

**COMHAIRLE CONTAE ÁTHA CLIATH THEAS  
SOUTH DUBLIN COUNTY COUNCIL**



Comhairle Contae South Dublin  
Átha Cliath Theas County Council

**MEETING OF SOUTH DUBLIN COUNTY COUNCIL**

**Monday 8<sup>th</sup> of June 2026**

**HEADED ITEM NO. (13)**

**Chief Executive's Report in relation to proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development of 29 homes and all associated open spaces and all site and development works necessary to facilitate the proposed development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16**



## 1.0 Introduction and Legislative Background

In accordance with the requirements of Part XI Planning and Development Act, 2000 (as amended) (the Act) and Part 8 of the Planning and Development Regulations, 2001 (as amended) (the Regulations), South Dublin County Council (SDCC) is seeking planning consent for a Proposed Social and Affordable Mixed Tenure Housing Development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16. The proposed development is comprised of 29 homes and all associated open spaces and all site and development works necessary to facilitate the proposed development and will include:

- i. Construction of 8 No. three-storey, three-bedroom houses in two terraced buildings.
- ii. Construction of 4 No. two-bedroom apartments in a two-storey building.
- iii. Construction of a two and three-storey apartment building which will comprise: 1 No. studio apartment, 8 No. one-bedroom apartments, 4 No. two-bedroom apartments and 4 No. three-bedroom apartments.
- iv. New boundary treatment to adjoining properties and roads. Associated upgrading of roadways and paths, provision of car and cycle parking spaces. All hard and soft landscape works, lighting, boundary structures and all associated ancillary buildings, infrastructure to include a pumping station, and all site and development works necessary to facilitate the proposed development.

Section 179 (3) (b) of the Act requires that the Chief Executive of a local authority shall, within 8 weeks after the expiration of the period during which submissions or observations with respect to the proposed development may be made, prepare a report in writing in relation to the proposed development and submit the report to the Elected Members of the Council.

Section 179 (3) (b) of the Act outlines that a report shall—

- 1 - Describe the nature and extent of the proposed development and the principal features thereof, and shall include an appropriate plan of the development and appropriate map of the relevant area,
- 2 - Evaluate whether or not the proposed development would be consistent with the proper planning and sustainable development of the area to which the development relates, having regard to the provisions of the development plan and giving the reasons and the considerations for the evaluation,
- 3 - Include the screening determination on why an environmental impact assessment is not required and specify the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might have otherwise been significant adverse effects on the environment of the development,
- 4 - List the persons or bodies who made submissions or observations with respect to the proposed development,
- 5 - Summarise the issues, with respect to the proper planning and sustainable development of the area in which the proposed development would be situated, raised in any such submissions or observations, and give the response of the chief executive thereto, and

6 - Recommend whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.

Under Section 179(4) of the Act, the Elected Members shall, within 6 weeks of the receipt of the report of the chief executive, consider the proposed development and the report. Following the consideration of the report of the Chief Executive, the proposed development may be carried out as recommended in the report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the Chief Executive's Report, or decides not to proceed with the development.

A resolution must be passed not later than six (6) weeks after receipt of the Chief Executive's Report.

### **1.1 Site Description:**

The proposed development is located on lands at Castlefield Avenue, Old Knocklyon Road, Dublin 16. The site has an overall area of 0.80ha and consists of two roughly triangular-shaped sites consisting of areas of residentially zoned, undeveloped lands in SDCC ownership. The subject lands are bisected by the Old Knocklyon Road running east-west through the centre of the site. The western and northern boundaries of the northern section of the site adjoin Old Knocklyon Road. The eastern section of the site is bordered by the M50 at high level and the southern area is bounded by Castlefield Avenue.

The northern portion of the site is currently partially fenced off, enclosed by walls and overburden and not readily accessible. The northern portion of the site is relatively flat. The site currently consists of rank grassland and scrub and is bordered by treelines and walls to the west and south and by M50 inclines, walls and noise amelioration barriers to the east.

The southern portion of the site is fenced off to the north, bounded by neighbouring properties to the west and is only accessible from the south at Castlefield Avenue. The southern portion of the site falls approximately 7 meters in level from south to north. Existing 1, 2 and 3 storey (2 storey with habitable roof space) detached dwellings are located to the western boundary of the site.

The site is adjacent to existing ESB, surface water and mains water services, with foul services running in an open green space to the west of the site. The eastern portion of the site, bounding the M50, is constrained by an existing 1.5m wide underground culvert with a 10m associated wayleave to either side. This effectively means that the land available for development is limited to the western portion of the site.

Chief Executive's Report on Public Consultation for Proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16.



**Fig. 1.1 - Site Location – not to scale. Site subject of current Part 8 outlined in solid red line. Extent of wayleave associated with culvert shown by dotted red line.**



**Fig 1.2 - Aerial view – not to scale (source Google maps). Site subject of current Part 8 outlined in solid red line. Extent of wayleave associated with culvert shown by dotted red line.**

## 2.0 Description of Proposed Development

On the 5th March 2026, SDCC gave notice that it had prepared a Part 8 for the proposed development of Proposed Social and Affordable Mixed Tenure Housing Development on our land at Castlefield Avenue, Old Knocklyon Road, Dublin 16. The proposed development is comprised of 29 homes and all associated open spaces and all site and development works necessary to facilitate the proposed development and will include:

- i. Construction of 8 No. three-storey, three-bedroom houses in two terraced buildings.
- ii. Construction of 4 No. two-bedroom apartments in a two-storey building.
- iii. Construction of a two and three-storey apartment building which will comprise: 1 No. studio apartment, 8 No. one-bedroom apartments, 4 No. two-bedroom apartments and 4 No. three-bedroom apartments.
- iv. New boundary treatment to adjoining properties and roads. Associated upgrading of roadways and paths, provision of car and cycle parking spaces. All hard and soft landscape works, lighting, boundary structures and all associated ancillary buildings, infrastructure to include a pumping station, and all site and development works necessary to facilitate the proposed development.

The proposed development has been designed to respond to the specific characteristics, nature and context of the site. A careful assessment of site conditions, zoning and planning context, relevant planning policies, objectives and guidance, housing need and nature of surrounding development have informed the masterplan approach and detailed design of the proposed development. These assessments were set out in detail in the County Architect's Report accompanying the Part 8 consultation process.

Chief Executive's Report on Public Consultation for Proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16.

