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Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 10 units on undeveloped lands on Saint Aongus' Green, Dublin 24.

Process under PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED) PUBLIC CONSULTATION PROCEDURE UNDER PART 8 OF THE LOCAL GOVERNMENT (PLANNING & DEVELOPMENT) REGULATIONS 2001 (AS AMENDED).

RECOMMENDATION PROCESS STAGE.

Recommendation to Council to Approve Development following display and consultation, and incorporating responses to observations and consultation





	COUNTY ARCHITECTS REPORT – Part 8 – display / consultation
Project Title:	Proposed Development on a site located on Saint Aongus' Green, Dublin 24.
County Architect: Senior Architect: Architects:	Eddie Conroy FRIAI Patrick de Roe FRIAI Architectural Services Department, South Dublin County Council
Brief explanation of Part 8 Process carried out under Part 8 of the Planning and Development Regulations 2001 (as amended)	Part 8 (Public Consultation Schemes) Developments by a local authority are subject to a public consultation process as set out in the Planning & Development Regulations, 2001 (as amended). This procedure requires that notice of the proposed development be given in the public press and that a site notice be erected. If any submissions or observations are received, a report is presented to the members of the Council. This report contains a list of the objector's names along with a summary of the points made by them and the Local Authority's response. Arising from consideration of the representations, the report sets out whether or not it is proposed to proceed as originally planned or to proceed with a modified proposal. Development by a Local Authority: 'Part 8' From time to time the Local Authority: 'Part 8' From time to time the Local Authority may carry out development within its administrative area, such as the construction of houses, roads, swimming pools, public toilets etc. Development carried out by a Local Authority is often referred to as a 'Part 8': - this is reference to Part 8 of the Planning and Development Regulations 2001 (as amended) which sets out the procedure for carrying out such developments. Public consultation is an intrinsic part of the 'Part 8' process. This is achieved by public notices, public display of the proposal, observations by members of the public, reportage on observations received and a recommendation that considers all internal and public observations. The consultation may extend to advisory consultation meetings with local community and interest groups dependant on the particular circumstances and impact of the proposal, though such meetings are not proscribed under the legislation. The primary purpose of the process is to notify the public of the proposal and incorporate any observations validly submitted into a report to inform the Council on its decision to recommend the proposal.

should be referred to in this regard to ascertain the final date of receipt for observations.

Part 8 of the Planning and Development Regulations 2001 (as amended) refers to requirements in respect of specified development by, on behalf of, or in partnership with Local Authorities. Part 8 applications are generally lodged by the proposing department within the Council. Article 80 of the Planning and Development Regulations 2001 (as amended) sets out a list of the types of development prescribed for the purposes of the act.

The process is as follows:

Public Notices of the proposed development must be placed in an approved newspaper. A site notice (or notices) must be erected on the land on which the proposed development is situated – Article 81(1)(a)(b) of the Planning and Development Regulations 2001 (as amended) provides guidance on the requirements.

The application, which must be submitted on the same date as the newspaper notice, must include a copy of the newspaper notice and site notice and drawings for public display of the proposal accessible to the public during normal office hours – via the Planning Portal. Drawings can be made available to the public on request.

There is no fee payable on a Part 8 application.

The application is referred to internal works Departments in the Council – (Roads, Water, and Drainage).

In the case of protected structures the application is referred to the Conservation Section, An Taisce, DHPLG and the Heritage Council.

The timeframe for third party Observations/Submissions on the Part 8 application is six weeks from the date of lodgement. This date is specified in the public notices. (There are 5 weeks allowed for a normal planning application.) There is no fee for observations/submissions on a Part 8.

At the end of the period for observations/submissions, the proposing Department completes a report on the public display for the attention of the Executive Manager of the Planning Department. The Executive Manager will make a recommendation to the proposing department on foot of this report.

A report will then be compiled for a meeting of the Council. Following consideration of this report by the Council, the proposed development may be recommended, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the report, or decides not to proceed with the development' – as per Section 179(4)(b) of the Planning and Development Act 2000 (as amended).

The making of a decision on a Part 8 application is a reserved function of Council, while for a normal planning application this is an executive function.

The above is a summary of the Part 8 requirement for consultation. It is intended for guidance only. The Planning Acts set out the requirements in full.

Public Notice:

South Dublin County Council - Proposed Development

Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 12 units on undeveloped lands on Saint Aongus' Green, Dublin 24.

Planning and Development Act, 2000 (as Amended) Public Consultation Procedure under Part 8 of the Local Government Planning and Development Regulations 2001 (as Amended).

Pursuant to the requirements of the above, notice is hereby given of the proposal to construct the following scheme by South Dublin County Council:

Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 12 units on undeveloped lands on Saint Aongus' Green, Dublin 24.

The proposed development shall consist of:

- 6 No. 1 Bedroom 1 storey houses (2 persons)
- 2 No. 2 Bedroom 1 storey houses (3 persons)
- 2 No. 1 Bedroom Ground Floor Apartments (2 person)
- 2 No. 1 Bedroom First Floor Apartments (2 person)

The works include: Landscaping works to boundaries and all necessary associated ancillary works on the site and to adjacent areas including community room. The housing provision comprises of one storey terraced units and two storey terraced end units grouped in 3 blocks around a central courtyard.

The proposed Scheme has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and a preliminary examination for Environmental Impact Assessment. The Planning Authority has concluded that there will be no real likelihood of significant effects on the environment arising from the proposed development and therefore an Environmental Impact Assessment is not required.

Any person may, within 4 weeks from the date of this notice, apply to An Bord Pleanála for a screening determination as to whether the proposed development would be likely to have significant effects on the environment.

Due to Covid-19 restrictions, plans and particulars of the proposed scheme will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy for a period of four weeks from Thursday 27th May 2021 only by appointment at the offices of South Dublin County

Council, County Hall, Tallaght, Dublin 24, and available online on the Consultation Portal.

Submissions:

Submissions or observations in relation to the proposed development, dealing with the proper planning and sustainable development of the area in which the development would be situated, may be made as follows:

Online at https://consult.sdublincoco.ie up to 11.59pm on Friday 9th July 2021

Or

Written submissions not later than 4.30pm, on Friday 9th July 2021

Please address your submission to:

Senior Executive Officer, Housing Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.

NOTE: Please make your submission by one medium only.

Only submissions received by **Friday 9**th **July 2021** and addressed as set out above, will be considered.

