authority shall be accompanied by a Design Statement to address the contextual and design issues which have been taken into consideration as part of the scheme. A Design Statement shall:*
 - *Explain the design principles and design concept of the scheme.*
 - *Demonstrate how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have been considered when designing schemes in urban*

areas. Each of the twelve criteria is of equal importance and must be considered in an integrated manner.

- Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Framework Plan or other similar Plan affecting the site.
- Include photographs of the site and its surroundings.
- Include other illustrations such as photomontages, perspectives, sketches.
- Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.
- Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.
- Outline how Green Infrastructure integrates into the scheme.
- Demonstrate how the proposed scheme contributes in a positive manner to the public realm and to the local context.
- Provide detail in relation to all intended finishing materials to be applied throughout the scheme, including an overall materials palette demonstrating suitability for the scheme, its context and the streetscape.'
- **Objective DMSO19 – New Residential Development:** 'Require that applications for residential developments comply with all design and floor area requirements set out in:
 - Quality Housing for Sustainable Communities – Best Practice Guidelines 2007,
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the companion Urban Design Manual – A Best Practice Guide, DEHLG 2009,
 - Sustainable Urban Housing: Design Standards for New Apartments 2020.'
- **Objective DMSO20 – Schedule of Accommodation:** 'All planning applications for residential development shall be accompanied by a Schedule of Accommodation to demonstrate compliance with housing and apartment standards.'
- **Objective DMSO21 – Floor Plans for Residential Development:** 'Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.'
- **Objective DMSO24 – Apartment Development:** 'All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application).'
- **Objective DMSO26 – Separation Distance between Side Walls of Units:** 'Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units. (Note: This separation distance may be reduced on a case-by-case basis in relation to infill and brownfield development which provides for the regeneration of under-utilised lands and subject to the overall quality of the design and the schemes contribution to the streetscape. A statement demonstrating design mitigation and maintenance arrangements shall be submitted in such cases).'
- **Objective DMSO27 – Minimum Private Open Space Provision:** 'Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:

- 3 bedroom houses or less to have a minimum of 60 sq. m. of private open space located behind the front building line of the house.
- Houses with 4 or more bedrooms to have a minimum of 75 sq. m. of private open space located behind the front building line of the house.

Narrow strips of open space to the side of houses shall not be included in the private open space calculations.'

- **Objective DMSO52 – Public Open Space Provision:** *'Public open space shall be provided in accordance with Table 14.12.'*
- **Objective DMSO56 – Proximity of New Residential Schemes to Parks:** *'Ensure every home within a new residential scheme is located within 150 metres walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park.'*
- **Objective DMSO63 – Location of Open Space:** *'Ensure open spaces are not located to the side or the rear of housing units.'*
- **Objective DMSO64 – Design of Open Space:** *'Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.'*
- **Objective DMSO71 – Overshadowing of Private Open Space:** *'Ensure private open spaces for all residential unit types are not unduly overshadowed.'*
- **Objective DMSO72 – Boundary Treatment to Private Open Space:** *'Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.'*
- **Objective DMSO73 – Balconies, Roof Terraces or Winter Gardens:** *'Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 14.14.'*
- **Objective DMSO74 – Screening of Private Open Space:** *'Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.'*
- **Objective DMSO75 – Communal Amenity Space:** *'Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 14.14.'*
- **Objective DMSO109 – Bicycle Parking:** *'Ensure that all new development provides high quality, secure and innovative bicycle parking provision in accordance with the bicycle parking standards set out in Table 14.17 and the associated design criteria for bicycle parking provision set out in this Plan, where feasible, practical and appropriate, having regard to local, national and international best practice.'*
- **Objective DMSO125 – Management of Trees and Hedgerows:** *'Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.'*
- **Objective DMSO126 – Protection of Trees and Hedgerows during Development:** *'Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with BS5837 2012 Trees in relation to the Design, Demolition and Construction – Recommendations or as may be updated and are monitored by the appointed arboriculture consultant.'*
- **Objective DMSO127 – Use of Native Species in New Developments:** *'Require the use of native species where appropriate in new developments in consultation with the Council.'*

- **Objective DMSO239 – Refuse Storage Areas:** *‘Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened or other such mitigation measures are provided.’*
- **Objective DMSO240 – Distance to Communal Bin Areas:** *‘Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.’*
- **Objective DMSO241 – Construction and Demolition Waste Management Plan:** *‘Require that Construction and Demolition Waste Management Plans be submitted as part of any planning application for projects in excess of any of the following thresholds:*
 - *New residential development of 10 units or more.*
 - *New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250 sqm.*
 - *Demolition / renovation / refurbishment projects generating in excess of 100m³ in volume of C&D waste.*
 - *Civil engineering projects in excess of 500m³ of waste materials used for development of works on the site.’*
- **Objective DMSO261 – Climate Action Energy Statements:** *‘All new developments involving 15 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.’*

Planning History:

Reg. Ref. F00A/0003

On 26th October 2000, the Planning Authority granted permission to Camilus Archer for a compost store and associated works on site at Palmer Road, Rush, Co. Dublin. This application site partially overlaps with the north-east section of the proposed development site.

Enforcement History

No active enforcement cases, or enforcement history has been identified for the application site.

Departmental Reports

Water Services Department: Report Received 8th November 2024. No objections to the proposed development subject to further amendment to surface water drainage proposals.

Parks and Green Infrastructure Division: Report Received 6th November 2024. No objections to the proposed development subject to further agreements.