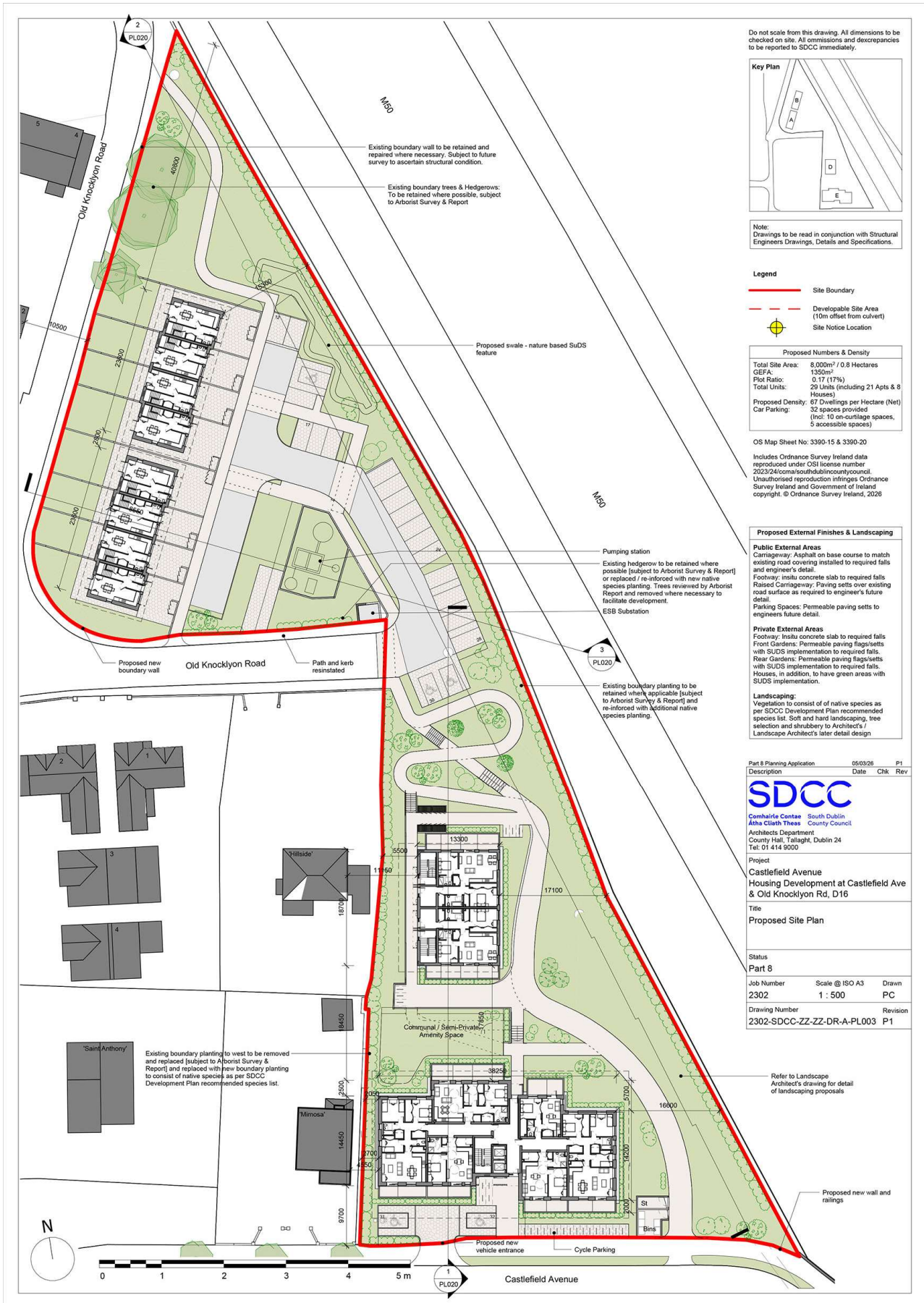


Fig. 2.1 - Plan of Proposed Development- not to scale

Detailed plans, drawings, and reports in relation to the proposed development are available at the following links:

- 01 - Site Notice
- 02 - Newspaper Text
- 03 - Copy of Newspaper Notice
- 04 - County Architects Report
- 05 - Site Location Map
- 06 - Drawings of Proposed Development
- 07 - Artists Impressions
- 08 - AA Screening Report
- 09 - AA Screening Determination
- 10 - EIA Screening Report
- 11 - EIA Screening Determination
- 12 - SuDs and Drainage Proposals
- 13 - Flood Risk Assessment
- 14 - Landscape Architect Masterplan and Statement
- 15 - Arborist Report

### **3.0 Public Consultation**

The public consultation period took place from the 5th of March 2026 to 21st of April 2026 inclusive (a period of 6 weeks) during which time information on the proposed Part 8 Development and environmental reports were disseminated to the public and submissions were invited. The public consultation on the proposed development included the following statutory and non-statutory elements:

- Newspaper Notice in The Echo
- Site Notices (3no. erected)
- SDCC Online Consultation Portal <https://consult.sdublincoco.ie>
- Email communication notifying relevant prescribed bodies

Plans and particulars of the proposed scheme were available for inspection or purchase at the Planning Department counter in the offices of SDCC, County Hall, Tallaght, Dublin 24 during the consultation period.

### **4.0 Environmental Impact Assessment and Appropriate Assessment**

The proposal has undergone Appropriate Assessment (AA) Screening under the Habitats Directive (92/43/EEC). SDCC has determined that the implementation of the proposed development would not be likely to have significant adverse effects on the integrity or conservation objectives of any Natura 2000 network of sites.

The proposal has also undergone Environmental Impact Assessment (EIA) Screening under the EIA Directive 2014/52/EU. SDCC has determined that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination has been made that an EIA is not required.

## 5.0 Outcome of the Public Consultation Process

The number of submissions and observations that were received during the public consultation period came to thirty-six in total. One submission received was in respect of a different project, thirty-five submissions were received through public consultation with one submission on foot of notice issued to prescribed bodies. A list of all the persons /bodies that made submissions within the public consultation period is provided in Table 1 below.

Ref. No.	Person	Individual/ Organisation	Link
SD-C411-1	Philip Jones	Individual	<a href="#">Submission 1</a>
SD-C411-3	Andrew Tunney	Individual	<a href="#">Submission 2</a>
SD-C411-4	Uisce Éireann	Organisation	<a href="#">Submission 3</a>
SD-C411-5	Sergio Calabria	Individual	<a href="#">Submission 4</a>
SD-C411-6	BPS Planning Consultants on behalf of Cormac O'Reilly, Chairperson Castlefield Manor Residents Association	Organisation	<a href="#">Submission 5</a>
SD-C411-7	David Barton	Individual	<a href="#">Submission 6</a>
SD-C411-8	Julia Gattunen	Individual	<a href="#">Submission 7</a>
SD-C411-9	David Flower	Individual	<a href="#">Submission 8</a>
SD-C411-10	Lisa O'Connor	Individual	<a href="#">Submission 9</a>
SD-C411-11	Eleanor Balamash	Individual	<a href="#">Submission 10</a>
SD-C411-12	David Naughton	Individual	<a href="#">Submission 11</a>
SD-C411-13	Nikki Wilson	Individual	<a href="#">Submission 12</a>