Submissions cannot be accepted in any other format or to any other postal address. Submissions and observations should state the name, address, and, where relevant, details of any organisation, community group or company etc. which you represent.

It should be noted that the Freedom of Information Act applies to all records held by South Dublin County Council.

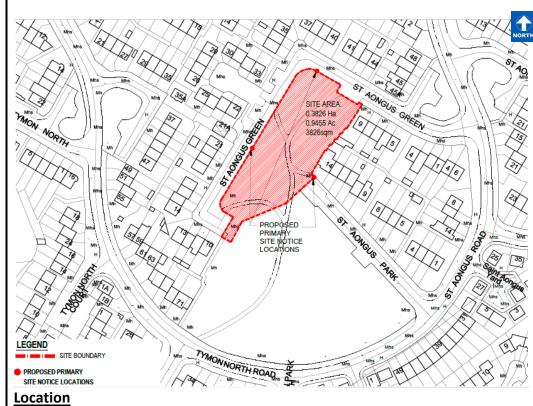
South Dublin County Council's Personal Data Privacy Statements can be viewed at www.sdcc.ie and all personal data will be retained in line with statutory requirements.

Date site notice erected: 27/05/2021

Context:

The proposed site is located in the townlands of North Tymon, South Dublin County. The proposed development is situated at the undeveloped lands between Saint Aongus' Green and Saint Aongus Park. The described development comprises an area of 0.382ha.

The site is surrounded by St. Aongus Green & St. Aongus Park residential developments to the East and Green open space to the South – whilst the St. Aongus Green road forms the Northern and Western Boundary. The site is well served by public transport and local facilities. The site is relatively free of onsite services, and it is undeveloped.





Aerial view of area (Google)



Aerial view of area (Google Maps)



View from North East of St. Aongus Green towards open space (Google)



View from St. Aongus Park towards open space (Google)



View from North West Corner of Saint Aongus' Green, Dublin 24 (Google)

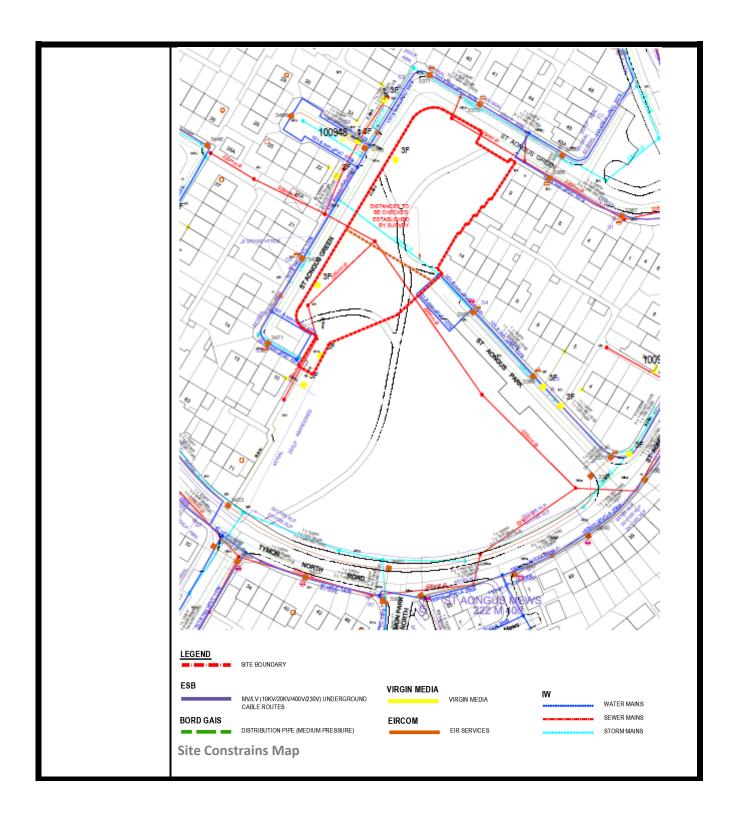
Housing Need in the area:

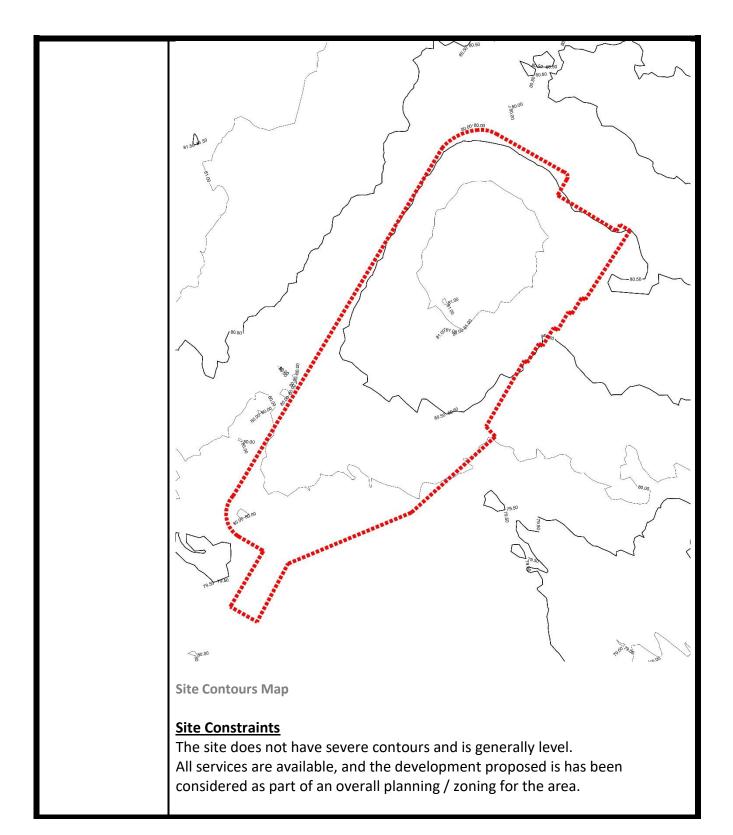
There is an identified need for suitable age-friendly housing in the county. It is desirable that the age friendly housing is developed in the established communities, to give security and protection of the overall community. This site has many of these qualities, that are recognised for age friendly housing.

Site Location:

Site Location and Extent – Local facilities, shops, post office, schools, health centre are within 10-15 minutes' walk.

