



Adamstown



A Review of

## Adamstown Strategic Development Zone Planning Scheme, 2014

in the context of the Section 28 Guidelines

### ‘Urban Development and Building Heights: Guidelines for Planning Authorities’,

(DoHPLG, 2018)

Prepared by South Dublin County Council  
Land Use, Planning and Transportation Department

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## Section 1: Introduction

### 1.1 General

The Adamstown SDZ Planning Scheme comprises 223.5 hectares of land located in West Dublin, south of Lucan and the N4 national primary road, and north of the railway line from Dublin to the South and West of Ireland (see Figure 1). The SDZ Planning Scheme divides the plan lands into eleven development areas or ‘tiles’ and sets out parameters for development within each area, including building heights.

The Department of Housing, Planning and Local Government published the document ‘*Urban Development and Building Heights – Guidelines for Planning Authorities*’ in 2018, which sets out national planning policy guidelines on building heights in relation to urban areas. The Guidelines contain a number of Strategic Planning Policy Requirements (SPPRs) including SPPR 3(B) which requires adopted planning schemes to be reviewed to ensure that the Guidelines are fully reflected.

Accordingly, the purpose of this document is to review the Adamstown SDZ Planning Scheme 2014 in order to assess its compliance with the Guidelines and to make recommendations for any changes required to ensure it is fully in line with the Guidelines.

As part of the Review, South Dublin County Council (SDCC) engaged Metropolitan Workshop (architecture and urban design consultants) in July 2019 to carry out an independent study of building heights within the undeveloped parts of Adamstown SDZ Planning Scheme 2014 (i.e. Adamstown Station, Adamstown Boulevard and Aderrig development areas). Built-out areas, areas under construction and areas where there are live permissions were not included in the study.

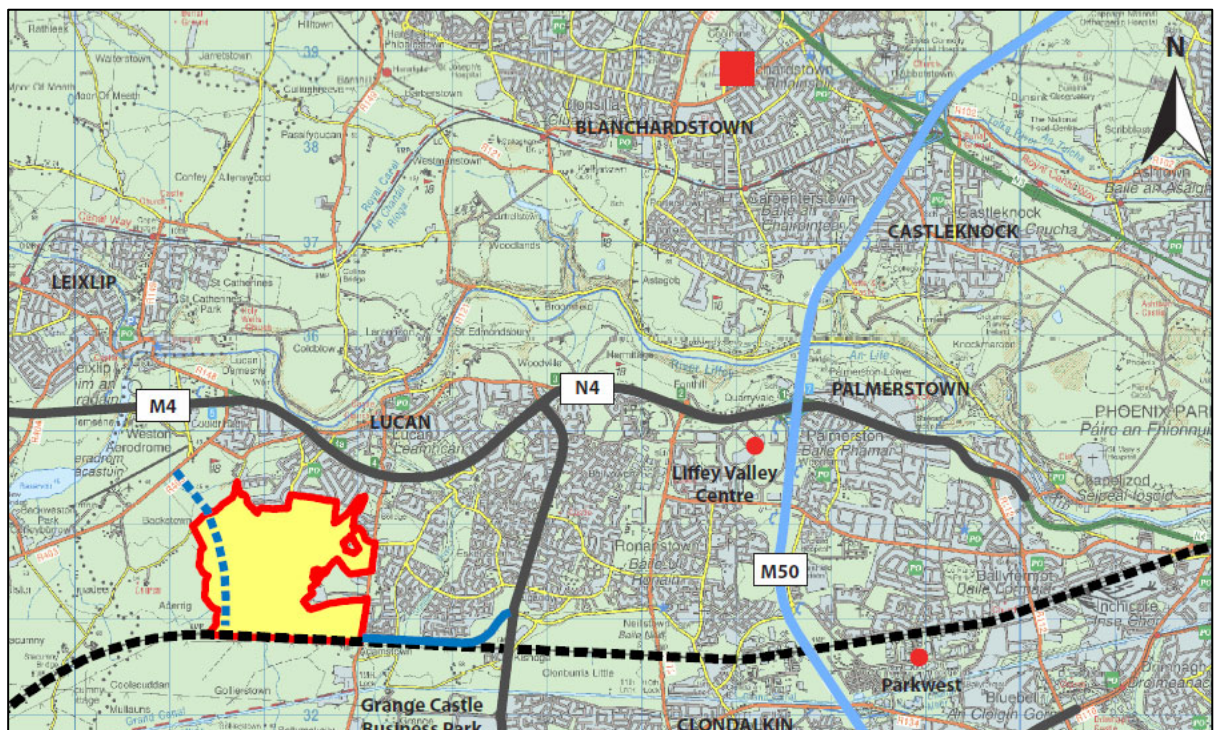
### 1.2 Summary of Findings and Recommendations

The overall finding of the Study in relation to building height was that the Scheme is compliant with the Building Heights Guidelines. A number of recommendations were made including that a one-storey location-specific height increase would be appropriate within a confined part of Aderrig. South Dublin County Council concur with this view and therefore recommend that the SDZ Planning Scheme be amended to include this proposal. Other findings/recommendations are addressed in later sections of this report.

Separately, in view of the focus on compact growth and sustainable development in other recently-published national and regional policy and guidelines (the *National Planning Framework*, 2018 (NPF); the *Regional Spatial and Economic Strategy*, 2019 (RSES); and the *Sustainable Urban Housing: Design Standards for New Apartments*,

Guidelines for Planning Authorities, 2018) the Metropolitan Workshop Study also recommended that increased density is appropriate in particular development areas including Adamstown Station and Aderrig. In this regard, a separate document was submitted to An Bord Pleanála in March 2020 seeking a non-material Amendment to the Adamstown SDZ Planning Scheme 2014, in relation to the above density and height increase recommendations (see Appendix 2). A decision regarding the proposed Amendment is due later in 2020.

Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA) Screening Reports were completed in March 2020 in light of the proposed non-material Amendment submitted to An Bord Pleanála. These AA and SEA Screening Reports include screening of the recommendations arising from the current Building Height Review (see Section 4.4 and Appendices 4 and 5). The finding of the AA screening report is that the proposed Amendment (including the proposed increase in height within part of Aderrig) is unlikely to result in any significant effect on any European Sites. The finding of the SEA screening report is that no significant environmental effects are identified for the proposed Amendment (including the proposed increase in height within part of Aderrig) and that full Strategic Environmental Assessment is not required.



**Figure 1:** Adamstown SDZ Planning Scheme Lands in the Context of West Dublin

### 1.3 Layout of Report

**Section 2** of this report outlines the background and context for the Adamstown SDZ Planning Scheme, sets out recent planning history and describes the policy approach regarding building height within the Scheme.

**Section 3** sets the broad policy context for the current Adamstown Building Height Review by outlining relevant national, regional and local policies, guidelines and plans.

**Section 4** describes the Building Heights Study commissioned by SDCC and examines in detail the provisions of the Building Heights Guidelines, outlining how the Adamstown SDZ Planning Scheme complies with these.

**Section 5** sets out the conclusion.

The following **appendices** are attached:

- **Appendix 1:** *'Adamstown Strategic Development Zone: Building Height Review'* carried out by Metropolitan Workshop Architecture and Urban Design Consultants.
- **Appendix 2:** *'Proposed Amendments in response to New Planning Policy and Guidance'*, SDCC, March 2020, submitted to An Bord Pleanála.
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## Section 2: Background, Context and Planning History

### 2.1 History

On 1st July 2001, the Government ordered the designation of 223.5 hectares of privately-owned land at Adamstown, as a site for the establishment of a Strategic Development Zone (SDZ) for the purpose of delivering residential development and associated infrastructure and facilities.

South Dublin County Council (SDCC) as the specified Development Agency for the Adamstown SDZ, prepared a draft Planning Scheme for the site in 2002. The Scheme was approved by An Bord Pleanála, on appeal, in September 2003 and provided for approximately 10,000 homes as well as community, retail, commercial, education and other uses. The emphasis of the SDZ Planning Scheme was on the creation of sustainable communities with the delivery of services in tandem with development and with movement focussed on public transport, walking and cycling.

Eleven distinct Development Areas or ‘tiles’ and four Amenity Areas were identified across the scheme (See Figure 3). Each development area has its own unique character, with allocated ranges of uses including residential, retail, commercial, community and recreation and a high-quality public realm. Areas are divided into high-density, medium-density and low-density character areas and ranges of building heights and typologies are set out, appropriate to character area, including courtyard, perimeter and landmark buildings.

Section 2.3 of the SDZ Planning Scheme ‘*Overall Design of Development*’ sets out the general model for development which –