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SD-C411-14	Jenna Long	Individual	<a href="#">Submission 13</a>
SD-C411-15	Mark and Justine Butterly	Individual	<a href="#">Submission 14</a>
SD-C411-16	Redmond Shouldice	Individual	<a href="#">Submission 15</a>
SD-C411-17	Linnea Steacy	Individual	<a href="#">Submission 16</a>
SD-C411-18	Jennifer Dalton	Individual	<a href="#">Submission 17</a>
SD-C411-19	Patricia Steacy	Individual	<a href="#">Submission 18</a>
SD-C411-20	Ella Wilson	Individual	<a href="#">Submission 19</a>
SD-C411-21	Maurice Reid	Individual	<a href="#">Submission 20</a>
SD-C411-22	Marie Whamond	Individual	<a href="#">Submission 21</a>
SD-C411-23	Robert Denvir	Individual	<a href="#">Submission 22</a>
SD-C411-24	Fiona Murphy	Individual	<a href="#">Submission 23</a>
SD-C411-25	Christopher Lawlor Rory O'Donoghue Tony Gillick Eimear Fahy Kieran O'Neill	Individual	<a href="#">Submission 24</a>
SD-C411-26	Marston Planning Consultancy Ltd on Behalf of Ballyboden Tidy Towns	Organisation	<a href="#">Submission 25</a>
SD-C411-27	Sabrina Forte	Individual	<a href="#">Submission 26</a>
SD-C411-28	Bernie Durkin	Individual	<a href="#">Submission 27</a>
SD-C411-29	Orysia Fleshy	Individual	<a href="#">Submission 28</a>
SD-C411-30	Noreen McEvoy	Individual	<a href="#">Submission 29</a>
SD-C411-31	Kieran O'Neill	Individual	<a href="#">Submission 30</a>
SD-C411-32	Kira Buckley	Individual	<a href="#">Submission 31</a>
SD-C411-33	Bernard Ferry	Individual	<a href="#">Submission 32</a>

SD-C411-34	Josephine Ferry	Individual	<a href="#">Submission 33</a>
SD-C411-35	Anthony/Una Buckley	Individual	<a href="#">Submission 34</a>
SD-C411-36	Olive Walsh	Individual	<a href="#">Submission 35</a>

**Table 1: List of Persons /Bodies that made Submissions**

Type of Submitter		Details
Individuals	32	15 no. individuals lodged identical submissions. At least one individual has submitted more than once (ref. no.s 25 and 31).
Organisations	2	Castlefield Manor Residents Association Ballyboden Tidy Towns CLG
Prescribed bodies	1	Uisce Éireann

**Table 2: Breakdown of Submitters**

All 35 submissions received by the Council during the public consultation period were read, summarised and analysed.

- Identical submissions were received from 15 individuals.
- The submission received from Uisce Éireann was a confirmation of feasibility and indicated no objections to the proposals.
- Of the submissions received two were supportive of the development.

A summary of the issues raised are provided in the table 3 below.

Observation / Submission Topic	Instances
1 Overdevelopment – density, scale and height	27
2 Traffic and road safety	24
3 Substandard residential amenity - noise and/or air quality	22
4 Loss of trees, hedgerows	20
5 Overlooking, overshadowing, loss of privacy	20
6 Flood risk	19
7 Construction stage impacts - noise/pollution/structural risk	19
8 Impact on the character of the area	18
9 Insufficient ecological assessment	18
10 Impact on local services (schools, GPs, childcare, sports)	17
11 Inadequate public consultation	17
12 Criticism of site layout and/or building design	11
13 Contrary to National/Regional standards/guidelines/Dev Plan	7
14 Parking (impact on locality)	6
15 Negative impact on property values	3
16 Unsuitable site for residential development	2
17 Support for proposals	2
18 Potential for anti-social behaviour	1

19	Proposed development would set poor precedent	1
20	Inadequate EIA screening	1
21	Inadequate AA Screening	1
22	Proposed pumping station location is not compliant with Uisce Éireann Code of Practice	1
24	No independent visual impact assessment provided	1

**Table 3: summary of Submissions**

## 6.0 Summary of Issues Raised and Chief Executive’s Response

This section presents an analysis of the submissions and includes a summary of each of the concerns raised in relation to entrance to the proposed Development and the responses and recommendations of the Chief Executive.

The responses and recommendations have been framed in a manner that takes account of proper planning and sustainable development of the area to which the development relates while having regard to the provisions of the County Development Plan and relevant planning guidelines.

### 7.1 Overdevelopment – density, scale and height

Several submissions have raised concerns that the proposed development constitutes overdevelopment of the site citing:

- Excessive density relative to the established suburban character of Castlefield/Knocklyon
- Inappropriate building height and scale (predominantly three-storey development)
- Alleged conflict with National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES), Sustainable Residential Development and Compact Settlements Guidelines 2024, and the South Dublin County Development Plan (SDCDP)

#### Chief Executive’s Response:

Using criteria set out in the Compact Settlement Guidelines the proposed site is considered as an infill site in an accessible city-suburban location. Given that a large proportion of the site has been substantially disturbed recently in order to construct the Ballycullen culvert (completed in 2017), it is considered reasonable to describe the site as brownfield in accordance with Compact Settlement Guidelines criteria.

#### Density

The proposed development provides 29 dwellings on a net site area of 0.43ha, equating to a density of approximately 67 dwellings per hectare.

- The site is identified as a “City-Suburban/Urban Extension” area under Table 3.1 of the Sustainable Residential Development and Compact Settlements Guidelines (2024)
- The applicable density range for such locations is typically 40–80 dwellings per hectare
- The proposal sits comfortably within this prescribed range

In accordance with Section 3.4 (Refining Density) of the Guidelines, density must be informed by a site-specific and performance-based assessment, including accessibility (the site is well served by public transport), surrounding context, amenity considerations and natural constraints (including the culvert wayleave, which has been appropriately accounted for in calculating net developable area).

### **Scale and Height**

The proposed development primarily comprises 2 and 3 storey buildings, which is considered appropriate in a suburban context when assessed on a performance basis, as required by:

- NPF Objective 13 (performance-based standards)
- Urban Development and Building Height Guidelines (2018)
- SDCC Building Height and Density Guide (BHDG)

South Dublin County Council applies a “context-driven approach” to building height, rather than strict numerical limits. In this case:

- The main apartment element (building ‘E’\_ is 3 storeys stepping down to 2 storeys adjacent to ‘Mimosa’ (in itself effectively a three storey dwelling having a habitable dormer roof)
- The smaller apartment / duplex block (building D) is 2 storeys, with design measures including minimal fenestration, no habitable spaces on western side, and monopitch roof form to protect adjoining amenity
- 3-storey houses (building A & B) are located toward the northern portion, separated from existing dwellings by Old Knocklyon Road
- No direct back-to-back relationships or unacceptable overlooking situations arise
- Precedent for mixed 2 and 3 storey low-rise, medium density development has been successfully established at the adjoining Watercourse Grove (Homeville) site with no negative impacts on residential amenity.