Transportation Planning Section: Report Received 5th November 2024. No objections to the proposed development.

Heritage Officer / Archaeologist: Report Received 30th October 2024. No objections to the proposed development.

Assessment:

The proposed development has been considered with regard to the following issues:

- Drawings and documents prepared;
- Principle of the development;
- Proposed density;
- Standard of proposed residential accommodation;
- Impact on visual and residential amenity;
- Transportation and access considerations;
- Parks and green infrastructure;
- Water services and drainage;
- Archaeological considerations;
- Appropriate Assessment screening;
- Ecological Impact Assessment report;
- Environmental Impact Assessment screening.

Drawings and documents prepared

Article 83(1) of the Planning and Development Regulations 2001 (as amended) details the drawings and particulars required to be made available for Part 8/Part XI projects. These include for:

- a location map drawn to a scale of not less than 1:1000 in built up areas and 1:2500 in all other areas (which shall be identified thereon) and marked or coloured so as to identify clearly the land on which it is proposed to carry out the proposed development;
- a site layout plan, drawn to a scale of not less than 1:500, showing the boundary of the site on which it is proposed to carry out the proposed development and the buildings or other structures, and roads or other features, in the vicinity of the site, and;
- such other plans and drawings, drawn to a scale of not less than 1:100, as are necessary to describe the proposed development,

It is noted the site location map and existing site plans (Drawing No.'s 23196-FCC-ZZ-ZZ-DR-A-04000 / 04001 / 04002 / 04003) indicate there are works proposed on Park Road for '*pedestrian crossing, mains water, & drainage connections*' and on Palmer Road for '*drainage connections*' which are located outside of the site boundaries. It is recommended that the red line boundary of the application site be extended to include for these works and/or the matter clarified.

It is noted the existing and proposed site plans (Drawing No.'s 23196-FCC-ZZ-ZZ-DR-A-04001 / 04002 / 04003) do not illustrate dimensioned distances to buildings, structures, roads or other features in the vicinity of the site. The proposed site plans also do not indicate the proposed house types or identify / label the duplex apartment blocks. It is recommended existing and proposed site plans provide for dimensioned distances to buildings, structures, roads or other features in the vicinity of the site; and that the

proposed site plans indicate the proposed house types or identify / label the duplex apartment blocks.

It is noted that Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04004 'Proposed Phasing Plan' and Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04005 'Site – Diagrams' are provided at a scale of 1:1000. As per Article 83(1) of the Regulations, it is recommended these layout drawings be provided at a scale of not less than 1:500.

It is noted several of the plan and elevation drawings for Duplex Block B and Duplex Block C (Drawing No.'s FCC-ZZ-ZZ-DR-A-04504 / 04505 / 04506 & 04507) include for typographical errors which label them as different blocks. It is recommended these typographical errors be corrected and/or the matter clarified.

It is noted the 'Utility Survey' report and drawing and the 'Topographical Survey' drawings prepared by Murphy Geospatial are incorrectly titled. The report / drawings titles should be revised to refer to the correct project name.

Principle of development

The application site is zoned 'RA' – 'Residential Area' under the Fingal Development Plan 2023-2029. Residential development is listed as a 'Permitted in Principle' use on 'RA' zoned lands and, as such, the proposed development is acceptable in principle, subject to further assessment and compliance with Development Plan policy.

Proposed density

The gross site area is approx. 1.09 hectares; however, the net developable site area is approx. 0.9054 hectares. The net developable site area has been calculated having excluded major road/streets within the proposed development site boundaries; and only included those areas that will be developed for housing and directly associated uses, i.e. Palmer Road, Park Road and the proposed east-west urban street have been discounted from the site area. This is as per the guidance of Appendix B '*Measuring Residential Density*' of the '*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*' (2024) (hereafter 'Compact Settlement Guidelines'). The proposed development therefore has a net density of approx. 35 dwellings per hectare (dph) based on the development of 32 no. dwellings on a net developable site area of 0.9054 hectares.

Table 3.5 of the Compact Settlement Guidelines refers to '*Areas and Density Ranges Key Towns and Large Towns (5,000+ population)*'. Rush is considered to fall within the definition of a Key/Large Town given its 2022 Census population. Table 3.5 states, *inter alia*, the following: '*Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).*'

The proposed development has a net density of approx. 35 dph, based on the net developable site area of approx. 0.9054 hectares and the proposal for 32 no. dwellings. This is in accordance with the Compact Settlement Guidelines.

Standard of proposed residential accommodation

Gross Floor Areas and Room Areas

The proposed development consists of 32 no. dwellings comprised of 20 no. duplex apartment units and 12 no. two-storey, terraced houses. The proposed residential mix is summarised in Table 1 below:

Beds/Persons	One/Two Person	Two Bed/Three Person	Two Bed/Four Person	Three Bed/Five Person	Total
Unit Typology	-	-	-	-	-
House	0	0	0	12	12
Apartment	7	7	3	0	17
Duplex Apartment Unit	0	0	0	3	3
Total	7	7	3	15	32

Table 1: Proposed Residential Mix.

The proposed duplex apartment units are located in 4 no. duplex apartment blocks (Blocks A, B, C & D). Block A is a two-storey building while Blocks B, C & D are two-storey buildings with three-storey corner elements. The proposed houses are located along the western boundary of the site and bookended by Blocks B & C. The proposed houses are comprised 10 no. mid-terrace houses and 2 no. end-terrace houses.