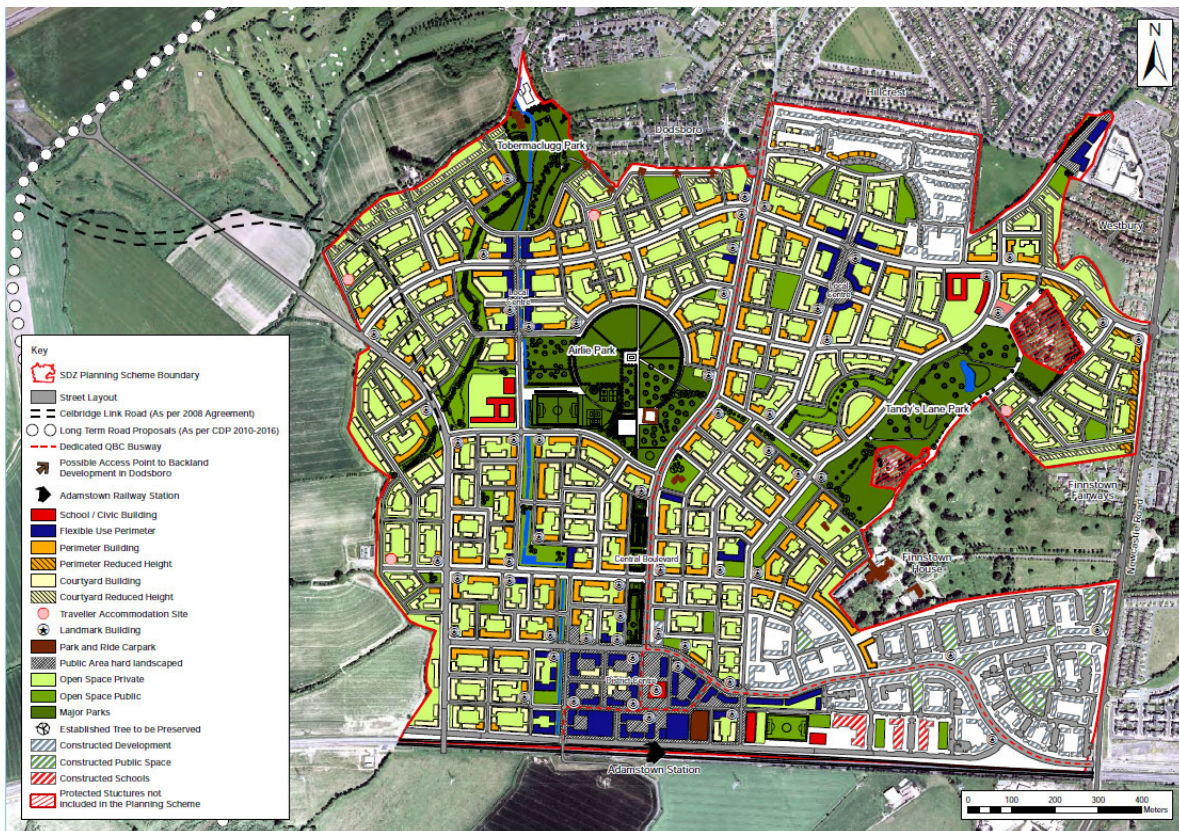
*‘is based on a traditional urban town and village format, with a lively and interconnecting network of streets, squares and public parks and gardens, varied and interesting buildings and a mix of residential, commercial, public and community uses, all in close proximity’.*

### 2.2 Review and Approval of SDZ Planning Scheme, 2014

In 2013, having regard to the challenges presented by the economic crisis and collapse of the residential market, South Dublin County Council initiated a statutory process to review and amend the 2003 Planning Scheme. This review delivered a policy refocus away from high density apartment-led development, and toward life-cycle housing and associated reduced densities. The review of the Planning Scheme retained the overall principles of a sustainable urban community and ensuring that residential development occurs at a pace whereby it is supported by all necessary facilities and infrastructure. The amended Planning Scheme, which provides for up to 8,905 homes as well as community, retail, commercial, education and other uses,



was approved by An Bord Pleanála, on appeal, in December 2014. Figure 2 below indicates the layout for the Adamstown SDZ Planning Scheme, 2014.



**Figure 2: Adamstown SDZ Planning Scheme, 2014: Layout**

### 2.3 Non-Material Amendment of SDZ Planning Scheme in 2017

Following publication of the document *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (DoHPLG, 2015), a number of amendments were proposed to the SDZ Planning Scheme 2014 to take account of the revised policy context. The amendments also sought to align the SDZ Planning Scheme with the provisions of the document *Quality Housing for Sustainable Communities* (DoEHLG, 2007). These amendments primarily related to ensuring that the minimum size of dwellings in Adamstown was consistent with national policy. These amendments to the Planning Scheme were approved by An Bord Pleanála in September 2017.





**Figure 3: Adamstown SDZ Planning Scheme, 2014: Development and Amenity Areas**

#### 2.4 Proposed Non-Material Amendment of SDZ Planning Scheme in 2020

In March 2020, the Adamstown SDZ Planning Scheme, 2014 was reviewed following publication of recent national and regional policy and guidance including the *National Planning Framework ('NPF')*, the *Regional Spatial and Economic Strategy ('RSES')*, updated *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (the 'Apartments Guidelines')* and the *Urban Development and Building Heights: Guidelines for Planning Authorities (the 'Building Heights Guidelines')*. Together, these policy and guidance documents emphasise compact growth focussed on urban cores and public transport links. Arising from the provisions of these documents, a proposed non-material Amendment was submitted to An Bord Pleanála recommending the following changes to the Planning Scheme (see Appendix 2):

- An increase in unit numbers, density and residential floor area within the Adamstown Station development area.
- An increase in unit numbers, density and residential floor area and a location-specific increase in building height within the Aderrig development area.
- Relocation of a proposed enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centre to the Adamstown Station district centre.

- Other minor amendments including updated references to and summaries of national and regional policy and guidance and updating of other references within the planning scheme document.

The location-specific increase in height within the Aderrig development area will also be recommended as part of the current Building Height Review. An Bord Pleanála is due to make a decision on the proposed non-material Amendment later in 2020.

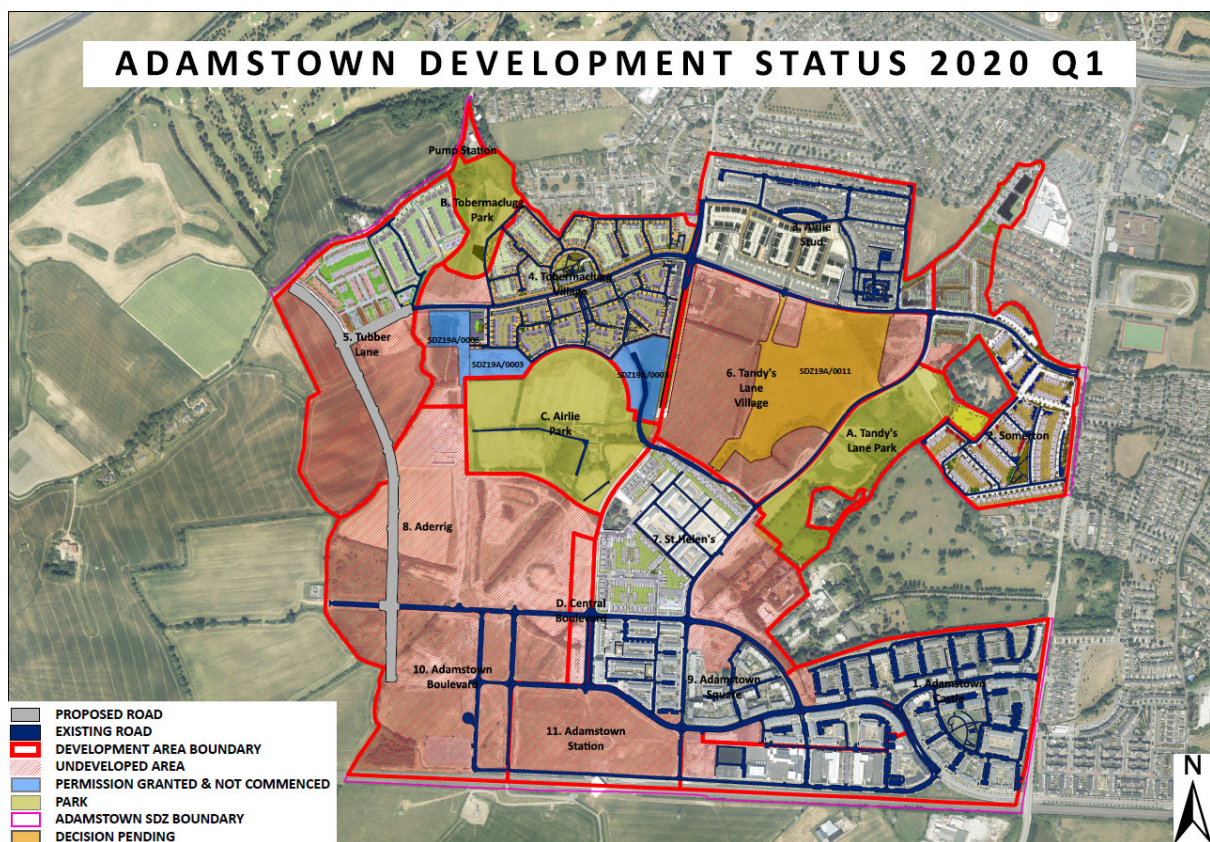
## 2.5 Development to Date in Adamstown

Development commenced in 2004 following the approval of the Planning Scheme. A total of 3,795 dwellings units have been granted permission to date. So far, the Adamstown model has delivered 2,613 homes (up to Q4, 2019) and significant supporting infrastructure and services, including a railway station, 2 primary schools, a post primary school, crèche, neighbourhood park, local retail services, a community centre and sports hall, water and sewerage infrastructure and internal strategic roads and upgrades to the adjoining road network. There are a further 600 units presently under construction (figure for Q4 2019). Development is currently in Phase 3 of the Planning Scheme.

In recent years following the economic recovery, an increasing number of planning applications have been submitted to and determined by South Dublin County Council. Developments granted since the end of 2016 including planning register reference numbers are set out below:

- A Community Centre with Sports Hall was permitted in November 2016 (SDZ16A/0001) and has been constructed.
- Permission was granted for the construction of 267 dwelling units in the north western part of the SDZ lands at Tobermaclugg in January 2017 (SDZ16A/0003). This development has been completed.
- Planning permission was granted for 246 dwellings on the eastern part of the SDZ lands at Somerton in April 2017 (SDZ16A/0005).
- 135 dwellings were granted planning permission within the central part of the SDZ lands at St Helen's in June 2017 (SDZ17A/0002).
- Planning permission was granted for an All-weather Multi-Purpose Sports Pitch in July 2017 (SDZ17A/0004).
- 169 dwellings were granted planning permission on the western part of SDZ lands at Tubber Lane in August 2017 (SDZ17A/0006).
- Planning permission was granted for Loop Road 1 in September 2017 (SDZ17A/0007); Loop Road 1 is fully constructed and operational.
- The Celbridge link road was granted permission in February 2018 (SDZ17A/0009) (forming part of Loop Road 3 within the SDZ lands).

- 268 dwelling units were granted permission in Tobermaclugg Village in March 2018, (SDZ18A/0002).
- A Local Centre including provision of a supermarket, retail unit/coffee shop was granted permission in Tobermaclugg Village in February 2019 (SDZ18A/0015).
- Tandy's Lane Public Park was granted permission in April 2018 (SDZ18A/0003).
- Airlie Park which includes provision of all-weather pitches, cricket pitch, basketball, tennis courts, play areas and changing facilities on a 10.95ha site was granted permission in February 2019 and is currently under construction (SDZ18A/0014).