The proposal for housing as part of an established neighbourhood with community facilities. The proposal for housing is supported by readily available access to extensive parkland (Tymon Park, Bancroft Park etc.) as well as shopping, healthcare, leisure and sport facilities, and transport links in townland area.





Planning / Zoning for the site



Zoning Map for Area



Objective OS

To preserve and provide for open space and recreational amenities

Land Use Zoning

Under the "South Dublin County Council Development Plan 2016 – 2022", the lands are zoned – Zoning Objective 'Open Space' (OS) with an objective 'To preserve and provide for open space and recreational amenities.'

Table 11.15: Zoning Objective 'OS': 'To preserve and provide for open space and recreational amenities'

USE CLASSES RELATED TO ZONING OBJECTIVE	
Permitted in Principle	Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club/Facility.
Open for Consideration	Agriculture, Bed & Breakfasta, Camp Site, Carparkh, Cemeterye, Childcare Facilities, Crematorium, Education, Garden Centre, Guest Housea, Home Based Economic Activitiesa, Hotel/Hostel, Housing for Older People, Outdoor Entertainment Park, Place of Worshipa, Public Services, Recycling Facility, Fesidential, Restaurant/Café, Shop-Local, Stadium, Traveller Accommodation.
Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome/ Airfield, Betting Office, Boarding Kennels, Caravan Park-Residential, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, Doctor/Dentist, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Health Centre, Heavy Vehicle Park, Hospital, Industry-Extractive, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m -1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Petrol Station, Primary Health Care Centre, Public House, Refuse Landfill/Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop Neighbourhood, Social Club, Transport Depot, Veterinary Surgery, Warehousing, Wholesale Outlet, Wind Farm.

- a In existing premises
- h For small-scale amenity or recreational purposes only
- e If provided in the form of a lawn cemetery

The land use zoning table for OS indicates that the proposed residential land use is 'open for consideration' and therefore may be acceptable subject to detailed assessment.

Planning Policy Context

The national, regional and development plan policies are the following:

National and Regional Policy

Project Ireland 2040 National Planning Framework, Government of Ireland, 2018.

Quality Housing for Sustainable Communities-Best Practice Guidelines, Department of the Environment, Heritage and Local Government, 2007.

Sustainable Residential Development In Urban Areas - Guidelines for Planning Authorities, Department of Environment, Heritage and Local Government (December 2008).

Urban Design Manual; A Best Practice Guide, A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage and Local Government, (2008).

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2015).

Design Manual for Urban Roads and Streets Department of the Environment, Community and Local Government and **Department of Transport**, **Tourism and Sport (2013)**.

Regional Planning Guidelines for the Greater Dublin Area 2010-2022, Dublin Regional Authority & Mid-East Regional Authority, (2010).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Building Research Establishment, (1991).

Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009).

National Cycle Manual – National Transport Authority (June 2011).

Relevant Policy in South Dublin County Council Development Plan 2016 - 2022

CORE STRATEGY (CS) Policy 2 Metropolitan Consolidation Towns

It is the policy of the Council to support the sustainable long-term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.

CS2 Objective 5:

To promote and support high quality infill development in existing built-up areas.

Policy H2 Supply of Housing

It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.

H2 Objective 1:

To ensure that sufficient zoned land, which could be serviced by sufficient public transport and road capacity, continues to be available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing lands based on the Settlement Strategy outlined in Chapter 1 Introduction and Core Strategy.

Policy H3 Housing for Older People

It is the policy of the Council to support the provision of accommodation for older people in established residential and mixed use areas that offer a choice and mix of accommodation types to older people (independent and semi-independent living) within their communities and at locations that are proximate to services and amenities.

H3 Objective 1:

To support housing that is designed for older people (including independent, semi-independent or nursing home accommodation) in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.

H3 Objective 3:

To support community led housing developments for older people in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities), where the quality and quantum of remaining public open space is deemed to be adequate and the amenities of the area are preserved.

H3 Objective 4:

To carry out, during the lifetime of this Plan, a comprehensive study of options for housing for older people in those parts of the County with the highest proportions of older people, and to make specific recommendations for housing provision in these areas.

Policy H6 Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

Policy H7 Urban Design in Residential Developments

It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

Policy H10 Mix of Dwelling Types

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

Section 2.3.0 Quality of Residential Development

Policy H11 Residential Design and Layout

It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H12 Public Open Space

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

Policy H13 Private and Semi-Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

Policy H14 Internal Residential Accommodation

It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

Policy H15 Privacy and Security

It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.

Section 7.1.0 Water Supply & Wastewater

Policy IE1 Water & Wastewater

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County

Section 7.2.0 Surface Water & Groundwater

Policy IE2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

Section 7.3.0 Flood Risk Management

Policy IE3 Flood Risk

It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.

<u>Assessment</u>

The subject proposal provides for an infill scheme of 12 no. residential units and Communal Community Facility on lands, that currently form part of undeveloped open space area.

The proposal includes for associated landscaping and providing new Social Housing units for Independent Age Friendly Living for Older Persons around a secure central community courtyard, to provide passive surveillance, and all necessary associated ancillary works on the site and adjacent areas (i.e. new access from St. Aongus Green by a form of home zone area, landscaping works to boundaries, ancillary works to landscape housing areas).

The described development provides residential infill and strikes the balance between the reasonable protection of the existing amenities and character of adjoining dwellings in this established residential area, which character is defined by the low to medium density and low-rise architectural form.

Total Site Area - 0.3826ha [3826 m²]

Number of units – 12 [6no. of 1-bedroom single storey houses, 2no. of 2-bedroom single storey houses and 4 no 1-bedroom apartments]

Residential Density

Overall, having regard to the land use zoning, the residential policies of the county Development Plan and the pattern of development in the area, it is considered that the principle of a residential development is in accordance with the Development Plan and the proper planning and sustainable development of the area. In relation to the density, having regard to Appendix A: Measuring Residential Density of the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) the use of a net site density is considered the most appropriate means of estimating density. The proposal would consist of private open space, incidental open space and landscaping. For density purposes, the site area is circa 0.38ha. The development of 12 Units in the proposed development would give density just under 35 units per hectare as recommended in the Development Plan. Having regard to the existing pattern of development in the area, the open space nature of the lands and the surrounding context, it is considered that the provision of the subject density is an efficient use of land in this instance.

Open Space provided by means of Community Courtyard / shared community space and public open space to the South West.