Objective DMSO19 of the Development Plan requires all applications for new residential development comply with the design and floor area requirements set out in the 'Quality Housing for Sustainable Communities – Best Practice Guidelines' (2007) (Hereafter 'Quality Housing Guidelines'); the 'Sustainable Urban Housing: Design Standards for New Apartments' (2023) (Hereafter 'Apartment Guidelines') and the Compact Settlement Guidelines, as applicable.

It is noted the aggregate living area of proposed House Type A fails to meet the minimum standard of the Quality Housing Guidelines. This matter should be addressed, and the house type revised to meet the required minimum standard. Save for the foregoing, the floor plan drawings for proposed House Type A and the proposed duplex apartment units in Blocks A, B, C & D demonstrate compliance with the requirements of the Quality Housing Guidelines and the Apartment Guidelines, as applicable.

Private Open Space

Private open space for each house is provided in the form of a rear garden. The private open space requirements for new houses are set out in the Compact Settlement Guidelines. SPPR 2 of the Compact Settlement Guidelines states the minimum private open space requirement for a three-bed house is 40 sq.m. While the architectural design

statement states all proposed rear gardens are over 40 sq.m in size, it is noted neither the proposed site layout plan nor the proposed House Type A drawing indicate the length or area (sq.m) of the proposed rear gardens. In the interests of clarity, it is recommended one or both of these drawings should be revised to indicate same and demonstrate compliance with SPPR 2 of the Compact Settlement Guidelines. Objective DMSO27 of the Development Plan states private open space shall be located behind the front building line of a house. The proposed development complies with this objective.

Private open space for each duplex apartment unit is provided in the form of a private ground floor terrace and/or first floor balcony. The private open space requirements for new apartments are set out in Appendix 1 of the Apartment Guidelines. It is noted the proposed plan for Block B (Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04503) does not indicate the area (sq.m) of the private terraces for two of the ground floor units. It is recommended this drawing be revised to provide for same and demonstrate compliance with the Apartment Guidelines. Save for the foregoing, the proposed development complies with the required standards of the Apartment Guidelines.

Separation Distances

DMSO26 of the Development Plan seeks to *'Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units'*. It is recommended the proposed site plan be revised to provide for dimensions of distances between the end of terrace units and the side walls to demonstrate compliance with this objective.

SPPR 1 of the Compact Settlement Guidelines has further regard to separation distances within new residential developments. SPPR 1 clarifies there shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units. SPPR 1 further details that statutory development plans shall not include an objective for minimum separation distances exceeding 16m between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level and that, when considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. SPPR 1 further clarifies separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

The proposed development provides for ample separation distances, in excess of the standards required by the Compact Settlement Guidelines, between proposed / existing dwellings and buildings; and between windows to habitable rooms above the ground floor level.

Public Open Space

The proposed development provides for an approx. total of 1,390 sq.m. Class 2 public open space, delivered in two parcels as follows:

- Approx. 700 sq.m. situated in the south-east of the development, adjacent to Block D, and;
- Approx. 690 sq.m situated in the north of the development, adjacent to Block A.

The public open space provision equates to approx. 15.3% of net developable site area.

The public open space provision complies with Table 14.12 'Recommended Quantitative Standards (*Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities 2009*)' and Objective DMSO52 of the Development Plan.

Communal Amenity Space

In addition to the private and public open space provisions, residents of each of the 4 no. duplex apartment blocks are provided with shared communal amenity space areas. The total provision of shared communal amenity space within the proposed development is approx. 479 sq.m which can be broken down as follows:

- Block A – 62 sq.m;
- Block B – 45 sq.m;
- Block C – 53 sq.m;
- Block D – 319 sq.m.

Based on the proposed dwelling mix in each individual duplex apartment block and the requirements of the Apartment Guidelines, each individual duplex apartment block is provided with a communal amenity space in accordance with the Appendix 1 of the Apartment Guidelines.

Other Considerations

The proposed development complies with SPPR 1 and SPPR 2 of the Apartment Guidelines as less than 50% of the units proposed are one bed or studio units.

The proposed development complies with SPPR 3 and SPPR 4 of the Apartment Guidelines by virtue of the gross floor areas proposed and the number of dual aspect units proposed, as detailed in the housing quality assessment and on the relevant floor plan drawings.

The proposed development complies with SPPR 5 of the Apartment Guidelines by virtue of the ground floor heights within the duplex apartment blocks, as detailed on the relevant block plan elevational drawings.

The proposed development complies with SPPR 6 of the Apartment Guidelines as less than 12 no. units per floor per core are proposed.

SPPR 7 of the Apartment Guidelines does not apply as the proposed development is not a shared accommodation/co-living development.

In accordance with Section 6.12 of the Apartment Guidelines a building lifecycle report has been prepared for the proposed development.

Impact on visual and residential amenity

The site is located in an area zoned 'RA' – 'Residential Area' with lands to the north, east and south also zoned 'RA' or 'RS' – 'Residential'. Given the proposed setback at both Park Road and Palmer Road and the predominantly two storey nature of the proposed development, with three storey elements facing inwards to the site, it is not considered the proposed development will have any undue negative impacts on the visual or residential amenity of the area that would not be expected through the appropriate development of 'RA' zoned lands.

Transportation and access considerations

A report on the proposed development has been prepared by the Transportation Planning Section of Fingal County Council.