**Figure 4: Development Status of Adamstown SDZ Planning Scheme, Q1 2020 (A larger version of this map is attached at Appendix 3).**

- Permission was granted for the construction of 343 dwelling units at St. Helen's in December 2018 (SDZ18A/0011) and is currently under construction.
- 237 dwelling units were granted permission in Airlie Stud Development Area in March 2018 (SDZ18A/0004) and construction has commenced.
- Permission was granted for the construction of 135 dwellings in Tobermaclugg Village Development Area in July 2019 (SDZ19A/0003).
- In February 2019, permission was granted for 148 dwellings on lands in the Tubber Lane Development Area (SDZ19A/0008).



- Planning permission has also recently been granted in October 2019 for 237 dwellings on the western part of the SDZ lands at Somerton and Airlie Stud (SDZ19A/0004).
- 158 residential units were granted planning permission in the Tubber Lane area in February 2020 (SDZ19A/0008).
- 3 additional houses were granted in the Tubber Lane area in February 2020 (SDZ19A/0010, amending the development permitted under SDZ17A/0006).
- Planning permission was granted for Tobermaclugg Park in April 2020 (SDZ20A/0005).

Approximately 2,346 dwellings units have been granted permission since the beginning of 2017, and construction is currently under way in Somerton, Tobermaclugg Village, Airlie Stud, St Helen's and Tubber Lane development areas and in Airlie Park. Figure 4 above and Appendix 3 illustrate the development status of Adamstown in Q1, 2020.

## 2.6 Building Height within the Planning Scheme

Section 2.3 (viii) '*Building Type and Height*' sets out the design rationale for building heights within the scheme, which is based around the area character type (low, medium or high density) and the building type. There are three broad building types: –

- *Courtyard Buildings*: These are smaller buildings laid out in a variety of configurations inside the perimeter of the blocks within each development area.
- *Perimeter Buildings*: These are larger buildings addressing the main roads, squares, parks and open spaces and generally defining the outside of the blocks within each development area.
- *Landmark Buildings*: These are taller buildings located at key focal points throughout Adamstown in order to create a sense of place, urban legibility and visual diversity.

In the indicative layouts for each development area, the locations for courtyard, perimeter and landmark buildings are identified and their corresponding heights are indicated depending on the development area character type. Significantly, all heights are given in ranges to allow flexibility and to avoid the visual monotony that could result from blanket height specifications.

Courtyard buildings are generally 2 to 3 storeys in height (but can range from 1 to 5 storeys depending on the density character of the area i.e. low, medium or high density); perimeter buildings are generally 3 to 4 storeys in height (but can range from 3 to 5 plus 1 storey set back, depending on the density character of the area);

while landmark buildings range from 5 to 10 storeys in height, again, depending on the density character of the area. Figure 5 below (taken from table 2.8 of the SDZ Planning Scheme) sets out Min-Max Building Height by development area for courtyard and perimeter buildings.

It should be noted that the proposed non-material Amendment currently being considered by an Bord Pleanála (referred to in Section 1.2 above) proposes *inter alia* a one storey height increase in the part of the Aderrig development area facing Central Boulevard Park, which would give a revised height range for perimeter buildings in this location of 3 plus 1 storey set back to 5 plus 1 storey set back; and for courtyard buildings, a height of 3 to 5 storeys.

As a general point, it is noted that examining building heights achieved to date within the Planning Scheme area is not a particularly useful indicator of the success of the height strategy of the Scheme; this is because most development since inception of the Scheme has taken place within low density areas, a function of the prevailing economic circumstances and their impact on development patterns. In addition, development that has taken place has also been at the lower end of the prescribed density ranges. However, within the Adamstown Square and Adamstown Castle areas, there is evidence of medium rise and medium density development that achieves good urban form and a positive sense of place through emphasis on excellent public realm, buildings addressing the street, and high-quality design and materials.

Figure 6 below comprises Table 2.9 of the SDZ Planning Scheme which identifies the Maximum Landmark Building Height by Area Character Type; i.e. max 5 storeys for low density, 7 storeys for medium density and 10 storeys for high density areas. Landmark buildings are situated at key focal points throughout Adamstown including the transport interchange, village centres, key street corners or junctions or at the end of strategic vistas, the edges of public squares or parks. The SDZ Planning Scheme requires that landmark buildings are characterised by high architectural quality in terms of innovative design and use of materials. The Scheme states that proposals will be evaluated in terms of townscape potential, overall environmental impact and contribution to sustainability through durability of materials and energy efficiency. The design rationale within the scheme also adheres to the principle of sustainable development and compact growth in terms of locating high density development and taller buildings in closer proximity to transportation nodes.

Table 2.8 Min-Max Building Height by Development Area				
	Development Area	Area Character Type	Courtyard Building Height (no. storeys)	Perimeter Building Height (no. storeys)
1	Adamstown Castle	Low density	1 - 2 and up to 3 at corners (1 - 2 where reduced)	3 - 4 and up to 5 at corners (2 - 3 and up to 4 at corners where reduced)
2	Somerton	Low density	1 - 2 and up to 3 at corners (1 - 2 where reduced)	3 - 4 and up to 5 at corners (2 - 3 and up to 4 at corners where reduced)
3	Airlie Stud	Low density	1 - 2 and up to 3 at corners (1 - 2 where reduced)	3 - 4 and up to 5 at corners (2 - 3 and up to 4 at corners where reduced)
4	Tobermaclugg Village	Low density	2 - 3 and up to 4 at corners (1 - 2 where reduced)	3 - 4 and up to 5 at corners (2 - 3 and up to 4 at corners where reduced)
5	Tubber Lane	Low density	1 - 2 and up to 3 at corners (1 - 2 where reduced)	3 - 4 and up to 5 at corners (2 - 3 and up to 4 at corners where reduced)
6	Tandy's Lane Village	Medium density	2 - 3 and up to 4 at corners	3 - 5
7	St. Helen's	Medium density	2 - 3 and up to 4 at corners	3 - 5
8	Aderrig	Medium density	2 - 3 and up to 4 at corners	3 - 5
9	Adamstown Square	High density	2 - 4 and up to 5 at corners	3 + 1 setback - 5 + 1 setback
10	Adamstown Boulevard	High density	2 - 4 and up to 5 at corners	3 + 1 setback - 5 + 1 setback
11	Adamstown Station	High density	2 - 4 and up to 5 at corners	3 + 1 setback - 5 + 1 setback

Figure 5: Table 2.8 of the Adamstown SDZ Planning Scheme, 2014

Table 2.9 Maximum Landmark Building Height by Area Character Type		
Area Character Type (development density)	Maximum Height (metres)	Maximum Height (no. of storeys approx.)
Low density	15	5
Medium density	21	7
High density	30	10

Figure 6: Table 2.9 of the Adamstown SDZ Planning Scheme 2014

## Section 3: Policy Context

### 3.1 Introduction

This section sets out the national, regional and local policy context within which the Adamstown Building Height Review is being carried out. The following relevant legislation, policy, guidelines and plans are reviewed:

- *National Planning Framework (2018)*
- *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*
- *EMRA Regional Spatial and Economic Strategy, 2019-2031*
- *Transport Strategy for the Greater Dublin Area 2016-2035*
- *Climate Action Plan (2019)*
- *Urban Development and Building heights – Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities (2018)*
- *The South Dublin County Development Plan, 2016-2022*

#### 3.1.1 *The National Planning Framework (2018)*

The *National Planning Framework* (NPF) is the Government's high-level strategic plan for shaping the future growth and development of the country to the year 2040. It is accompanied by the *National Development Plan 2018-2027* which is a 10-year investment plan for key projects. Together, the two plans form 'Project Ireland 2040', a long-term overarching strategy for sustainable social and economic development.





The NPF contains a series of National Strategic Outcomes (NSOs) which are the goals that the plan seeks to deliver. These include compact growth, sustainable mobility, a strong economy, enhanced amenities and heritage, transition to a low carbon society and access to quality childcare, education and health services.

Compact growth targets include 50% of overall national growth to be accommodated in the five cities; 40% of future housing development to be within and close to the existing footprint of built-up areas; compact urban form, facilitated through well designed higher density development; and more significant greenfield development, on sites that can be integrated with the existing built-up area of the city and serviced by high capacity public transport. In this context, Adamstown is identified in the NPF as a key future growth enabler for Dublin.

The NPF identifies a series of National Policy Objectives (NPOs) to achieve set goals for shaping development within the state into the future. Chapter 4, *'Making Stronger Urban Places'* focuses on improving urban areas, planning for future urban growth and economic development and regeneration. This chapter considers issues such as building height and car parking and proposes that these matters can be dealt with through the application of more flexible performance criteria rather than fixed standards. In this regard, NPO 13 states that:

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected."*

NPOs 33 and 35, respectively, support the idea of increasing residential density and height in appropriate locations:

*'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'.*

and

*'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights'.*

### 3.1.2 *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*

In recent years, the government has published action plans, guidelines and new legislation to combat the recession from 2008 onwards, the lack of housing supply and significantly increased monthly rents. The Urban Regeneration and Housing Act, 2015 aimed to help incentivise regeneration and address housing supply issues. Decreased development contributions were introduced to reduce the cost of built development, and a vacant sites levy was introduced, which is an annual charge designed to prevent long-term hoarding of vacant land zoned primarily for residential development.



In 2016, the Government published '*Rebuilding Ireland; Action Plan for Housing and Homelessness*'. This included several pillars of action, including addressing homelessness, acceleration of social housing provision, building more homes, improving the rental sector and utilising existing housing stock, including mechanisms to achieve all of the above. The role of a new Planning Regulator was set out, and a range of actions were specified for improving the rental sector, with emphasis on affordable rent and delivery of student accommodation.