### **Conflict with Planning Policy**

Planning policy and good practice does not require replication of prevailing height, but rather an appropriate and proportionate response to context. The proposal achieves responsive and articulated massing and stepping of height. Furthermore, the development incorporates setbacks and separation distances consistent with Development Plan and Compact Settlement Guideline standards

The proposal is considered to be consistent with:

- National Planning Framework (NPF)
  - Supports compact growth and consolidation (NPO 3, 11)
  - Encourages performance-based design and increased density (NPO 13, 35)
- Regional Spatial and Economic Strategy (RSES)
  - Supports sustainable settlement patterns and efficient use of serviced land (RSO 2)
- SDCC Development Plan 2022–2028
  - Core Strategy promoting infill and consolidation

- Policies QDP7 and QDP8 (design, height, and density)
- Quality of Residential Development standards (H7, H11)

The proposal has been accompanied by a County Architect's Report demonstrating compliance with the Building Height and Density Guide and relevant performance criteria.

The Council does not consider that the site can reasonably be described as overdeveloped due to its constraints. Even without the presence of the culvert the strategy of providing a linear open space corridor along the eastern boundary and concentrating built development along the eastern boundary is a sound master planning decision. The proposed design demonstrates the efficient use of zoned, serviced land, a compact growth approach, consistent with NPF Objectives 3 and 11 and Compact Settlement Guidelines. The proposal presents a balanced response, where density is achieved without compromising relevant planning standards or adversely affecting adjoining properties.

The alternative densities suggested in some of the submissions (e.g. 20 dwellings/hectare) would represent a significant underutilisation of a zoned and serviced suburban site, contrary to county, regional and national policy promoting consolidation and Compact Settlement Guidelines.

Having regard to the above it is considered that the proposed development does not constitute overdevelopment and is acceptable in terms of density, scale, height, and overall design.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

## 7.2 Traffic and road safety

Several submissions have raised concerns regarding traffic and road safety, including:

- Absence of a Traffic & Transport Assessment (TTA), Road Safety Audit (RSA), and Mobility Management Plan
- Suitability of Old Knocklyon Road as the primary access point
- Potential increase in traffic volumes on Castlefield Avenue, Old Knocklyon Road, and Ballycullen Road
- Interaction with Active Travel measures, including road narrowing and shared surfaces
- Emergency vehicle access and road safety concerns

### **Chief Executive's Response:**

The proposed development consists of small-scale city-suburban infill and does not meet the thresholds triggering the requirement for an obligatory, advisory, or sub-threshold traffic impact assessment as set out in TII Traffic and Transport Assessment Guidelines.

The proposed development does not meet the recommended threshold for the

carrying out of a Mobility management Plan / Travel Plan nor are there any characteristic of the proposed development which might trigger a requirement for a sub-threshold plan or statement.

The proposed development does not include the construction or modification of a national road and there is no requirement for a Road Safety Audit under the TIII Road Safety Audit Guidelines 2005.

The proposed development is serviced by an existing road network and a detailed engineering assessment, including a swept-path analysis, has been carried out as part of the design process and consultation with internal SDCC departments confirms that:

- The layout is suitable for service, refuse, and emergency vehicles
- Internal circulation operates safely and effectively
- The principal access point the development on the Old Knocklyon Road has been carefully considered as part of the overall site Masterplan and is considered to represent the safest and most appropriate solution, having regard to:
  - Site constraints (including the culvert wayleave)
  - Existing road geometry and visibility
  - Avoidance of undue disruption to adjoining residential areas

A suggestion that the development should be served by multiple access points has been made in some of the submissions received. It is considered that a single, well-designed access point is appropriate and consistent with residential design standards, avoiding unnecessary additional junctions and potential conflict points.

Concerns regarding increased congestion on surrounding roads are noted.

It is acknowledged that the development will generate additional traffic; however:

- The scale of development is modest (29 units)
- Associated trip generation is therefore limited and incremental
- The surrounding road network, including Old Knocklyon Road and Castlefield Avenue, is considered capable of accommodating this level of additional traffic

It is further noted that:

- National and regional policy support consolidated residential development within existing suburban areas, even where some incremental traffic increases occur
- The site is an accessible city-suburb location close to public transport and local services, reducing reliance on private car use.

It is not considered that the proposal will result in significant traffic congestion or that it would adversely affect the operation of the wider road network, including junctions.

Submissions refer to the impact of recent or proposed Active Travel schemes, including road narrowing and shared surfaces. Our Active Travel programme is designed to enhance pedestrian and cyclist safety, in accordance with national policy and DMURS principles and the proposed development will be designed to integrate with these measures, ensuring safe pedestrian and cyclist movement, permeability,

appropriate road cross-sections and compatibility between vehicular and non-vehicular users

The Active Travel Section were consulted from the earliest stages of the design development and have no objection to the proposal. The detailed design of road and public realm elements will be progressed in ongoing consultation with the relevant departments of SDCC.

Concerns regarding footpath provision and connectivity are noted. The proposal provides for:

- New and improved pedestrian infrastructure, including internal footpaths and connections
- Opportunity to enhance existing pedestrian facilities along Old Knocklyon Road, subject to detailed design

The Part 8 includes for the carrying of any ancillary works necessary to facilitate the proposed development and typically utility connections, provision of entrances, public lighting upgrades and reinstatement works are required outside of the red-line boundary. Any works required outside the red line boundary which would require road opening or road closure consents would be subject to normal licencing application process between the contractor and SDCC.

Concerns regarding emergency access are noted. The proposed layout:

- Complies with fire safety and emergency access requirements
- Has been designed to accommodate emergency service vehicles, as demonstrated by swept path analysis
- Maintains clear access routes within the development

Accordingly, the proposal does not give rise to concerns regarding accessibility for emergency services.

The development has been assessed having regard to:

- DMURS (Design Manual for Urban Roads and Streets)
- SDCC Development Plan policies (including SM5, SM6, and SM7)
- Standard engineering and traffic safety criteria

The design promotes low vehicle speeds within the development, safe interaction between pedestrians, cyclists, and vehicles and clear and legible movement routes. The scheme is considered to improve overall pedestrian permeability and safety, consistent with Development Plan and DMURS objectives. There is no evidence to indicate that the development would result in a material increase in road safety risk and will not have a significant adverse impact on traffic conditions or road safety in the area.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.3 Substandard residential amenity - noise and/or air quality

Several submissions have raised concerns regarding potential substandard residential amenity, particularly arising from:

- The absence of a Noise Impact Assessment (NIA)
- The site's proximity to the M50 motorway, giving rise to high ambient noise levels
- Potential failure to comply with EPA, WHO, and planning noise criteria
- Insufficient design and mitigation measures for both internal and external noise environments
- Concerns regarding air quality and health impacts
- Reference to previous studies and third-party acoustic assessments indicating elevated noise levels.