Car Parking Provision

Regarding car parking proposals, the Transport Section state the proposed development provides for car parking in accordance with the Fingal Development Plan 2023-2029 standards. The site is located within 'Zone 2' in accordance with Table 14.18 'Car Parking Zones' of the Development Plan. The proposed development consists of 32 no. units comprised of 17 no. one or two bedroom units and 15 no. three bed units. In accordance with Table 14.19 'Car Parking Standards' of the Development Plan the proposed development provides for 54 no. car parking spaces. A breakdown of the car parking requirements is provided in the Transport Section's report. The Transport Section have also assessed the site is located within an area described as 'Peripheral' in accordance with Table 3.8 'Accessibility' of the Compact Settlement Guidelines. Residential developments in such areas are permitted a maximum of 2 no. car parking spaces per unit in accordance with SPPR 3 of the Compact Settlement Guidelines i.e. a max. 64 no. car parking spaces for the proposed 32 no. dwellings. In consideration of all the foregoing, the Transport Section state the proposed car parking quantum is in accordance with the standards of both the Fingal Development Plan 2023-2029 and the Compact Settlement Guidelines.

Bicycle Parking Provision

Regarding bicycle parking proposals, the Transport Section state the proposed development is in accordance with the Fingal Development Plan 2023-2029 standards. The Transport Section note the terraced houses are proposed to have brick-faced bicycle stores located in the front gardens for ease of access. They also note ground floor apartments are proposed to be provided with internal stores for bicycle parking, which can be accessed directly off the ground level terrace; while upper level apartment and duplex apartment units are proposed to be provided with a designated secure ground level bicycle store in close proximity. Sheffield stands are proposed short-stay bicycle

parking spaces for visitors. In the interests of clarity, it is recommended a bicycle parking diagram, indicating the quantum of bicycles located within each store is prepared as part of the application documentation. The Transport Section state the bicycle parking proposals meet the requirements of the Compact Settlement Guidelines.

Other Parking Provisions

The Transport Section note 10 no. of the proposed dwellings are of a Universal Design and, consequently, 10 no. of the proposed 54 no. car parking spaces are accessible car parking spaces.

The Transport Section also note Section 14.17.10 'Electric Vehicle Parking' of the Development Plan requires the following:

- All multi-unit residential developments shall incorporate EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces.
- Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for accessible spaces should also be included in the development where these exist.
- All other parking spaces, including in residential developments, should be constructed to be capable of accommodating future charging points as required.

Based on the above, the Transport Section state the proposed development requires a minimum of 11 no. EV charging spaces given the overall proposal for 54 no. car parking spaces. The proposed development provides for 12 no. EV charging spaces, of which 4 no. are accessible car parking spaces.

Finally, the Transport Section note Section 14.17.9 'Motorcycle Parking' of the Development Plan requires 1 no. motorcycle parking bay be provided per 10 no. car parking spaces for apartment developments. The Transport Section note 27 no. of the proposed 54 no. car parking spaces are associated with the duplex apartment units and, consequently, 3 no. motorcycle parking bays are proposed within the development. A breakdown of the motorcycle parking requirements is provided in the Transport Section's report.

Access and Sightlines

The Transport Section acknowledge the proposal for a vehicular entrance to the development from Park Road and state the phasing proposal for the development demonstrates how the access road may be aligned to potentially link with the existing east-west road at Mariners Avenue (to the east of the subject site). The Transport Section note that under the (now expired) Rush Kenure Local Area Plan (LAP) the road from Mariners Avenue was originally envisaged to continue through the subject site and join Park Road to the west of the subject site. While the Rush Kenure LAP has expired, the Transport Section are satisfied the proposed development does not preclude the extension of the existing road at Mariners Avenue as originally envisaged should this be required in the future. The Transport Section also note access to 5 no. car parking spaces

is proposed off Palmer Road to the north and that the proposed development facilitates potential future widening and upgrade of Palmer Road.

Regarding sightlines, the Transport Section state for a 50km/hr speed limit, the sightlines required are 45m visibility (49m bus route) to the nearside edge of the road both sides of the entrance, viewed from a 2.4m setback from the edge of the road; as per the requirements of the Design Manual for Urban Roads and Streets (DMURS). This visibility requirement is from a driver eye height of 1.05m to an object height of 0.6m.

The Transport Section note the submitted site layout plan prepared by Kavanagh Mansfield & Partners illustrates sightlines for the proposed access off Park Road. The sightline demonstrated right of exit (north) measures 49m to the nearside road edge from a 2.4m setback at the centre of the proposed entrance. The sightline left on exit (south) measures 49m to the centre of the road from the same point at the proposed entrance. The drawing notes an overtaking constraint is to be applied to north bound Park Road traffic. The Transport Section conclude the submission demonstrates sightlines in accordance with DMURS are achievable; however, they consider it unclear if the submission proposes a solid white centreline on the road and request clarification on this matter. Should a solid white centreline on the road be proposed the Transport Section recommend the application redline boundary should be extended to include this proposal.

Road Safety Audit

The Transport Section state any proposed development which results in a permanent change to the road layout, or an intensification of an existing road, should be accompanied by a Road Safety Audit. The Transport Section note a Stage 1 Road Safety Audit has been provided with issues raised addressed.