### 3.1.3 *EMRA Regional Spatial and Economic Strategy, 2019-2031*

The Eastern and Midland Regional Assembly *Regional Spatial and Economic Strategy* (RSES) provides a long-term strategic planning and economic framework for the development of the Region. The RSES replaces the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and is informed by *Project Ireland 2040 – the National Planning Framework* (NPF) and the *National Development Plan* (NDP) – as well as other relevant policies of the government, including climate change plans and economic policies, etc.



The RSES is implemented in policy by way of review by local authorities of all development plans and other relevant plans. The Strategy sets out 16 Regional Strategic Outcomes (RSOs), which are aligned with international, EU and national policy and which in turn set the framework for city and county development plans. The RSOs include sustainable settlement patterns, compact growth and urban regeneration, healthy cities, integrated transport and land use and enhancement of biodiversity and natural heritage.

The RSES contains a *Metropolitan Area Strategic Plan* (MASP) for the Dublin Metropolitan Area. In order to achieve the ambitious growth targets of the *National Planning Framework*, the MASP identifies strategic residential and employment corridors along key existing and planned public transport corridors, that contain development opportunities for the city – Adamstown is identified as one of these locations, forming part of the South West Strategic Development Corridor.

#### 3.1.4 *Transport Strategy for the Greater Dublin Area 2016-2035*

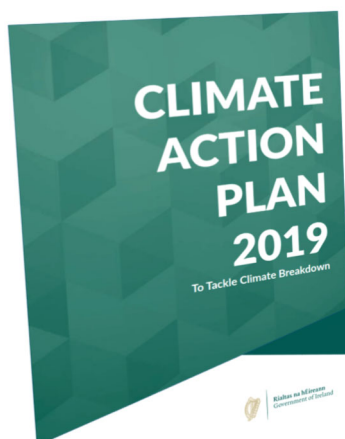
This transport strategy provides a framework for the planning and delivery of transport infrastructure and services for the Greater Dublin Area. Adamstown is a major residential and commercial area located within the GDA and as such, the implications of the transport strategy for this area are important.



The relevant transport objectives for the SDZ area are:

- Corridor C – Maynooth-Leixlip-Lucan to Dublin City Centre (Adamstown and Clonburris are incorporated within this corridor): The Kildare Railway Line serves Adamstown and will cater for its future population growth.
- Expansion of the DART Network along the Kildare Line: At the time of writing, this project is at design stage and consultation has commenced with local authorities and other key stakeholders with a view to instigating the statutory application process. Customer capacity and train service frequency will be significantly increased as a result of the project.
- New LUAS line proposed from central Lucan to the city centre.
- Development of Greenways and enhanced cycle provision as per the GDA Cycle Network Plan.

### 3.1.5 *Climate Action Plan (2019)*

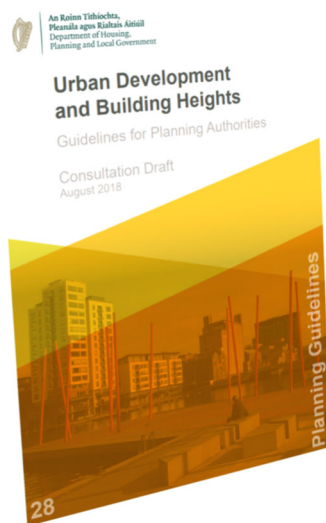


The 'Climate Action Plan' was published in June 2019 and sets out the commitment of the government and public bodies to tackling climate disruption and achieving Ireland's decarbonisation goals. Central to this are principles of sustainability and more connected communities.

The action plan promotes principles involving less transport intensive growth by implementing key policies such as those contained in the National Planning Framework to promote compact growth and connected and sustainable living.

### 3.1.6 Urban Development and Building Height Guidelines (2018)

The 'Urban Development and Building Heights: Guidelines for Planning Authorities' were published in December 2018 under section 28 of the Planning and Development Act, 2000 (as amended) and set out national planning policy guidelines on building heights in relation to urban areas. The Guidelines reiterate the need for sustainable urban communities, consolidation and strengthening of the existing built up areas and moving away from low density urban sprawl, in line with the principles of the NPF and RSES. The Guidelines highlight that there is significant scope to accommodate the anticipated population growth and development needs set out in the NPF by building up and consolidating existing urban areas.



In common with the NPF, the Guidelines promote a new approach based around stated performance criteria rather than generic limits or blanket height restrictions. Development plans, local area plans and SDZ planning schemes are required to become: -

*'more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, whilst also being mindful of the quality of development and balancing amenity and environmental considerations'.*

The Guidelines set out four Specific Planning Policy Requirement (SPPRs) which must be complied with:

**SPPR 1** supports increased building height and density in locations with good transport links. Local authorities are to identify those specific areas in statutory plans.

**SPPR 2** concentrates on ensuring that appropriate mixes of uses are provided for in statutory plans.

Section 3 of the Guidelines focuses on building height and the Development Management process and implementing national policy that building heights should be increased in appropriate urban locations with good public transport accessibility. The Guidelines set out 'development management criteria' and applicants must demonstrate how a given proposal will satisfy these. The criteria are grouped under headings relating to different urban scales; i.e. at the scale of the city/town; at the scale of the district/neighbourhood/ street; and at the scale of the site/building. Other specific assessments that may be relevant at all of these scales are also set out. Criteria include proximity to good transport links; character of the area, having regard to key features; contribution to place-making; response to surrounding natural and built environment; use of well-considered design and materials; access to natural daylight, ventilation and views; minimisation of overshadowing and loss of light, etc.

**SPPR 3** specifically focuses on development management and on planning schemes, referencing the aforementioned criteria. SPPR 3(B) is particularly significant in that it specifically refers to adopted Planning Schemes and states:

***'In the case of an adopted planning scheme the Development Agency in conjunction with the relevant Planning Authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate locations shall be articulated in any amendment(s) to the planning scheme.'***

The review of building height in Adamstown set out in the current document arises from this requirement.

**SPPR 4** concentrates on building height in suburban/edge locations (city and towns). Planning authorities are required to secure minimum densities as set out in the

guidelines ‘Sustainable Residential Development in Urban Areas (2007)’; a greater mix of building heights and typologies in suburban locations; and avoidance of mono-type building typologies.

In section 3.5, specific reference is made to Adamstown SDZ, in the context of being an exemplar for the provision of a variety of building typologies and tenure options including townhouses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storey and above).

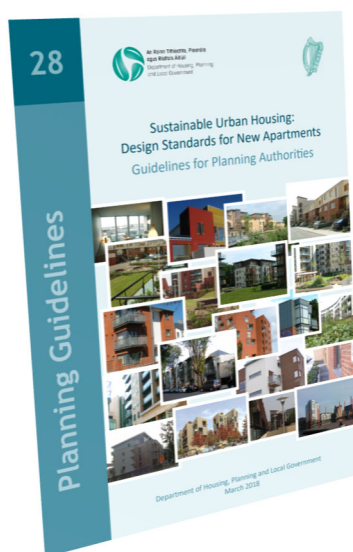
In this regard, it states that: -

*‘the forms of development set out above can, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community as in the case of the award winning Adamstown Strategic Development Zone in South Dublin County Council’.*

Section 4 below analyses the SDZ Planning Scheme in the context of the requirements of the SPPRs in the Building Heights Guidelines, in more detail.

### 3.1.7 Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)

The *Sustainable Urban Housing: Design standards for New Apartments: Guidelines for Planning Authorities (March 2018)* were published under Section 28 of the Planning and Development Act, 2000 (as amended). They supersede and build upon the 2015 Apartment Guidelines.





The new Guidelines have changed the unit mix which is considered acceptable, therefore allowing for increased residential density, in line with national and regional policy contained in the NPF (National Planning Framework) and the RSES (Regional Spatial and Economic Strategy). They have also relaxed restrictions on studio apartments to enable these unit types to potentially play a greater role in meeting Ireland's current housing demand.

The Guidelines contain a number of Specific Planning Policy Requirements (SPPRs):

**SPPR 1** allows apartment developments to include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios), and no minimum requirement for apartments with three or more bedrooms. It also provides for planning authorities to specify a residential unit mix within a statutory development plan, but only subject to an agreed HNDA (Housing Needs Demand Assessment) incorporated into that development plan.

**SPPR 2** expands on unit mix in relation to schemes of different sizes. **SPPR 3** sets out minimum apartment floor areas; the main change here is the specified minimum floor area of 37 sq. m. for studio apartments (reduced from 40sqm in the previous 2015 Guidelines). **SPPR 4** refines the policy on the requirement for dual aspect apartments (minimum 33% dual aspect in central urban locations and minimum 50% in suburban/intermediate locations); **SPPR 5** specifies a 2.7m minimum ground floor level apartment floor-to-ceiling heights (as before); **SPPR 6** increases the maximum number of apartments per stair core from 8 to 12; **SPPRs 7 and 8** specify requirements in relation to Build-To-Rent development (in general terms, many of the limitations applying to development generally, including unit mix and car parking, are relaxed in the case of BTR developments); while **SPPR 9** sets out requirements in relation to Shared Accommodation.

The Guidelines also outline the appropriate scale and extent of apartment development having regard to proximity and accessibility considerations whereby increased density is promoted, the greater the proximity to urban cores and public transport links. The Guidelines identify three main location types: - Central and/or Accessible Locations; Intermediate Urban Locations; and Peripheral and/or Less Accessible Urban Locations. Adamstown would fall into the 'Intermediate Urban Locations' category. Sites identified within this category as suitable for apartment development include:

*'Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up*

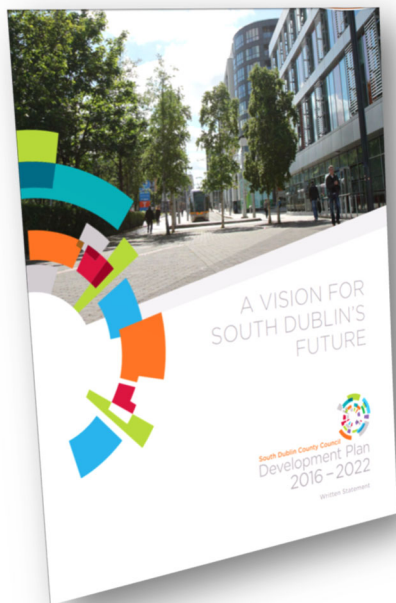
to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided’.