#### **Chief Executive's Response:**

We are aware of the significant source of environmental noise represented by the M50 and noise impacts are one of a series of considerations which have informed the masterplan and design of the proposal from the outset. The experience of successful noise mitigation measures taken in the siting, design and construction of the recently completed development at Watercourse Grove (Homeville) to the immediate north of the subject site have informed the strategy and approach to the current proposal. The Watercourse Grove (Homeville) project is very similar in terms of proximity to the M50, and the current proposal is consistent with Watercourse Grove (Homeville) in terms of separation distance from the M50 and is consistent with other developments along the corridor such as the wider Castlefield estates and White Pines to the south off Stocking Avenue. Post-occupancy assessments of the Watercourse Grove (Homeville) development indicate that internal noise levels for residents are acceptable and have validated the design approach taken.

To ensure an acceptable acoustic environment for future resident's initial mitigation measures are proposed as part of the Part 8 and were included in the County Architect's Report at consultation stage:

- The existing masonry wall along the M50 boundary is retained.
- Dense planting (trees and shrubs) will be installed along the wall to enhance the acoustic performance of the boundary as well as improving visual amenity.
- Triple-glazed, sound-reducing windows will be installed to the houses and apartments to minimize internal noise levels.
- Acoustic attenuating sound reducing wall vents to be installed
- Any other measures identified during the detailed design process

The proximity of the M50 and the presence of noise in the environment does not in itself render the site undevelopable. National and local policy support the use of serviced urban land, including sites adjacent to infrastructure, subject to appropriate mitigation. The submissions refer to historical measurements and EPA mapping indicating elevated noise levels. We acknowledge that noise levels may exceed guideline thresholds in parts of the site and this is a known characteristic of sites adjacent to busy road infrastructure.

Planning policy does not require that external noise levels be eliminated entirely instead, it requires a balanced and managed approach to achieve acceptable internal living conditions and the provision of reasonable external amenity where feasible

Much of the Castlefield estate is located a similar distance from the M50 corridor. It is noted that the noise survey included in one of the submissions was conducted not on the site itself but in the garden of a dwelling within the Castlefield estate which presumably functions adequately as a family home and provides adequate level of residential amenity. The submissions seek to establish that the site is undevelopable for residential development using data gathered within the footprint of an existing residential development. This taken together with the fact that the location of the survey differs from the characteristics of the subject site in terms of elevation and character of surrounding surfaces calls the relevance of the survey and credibility of the concerns into question.

The Part 8 process establishes the principle of development as described in the consultation documents. It is proposed that this development will be progressed as a design-build contract whereby the selected contractor and their design team will take responsibility for the detailed design, construction and completion of the homes to a developed design and performance specification set out by SDCC. Part of this design development and performance specification will be concerned with establishing standards to be met for achieving acceptable internal and external noise conditions.

It is proposed that in the interests of clarity that an independent Noise Impact Assessment (NIA) is conducted as part of the detailed design and tender preparation process which will establish:

- baseline noise levels at the site
- assess compliance with relevant standards and guidance, including inter alia TII Guidelines (2012), Environmental Noise Regulations (2018), BS 8233 / ProPG (industry standards).
- Identify specific mitigation measures required to achieve acceptable internal and external noise conditions

We are satisfied to ensure that any recommendations and/or mitigation measures are incorporated into the developed design and that noise issues are addressed on an ongoing basis as part of the detailed design and tender preparation process. It will be a requirement of the contractor and their design team to design the scheme to achieve the standards required and it is not appropriate at this stage to pre-judge what specific site level and building level measures are required to achieve satisfactory acoustic performance for the development.

Concerns regarding air quality are noted however, there is no evidence to indicate that the site is subject to air quality exceedances that would preclude residential development. As with concerns around noise levels, the performance specification for the proposed homes will seek that standards for air quality within and around the homes will be defined and met in so far as is practicable. Furthermore, the promotion of compact growth reduces overall commuting distances and supports sustainable

transport patterns, which contribute positively to air quality objectives at a wider level.

Having regard to the above it is considered that the site is suitable for residential development and the proposed development has the ability to achieve an acceptable standard of internal and external residential amenity subject to detailed design refinement typically carried out at detailed design, tender and construction phases.

**Chief Executive's Recommendation:** It is recommended that in the interests of clarity that an independent Noise Impact Assessment (NIA) is conducted as part of the detailed design and tender preparation process and any mitigation measures proposed are into incorporated the detailed design of the project.

#### 7.4 Loss of trees, hedgerows

Several submissions expressed concerns regarding removal of trees / hedgerows without sufficient replacement measures

**Chief Executive's Response:** The existing site contains a mix of tree and shrub perimeter planting. The main body of the site has been substantially disturbed in recent years to facilitate the construction of the Ballycullen culvert and is effectively a brownfield site with planting along the western boundary maintained throughout the construction process. This disturbance is clearly visible on the site and there is evidence of significant overburden and spoil which has been colonised by rank grass and shrub growth. The perimeters of the site are unmanaged, and the existing trees vary in condition. The overall quality and condition of the trees are fair to poor with many of the trees suffering from dieback, decay and ivy growth. The proposed development will involve the removal of 26 existing trees and 6 tree and hedgerow groups. Of the 32 survey entries to be removed, 3 trees are of moderate quality and value (B Category), 12 trees and 6 tree and hedgerow groups are of low quality and value (C Category), and 11 trees are of poor quality (U Category). These proposals are clearly outlined on the proposal drawings and the accompanying Arboricultural Impact Assessment.

The loss of trees will have an initial visual impact, and canopy cover will be removed. A substantial proposal for new landscape planting and treatment including the provision of new tree planting is proposed and is outlined on the proposed landscape drawing. The landscape proposals together with management and tree protection measures set out in the arborist's report will work together with a nature-based SuDS proposal (including the use of biodiversity planting and substantial boundary planting of mixed native species and pollinator friendly species) to mitigate any potential impact on the environment and biodiversity during the operational phase of the project. These measures will represent a significant element of biodiversity enhancement on the site.

The proposed development is achievable in both arboricultural terms and in relation to local planning policy as it relates to trees. Tree impacts have been assessed, and tree protection measures have been specified in accordance with best practice and are sufficient to safeguard retained trees during the proposed works. We are satisfied to

continue to assess the condition of existing trees on the site throughout the detail design, tender and construction phases of the project and where appropriate and feasible will endeavour to retain additional trees where possible.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.5 Overlooking, overshadowing, loss of privacy.

Some submissions cite that the proposed development may adversely affect the privacy of existing residents due to the increased building heights and the removal of trees.

**Chief Executive's Response:** The proposed development has been master planned and designed in detail to minimise any significant impacts on existing and proposed residential amenity. The proposal incorporates:

- Appropriate separation distances between buildings which meet or exceed County Development Plan and Compact Settlement Guidelines standards.
- Appropriate stepping of height and design of roof forms to further respect adjoining residential development.
- Careful positioning of windows and balconies and avoiding positioning of habitable spaces on any elevation directly adjacent to adjoining properties.
- Reduced fenestration to non-habitable spaces located on elevations directly adjoining existing development.
- A significant landscape proposal incorporating existing and proposed boundary and structure planting.