Connectivity and Permeability

The Transport Section note connectivity is provided for pedestrians through the development connecting them from Park Road to Palmer Road. The proposed shared surface is 4.8m in width and provides access to the majority of the dwellings, while a 6m wide east-west road with cycleways and footpaths is proposed off Park Road. The Transport Section consider this consistent with the east-west road at Mariners Avenue and ensures the potential future connections. The Transport Section recommend the east-west road, footpaths and cycleways should be extended to abut the eastern site boundary and that connectivity links of the east-west network shall be facilitated at the eastern boundary if and when deemed appropriate by Fingal County Council.

Parks and green infrastructure

A report on the proposed development has been prepared by the Parks and Green Infrastructure Division of Fingal County Council. The Parks Division have stated they have no objections to the proposed development subject to a number of amendments and conditions.

The Parks Division have recommended a detailed landscape plan, including SUDs proposals, be submitted and agreed with the Parks Division and Water Services Department prior to the commencement of works on site. It has been requested the landscape plan include the following:

- Contours and services and SuDS features (including headwalls etc);
- Cross sections of SuDS features to be provided taking into consideration safe access for large scale maintenance vehicles and users of the public open space;
- No services to be located within a minimum of 2.5 metres of tree planting in open space areas;
- Proposed signage to be on the hardstanding surface;
- Proposed benches shall be anchored on a hard standing surface;
- Constructed tree pits will be required where trees are planted in hard surfaces and grass verges less than 1.2 metres wide (note kerb should not be included in this measurement);
- Good passive supervision to be provided for proposed play areas;'
- The location of each constructed tree pit of a minimum rooting volume of 16 cubic metres to be clearly shown on the landscape plan;
- Landscape management and maintenance details taking into full consideration the use of large scale maintenance machinery.

The Parks Division have also recommended revised public lighting and street tree planting proposals be agreed with the Public Lighting Section and the Division prior to the commencement of works on site. It has been requested these proposals include the following:

- A minimum separation distance of 7 metres to be maintained between public lighting and proposed tree planting in accordance with Fingal County Council's Tree Strategy – Forest of Fingal – A Tree Strategy for Fingal.
- Ensure proposed lamp standards are on a hard standing as opposed to be positioned in grass / planted area.

Additionally, the Parks Division have recommended the arboricultural recommendations as provided in the Arboricultural Report and Tree Protection Plan be complied with in full. It has been requested a meeting be held between the consultant arborist and the Parks Division to agree on the final details of the tree protection measures to be implemented prior to the commencement of works on site.

It is also noted the Design Rationale - Landscape Architecture document prepared by DFLA does not accurately reflect the proposed public open space areas or communal amenity space areas in terms of its description (Sections 3.3.1 and 3.3.2). The descriptions within the document should be revised and updated accordingly.

Water services and drainage

A report on the proposed development has been received from the Water Services Planning Section.

Regarding the foul drainage proposals, Water Services acknowledge the Confirmation of Feasibility received from Uisce Éireann and note connections to the existing network are feasible subject to upgrades via the extension of the network along Palmer Road. Water Services note the design prepared by Kavanagh Mansfield & Partners includes this aspect and state the cost of these works must be borne by the developer, i.e. Fingal County Council. It is also stated the developer must enter into a Connection Agreement with Uisce Éireann. Water Services conclude by stating the design proposal appears acceptable although they noted that Uisce Éireann is the statutory service provider and should be consulted individually.

Regarding the surface water drainage proposals, Water Services state the proposed Aquacell™ system does not align with Fingal County Council's policy in respect of Taking-in-Charge requirements and it has been recommended the proposed development is amended to utilise a StormTech™ system. This recommended amendment of Water Services would necessitate a review and update of the Appropriate Assessment Screening of the proposed development prepared by CAAS Ltd. Save for the foregoing, Water Services state they have no objection to the proposed development subject to no surface water / rainwater is to discharge into the foul water system under any circumstances and the surface water drainage must be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works, Version 6.0, FCC, April 2006.

Regarding the water supply proposals, Water Services again note the Confirmation of Feasibility received from Uisce Éireann and state the development must enter into a Connection Agreement with Uisce Éireann. Water Services conclude by stating the design proposal appears acceptable although they noted that Uisce Éireann is the statutory service provider and should be consulted individually.

Archaeological considerations

An archaeological report (under NMS Licence No. 24E0330) has been prepared for the proposed development on behalf of Fingal County Council by Maeve McCormick of Archer Heritage Planning (dated 02 April 2024).

A report on the proposed development has been prepared by the Heritage Officer / Archaeologist of Fingal County Council. The report of the Heritage Officer / Archaeologist acknowledges the archaeological report and notes a total of 452 linear metres were subject to test-excavation and that no features, deposits or finds were identified. Given the results of the desktop assessment and test-excavation, which concluded that the potential impact of the proposed development on potential buried archaeological sites and features is low, the Heritage Officer / Archaeologist has no objections to the proposed development on archaeological grounds.

Appropriate Assessment screening

An Appropriate Assessment (AA) screening report screening report has been prepared for the proposed development on behalf of Fingal County Council by CAAS Ltd. The screening report's conclusion states:

This Appropriate Assessment Screening Report has considered potential effects which may arise during the construction and operational phases of the proposed residential scheme at Park Road, Rush, County Dublin. Through an assessment of the potential sources and potential pathways for significant effects; an evaluation of the project characteristics; taking account of the processes involved and the distance of separation from European sites, it has been evaluated by this report, which intends to inform the competent authority on the Appropriate Assessment process, that there is no likelihood of significant effects occurring to the Qualifying Interests, Special Conservation Interests, in view of their Conservation Objectives, of any designated European site as a result of the implementation of the proposed development.