### 3.1.8 South Dublin County Development Plan 2016-2022

The current South Dublin County Development Plan was adopted in 2016, which post-dates the Adamstown SDZ Planning Scheme 2014. The Development Plan sets out an overall strategy for the proper planning and sustainable development of the County for the period 2016-2022. Text and policies relating to building height are set out below:

Section 2.2.3 *Residential Building Height* states:

*‘A policy shift towards more compact and sustainable forms of development over the past two decades has resulted in increased building heights in the County. Varied building heights are supported across residential and mixed-use areas in South Dublin County to promote compact urban form, a sense of place, urban legibility and visual diversity’.*



Council policy on residential building heights is set out below:

### HOUSING (H) Policy 9 Residential Building Heights

**It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County.**

#### H9 Objective 1:

To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity.

#### H9 Objective 2:

To ensure that higher buildings in established areas respect the surrounding context.

#### H9 Objective 3:

To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).

#### H9 Objective 4:

To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.

**Figure 7: Council Policy on Residential Building Heights; South Dublin County Development Plan, 2016-2022**

Section 5.1.5 deals with building height in urban centres including Strategic Development Zones and as such is particularly relevant to building height within Adamstown. It states:

*‘Varied building heights are supported in urban centres and regeneration zones and will be important in creating a sense of place, urban legibility and visual diversity. Tall buildings that exceed five storeys will be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones based on approved Local Area Plans or SDZ Planning Schemes (see also Chapter 2 Housing and Chapter 11 Implementation).’*

Council policy on building heights in urban centres is set out below:

URBAN CENTRES (UC) Policy 6 Building Heights
It is the policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.
<b>UC6 Objective 1:</b> To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.
<b>UC6 Objective 2:</b> To ensure that higher buildings in established areas take account of and respect the surrounding context.
<b>UC6 Objective 3:</b> To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

**Figure 8: Council Policy on Building Heights in Urban Centres; South Dublin County Development Plan, 2016-2022**

Chapter 11 of the Development Plan deals with ‘*Implementation*’ and sets out development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. Section 11.2.7 sets out the rationale for how building height is treated in the development management process, as follows:

*‘Varied building heights are supported across residential areas, urban centres and regeneration zones in South Dublin County, subject to appropriate safeguards to protect the amenity of the area.*

*Development proposals that include ‘higher buildings’ that are greater than the prevailing building height in the area should be supported by a strong urban design rationale (as part of a Design Statement) and provide an appropriate series of measures that promote the transition to a higher building.*

*Proposals for higher buildings of over three storeys in residential areas should be accompanied by a site analysis (including character appraisal) and statement that addresses the impact of the development (see also Section 11.2.1 – Design Statements).*

*The appropriate maximum or minimum height of any building will be determined by:*

- *The prevailing building height in the surrounding area.*

- *The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved.*
- *The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space.*
- *The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development.*

*Proposals for ‘tall buildings’, that exceed five storeys will only be considered at areas of strategic planning importance such as key nodes, along the main street network and along principal open spaces in Town Centres, Regeneration zones and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme’.*

Section 11.2.5 relates to ‘Enterprise and Employment Areas’ and contains Table 11.18 which specifies ‘Key Principles for Development within Enterprise and Employment Zones’. The extract from that table below relates to building heights within enterprise and employment areas.

<b>Key Principles for Development within Enterprise and Employment zones</b>	
<b>Built Form and Corporate Identity</b>	Building heights respond to the surrounding context with transitions provided where necessary and reinforce the urban structure with taller buildings located along key movement corridors, gateways and nodes.
	Individual buildings should be of contemporary architectural design and finish (including use of colour). Various treatments should be employed to reduce the bulk, massing and scale of larger buildings.

**Figure 9: Extract from Table 11.18; South Dublin County Development Plan, 2016-2022**

## Section 4: Building Height Study and Requirements of Guidelines

### 4.1 Review Requirement

The overall objective of the *Urban Development and Building Height Guidelines* is to set out government policy to support increased building height and density in urban locations with good public transport accessibility. Planning authorities are required to explicitly identify areas where increased building height will be actively pursued, and not to provide for blanket numerical limitations on building height. The guidelines identify development management criteria which applicants must demonstrate that a proposed development satisfies. Specific Planning Policy Requirement 3(B) requires that a review of all adopted planning schemes should be carried out to ensure that these criteria are fully reflected, and in particular that Government policy that building heights be generally increased in appropriate locations, be articulated in any amendments to the planning scheme. This requirement therefore gives rise to the current Adamstown Building Height Review.

### 4.2 Building Heights Study

South Dublin County Council engaged Metropolitan Workshop (architecture and urban design consultants) in July 2019 to carry out an independent study of building heights within the undeveloped parts of the Adamstown SDZ Planning Scheme, 2014, to inform this Height Review Study. These comprise the development areas of Adamstown Station, Aderrig and Adamstown Boulevard which are all located close to the railway station. The remainder of Adamstown SDZ has either been built-out, is under construction or has live planning permissions in place and as such has not been considered in the study. In addition to building height, the Metropolitan Workshop study also examined and made recommendations in relation to the interconnected issue of density.

The overall finding of the Study in relation to building height is that the Scheme is compliant with the Building Heights Guidelines, but that it is possible to achieve a planning scheme of greater density than is permissible in the current scheme while adhering to the existing building heights. As such, increased density is recommended in particular locations including Adamstown Station, Adamstown Boulevard and Aderrig while a minor increase in height is advocated within a confined area of Aderrig. The proposed non-material Amendment submitted to the Board in March 2020 seeks increased density within the Adamstown Station and Aderrig development areas and increased height within a confined area of Aderrig, in line with these recommendations. The recommendation regarding increased density within Adamstown Boulevard is not being pursued at this point in time as it was

considered that this area requires further closer analysis in order to allow consideration of alternative ways to proceed.

#### 4.2.1 Methodology

The core methodology of the Building Height Review study involved carrying out a series of capacity studies which tested four different development scenarios for Adamstown Station, Adamstown Boulevard and Aderrig to determine whether increased prescribed heights for these areas could be recommended. In all cases, in order to ensure best practice urban design, a number of constraints were applied to the capacity studies, including:

- Avoidance of overlooking to protect residential amenity;
- Providing a diverse mix of dwelling types and sizes to promote better social cohesion;
- Ensuring economic viability of development;
- Avoidance of north facing single-aspect apartments;
- Generally providing at least 6 units per floor per core; and
- Ensuring continuous but varied road frontage to create better urban form.

Specific tested building typologies were used and particular unit mixes were assumed. The four capacity studies are described as follows:

1. **Capacity Study 1** is particularly relevant as it tested a scenario using existing densities and building heights prescribed in the current Adamstown SDZ Planning Scheme. The purpose was to determine a baseline feasibility for the development of the areas without any changes to the Planning Scheme. This was found to result in poor urban form, particularly in the Adamstown Station area where there would be –

*‘discontinuous street frontage, leaky spaces, etc. when built out at 6 storeys’.*

The report further stated that –

*‘this form of development very quickly reaches the upper levels of quantum with a built form which looks underdeveloped. This suggests that there is scope for increased density in this location without having to necessarily increase the existing height limits.’*

In relation to Aderrig, the finding was that –

*‘there may be an over-reliance on 4-5 storey apartment buildings which may not be built due to viability issues’.*



2. **Capacity Study 2** applied the parameters above but utilising mainly duplex dwellings. The purpose of this was to demonstrate the potential that the 3/4 storey height limits in some areas within the current SDZ Planning Scheme may result in duplex units being proposed rather than apartments due to their greater economic viability at this height. This was viewed in the study as a risk in that a preponderance of duplexes would result in poor urban form.
3. **Capacity Study 3** used increased densities within the current height parameters of the Planning Scheme. This would examine whether the current heights are too low to facilitate higher density development, as well as providing more optimal urban form, particularly in the Adamstown Station area (being close to a major transport link).
4. **Capacity Study 4** comprised an 'optimised' scenario taking the best elements of the other scenarios. This aimed to reconcile the densities of the first scenario, avoid the overuse of duplexes arising from the second scenario, and add to the better urban form of the third scenario, to produce an optimised scheme from both the urban design and economic viability point of view.

Significantly, the study also analysed key performance criteria which reflect the criteria set out in section 3.2 of the Building Height Guidelines and referred to in section 3.1.6 of this report (above) and analysed in more detail in section 4.3 below. These include criteria grouped under headings such as '*at the scale of the relevant city/town*', '*at the scale of district/neighbourhood/street*' and '*at the scale of the site/building*'.

#### 4.2.2 *Building Height Study Findings*

The conclusions and recommendations contained in the Metropolitan Workshop study are set out below, followed by a comment on each, addressing what action, if any, is recommended as a result.

With respect to analysis of the key performance criteria which reflect the criteria set out in section 3.2 of the Building Height Guidelines the study concludes:

*'the SDZ Scheme in its current form meets the Key Performance Criteria and therefore the scheme can be fully in alignment with the new Guidelines'*.

**Comment:**

Therefore, the study finds that the SDZ Planning Scheme reflects the criteria cited in section 3.2 and referred to in SPPR 3(B) of the Guidelines. This is examined in more detail in Section 4.3 below. This is also a significant statement in that it finds that the

Adamstown SDZ Planning Scheme 2014 is in line with the Building Heights Guidelines.