The above provision meets requirements of SDCOCO Development Plan, section 11.3.1 (iii) Public Open Space "In all other zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space. This includes community led housing for older people in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities)".

The proposed development meets the requirements of the County Development Plan and the Departmental guidelines in respect of private amenity space, internal room sizes etc.

Project Description and Design

Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 12 units on undeveloped lands off Saint Aongus' Green, Dublin 24.

The scheme will consist of 2no two storey duplex units (housing 2 apartments each) and 2no 2-bedroom single storey houses and 6no 1-bedroom single storey houses type arranged in terraced blocks, grouped around secure community garden / shared area, and overlooking existing public open space. The design seeks to enforce a village model with the central courtyard, which adjoins the houses rear private patios, providing passive surveillance of the proposed scheme. The front entrance areas are facing the boundaries and are overlooking an existing open space (to the South), residential development to the East and public footpaths and roads (to the West and North).

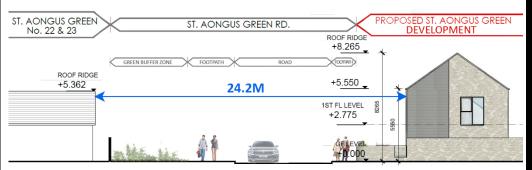
A consideration was given into design and layout of the site to ensure adequate distances from existing housing (refer to figures 3 & 4 in this section below).

The works include: new access from St Aongus Green by a form of home zone area, landscaping works to boundaries, ancillary works to landscape housing areas, and all necessary associated ancillary works on the site and adjacent areas, including Communal Community Facility.



LEGEND		
REF	HOUSE / APT TYPE	QUANTITY
S2	2 PERSON 1 BED HOUSE	6
P3	3 PERSON 2 BED HOUSE	2
M(2U)-2P-GF	2 PERSON 1 BED GROUND FLOOR APARTMENT	2
M(2U)-2P-FF	2 PERSON 1 BED FIRST FLOOR APARTMENT	2
	TOTAL NUMBER OF UNITS	12

2. Mix of Units



3. Street Diagram Section





4. 3d views of the site

Screening for Appropriate Assessment

The Screening for Appropriate Assessment report has been prepared by JBA Consulting on behalf of South Dublin County Council (the applicant), as part of a planning application for a residential development at Saint Aongus' Green, Dublin 24. The proposed development is a social-housing project that will provide independent living for older persons. The proposed development will involve the construction of 12 no. residential units in the format of three terraces facing a courtyard with ancillary community consultation building.

In accordance with their obligations under the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011), South Dublin County Council must assess whether the proposed development could have 'likely significant effects' on any Natura sites. This document provides supporting information to assist the local authority with an Appropriate Assessment screening exercise, including: a description of the proposed development, details of its environmental setting, a map and list of Natura 2000 sites within the potential zone of impact, and an assessment of potential impacts. It is concluded that the proposed development will not cause direct or indirect impacts on any Natura 2000 sites, and that Appropriate Assessment is not required.

Summary taken from AA Screening Report

Due to the location of the proposed site, the nature of the construction works associated underlying geology and its proximity to the Natura 2000 sites within the ZoI, impacts via surface water, groundwater (to surface water) and land & air pathways to the SACs or SPAs are not anticipated.

Conclusion of AA Screening Report: Concluding Statement

Following this initial screening of the proposed development at St Aongus Green, Dublin 24, it can be concluded that significant impacts are not anticipated via surface water, groundwater, or land/air pathways on the following Natura 2000 sites:

- Wicklow Mountains SAC [002122]
- Glenasmole Valley SAC [001209]
- South Dublin Bay SAC [000210]
- North Dublin Bay SAC [000206]
- South Dublin Bay and River Tolka Estuary SPA [004024]
- North Bull Island SPA [004006]

If any changes occur in the design of these works, a new Screening for Appropriate Assessment is required.

Screening for Environmental Impact Assessment

JBA Consulting Engineers and Scientists Ltd. has been commissioned by South Dublin County Council to prepare an EIAR Screening Report for a proposed infill age-friendly housing scheme at Saint Aongus Green, Dublin 24 (the 'proposed development'). The proposed development, which will be submitted under Part 8 of the Planning and Development Act (2000) as amended, consists of age-friendly single storey houses and 2 storey apartment units (12 dwellings total) and Community Consultation Facility.

Conclusions and Recommendations taken from EIA Screening Report:

The purpose of this report was to identify whether there is a need under The Planning and Development Act 2000, as amended, for an EIAR for the proposed housing development at St Aongus Green, Dublin 24.

The proposed development consists of age-friendly single storey houses and 2 storey apartment units (12 dwellings total) and Community Consultation Facility.

It was determined that the proposed development does not fall under Schedule 5 (Parts 1 and 2) of the Act. As such, an EIAR has not been automatically triggered. To determine whether the development may fall under the category of Sub-threshold development, with the potential to give rise to significant environmental effects, a screening exercise was undertaken.

During construction, typical impacts such as noise, dust, traffic disruption, and the generation of small amounts of waste are to be expected. These are typical construction phase impacts, and will be mitigated against by environmental operating plans devised by the on-site contractor, following best practice quidance.

There is the potential for encounters with groundwater during construction of the underground attenuation system. It is recommended that controls be put in place by the appointed contractor in case this occurs. These should include:

- the storage of fuel oils on site should be located in a compound as far from the excavated area as possible
 - no washout of concrete trucks or material should take place in the area.

An AA Screening Report completed by JBA for the proposed development determined that no likely significant impacts are expected as a result of the proposed development. This is due to the small size of the development and the distance and lack of pathways to Natura 2000 sites.

Once operational, the proposed development is expected to be low in environmental impact. There are similarly sized residential developments in the surrounding area, and the development includes open green spaces. It has been concluded that the proposed development does not fall under the category of sub-threshold development, and thus an EIAR is not required. The overall conclusion is based on the details of the scheme available at the time of preparation of this report. If the extent of the scheme or the construction methods for the scheme are changed then the EIAR Screening assessment should be reviewed.

Landscape / Site

The substantial part of the site is of existing grassed area. The South East corner section of the site has a boarder of trees and bushes. The existing landscape of the major part of the site is substandard.

Provision is made for supplementary planting to the new boundaries and for hard landscaping within the project, for both public and common space areas and private patios.

The internal community courtyard will be mixture of hard landscaping (permeable paving) and a low maintenance planting, with landscape features and fittings, seating and lighting.