No significant adverse impacts arise to adjoining properties and any conditions proposed are consistent with normal urban/suburban residential relationships.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.6 Flood Risk

Several submitters expressed concerns regarding potential flood risk and perceived inadequacies in the flood risk assessments provided.

**Chief Executive's Response:** A Site Specific Flood Risk Assessment (SSFRA) of the site and the proposed development has been carried out by JBA Consulting and included in the Part 8 consultation documentation. This assessment concluded that the '*The Flood Risk Assessment was undertaken in accordance with 'The Planning System and Flood Risk Management' guidelines and confirm that the development resides in Flood Zone C and is in agreement with the core principles contained within.*' A hydraulic model was developed to assess flood risk on the site taking into account the Ballycullen Flood Alleviation Scheme which completed construction in 2017. Results from the hydraulic model developed in this study show that the site is located in Flood Zone C.

Flood maps were produced for the 1% AEP and 0.1% AEP events (Flood Zones A and B respectively) which show that no channel overtopping occurs. The culverted and open channel sections of the stream are able to convey present day flows and increased flows as a result of climate change demonstrating that the proposed development is not at risk of fluvial flooding as a result of climate change. The development is at low risk of fluvial flooding and pluvial flood risk will be managed through appropriate stormwater and surface water drainage. Furthermore, the scheme does not significantly change ground levels and under a residual risk scenario there is no increase in flood risk elsewhere.

It has been concluded that the proposed development does not have the potential to have significant effect on hydrological conditions. Appropriate stormwater attenuation/treatment has been incorporated into the proposed development – including nature based solutions - in accordance with Sustainable Drainage System principles and relevant standards and allowing for climate change considerations. Attenuations systems proposed are sufficient for attenuating a 1 in 100 year flood event (increased by 20% to allow for climate change).

Additional precautionary measures are included to mitigate residual risk to the site due to the blockage of culverts located along the remaining section and these are incorporated into the proposed design.

The site was visited by SDCC staff immediately following Storm Chandra as part of standard due diligence. This was considered relevant and noted in the County Architect's report. However, it would be inaccurate to suggest that this visit was relied upon as the sole or comprehensive basis for assessing flood risk. **Note:** the visit was due diligence in addition to the SSFRA. It is considered that the proposed development has been adequately considered from a flood risk perspective.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.7 Construction stage impacts - noise/pollution/structural risk

Construction-related impacts were highlighted in several submissions, including concerns about increased noise levels and air pollution, as well as potential effects arising from excavation activities, ground vibration, and the operation and movement of heavy machinery during the construction phase.

**Chief Executive's Response:** The proposed development will be progressed post-planning as a design build contract and a detailed design development and tender process will be conducted. As part of this process the performance specification will require that all contractors and their design teams must comply with all relevant statutory requirements and best practice for the construction stage noise, waste management, and traffic management in the design, planning and carrying out of the works. Contractors will be expected to provide method statements and site specific plans for same.

The proposed development is unlikely to give rise to any noise nuisance with the implementation of noise design measures standard for this type of development in adherence with relevant residential development noise-related guidelines (E.g., ProPG: Planning & Noise, Professional Practice Guidance on Planning & Noise, New Residential Development (Acoustics and Noise Consultants, Institute of Acoustics, Chartered Institute of Environmental Health, May 2017).

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.8 Impact on the character of the area

Some submissions presented concerns regarding the impact of the development on the character of the area, both in terms of its visual appearance and overall sense of place.

**Chief Executive's Response:** The proposed development consists of a low-rise medium density infill development of two to three storeys in height on a brownfield site and with a high proportion of own door units. The site is located within an existing context characterised by a mix of suburban, semi-detached and detached dwellings predominantly of two storey height and with some single storey dwellings. Replicating the prevailing pattern of low-density suburban development on this infill sites would not be consistent with current planning policies and good practice. The recent Watercourse Grove (Homeville) development to the north of the subject site has established a successful precedent for mixed two and three storey low-rise, medium density development within the immediate vicinity of the site and has successfully been integrated into the neighbourhood without negatively impacting residential amenity.

The current development proposal is in-line with Compact Settlement Guidelines which seeks to promote appropriate infill in suburban contexts and increased densities on accessible and intermediate sites. The Guidelines further promote the value of providing diversity and variety in dwelling types to cater for changing demographic needs. The provision of variety and diversity is identified as a key indicator of quality urban design and placemaking providing choice and affordability.

As with Watercourse Grove (Homeville), the provision of well-designed infill development will serve to enhance the character of the area and contribute positively to the creation of a viable and sustainable neighbourhood.

The proposed development responds positively to its context and the constraints and characteristics of the site. The site and surrounding context is not considered so sensitive or constrained as to preclude appropriate intensification. The development introduces a modest increase in density and scale, consistent with planned suburban consolidation in a proportionate and well-designed manner. The design maintains established building lines and integrates with the existing streetscape pattern creating enclosure and built edges to existing streets where possible. Variation in building type

reflects modern housing delivery requirements, while remaining respectful of context

For the reasons set out above the development is not considered to give rise to a significant adverse impact on the character of the surrounding context.

**Chief Executive's Recommendation:**

It is recommended that no variation or modification be made to the proposed development.

**7.9 Insufficient ecological assessment, including impact on the River Dodder corridor.**

Some submissions raise concerns that the proposal lacks adequate assessment of ecology and biodiversity

**Chief Executive's Response:**

It was noted in the County Architect's Report that in addition to Screening for AA and EIA that any further surveys or investigations required at detailed design and construction stage will be carried out by a suitably qualified and experienced ecologist. Fehily Timoney are engaged on an ongoing basis on the project to advise, scope-out and conduct any ecological surveys deemed necessary and these works are progressing as survey season allows. These surveys are intended to identify any potential ecological effects of the proposed development, and, where necessary, will define measures to avoid, prevent and minimize significant ecological effects due to the construction and operation of the development on-site. We are aware of their obligations to survey and assess development sites and commit to take into account and implement any recommendations and mitigation measures proposed – if any – and to modify the proposal or otherwise make any amendments considered necessary to the proposed development during the detailed design, tender preparation and construction stage in the interests of maintaining and enhancing biodiversity. SDCC will continue to monitor and incorporate any necessary mitigation to address environmental considerations throughout the project.

**Chief Executive's Recommendation:** It is recommended that a condition can be included that the proposal be modified – if necessary - to take into account any recommendations or mitigation measures proposed as a result of ongoing ecological survey work during the detail design, tender preparation, construction and operational phases of the project.

**7.10 Impact on local services (schools, GPs, childcare, sports)**

Some responses indicate concerns about the capacity of local services such as schools, clubs or health services to accommodate the increased demand arising from the proposed development.