This is reiterated in the initial overall summary statement in the 'Conclusions' section which states the following:

*'In summary, from the [analysis carried out for the Building Height Review] it can be concluded that in relation to the development areas of Aderrig, Adamstown Boulevard and Adamstown Station the current overall SDZ appears to be fully compliant with 'Urban Development and Building Heights: Guidelines for Planning Authorities'.'*

The Study sets out the recommendations below in order *'to offer more variation in the urban form and to enable a broader mix of typologies'*:

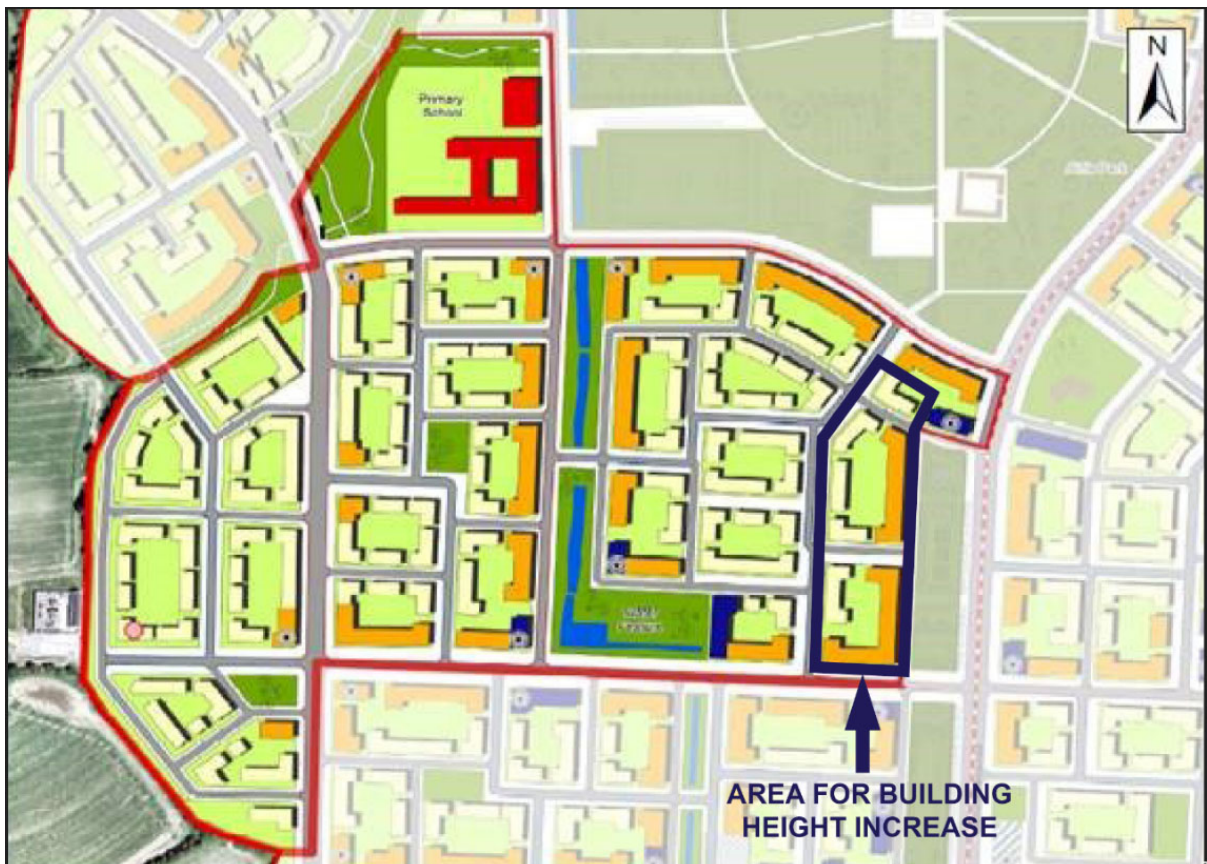
- *To improve legibility along the linear parks it is recommended to increase the maximum height in Aderrig along the Central Boulevard Park to 6 (5 + 1 setback) stories. [See Revised Building Heights Diagram - Page 38].*
- *Additionally, to promote a more gradual change in heights, it is recommended to increase the maximum heights for the buildings adjacent to the buildings altered above to 5 stories.*

**Comment:**

The one-storey height increase within a confined area in Aderrig as recommended above, has been proposed as part of the non-material Amendment submitted to An Bord Pleanála in March 2020. The location for the height increase is beside Central Boulevard Park, resulting in an overall height of up to 6 storeys (i.e. 5 plus 1 set back) for the perimeter buildings addressing the Park; and up to 5 storeys for the courtyard buildings directly behind to the west. The blocks where additional height is proposed are located beside or close to a major street and future bus corridor, are within a 5-7-minute walk of the train station and district centre and would provide a stronger urban edge addressing Boulevard Park. Existing and proposed heights within this part of Aderrig are specified in Figure 10 while the location for the height increase is indicated in Figure 11.

<b>ADERRIG</b> Building Heights adjoining Central Boulevard Park as per SDZ Planning Scheme and as now proposed		
<b>Building Type</b>	<b>Heights in SDZ Planning Scheme 2014</b>	<b>Proposed Heights (adjoining Central Boulevard Park only)</b>
Courtyard Building	2-3 storeys with up to 4 storeys at corner/feature building	<b>3 to 5 storeys (i.e. 1 storey increase)</b>
Perimeter Building	3-5 storeys	<b>3 + 1 setback – 5 + 1 setback (i.e. 1 storey increase)</b>
Landmark Building	Up to 7 storeys	Up to 7 storeys (No change)

**Figure 10:** Table indicating Building Heights as per SDZ Planning Scheme and as now proposed in Amendment submitted to An Bord Pleanála



**Figure 11:** Indicative layout for Aderrig development area, Adamstown SDZ Planning Scheme 2014, showing location for proposed building height increase.

- *It is recommended that the target densities of the three development areas which are the subject of this report should be increased to the following to facilitate higher-density urban form in line with current planning guidelines\*:*

- *Aderrig = 52-70 dwellings per hectare (d/Ha)*
- *Adamstown Boulevard = 60-80 d/Ha*
- *Adamstown Station = 85-150 d/Ha*

*\*as dwelling yield is based on standardised average dwelling sizes, the total permissible development areas for the SDZ should be increased accordingly.*

**Comment:**

As part of the proposed non-material Amendment submitted to An Bord Pleanála in March 2020, increases in density broadly in line with the above were proposed for both Adamstown Station and Aderrig, having regard to national policy seeking compact growth focussed on urban cores and public transport links. The recommended density increase within Adamstown Boulevard is not being pursued at the current juncture as it is considered that further closer analysis of possible alternatives is required.

- *In order to provide better urban form, in particular in Adamstown Station, it is recommended that ‘landmark’ buildings are favoured close to the train station.*

**Comment:**

The SDZ Planning Scheme currently allows for up to seven landmark buildings (each up to 30 metres / ten storeys in height) within the Adamstown Station development area. A further nine landmark buildings are provided for on adjoining development tiles which are also in close proximity to the Station. All 16 of the foregoing landmark buildings would be within a five-minute walk of the railway station. It is therefore considered that there is more than adequate scope within the current SDZ Planning Scheme for landmark buildings in locations close to the station. It is noted that the ‘*Revised Building Heights*’ drawing on page 38 of the Metropolitan Workshop report (Appendix 1) indicates the same number of landmark buildings as the SDZ Planning Scheme, but located somewhat closer to the Station. However, it is considered that there is sufficient flexibility within the Scheme for specific locations of landmark buildings to be decided at planning application stage, having regard to the indicative layouts for each area presented in the Planning Scheme.

It is also noted that a 6-8 storey building height is indicated on the ‘*Revised Building Heights*’ drawing for all landmark buildings (i.e. within Aderrig, Adamstown Station and Adamstown Boulevard). The current approach of the SDZ Planning Scheme is considered more refined, whereby heights for landmark buildings are prescribed

according to area character i.e. up to 5 storeys for low density areas; up to 7 storeys for medium density areas (such as Aderrig); and up to 10 storeys for high density areas (such as Adamstown Station). This approach is considered more appropriate and as such is being retained.

- *Proposed developments in excess of 32 metres will likely be subject to restrictions from the Irish Aviation Authority.*

**Comment:**

The tallest buildings provided for within the SDZ Planning Scheme are a maximum of 30 metres. In view of the location of Adamstown in proximity to both Weston Airport and Baldonnell Aerodrome (Adamstown railway station is 2.2km southeast of Weston Airport and 3.75km north of Baldonnell Aerodrome), at planning application stage, all proposals involving tall buildings are referred to the Irish Aviation Authority and the Department of Defence for comment.

- *The current SDZ does not appear to differentiate between residential and non-residential storeys in its prescription of heights. In practice, non-residential development is likely to be notably taller per storey and therefore there is potential for disparity in height that may have a negative impact on the urban form of future development. Any future amendment to the scheme in terms of building heights should acknowledge and address this.*

**Comment:**

Building heights for landmark buildings are given in both maximum height in metres and approximate equivalent storey height (see Figure 6 which contains Table 2.9 of the SDZ Planning Scheme). General building heights for courtyard and perimeter buildings are given as a storey height range. It is considered that there is sufficient flexibility in this approach to accommodate any differential between commercial and residential building heights without undue impact on urban form.

#### 4.2.3 Summary

The Building Height Study therefore establishes that the Adamstown SDZ Planning Scheme, 2014 is compliant with the Building Height Guidelines and makes several recommendations which have been addressed above. This includes a recommendation for a one storey height increase in a confined location within Aderrig. The blocks where additional height is proposed are located beside or close to a major street and future bus corridor and are within a 5-7-minute walk of the train station and district centre. The proposed height increase would improve

legibility by providing a stronger urban edge addressing Boulevard Park which is a key urban public open space. South Dublin County Council has considered the findings of the report and concurs with this recommendation which has been included in the proposed Amendment submitted to An Bord Pleanála in March 2020.

#### 4.3 Building Heights Guidelines – Specific Planning Policy Requirements

An analysis of the SDZ Planning Scheme in the context of the four Specific Planning Policy Requirements contained in the Guidelines is set out below.

##### **SPPR 1**

*‘In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height’.*

##### **Comment:**

This SPPR specifically refers to ‘redevelopment, regeneration and infill development’ and is therefore not applicable to Adamstown SDZ, which is a greenfield suburban site on the western fringes of Dublin City. Notwithstanding this, in the Adamstown SDZ Planning Scheme, building heights are prescribed as flexible ranges appropriate to character area. The matter of increased building height in appropriate locations in the County generally will be addressed as part of the County Development Plan review and in any future statutory local area plans.