Given its small scale, temporary (i.e., under one year) of the construction period, the operational phase being in keeping with the context of the local environment setting, and the nature and context of the other plans and projects identified in this report; the proposed development is not foreseen to have any likelihood for significant in-combination effects arising from any other plans or projects.

It is concluded by this AA Screening Report that the proposed development is not foreseen to have any likelihood of significant effects on any European sites, alone or in combination with other plans or projects – and therefore any likelihood for significant effects on any European site as a result of the proposed development can be ruled out. This conclusion is made in view of the Conservation Objectives of the habitats or species for which these sites have been designated. Consequently, this report informs the competent authority undertaking the Appropriate Assessment process that the proposed development does not need to be subject to Stage Two Appropriate Assessment and a Natura Impact Statement is not required.'

The screening report has been sent to Fingal County Council's Ecologist, Jessica Clarke, ('the Council') for review. The Council has concluded they are in agreement with the conclusion of the AA screening report with respect to the potential for the proposed project to have a likely significant effect on any the Qualifying Interests of any European sites, in light of their Conservation Objectives.

The Council have determined that, in light of best scientific knowledge, including in particular the nature of the predicted impacts that may arise from the project, and in the absence of any measures intended to avoid or reduce any harmful effects on European sites, that the project is not likely to have a significant effect on the Qualifying Interests of any European sites in light of their Conservation Objectives, either alone or in combination with other plans or projects.

In reaching this determination, consideration has been given to the small scale of the works, the distance and lack of direct hydrological links to any Designated Sites, the use of existing surface water and foul water network for the offsite disposal of water and foul and considering the evidence provided within the AA Screening Statement, as well as available bird studies referenced herein, to demonstrate the site or nearby sites are not utilised by SCI that may be significantly affected by the proposal.

It is noted the screening report was prepared, and above determination of the Council reached, prior to the recommendation of the Water Services Department to omit the Aquacell™ system and utilise a StormTech™ system with regard to the surface water

drainage proposals for the development. In consideration of same, it is recommended the screening report be reviewed and updated as necessary to take this amendment into due consideration.

Ecological Impact Assessment report

An Ecological Impact Assessment (EclA) screening report has been prepared for the proposed development on behalf of Fingal County Council by CAAS Ltd. The report conclusion states the following:

'The proposed development does not have any likelihood for significant effects to any European or Natural Heritage Sites as a result of its implementation, alone or in combination with any other plans or projects. The proposed development complies with the policies and objectives of the Fingal County Development Plan (Appendix IV).

The proposed development is located in a site that has low (higher value) for dry calcareous and neutral grassland (GS1) mosaic, scrub (WS1), stone walls and other stonework (BL3) and reptiles and local (lower value) for bat and bird populations and treelines. There will be partial loss of scrub and treeline habitat, however this management will likely improve the quality of these habitats. There will be loss of foraging habitat for bats and birds. With the application of tailored mitigation measures, as described in s5, and the implementation of the landscape plan for the proposed project, there will be no residual effects for bat and bird populations.

There will be a permanent loss of dry calcareous and neutral grassland (GS1) mosaic habitat that contains a good diversity of grass and Juncus species. This habitat does not have potential to support the Annex 132 dry calcareous grassland Festuco-Brometalia (6210) habitat, or similar Annexed grassland habitat³³. However, due to the diversity of species, there will be a residual effect for flora within the proposed development site as a result of the permanent loss of this mosaic habitat type for the local area that will be of low, local scale significance.

There will also be permanent loss of part of the potential habitat stone wall for Zootoca viviparae (common lizard). However, with appropriate management and mitigation measures, the proposed development will result in a local positive impact for the retained section of this stone wall, alongside the retention of the scrub habitat adjacent to it. Therefore, overall, there will be a residual effect of low, local scale significance for Z. viviparae.'

The EclA report findings and conclusion were taken into consideration by Fingal County Council's Ecologist, Jessica Clarke, ('the Council') in their review of the AA screening report.

Environmental Impact Assessment screening

An Environmental Impact Assessment (EIA) screening report has been prepared for the proposed development on behalf of Fingal County Council by CAAS Ltd. The screening report's conclusion states:

'It is considered that the proposed residential development scheme at Park Road, Kenure, Rush does not need to be subject to Environmental Impact Assessment and no Environmental Impact Assessment report is required for it.

This conclusion is based on an objective review of the characteristics of the proposed development against the requirements of the relevant legislation and has had due regard to the relevant guidance.'

The screening report has been sent to Fingal County Council's Ecologist, Jessica Clarke, ('the Council') for determination. The Council have concluded that, having regard to the criteria in Schedule 7 and the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001 (as amended), it is considered that the proposed housing development would not be likely to have significant negative effects on the environment. It is considered that the proposed housing development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact report is not therefore required.

Conclusion:

The proposed development would be in accordance with the land-use zoning objective attached to the application site under the Fingal Development Plan 2023-2029; the policies and objectives of the Fingal Development Plan 2023-2029 as they relate to residential development; and the requirements of the set out in the '*Quality Housing for Sustainable Communities – Best Practice Guidelines*' (2007), the '*Sustainable Urban Housing: Design Standards for New Apartments*' (2023) and the '*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*' (2024), as applicable. The proposed development is generally considered to accord with the proper planning and sustainable development of the area.