**Chief Executive's Response:**

The proposed development is of a modest scale (29 units) and it is located within an established suburban area already served by existing infrastructure, services and amenities. National and regional policy supports incremental growth in such areas,

enabling the efficient use of existing services and ensuring the viability of future provision. The provision of some services are planned at a strategic level by relevant providers (e.g. education, health) and it should be noted that medium density consolidated suburban development such as that proposed here supports the viability and enhancement of local services.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

#### **7.11 Inadequate public consultation**

Some submissions raise concerns regarding the extent of engagement with local residents

**Chief Executive's Response:** A key element of the Part 8 process consists of public consultation and ensuring that the public and important stakeholders are aware of any Part 8 proposal. This is achieved by the public display of the proposal and publication of public notices, following which observations by members of the public and key stakeholders may be received.

The number and content of submissions received demonstrate that public awareness of the proposed development has been achieved providing the opportunity for meaningful public participation.

It is considered that the statutory consultation requirements for a Part 8 process provides a clear, transparent, and legally prescribed framework for public consultation. Having regard to the above, it is considered that the statutory requirements for public consultation have been fully complied with by SDCC.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

#### **7.12 Criticism of site layout and/or building design**

A number of submissions raise concerns regarding the design, layout and density of the proposed development, stating that these aspects are inappropriate for the site.

**Chief Executive's Response:** We have endeavoured to propose a development which responds to the characteristics, constraints and context of the specific site. The task of balancing appropriate densities, mix of unit types, high quality materials and visual expression, compliance with Building Control standards, County Development Plan standards and Department of Housing space standards in a high quality and architecturally coherent way has been achieved in this proposal.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### **7.13 Contrary to National/Regional standards/guidelines/County Development Plan standards and represents a material contravention of the CDP.**

A number of submissions suggest that the proposal may contravene the South Dublin County Development Plan 2022–2028, National Planning Framework, Regional Strategy (RSES) and Sustainable Residential Development Guidelines

**Chief Executive's Response:** The current proposal has been developed having regard to a comprehensive range of local and national planning policy and guidance and taking a context drive approach. The main sources of national and local planning policies and objectives and guidance referred to in the design of the current proposal are included in Appendix I to the County Architect's Report.

The proposed development has been developed in consultation with relevant sections of SDCC and overall, the proposed development of social and affordable housing and associated works on this site is considered acceptable when assessed against the principles of proper planning and sustainable development, and the relevant zoning provisions, policies, objectives and standards set out in the County Development Plan 2022- 2028.

It is considered that the proposed development is consistent with national, regional, and local policy objectives and does not represent a material contravention of the Development Plan.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### **7.14 Parking (impact on locality)**

Various submissions identify concerns regarding parking provision and traffic/overflow impacts

**Chief Executive's Response:**

The proposed development provides a total of 31 car parking spaces to serve 29 residential units. This level of provision is considered appropriate for an accessible city-suburban site having regard to:

- The site's proximity to high quality public transport and local services
- The County Development Plan and Compact Settlement Guidelines approach to balanced parking provision to avoid over-provision and to support modal shift, including walking, cycling, and public transport use

The parking ratio broadly aligns with typical suburban standards and is considered to be in line with current planning policy objectives aimed at reducing car dependency and supporting more sustainable patterns of development.

Having regard to the above the level of parking provision provided is considered adequate and is not expected to give rise to significant overspill or adverse impact on

<p>adjoining residential streets.</p>
<p><b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.</p>
<p><b>7.15 Negative impact on property values</b></p>
<p>Certain submissions highlight concerns that the proposed development will reduce the value of nearby homes</p> <p><b>Chief Executive's Response:</b> The issue of potential effects on private property values is not regarded as a material planning consideration.</p>
<p><b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.</p>
<p><b>7.16 Unsuitable site for residential development</b></p>
<p>Various submissions identify concerns regarding the principle of development on the site and compatibility with zoning, site constraints, and residential amenity.</p> <p><b>Chief Executive's Response:</b> The land subject of the current Part 8 process has a Zoning Objective in the South Dublin County Council County Development Plan 2022- 2028 as follows: 1 - Zoning Objective 'RES' - with an objective to 'protect and/or improve residential amenity.' The entirety of the site is covered by this designation. The principle of development on greenfield and brownfield sites with 'RES' in proximity to the M50 corridor has been well established and is successfully demonstrated by recent developments such as Watercourse Grove (Homeville) and White Pines. It is acknowledged that the site is constrained by shape, topography and the presence of wayleaves however this has in-turn informed every aspect of the site Masterplanning and design including layout, height, massing and arrangement of open spaces. It is considered that the proposed development has managed to achieve a balance between the need to develop a serviced, zoned infill site in an accessible location while respecting and maintaining residential amenity and providing choice in house types and variety necessary for the promotion of sustainable neighbourhoods.</p>
<p><b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.</p>
<p><b>7.17 Potential for anti-social behaviour</b></p>
<p>Some responses indicate concerns about open space quality, safety, and potential anti-social behaviour.</p> <p><b>Chief Executive's Response:</b> The masterplan strategy for the site emphasises the requirement to provide good levels of passive surveillance to all open space types within the proposal. In addition, the proposed open spaces are designed to provide quality open space, permeability, safe pedestrian routes and will be appropriately illuminated at night. The proposed open space has potential to contribute to</p>

residential amenity for both existing and future residents. There is no evidence provided to indicate specifically how or why the proposed development would provide potential for antisocial behaviour.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.18 Proposed development would set poor precedent

Some submissions raised concerns that the proposed development's design quality, density and scale could establish an undesirable precedent for the area.

**Chief Executive's Response:** The masterplan adopts a site-specific, context-driven approach, with stepped building forms responding to topography, sensitive height transitions, active street edges, strong permeability, well-overlooked open spaces, nature-based drainage, and reinforcement of green infrastructure. In the Masterplan and design of the proposed development, we have had regard to recent successful developments along the M50 corridor including Watercourse Grove (Homeville) and White Pines. The grounds for objection under this heading remain general and abstract.

Having regard to zoning, development policies, ministerial guidance, and the surrounding context, the proposal represents a balanced, sensitive, and compliant response. The principle of residential development on this zoned and serviced site is consistent with the SDCC CDP, Compact Settlement Guidelines and relevant ministerial guidelines. Having regard to the above and consideration set out in previous responses in this document it is considered that the proposed development would not set a poor precedent and is acceptable in terms of density, scale, height, and overall design.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### 7.19 Inadequate EIA screening

Some submissions raised concerns regarding the adequacy of the EIA screening, arguing that it does not sufficiently address the cumulative environmental impacts of the site particularly in relation to noise, flood risk, and loss of green infrastructure.

**Chief Executive's Response:** An EIA Screening Report has been prepared for the proposed development by Fehily Timoney. This report informed the Council's EIA Screening Determination. A comprehensive Cumulative Assessment was undertaken as part of the EIA Screening process. This assessment is presented in Section 6.7 of the EIA Screening Report. All other Projects within 500 m of the development site that may result in environmental interactions with the proposed development were identified and listed in Section 4 of the EIA Screening Report. It was concluded that the proposed development will not result in any significant adverse cumulative effects, having regard to the design and nature of the proposed development, potential environmental impacts that may arise due to the proposed development, and environmental mitigation measures to be embedded and integrated into the proposed

development (to suitably avoid, prevent and minimise effects on the environment). The proposed development is small-scale in nature, consistent with the land use zoning objective for the development site; and is in keeping with existing land use in the area, which consists of residential development, community infrastructure and transport infrastructure.