##### **SPPR 2**

*‘In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities’.*



**Comment:**

The Adamstown SDZ Planning Scheme provides for a wide range in building heights compared to the prevailing context and a mix of residential, commercial and community uses including retail, employment, recreation and education. Development within the Adamstown Planning scheme is subject to a schedule of phasing and implementation which is intended to ensure that appropriate levels of infrastructure, services, facilities and amenities are provided in tandem with residential development. It is considered that the Adamstown SDZ Planning Scheme is broadly consistent with SPPR 2.

**SPPR 3**

*It is a specific planning policy requirement that where;*

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*  
*2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.*

- (B) *In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme*

- (C) *In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.*

**Comment:**

SPPR 3(A) refers to development in general subject to a development plan/local area plan, and SPPR 3(C) refers to planning schemes approved after the coming into force of the Building Height Guidelines and as such, neither are relevant to Adamstown.

SPPR 3(B) is particularly relevant to Adamstown as it requires adopted planning schemes to be reviewed to ensure that the development management criteria set

out in Section 3.2 of the Guidelines are fully reflected and consistent with the Planning Scheme and that any amendment(s) should reflect Government policy to increase building heights in appropriate locations. The formal review of the Adamstown SDZ Planning Scheme now being conducted is as a result of the provisions of this SPPR.

In relation to the development management criteria, the Guidelines also require that;

*'in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies [the] criteria.'*

Therefore, the criteria require to be reflected within planning schemes and, in turn, need to be addressed by applicants for planning permission.

The criteria are grouped under headings relating to different urban scales; i.e. *at the scale of the city/town; at the scale of the district/neighbourhood/ street; and at the scale of the site/building*. Other specific assessments that may be relevant at all of these scales are also set out.

A summary of these criteria is set out below:

- At the scale of the relevant city/town:
  - Site well-served by public transport;
  - Integration into/enhancement of the character of the public realm of the area;
  - Makes a positive contribution to place-making.
- At the scale of the district/neighbourhood/street:
  - Responds to natural and built environment including urban neighbourhood and streetscape;
  - Proposal not monolithic; materials/building fabric well-considered;
  - Enhances the urban design context for public spaces and key thoroughfares; additional height should enhance scale and enclosure; *'The Planning System and Flood Risk Management – Guidelines for Planning Authorities'* (2009) should be adhered to.
- At the scale of the site/building:
  - Form, massing and height should promote access to daylight, ventilation, views and minimise overshadowing and loss of light;

- Quantitative performance approaches to daylight provision should be heeded or a rationale for any alternative design solutions set out;
- Specific assessments may also be required to support proposals such as assessments of impact on: -
  - Microclimate;
  - Biodiversity (particularly the potential interaction of buildings and lighting with bird and bat flight lines);
  - Impact on telecommunication links;
  - Aeronautical assessment;
  - Urban design statement (including impact on historic built environment); and
  - Relevant environmental assessments including SEA, EIA AA and Ecological Impact Assessment, as appropriate.

The Adamstown SDZ Planning Scheme development strategy is based on urban design considerations, which incorporate the issues covered by the above criteria. The independent study carried out by Metropolitan Workshop also found that the

*‘the SDZ Scheme in its current form meets the ..... criteria and therefore the scheme can be fully in alignment with the new Guidelines’.*

The Planning Scheme philosophy set out in section 1.1 of the Planning Scheme document emphasises that;

*‘the Scheme was prepared with regard to best practice in the planning and design of new urban communities’.*

It highlights that the approach is holistic, integrating the following elements:

- **Urban Design** *To create urban place with a strong sense of identity that is attractive and desirable as well as safe and secure, in a traditional town and village format;*
- **Land Use** *To require a mix of land uses to provide amenities, facilities, services and employment and enable the community to work, shop and recreate locally;*
- **Housing** *To facilitate a mix of house types, sizes and tenure options that allow all sections of society to remain part of the community throughout the life cycle i.e. from the cradle to the grave;*
- **Transportation** *To provide alternatives to the private car in the form of a new railway station and transport interchange, additional rail capacity, dedicated bus routes and a continuous network of walking and cycling links;*

- **Ecology and Landscape** *To preserve ecosystems and landscape by incorporating distinct habitats and established landscape features into a network of parks and open spaces;*
- **Conservation** *To protect and ensure the appropriate use of historic structures, built heritage and archaeological features;*
- **Energy Efficiency** *To minimise energy usage through innovations in accessibility, block layout, building design, use of materials and adaptability in floor plans and uses;*
- **Phased Delivery** *To ensure that development occurs at a pace whereby it is supported by all necessary infrastructure, services, amenities and facilities.*

Furthermore, Section 2.3 of the Planning Scheme sets out the ‘Design Statement’.

The basic tenet is as follows:

*‘Development in the Adamstown SDZ is based on a traditional urban town and village format, with a lively and interconnecting network of streets, squares and public parks and gardens, varied and interesting buildings and a mix of residential, commercial, public and community uses, all in close proximity’.*

The Scheme sets out guiding principles for planning and design within Adamstown, which also fully reflect the development management criteria set out in SPPR 3(B).

The guiding principles are as follows:

- *Connectivity and permeability in layouts rather than enclosed and gated enclaves;*
- *Perimeter buildings addressing and abutting streets rather than set back on their sites;*
- *Integration of buildings and public amenity space to ensure overlooking and passive supervision;*
- *A mix of activities and uses focused on a hierarchy of identified centres with opportunities for non-residential development throughout the area;*
- *Greater variety in residential densities than in suburban areas to date;*
- *Greater variety in building height;*
- *Opportunities for landmark buildings at key nodes and focal points to promote urban legibility and a varied townscape;*
- *Good modern architecture with a building language that is varied and forward-looking rather than repetitive and retrospective;*
- *A range and choice of dwelling types and sizes;*
- *Apartments, duplexes and townhouses, with greater internal floor areas and private amenity space than before;*
- *Increased utilisation of shared/communal and well-defined on street car parking.*

This section of the Planning Scheme closes with the statement:

*‘These principles support a deliberate shift in the planning and design of Adamstown, away from the traditional suburban housing estate format towards a more sustainable, compact and integrated urban format of development’.*

With specific reference to landmark buildings, paragraph 2.3.36 of the Scheme states:

*‘Landmark buildings will be characterised by high architectural quality in terms of innovation in design and use of materials. They will be evaluated in terms of townscape potential, overall environmental impact and contribution to sustainability through durability of materials and energy efficiency’.*

It is therefore clear from the above that the development management criteria referred to in SPPR 3(B) of the Guidelines are fully reflected throughout the Planning Scheme and in particular within the aspects cited above including the ‘Adamstown Planning Scheme Philosophy’ (Section 1.1); and the guiding principles set out in ‘Overall Design of Development’ (Section 2.3).

#### **SPPR 4**

*It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

#### **Comment**

Sections 3.4 – 3.8 of the Guidelines, which include SPPR 4, relate to ‘Building height in suburban/edge locations (City and Towns)’ and are of most relevance to Adamstown. It is noted that Adamstown is specifically referenced in Section 3.5 as

an exemplar of a medium density development area with good urban form and sense of place.

Section 3.4 outlines that newer housing developments in suburban edges of towns and cities now typically include 2-3 storey town-houses, duplexes of 3-4 storeys and apartments of 4 storeys upwards. The Guidelines state in section 3.6 that –

*‘development should include an effective mix of 2, 3 and 4 storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets’.*

In Section 3.7, the guidelines state that –

*‘such development patterns are generally appropriate outside city centres and inner suburbs, i.e. the suburban edges of towns and cities, for both infill and greenfield development and should not be subject to specific height restrictions.’*

It is considered that the Adamstown SDZ Planning Scheme balances the requirement for no blanket height restrictions in the Building Height Guidelines, with the requirement that strategic development zone planning schemes specify maximum heights, as set out in Section 168 (2)(C) of the Planning and Development Act, 2000 (as amended), in that the Planning Scheme provides for flexible height ranges appropriate to different character areas (low, medium and high density areas). Broadly, this approach comprises the specification of an adaptable mix of building types and heights including courtyard buildings ranging from 1-4 storeys; perimeter buildings ranging from 3-5 storeys; and landmark buildings up to 5, 7 and 10 storeys in low, medium and high-density character areas, respectively. This approach allows for taller buildings in appropriate locations such as close to the railway station and lower buildings in other locations such as close to existing low-rise suburban development.

The requirements of sub-categories 1-3 of SPPR 4 are achieved within the Adamstown Planning Scheme through the following:

1. The Guidelines *‘Sustainable Residential Development in Urban Areas’* (DoEHLG, 2009) refer to net residential densities in the general range of 35-50 dwellings per hectare (dph) in ‘Outer Suburban / Greenfield Sites’ and recommend increased densities along public transport corridors of a minimum of 50 dph, with the highest densities being located at bus stops/rail stations. The Adamstown SDZ Planning Scheme allows for a net density range of 47-56 dph across the entire SDZ lands with



75-90 in Adamstown Station development area (close to the train station), reducing to lower densities of 35-50 further from the train station and adjacent to existing housing areas.

However, it should be noted that the proposed non-material Amendment submitted to An Bord Pleanála in March 2020 proposes increasing densities within the Adamstown Station and Aderrig areas from the existing ranges of 75-90 dph and 52-65 dph to the new density ranges of 75-150 dph and 52-70 dph, respectively, in accordance with recent national policy and guidelines. The impact on the density range of the overall SDZ Planning Scheme would be to increase it from the current range 47-56 dph to 47-64 dph. A decision regarding the proposed Amendment is due from An Bord Pleanála later this year.

SPPR 4 requires planning authorities to secure the minimum densities prescribed within the Sustainable Residential Development Guidelines in the future development of greenfield or edge of city/town locations for housing. Having regard to the densities above, it is clear that the Adamstown SDZ Planning Scheme, both currently and in the context of the proposed Amendment to increase densities, meets this requirement.

Furthermore, an analysis of densities achieved so far within the developed areas of Adamstown indicates that all densities 'on the ground' achieve a minimum of 35 dph, with most substantially exceeding this figure (see Figure 12 below).