Recommendations:

There are a number of technical additions/changes to the documentation that should be made before the scheme goes on display as follows:

1. The following amendments should be made to drawings/documentation:
 - (a) The site location map and existing site plans (Drawing No.'s 23196-FCC-ZZ-ZZ-DR-A-04000 / 04001 / 04002 / 04003) indicate there are proposed works on Park Road for '*pedestrian crossing, mains water, & drainage connections*' and on Palmer Road for '*drainage connections*' which are located outside of the site boundaries. It is recommended the red line boundaries of the application site be extended to include for these works.
 - (b) Existing and proposed site plans should be revised to provide for dimensioned distances to buildings, structures, roads or other features in the vicinity of the site. Proposed site plans should be revised to indicate the proposed house types or identify / label the duplex apartment blocks.

- (c) Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04004 'Proposed Phasing Plan' and Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04005 'Site – Diagrams' should be provided at a scale of not less than 1:500.
 - (d) Drawing No.'s FCC-ZZ-ZZ-DR-A-04504 / 04505 / 04506 & 04507 relate to Duplex Block B and Duplex C; however, they include for typographical errors which refer to other proposed blocks. These drawings should be revised to correct typographical errors.
 - (e) The aggregate living area of proposed House Type A fails to meet the minimum standards of the '*Quality Housing for Sustainable Communities – Best Practice Guidelines*' (2007). The proposed house type should be revised to demonstrate compliance with the required minimum standard.
 - (f) The proposed site layout and/or proposed House Type A drawing should be revised to indicate the length and area (sq.m) of the proposed rear gardens and thus, demonstrate compliance with SPPR 2 of the Compact Settlement Guidelines.
 - (g) The proposed plan for Block B (Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04503) does not indicate the area (sq.m) of the private terraces for two of the ground floor units. The drawing should be revised to include for same and demonstrate compliance with the standards of the Apartment Guidelines.
 - (h) The 'Utility Survey' report and drawing and the 'Topographical Survey' drawings prepared by Murphy Geospatial are incorrectly titled. The report / drawings titles should be revised to refer to the correct project name.
 - (i) It is also noted the Design Rationale - Landscape Architecture document prepared by DFLA does not accurately reflect the proposed public open space areas or communal amenity space areas in terms of its description (Sections 3.3.1 and 3.3.2). The descriptions within the document should be revised and updated accordingly.
 - (j) It is recommended a bicycle parking diagram be prepared to clearly indicate the bicycle parking capacity of each proposed store.
2. The following recommendations of the Transportation Planning Section should be considered as part of the proposed development:
- (a) With reference to the required sightlines, it is unclear if a solid white centreline is proposed on Park Road. This matter should be clarified and, if a solid white centreline on Park Road is proposed, the redline boundaries of the application site should be extended to include this proposal.
 - (b) The east-west road, footpaths and cycleways should be extended to abut the eastern site boundary to facilitate a potential future connection to adjoining lands.
3. The following recommendations of the Parks and Green Infrastructure Division should be considered as part of the proposed development:
- (a) A detailed landscape plan, including for all elements detailed in the Parks and Green Infrastructure Report of 6th November 2024, should be agreed with the Parks Division and Water Services Department.

- (b) Revised public lighting and street tree planting proposals should be agreed with the Public Lighting Section and the Parks and Green Infrastructure Division.
 - (c) Final details of the tree protection measures to be implemented should be agreed between consultant arborist and the Parks and Green Infrastructure Division.
4. The following recommendations of the Water Services Department should be considered as part of the proposed development:
- (a) The Aquacell™ system proposed to be used for the surface water drainage of the development does not align with Fingal County Council's policy in respect of Taking-in-Charge requirements. It is recommended the proposed development is amended to utilise a StormTech™ system in accordance with the preference of the Water Services Department. It is also recommended the Appropriate Assessment Screening Report prepared by CAAS Ltd. be reviewed and updated as necessary to take this amendment into due consideration.

Date: 13th November 2024.

FINGAL COUNTY COUNCIL

PLANNING & STRATEGIC INFRASTRUCTURE DEPARTMENT PRELIMINARY PLANNING REPORT

Register Reference:	Part XI/007/24.
Proposed Development:	32 no. residential dwellings & associated site works at Park Road, Kenure, Rush, Co. Dublin.
Location:	Park Road, Kenure, Rush, Co. Dublin.
Proposing Department:	Architects Department.
Application Type:	Part XI.

Report Addendum:

In the intervening time between the issue of the report recommendations and the issue of final design proposal, the recommended technical additions/changes to the documentation have been addressed as follows:

1. The following amendments should be made to drawings/documentation:
 - (a) The site location map and existing site plans (Drawing No.'s 23196-FCC-ZZ-ZZ-DR-A-04000 / 04001 / 04002 / 04003) indicate there are proposed works on Park Road for 'pedestrian crossing, mains water, & drainage connections' and on Palmer Road for 'drainage connections' which are located outside of the site boundaries. It is recommended the red line boundaries of the application site be extended to include for these works. [Noted. Red site boundary lines and notes updated.](#)
 - (b) Existing and proposed site plans should be revised to provide for dimensioned distances to buildings, structures, roads or other features in the vicinity of the site. Proposed site plans should be revised to indicate the proposed house types or identify / label the duplex apartment blocks. [Noted. Additional dimensions added to site plan drawings 04001, 04002, 04003.](#)
 - (c) Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04004 'Proposed Phasing Plan' and Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04005 'Site – Diagrams' should be provided at a scale of not less than 1:500. [Noted. Scale increased to 1:500 for phasing and site diagrams. Additional sheet '04006 – Site Parking Diagram' added due to increased scale.](#)
 - (d) Drawing No.'s FCC-ZZ-ZZ-DR-A-04504 / 04505 / 04506 & 04507 relate to Duplex Block B and Duplex C; however, they include for typographical errors which refer to other proposed blocks. These drawings should be revised to correct typographical errors. [Noted. Typographical errors addressed.](#)