The public notices accompanying the Part 8 public consultation indicated that any person had the opportunity, within 4-weeks from the date of publication of the notice, to apply to An Coimisiún Pleanála for a screening determination as to whether the development would be likely to have significant effects on the environment. No referral to An Coimisiún Pleanála was made by any party.

No specific evidence has been presented to support the assertion that the site is a particularly sensitive location. The parties making submissions have not identified any specific grounds or demonstrated any particular adverse impacts that the proposed development might have. The screening reports prepared by SDCC provide considerable scientific assessment of the site in the context of the proposed development, however the parties have not identified any particular omission, inaccuracy or error in these documents.

The Part 8 material provided on the consultation portal – including screening reports - is accurate and is considered sufficient to indicate the nature and extent of the proposed development as required under the relevant part of the Planning Regulations.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

## 7.20 Inadequate AA Screening

Some submission raised concerns about ecological impacts on European protected sites and the adequacy of Appropriate Assessment (AA) screening.

### **Chief Executive's Response:**

The AA and EIA screening processes carried out as part of the Part 8 process concluded that a Stage 2 AA assessment is not required for the site.

The AA screening report presents an examination of whether the proposed works are likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is based on best available scientific knowledge. The AA screening report has concluded that there are no meaningful pathways for effects identified with respect to European sites and that there are no likely significant effects identified to any European sites.

An AA Screening Report has been prepared for the proposed development by Fehily Timoney. This report has informed the Council's AA Screening Determination. This

report robustly assessed the potential for the proposed development to have likely significant effects on European sites. All European sites within a scientifically defined Zone of Influence from the proposed development were considered.

A Source-Pathway-Receptor assessment was undertaken, and it was evaluated that there are no likely significant effects on the qualifying interests, special conservation interest or the conservation objectives of any designated European site. It should be noted that the nearest European site within the Zone of Influence of the proposed development is the Glenasmole Valley SAC, which is approximately 3.84 km from the development site.

Submission no. SD-C411-6 states the AA screening is inadequate and references a single-page report. However, a comprehensive 37-page AA screening report was prepared by consultants Fehily Timoney and included in the Part 8 documentation.

The Part 8 material provided on the consultation portal – including screening reports - is accurate and is considered sufficient to indicate the nature and extent of the proposed development as required under the relevant part of the Planning Regulations.

**Chief Executive's Recommendation:** It is recommended that no variation or modification be made to the proposed development.

### **7.21 Proposed pumping station location is not compliant with Uisce Éireann Code of Practice**

A number of submissions raise issues regarding drainage infrastructure capacity, wastewater management, and compliance with utility standards.

#### **Chief Executive's Response:**

The proposed foul drainage network has been designed to comply with Uisce Éireann Code of Practice. Uisce Éireann have confirmed there is available capacity in the surrounding network to accommodate the foul flows from the development. To deal with the existing levels on site, a foul pumping station has been proposed to connect to the UE network on the nearby Ballycullen Road. The pumping station will be designed to comply with the Uisce Éireann Code of Practice and has been located on the site to comply with all the necessary offsets required by Uisce Éireann.

The pumping station has been reviewed and approved by Uisce Éireann and the detailed design development of the project will be progressed in consultation with UE who are the appropriate body to interpret their codes of practice and certify compliance with all relevant standards. Submission from Uisce Éireann provided technical guidance on connection agreements, separation distances from public infrastructure, protection of existing wayleaves, and compliance with their Standards, Codes and Practices; we acknowledge this and will ensure all recommendations are implemented during detailed design. The issue of flood risk on the site has been dealt with elsewhere in this report.

<b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.
<b>7.22 No independent visual impact assessment provided</b>
<p>Some contributors have raised concerns about visual impact, design representation (CGIs), and the need for a visual impact assessment (VIA).</p> <p><b>Chief Executive's Response:</b> The scheme comprises a modest, low-rise, medium density residential development within an established suburban area. The CGI images submitted are standard practice in planning applications and are intended to assist in communicating the design intent and potential visual appearance of the scheme. While such images are illustrative in nature, they are not relied upon in isolation. The planning assessment has been undertaken primarily on the basis of measurable and verifiable information contained in the drawings which accurately define the proposed development. No concerns have been expressed as to how the submitted drawings and images might be considered deficient or misleading.</p> <p>It is further noted that there is no statutory requirement for an independent VIA for developments of this scale and type under the Planning and Development Regulations and the Compact Settlement Guidelines recommend that VIA is appropriate for large developments of significant scale or height.</p> <p>It is considered that the level of visual assessment information submitted with the application is appropriate and proportionate to the scale, nature, and context of the proposed development and there is no requirement to prepare independent visual assessment for the purposes on Part 8.</p>
<b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.
<b>7.23 Support for Proposal.</b>
<p>Two submissions were made wholly in support of the proposal, and it is noted that some submissions indicated support in principle for the development while taking issue with other aspects of the proposal.</p> <p><b>Chief Executive's Response:</b> Support for the development by the submitters is noted.</p>
<b>Chief Executive's Recommendation:</b> It is recommended that no variation or modification be made to the proposed development.

## 8.0 Chief Executive's Recommendation

Following detailed consideration of the issues highlighted and noting the view that the issues raised in submissions have been satisfactorily addressed as outlined in the foregoing report.

It is considered that the proposed development, on appropriately zoned lands, is consistent with the provisions of the South Dublin County Development Plan 2022-2028 and is in accordance with the proper planning and sustainable development of the area. Two ammendmens of the proposal are recommended as follows:

- It is recommended that in the interests of clarity that an independent Noise Impact Assessment (NIA) is conducted as part of the detailed design and tender preparation process and any mitigation measures proposed are into incorporated the detailed design of the project.
- It is recommended that a condition can be included that the proposal be modified – if necessary - to take in to account any recommendations or mitigation measures proposed as a result of ongoing ecological survey work during the detail design, tender preparation, construction and operational phases of the project.

Having regard to the nature and extent of the proposed development, it is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and is consistent with the South Dublin County Development Plan and its objectives.

It is therefore recommended that the Council adopt the following Motion:

**“That this Council approves of the proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development of 29 homes and all associated open spaces and all site and development works necessary to facilitate the proposed development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16, it being in accordance with the proper planning and sustainable development of the area.”**

Colm Ward  
Chief Executive

Date 8<sup>th</sup> June 2026

Chief Executive's Report on Public Consultation for Proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16.

Chief Executive's Report on Public Consultation for Proposed development consisting of the construction of a Social and Affordable Mixed Tenure Housing Development on SDCC land at Castlefield Avenue, Old Knocklyon Road, Dublin 16.