At the design stage we will liaise with SDCC Public Realm Department re: landscape design and detailed aspects of landscape will be incorporated into building contract.

Ancillary Works to Project:	Re-routing of existing services Alteration / Upgrading of existing landscaping and open space.
Project Partners	Architects & Housing Construction Department Department of Housing, Planning and Local Government Environment Department
Site / Services Contraints :	All major existing services runs have been identified for the design. Local alterations to layout are likely when on site investigations establish precise underground service locations.
Internal Comments	Will be reported at final stage of Part 8.
Flood	Ensure floor levels are above 100 year projected floor events. No indication of flood risk from flood risk analysis.
Surface Water & Attenuation	Surface water - requires to be fully scoped. The services network is readily available adjacent to the site. The drainage system design will be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works. Overall study to be undertaken to determine most sustainable and appropriate attenuation on site.
Foul drainage	Foul drainage will be designed in compliance with the IW standards. Will be fully scoped to ensure capacity of existing network. An Irish Water preapplication will be submitted at the appropriate stage of the project development.
Roads Roads Access	Roads access and capacity are within acceptable and safe limits. Roads will be to taking in charge standards [TIC] and DMURS criteria. Parking provision of 17 No. spaces is considered adequate due to excellent public transport links on site.
Irish Water	Application for Foul and Water services to be completed. No known diversions.
Invasive Non- native Species (INNS)	No Invasive Non-native Species on the Third Schedule list of Non-native species (subject to restrictions under Regulations 49 and 50) were recorded on the site visit. Survey was carried out by JBA Consulting Engineers and Scientists Ltd on behalf of South Dublin County Council.
County Heritage Officer	The finished development will incorporate nesting sites where practicable. The EIA screening indicates that the walkover survey of the site by JBA ecologists found no evidence of the breeding places of species protected under the Wildlife Act. The nearest park with a known population of wintering Brent geese is the 120 ha Tymon Park. JBA Screening for Appropriate Assessment concluded that due to the semi-enclosed nature of Saint Aongus' Green, with trees, roads and paths, the proposed site is assessed as not offering important supporting habitat for any of the four bird species listed: Common Redshank <i>Tringa</i>

May 2021	Patrick de Roe FRIAI Senior Architect
Contract:	The project will be carried out under The Capital Works Management Framework (CWMF) Public Works Contract. Performance Bond will be retained to appropriate level as required under the contract.
	totanus, Black-headed Gull Choicephalus ridibundus, Brent Goose Branta bernicla, and Oystercatcher Haematopus ostralegus. There is also no habitat or water course within the site suitable for Otter.

	CONSULTATION and RECOMMENDATION STAGE
Summary of Consultation process	The project was reviewed in principle at the Local Area Committee 2020 with all councillors circulated with the proposal. The project, at consultation stage, was notified through newspaper and site notices with observations invited. A consultation meeting was held with representatives of the residents, and local councillors, and the project, as initially displayed for consultation, has been reviewed to examine those concerns. A summary of the observations is as follows: Public Realm/Loss of Green Space/Recreational Amenity /Impact on Services/ Loss of Secure Space for Children to Play Road/Traffic Matters/Parking/ Design/Density/Site Location Construction Period Concerns Security/Anti-Social Behaviour Site Investigations/Project Scoping Statutory Bodies Submissions Miscellaneous Issues The above is a summary only of the main observations. The full extent of observations submitted may be accessed in the full Housing report.
Submissions regarding Public Realm/Loss of Green Space/Recreatio nal Amenity /Impact on Services/ Loss of Secure Space for Children to Play	 Loss of Green Space/ open space /community amenity. Concern for health & safety of children by removing green space used as play field. Loss of view of Dublin Mountains Loss of Memorial to child on site. Loss of well-established trees / Removal of 10 trees contradictory to SDCC 'Urban Forest' initiative. Reduction of passive surveillance of the larger green space Supervision of walking route for school children will be impacted by development Development reduced the ability to exercise / walk in a safe space. Current green area is supportive of mental health and will impact resident's mental health if removed.

- Impact of local wildlife, birds & bats habitat.
- Concerns over uncomfortable and vast scale of remining large open space in comparison to the smaller green area to be built on.
- Reduces the ability to further provide a reliable service to the public.
- No other outside space for disabled tenant with extension in back garden.

Response:

While a proportion of the larger open space is being utilized for age-friendly housing the overall social value, passive surveillance security to existing properties, public access and facilities will be improved.

The immediate area and nearby environs are well-served by a number of well-maintained green spaces. The scheme offers a balance between the provision of badly-needed age-friendly housing with the potential to release a number of underused homes to growing families and the enhancement of the remaining part of the open space as a more intensive amenity space.

Building in areas of existing houses always presents issues with real or perceived reduction or effect on privacy. It is proposed to provide the part of the remaining open space at St. Aongus Green with usable activity areas to include for paved zone for outdoor community events (Home Zone - South of proposed development) paved walking paths with benches and green areas I as informal landscaped areas for children's play, and exercise. Provision has been made for new trees and other planting to the remining open space to support and enhance wildlife and an existing environment.

A more detail landscape proposal will be developed by Landscape Architect at the detail design stage of the project in consultation with SDCC Public Realm department following detailed arborist report.

The majority of the houses with existing mountain views will retain views from upper storey.

The existence of the memorial to child on site is known to the Council. Should the proposed development be approved, a liaison group will be established between the housing department, architects, local resident representatives and local area members to communicate matters relating to the construction project including boundary treatments between the green space and the new housing proposed and in relation to the movement of the memorial. Planting as appropriate will be incorporated into the scheme in accordance with the requirements of the Council's Public Realm Taking in Charge standard.

The development will increase the passive surveillance of the exposed boundaries of existing dwellings. The new dwellings orientated towards larger open space will provide passive surveillance to the North part of the green area.

An EIA Screening Report completed by JBA on behalf SDCC for the proposed development determined that no likely significant impacts are expected as a result of the proposed development. This is due to the small size of the development and the distance and lack of pathways to Natura 2000 sites.

Once operational, the proposed development is expected to be low in environmental impact. There are similarly sized residential developments in the surrounding area, and the development includes open green spaces and extensive additional planting.

The EIA screening indicates that the walkover survey of the site by JBA ecologists found no evidence of the breeding places of species protected under the Wildlife Act.