- (e) The aggregate living area of proposed House Type A fails to meet the minimum standards of the 'Quality Housing for Sustainable Communities – Best Practice Guidelines' (2007). The proposed house type should be revised to demonstrate compliance with the required minimum standard. [Noted. Ground Floor layout reviewed aggregate living area increased and Housing Quality Assessment \(HQA\) revised.](#)
 - (f) The proposed site layout and/or proposed House Type A drawing should be revised to indicate the length and area (sq.m) of the proposed rear gardens and thus, demonstrate compliance with SPPR 2 of the Compact Settlement Guidelines. [Noted. Additional dimensions and area added to proposed site plan 04003 and to 04500 House Type A layout respectively.](#)
 - (g) The proposed plan for Block B (Drawing No. 23196-FCC-ZZ-ZZ-DR-A-04503) does not indicate the area (sq.m) of the private terraces for two of the ground floor units. The drawing should be revised to include for same and demonstrate compliance with the standards of the Apartment Guidelines. [Noted. Areas added to layout.](#)
 - (h) The 'Utility Survey' report and drawing and the 'Topographical Survey' drawings prepared by Murphy Geospatial are incorrectly titled. The report / drawings titles should be revised to refer to the correct project name. [Noted. Project named updated.](#)
 - (i) It is also noted the Design Rationale - Landscape Architecture document prepared by DFLA does not accurately reflect the proposed public open space areas or communal amenity space areas in terms of its description (Sections 3.3.1 and 3.3.2). The descriptions within the document should be revised and updated accordingly. [Noted. Design Rationale document updated by DFLA.](#)
 - (j) It is recommended a bicycle parking diagram be prepared to clearly indicate the bicycle parking capacity of each proposed store. [Noted. Additional sheet '04006 – Site Parking Diagram' with capacity of each store added.](#)
2. The following recommendations of the Transportation Planning Section should be considered as part of the proposed development:
- (a) With reference to the required sightlines, it is unclear if a solid white centreline is proposed on Park Road. This matter should be clarified and, if a solid white centreline on Park Road is proposed, the redline boundaries of the application site should be extended to include this proposal. [Noted. Red site boundary line adjusted to encompass revised road marking on approach to toucan crossing point. The Civil & Structural engineer has reviewed the sightlines and an overtaking constraint no longer applies, refer to revised Road Site Layout Plan CL 2407 C01J.](#)
 - (b) The east-west road, footpaths and cycleways should be extended to abut the eastern site boundary to facilitate a potential future connection to adjoining lands. [Noted. Refer to revised Phasing Diagram 04004. This illustrates the future connection of the east-west street to the site adjacent the east boundary. This will be included in construction package.](#)

3. The following recommendations of the Parks and Green Infrastructure Division should be considered as part of the proposed development:
 - (a) A detailed landscape plan, including for all elements detailed in the Parks and Green Infrastructure Report of 6th November 2024, should be agreed with the Parks Division and Water Services Department. [Noted. This will be agreed with the Parks Division and Water Services Department prior to construction.](#)
 - (b) Revised public lighting and street tree planting proposals should be agreed with the Public Lighting Section and the Parks and Green Infrastructure Division. [Noted. This will be agreed with the Public Lighting Section and the Parks and Green Infrastructure Division prior to construction.](#)
 - (c) Final details of the tree protection measures to be implemented should be agreed between consultant arborist and the Parks and Green Infrastructure Division. [Noted. This will be agreed between consultant arborist and the Parks and Green Infrastructure Division prior to construction.](#)
4. The following recommendations of the Water Services Department should be considered as part of the proposed development:
 - (a) The Aquacell™ system proposed to be used for the surface water drainage of the development does not align with Fingal County Council's policy in respect of Taking-in-Charge requirements. It is recommended the proposed development is amended to utilise a StormTech™ system in accordance with the preference of the Water Services Department. It is also recommended the Appropriate Assessment Screening Report prepared by CAAS Ltd. be reviewed and updated as necessary to take this amendment into due consideration. [Noted. The Aquacell system has been changed to Stormtech as requested. Please refer to revised Civil & Structural package for further information.](#)

In assessing these amendments, it is considered no issues arise regarding environmental considerations. The Planning and Strategic Infrastructure Department are satisfied the recommendations of this report have been satisfactorily addressed.

Date: 20th November 2024.

The undersigned agree that this Project has completed all of the requirements of the internal consultation process and the Proposing Department can proceed to place the Project on public display and commence the Public Consultation process.



Carmel Brennan
Project Leader
Senior Architect

21st November 2024

Date



Paul Carroll
Interim Director of Services
Proposing Department

21st November 2024

Date



Colm McCoy
Senior Planner
Planning & Strategic Infrastructure Department

21st November 2024

Date