A Screening for Appropriate Assessment was carried out by JBA Consulting on behalf of SDCC, which advised regarding existing habitat as follows:

A desk survey of the baseline ecology at the site was performed and is further supported by an Invasive Non-native Species (INNS) survey. Most of the site falls under amenity grassland (GA2). A small treeline (WL2) runs along the street facing border. These habitats are not qualifying interests (QIs) of any Natura 2000 within the Zone of Influence (ZoI), and unlikely to support protected species of these Natura 2000 sites.

The habitats recorded on site are listed in Table below: A habitat map of the site is seen in Figure below.

Habitat	Fossitt Code
Amenity Grassland	GA2
Treelines	WL2



Figure 3-1: Habitat Map (ESRI Satellite, 2021)

Amenity Grassland (GA2):

The site mainly consists of managed grass used for amenity green space, predominantly Ryegrass Lolium spp (out of season for species identification), as well as Daisy Bellis perennis and Dandelion Taraxacum spp.



FIGURE 3-2: AMENITY GRASSLAND (GA2) MAKES UP MOST OF THE PROPOSED SITE.

Treelines (WL2):

A treeline of Field Maple Acer campestre runs along the roadside borer of the site. **None of the trees have bat roosting potential**.



FIGURE 3-3: TREELINES OF FIELD MAPLE ALONG THE PROPOSED SITES BORDER

No protected flora of fauna were recorded on the site visit. A desk study of the NBDC records (2021) indicates that within the 2km tile (012E) of the site that four qualifying interests (QIs) of the Dublin Bay SPAs were recorded within the last 10 years. These QIs were Common Redshank Tringa totanus, Black-headed Gull Choicephalus ridibundus, Brent Goose Branta bernicla, and Oystercatcher Haematopus ostralegus. Otter Lutra lutra was also recorded within 2km of the site in the last 10 years, Otter is a QI of the Wicklow Mountains SPA.

Brent Geese are known to frequent larger parks in Dublin to graze on grass during the latter half of the winter months. The nearest park with a known population of wintering geese is the 120 ha Tymon Park, the boundary of which is approx. 300m from the proposed site. The peak count of Brent Goose for Tymon Park was 600, in a study of use of inland feeding sites by Brent Geese (Benson, 2009).

Due to the semi-enclosed nature of Saint Aongus' Green, with trees, roads and paths, the proposed site is assessed as not offering important supporting habitat for any of the four bird species listed above. There is also no habitat or water course within the site suitable for Otter. With the exception of Brent Goose, these QIs were not considered further in the Screening for Appropriate Assessment.

Please note that mature dense planting and trees near St. Angus Park is proposed to be retained and enhanced with additional native planning to support existing flora and fauna.

As shown on the drawings, it is proposed to carve from large open space the smaller usable activities area adjacent to St. Aongus Green for recreation and play of all local residents. The space will benefit from introduction of physical elements, such new planting & paths, and subdivision into more human scale.

Submissions regarding Road/Traffic Matters/Parking

- Concerned about the additional traffic the development will bring to the area and concerns over safety.
- Current lack of parking spaces.
- Proposed parking spaces not sufficient, leading to road congestion.
- Concern for safety of children & elderly people using wheelchairs & walking frames with parking congestion and on street parking.
- Concerns over more demand for public services

Response:

The concerns and comments regarding traffic related matters on this proposed project are noted.

The Council's Roads Department were consulted and have advised that the development due to its limited size, will not impact in a significant way on traffic in the area and safe egress and access can be achieved.

The Council note that the site is well serviced with public transport links which can be accessed by tenants and visitors of the proposed housing development.

Traffic and parking requirements resulting from age-friendly housing are significantly lower than those required for a standard housing development. It is considered that St. Aongus Green will not be subject to any significant additional traffic as a result of this development.

The 17 No's of new parking spaces will be provided on the Northern East side of development (6 spaces in addition to 6 existing places), and along the end of the cull the sac road, adjacent to the open space area (11 spaces), all to cater for the local resident and visitors.

Parking is minimal for age-friendly type of development and car ownership/parking will not form part of the tenancy agreement as local transport options are readily available. Parking provision of 17 no's spaces is considered adequate due to excellent public transport links.

Roads and public footpaths will be to taking in charge standards [TIC] and DMURS criteria, and fully compliant with Part M of TDG.

Transport Infrastructure Ireland (TII) is one of the prescribed bodies who received the proposed Part 8 scheme details but did not make the submission.

Submissions regarding Design /Density /Site Location

- Proposed alternative site locations within the larger green area / Possible alternative location on south side of green / request to reconsider location of the development within the area.
- Development will detract from the visual and residential amenity of the existing street.
- Visual barrier between existing homes and remaining green.
- Proposal to reduce from two storey to one storey.

- Concern over scale and massing of the development that 2.5 story is being proposed.
- Concerns that the green space within development is for new residents only.
- Concerns that the proposed scheme is enclosed and cut off from existing homes.
- Proximity is very close to existing Older Persons Accommodation in the area.
- Request for additional information on the design process / explanation how designers arrived at their design decision.
- Lack of Design Statement Report with the application.
- Concern over low level of detail and clarity in information, design and layouts provided with Part 8 in comparison with standard planning application process.
- Recommendation for more soft landscaping in the form of planting and planters to front gardens of the development to screen and to soften streetscape.
- Minimum level of information on boundary treatment to the front gardens of development.
- Only schematic landscape shown on the site plan /lacking information relating to the landscape design /lack of Landscape Architect report.
- Public lighting not shown on the site plan
- Requests additional information on materials used in development.
- Concerns over the use of timber cladding on the development that will deteriorate over the time.
- Clarification over location of PV panels.
- Recommendation for an outdoor light fittings' choice be revisited.
- Lack of additional CGI views of Northern development.
- Clarification for footpath kerb detail.

Response:

The site for the proposed development is one of many sites considered suitable for the provision of age friendly specific housing and this development is carefully designed as part of an initiative of **age friendly** housing in the Council's current social housing building programme approved by the Department of Housing and Local Government. The proposal for this housing was selected as part of an established neighbourhood with community facilities. The site is well located in relation to local facilities and services with bus stop and shops.

This proposed development is design as a step-down accommodation for the older generation living in the area, that will enable them to stay within local environment and community.

Alternative locations for the development within this larger green area, as proposed in some of the submissions, cannot form part of this process.

If considered, such proposal shall be part of the whole new assessment, approval, and Part 8 Process.

A site analysis has been carried out to address the scale, siting and layout of new development taking account of the local context. Architectural integration with the surrounding built is provided through density, features such as roof forms, heights, fenestration patterns and materials & finishes

The modest size, massing and quantum of the development is keeping in with the character and scale of existing properties. Majority of the proposed dwellings are 1-storey in height, therefore they do not pose a visual barrier to the 2-storey existing properties. The proposed infill development complements the existing urban grain of the area, by continuing existing building line and the rhythm of existing housing and forming natural, visual ending of the streetscape (see figure below).

The street will benefit by the provision of new accessible pathways to allow ambulant and wheelchair users move freely.



FIGURE DEMONSTRATING THE URBAN GRAIN OF THE AREA

The only two 2-storey units within development are keeping in scale with the existing housing and are orientated towards the road and are facing blank gables of existing 1-storey properties and will be retained in the proposed development. They are also located sufficient distance from these existing properties on the other side of the road and from the adjacent property to the East to eliminate overlooking and overshadowing issues, while supervising the green space to the North.

There are no 2.5 storey buildings being proposed with this development, and the dwellings will be to standard domestic heigh and will have minimal required floor to ceiling heigh.

The proposal is a courtyard-type development designed to support independent living for older persons while encouraging communal interaction through shared space.

The design seeks to establish a "village" model with a 1 and 2 -storey terraced units grouped around a central courtyard. That space creates **shared rear garden** for the residents, with small private patios adjoining. This approach to the design offers secure, sheltered environment to residents while also providing passive surveillance to both the proposed scheme and the currently exposed boundaries of adjacent properties. The standard layout of houses with longer back-gardens, would use up much more of the open space than the efficient courtyard arrangement proposed. The courtyard type design with shared garden space allows residents to interact, connect with community and visitors, in a safe location. The courtyard plan and increased passive surveillance will reduce anti-social behaviour on this open space.

The layout proposed was carefully considered and developed in consultation with Age Friendly Ireland. This development is not intended to be a gated, enclosed and cut off development, the concept is that the shared area can be enjoyed with visitors of the residents. Local community interaction will be encouraged and maintained by the direct access / entrances to each of the dwellings from the street side. This proposed development is designed as a step-down accommodation for older persons living in the area to enable them to stay within their familiar environment and community.

The development location was selected based on demographical latest available data for population in the area. The new and existing age friendly housing (located opposite

of the road) will benefit from level of interaction between elderly residents, and share some of the services and amenities (consultation facility, caretakers visit etc.)

Due to small scale and type of the development, and provisions of Part 8 procedure the Design Statement Report is not required within this process. The primary purpose of the process is to notify the public of the proposal and incorporate any observations validly submitted into a report to inform the Council on its decision to recommend the proposal.

All displayed information and layouts of the proposed Part 8 development are in compliance with required standard level of detail, scale and requirement of the Part 8 Procedure.

Recommendation for more soft landscaping in the form of planting and planters to front gardens of the development to screen and to soften streetscape has been noted. A more detail landscape proposal and planting as appropriate will be developed by Landscape Architect at the detail design stage of the project in consultation with SDCC Public Realm Department, Housing Department and in accordance with the requirements of the Council's Public Realm Taking in Charge standard and DoHPLG Requirements for Detail Design of Quality Housing.

The boundary treatment to the front gardens of the proposed dwellings will be in line with urban character of the development and will the incorporate low-level brick or stone finish walls with intervals of low-level railings, and with some bulti-in in low-level planters integrated into design to provide an active interface with the street (see figure below for reference). The detail and elements will be developed at the detail design stage of the project.



FIGURE – 3D IMAGE SHOWING THE DESIGN INTEND OF THE FRONT GARDEN BOUNDARY TREATMENT

Public lighting and courtyard outdoor light fittings will be developed at the detail design stage of project in consultation with SDCC public Light Services Department and in compliance with Public Lighting Specification.

The proposed development is designed having regard for sustainable design and the development plan standards which meets the requirement of The Department of Housing, Planning and Local Government and South Dublin County Council. The buildings will be designed to Near Zero standards. External finishes will be chosen to be robust, durable, sustainable, good quality, easily maintained and vandal resistant.

Materials will be sympathetic to existing surrounding housing finishes. It is proposed to use good quality brick, with inserts of high strength, durable and robust cladding material (to the streetscape elevations, and high quality self-cleaning monocouche render system to the rear elevations. External glazing will be thermally broken and provide good levels of sound insulation. Timber-cladding is not proposed for the development as claimed.

The PV supplemented energy-coordinated energy design will be developed calculated at the detailed design stage. The positioning of the PV panels will utilize the of the best roof orientation and height, primarily facing south direction where possible.

The CGI provided with the displayed documentation are for illustrative purposed only and it is not expected to demonstrate the 3d views for all the angles / elevations. The displayed documentation included an aerial view and linear drawing of North elevation (see extracts below).



EXTRACT FROM AERIAL 3D VIEW OF NORTH SIDE OF DEVELOPMENT



EXTRACT - NORTH EAST ELEVATION

All footways and roads detailed design will be in compliance with the requirements of the Council's Public Realm Taking in Charge [TIC], Part M TGD, and DMURS criteria and developed in consultation with SDCC Road department. The dished kerb will be used only locally where is required to comply with the current standards and regulations.

Submissions regarding Construction Period Concerns

- Impact and length of construction period to the residents.
- Concerns over construction traffic and safety
- Concerns over construction noise and disruption
- Concerns over construction working hours extending beyond restricted time.
- Concerns over impact actual works of the development will have on residents

Response:

During construction, typical impacts such as noise, dust, traffic disruption, and the generation of small amounts of waste are to be expected. These are typical

construction phase impacts and will be mitigated against by environmental operating plans devised by the on-site contractor, following best practice guidance. A complete Construction Traffic Management Plan will form part of the contract should the development be approved. As with all sites being developed, the site will generate the construction traffic and some temporary congestion. The usual conditions will be moderated by rapid off-site construction and a shortenedon site construction period. The Contractor working hours will be restricted to permissible working time under the Development Plan (Section 11.6.3 ENVIRONMENTAL HAZARD MANAGEMENT (ii) Noice) and this condition will form part of their contract agreement should the development be approved. Any deviation from permissible working time will need to be approved by SDCC. **Submissions** Security / Anti-Social Behaviour concerns by new development and remaining green area. regarding Concerns that by reducing the passive surveillance of the green area, it will be Security /Antia less secure open space. Social Behaviour This proposed development is for older persons' over 55+ only and will only be Response: allocated in accordance with the Council's Policy for Rightsizing & Allocation of Age Friendly Accommodation. Tenancy will be targeted at older tenants who wish to continue to live nearby but in more appropriate size accommodation. Technology included in the units will be aimed to provide security and comfort, with recognition of the age profile – a greater need for monitoring / call assistance, perceivable security assurance, closeness to facilities/ transport and low running costs for energy The Housing Department will work closely with all tenants to ensure that they meet their responsibilities as a tenant of the Council and that they actively contribute and respect the environment that they live in. The passive surveillance of the remining green area will be improved by this development and planed enhancement landscape strategy (as prescribed above). The new development dwellings orientated to the South will overlook the space directly, providing a passive surveillance to public open space. **Submissions** Lack of evidence of choice and testing of alternative sites. Request for a Landscape and Visual Impact Assessment to be done. regarding No analysis of sunlight hours given or of potential for overshadowing Site presented. **Investigations** Lack of shadow and sunlight analysis for the development in the consultation /Project Scoping information. The site for the proposed development is one of many sites considered suitable for the Response: provision of age friendly specific housing and this development is carefully designed as part of an initiative of age friendly housing in the Council's current social housing building programme approved by the Department of Housing and Local Government.

The site selection is based upon a comprehensive study of options for age friendly housing in those parts of the County with the highest proportions of older people.

This proposed development is design as a step-down accommodation for the older generation living in the area, that will enable them to stay within local environment and community. The proposal for this housing was selected as part of an established neighbourhood with community facilities, within close distance to local amenities and public services.

Due to scale and type of proposed development Landscape and Visual Impact Assessment is not requirement under Part 8 procedure.

SDCC carried out internal 3d software shadow analyses and determined that no overshadowing by proposed development of existing properties to the West and North will result.

The careful consideration was given to the site layout and building orientation design (mainly East /West orientation), to ensure that all the dwellings will receive morning or afternoon sunlight during the day.

Submissions regarding Statutory Bodies Submissions

- **Geological Survey Ireland:** No specific comment or observations to make on this matter at this time.
- Department of Communications, Climate Action and Environment:
 Requiring consultation with the Regional Waste Management Planning Office regarding the proposed development of the final plans.
- Inland Fisheries Ireland: IFI recommend a revised surface water layout for the operation of the development which would incorporate soft engineering options such as swales or bio-retention areas rather than the hardunderground attenuation Stormtech system proposed.
- Irish Water: In respect of wastewater, there is a public 225mm waste water sewer running in a south easterly direction within the site boundary. A minimum setback distance of 3m must be maintained between the outer diameter of this sewer and proposed building boundary walls to ensure adequate access is achieved for maintenance and to ensure there is no additional loading imposed onto the sewer from adjacent buildings. In respect of water, there are public 101.6mm uPVC Watermains traversing the site in certain areas. A minimum setback distance of 3m must be maintained between the outer.

Response:

The statutory bodies submissions noted and their recommendation to be implemented as appropriate in the detail design stage of development.

Due to the small scale of the development the implementation of soft engineering options such as swales or bio-retention areas are limited.

SDCC shall consult with the Regional Waste Management Planning Office regarding the proposed development on ongoing basis, during detail design and construction stage of the project.

The Irish Water observation and recommendation in regard to distances of 225mm wastewater sewer and public 101.6mm uPVC Watermains services runs within the boundary of development has been noted. The recommended exclusion zone distances will be incorporated into detail design of development.

SDCC shall engage with Irish Water through the Pre-Connection Enquiry (PCE) process. If any proposals arise to divert existing water or wastewater services shall be submitted to Irish Water for assessment.

Miscellaneous Submissions	The financial impact of Development on the value of the properties along St Aongus Green.
Response:	The construction of new high-quality housing for older persons in this area and the potential to release existing under-used homes to growing families is a clear advantage to the area and its residential and community value.

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Part 8 Approval Recommendation	It is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and therefore it is recommended subject to the conditions attached, for approval at the September 2021 Council Meeting by the County Architect.
	Project Description – for APPROVAL BY COUNCIL
	Proposed Development of a Social Housing Project for Independent
	Living for Older Persons, consisting of 12 units on undeveloped
	lands on Saint Aongus' Green, Dublin 24.
	Planning and Development Act, 2000 (as Amended) Public Consultation Procedure under Part 8 of the Local Government Planning and Development Regulations 2001 (as Amended).
	Pursuant to the requirements of the above, notice is hereby given of the proposal to construct the following scheme by South Dublin County Council:
	Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 12 units on undeveloped lands on Saint Aongus' Green, Dublin 24.
	The proposed development shall consist of:
	 6 No. 1 Bedroom 1 storey houses (2 persons) 2 No. 2 Bedroom 1 storey houses (3 persons) 2 No. 1 Bedroom Ground Floor Apartments (2 person) 2 No. 1 Bedroom First Floor Apartments (2 person)
	The works include: Landscaping works to boundaries and all necessary associated ancillary works on the site and to adjacent areas including community room. The housing provision comprises of one storey terraced units and two storey terraced end units grouped in 3 blocks around a central courtyard. The proposed Scheme has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and a preliminary examination for Environmental Impact Assessment. The Planning Authority has concluded that there will be no real likelihood of significant effects on the environment arising from the proposed development and therefore an Environmental Impact Assessment is not required.
Part 8 – Approval -Conditions and modifications to	 Provision to be made in the tender for Health and Safety requirements to ensure safety measures are put in place for construction traffic and site management.

be incorporated in The general layout to be revised as required to meet DoHPLG requirements for compliance and funding. approved project. The retention of any existing planting following assessment by a qualified specialist and the incorporation of same into the landscape proposals as indicated on the plans and documentation. The incorporation of the recommendations as set out in the Screening / **Habitats Directive Assessment.** The general layout to be revised as required to affect the above conditions. Upgrading or alteration to units to meet any legislative enactment or requirement is deemed approved. Localised alterations as required to meet Housing department / allocation / medical conditions, or to address specific issues raised, are deemed approved. The proposals to include for all works required for Taking in Charge of the completed project, and compliance with the standards and conditions of Taking in Charge as issued and updated by August 2021 **Eddie Conroy FRIAI County Architect** Patrick de Roe FRIAI Senior Architect