2. As described in earlier sections, the Adamstown SDZ Planning Scheme provides for a varied mix of building types and heights throughout the SDZ lands and also within each individual development area, through the building type and height strategy and through varying density requirements for each development area. Section 2.3(i) of the SDZ Planning Scheme, 'Design Statement', contains the vision and guiding principles for the SDZ lands which are consistent with SPPR 4 (2) and (3).
3. As outlined above, the Adamstown SDZ Planning Scheme provides for a wide variety of unit typologies and sizes within each development area and therefore satisfies this requirement.

Achieved Density (for areas partly and fully developed) Compared with Min-Max SDZ Planning Scheme Density				
Area No.	Development Area	Density as per SDZ Scheme (dwellings per hectare)	Development Status	Achieved Density (to date)
1	Adamstown Castle	46 – 47	Mainly developed	47
2	Somerton	35 – 42	Fully-developed	35
3	Airlie Stud	44 – 47	Fully-developed	47
4	Tobermaclugg Village	40 – 50	Mainly developed	43
5	Tubber Lane	35 – 45	Part-developed	45
7	St Helen's	52 – 65	Part-developed	60
9	Adamstown Square	59 – 60	Mainly developed	54
	<b>Overall Planning Scheme Density</b> (including undeveloped areas not listed in table)	<b>47-56</b>	<b>Part-developed</b>	<b>47</b>

**Figure 12:** Table Indicating Achieved Density (for areas partly and fully developed) Compared with Min-Max SDZ Planning Scheme Density

#### 4.4 Screening for Appropriate Assessment and Strategic Environmental Assessment

Screening for Appropriate Assessment (AA) has been carried out by Doherty Environmental Consultants and Screening for Strategic Environmental Assessment (SEA) has been carried out by Minogue and Associates Environmental Consultants (Reports attached at Appendices 4 and 5, respectively). Both of these screening reports were carried out for the purpose of the proposed Amendments submitted to An Bord Pleanála in March 2020 and include the proposed one storey height increase in part of the Aderrig development area now recommended (in addition to the proposed density increases in Adamstown Station and Aderrig development

areas, the relocation of the enterprise centre to Adamstown Station and other minor proposed changes).

The finding of the AA screening report is that the proposed amendment is unlikely to result in any significant effect on any European Sites. In this regard, the conclusion of the report states:

*'In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by South Dublin County Council that the proposed amendment to the SDZ is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion'.*

The finding of the SEA screening report was that no significant environmental effects are identified for the proposed amendments to the Adamstown SDZ Planning Scheme and that full Strategic Environmental Assessment is not required.

In this regard, the concluding paragraph of section 3.2 of the SEA Screening Report states:

*'The proposed amendments to the Adamstown Planning Scheme seeks to respond to changes in national policy in particular the Regional Spatial Economic Strategy (RSES) for the Eastern and Midland region and the National Planning Framework (NPF). The principal amendments are positive in relation to the promotion of higher densities close to public transport, thus better integrating land use and transport considerations. The relocation of enterprise centre to the Adamstown Station area further supports this approach. The amendment relating to increased height relates to one specific location and again meets compliance with the Height Guidelines. The remaining amendments are minor in nature, and have not been identified as generating strategic environmental effects. As the assessment against the above criteria in the SEA Directive and SI 436 of 2004 (as amended) demonstrate, no significant environmental effects are identified for these proposed amendments to the Adamstown Planning Scheme and therefore are determined not to require full Strategic Environmental Assessment'.*

AA and SEA Screening Statements have been submitted to the appropriate bodies, including the Environmental Protection Agency, the National Parks and Wildlife Service, the relevant government departments and relevant adjoining local authorities as recommended in the AA and SEA guidelines.

## Section 5: Conclusion

South Dublin County Council, as the Development Agency for Adamstown SDZ, has carried out this review of the SDZ Planning Scheme as required under Specific Planning Policy Requirement 3(B) of the *'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018)*.

SPPR 3(B) requires adopted planning schemes to be reviewed to ensure that criteria contained in the Building Height Guidelines are fully reflected and in particular that Government policy requiring increased building heights in appropriate locations, be articulated in any amendments to the planning scheme.

South Dublin County Council engaged Metropolitan Workshop to carry out an independent study of building heights within Adamstown and the general finding was that in relation to the areas studied (i.e. the undeveloped tiles of Adamstown Station, Aderrig and Adamstown Boulevard) the SDZ Planning Scheme is compliant with the Guidelines and that the Scheme fully reflects the criteria contained in Section 3.2 of the Guidelines and referenced in SPPR 3(B).

A number of recommendations were made including that a one-storey location-specific height increase would be appropriate within a confined part of Aderrig facing Central Boulevard Park. This was justified in terms of improving legibility and creating a stronger urban edge addressing the Park.

It was also recommended that target densities be increased within the Adamstown Station, Aderrig and Adamstown Boulevard development areas. This was justified in terms of facilitating higher density urban form close to public transport links in line with national planning policy and guidelines as set out in the NPF, the RSES, the Building Heights Guidelines and the Apartment Guidelines.

Both of the above recommendations – for increased height in a confined location within Aderrig and for increased density within Aderrig and Adamstown Station – formed a proposed Amendment submitted to An Bord Pleanála in March 2020, which the Council is seeking to be considered as a non-material Amendment. (The proposed increased density within Adamstown Boulevard did not form part of this proposed Amendment and is not being considered currently as further closer analysis of development options within this area is required).

AA and SEA screening assessments were carried out in relation to the proposed Amendment submitted to An Bord Pleanála, including the proposed height increase in part of Aderrig. The finding of the AA screening report is that the proposed Amendment (including the proposed increase in height within part of Aderrig) is

unlikely to result in any significant effect on any European Sites. The finding of the SEA screening report is that no significant environmental effects are identified for the proposed Amendment (including the proposed increase in height within part of Aderrig) and that full Strategic Environmental Assessment is not required. AA and SEA Screening Statements were circulated to the appropriate agencies as required.

The following key points confirm the compliance of the Adamstown SDZ Planning Scheme with the Building Heights Guidelines:

- Adamstown is served by high quality public transport including the Dublin/Kildare railway line and Adamstown Train Station located to the south of the SDZ area.
- In general, the Planning Scheme facilitates increased densities and greater heights compared to the prevailing context.
- Blanket height restrictions do not apply within the SDZ, but rather, building heights are prescribed as flexible ranges appropriate to different character areas.
- This approach provides for taller buildings in appropriate locations such as close to the railway station and lower buildings in other locations such as close to existing low-rise suburban development.
- The variety of building heights provided for within the planning scheme improves legibility throughout the overall area and allows a diversity of built form which also enhances the urban design context for the public realm.
- In development to date, which has comprised mainly lower density development tiles, the Adamstown SDZ has exceeded minimum densities for outer suburban/greenfield areas as outlined in guidance. Future development will take place in medium and higher density development areas and will consist of increased densities in line with requirements.
- The Planning Scheme provides for a broad mix of uses including residential, employment, retail, recreation, education and community uses.
- A wide range of residential building typologies are catered for including apartments, duplexes and own-door houses.
- The proposed one storey height increase within Aderrig would be consistent with the Guidelines having regard to its location in close proximity to the train station and in terms of improving legibility and creating a stronger urban edge which addresses a key urban public open space.

For the above reasons, it is considered that the Adamstown SDZ Planning Scheme, including the proposed height increase within Aderrig, is consistent with the document '*Urban Development and Building Heights: Guidelines for Planning Authorities*' (2018).





# APPENDIX

# 1

'Adamstown Strategic Development Zone: Building Height Review',  
Metropolitan Workshop Architecture and Urban Design Consultants.





# Adamstown Strategic Development Zone

Building Height Review



## Legal

This report is intended for the sole use of the South Dublin County Council ("SDCC") in relation to a study for the lands within their ownerships at Adamstown, Co. Dublin.

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Architecture + Urbanism

Revision	Date	Notes	Prepared By	Checked By	Approved By
01	07.02.20	Revised reccomendations to include height change	CMcG	JMcK	JMcK

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# 1

## Adamstown SDZ

Introduction + Background

Development areas

Building heights

# Introduction + Background

## Introduction

In December 2018, the Irish Government issued new guidelines relating to the heights of proposed developments entitled *Urban Development and Building Heights: Guidelines for Planning Authorities*. Generally these new guidelines require planning authorities to support in principle developments of 3-4 stories outside of urban areas and 6 stories in urban environments (subject to certain criteria) as the default through their Development and Local Area Plans.

The guidelines contain 4 Specific Planning Policy Requirements (SPPRs), of which no. 3(b) states:

*'In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme'*

As part of this requirement, Metropolitan Workshop was appointed by South Dublin County Council (SDCC) to undertake such a review of the impact of these new guidelines on the yet to be developed areas that form part of the Adamstown Strategic Development Zone (SDZ).

The report within contains Metropolitan Workshop's review of building heights within the Adamstown SDZ and features analysis of the impact of the new guidelines, other relevant factors in relation to building heights, a review of the in-place height strategy, and an analysis of potential locations where the prescribed height may be increased in accordance with the guidelines.

## History of the Adamstown SDZ

Further to the *Planning and Development Act (2000)*, which introduced Strategic Development Zones, lands totalling 223.5 hectares at Adamstown in west Dublin were designated as an SDZ in July 2001.

SCDD as the relevant local planning authority prepared a draft planning scheme for the Adamstown SDZ in 2002 which was granted following an appeal of the scheme to An Bord Pleanála (ABP) in September 2003.

The scheme was notable for being the first urban village development planned in Ireland since Shannon Town, Co. Clare in 1982. The first developments on-site began in 2005 however to date there are areas within the lands which are yet to be developed.

The scheme as granted has been amended twice to date: Firstly in 2006, wherein the combined school and leisure facilities were relocated (necessitating a development area boundary change) as well as a primary healthcare facility introduced.

The second series of changes, granted following an ABP appeal in December 2014, featured a number of amendments to the scheme (including an amendment to the phasing requirement). The current planning scheme as amended is the result of this and is the basis for this review.

## Development areas

The Adamstown SDZ is formed of 11 separate Development Areas; Adamstown Castle, Somerton, Airlie Stud, Tubbermaclugg Village, Tubber Lane, Tandy's Lane Village, St. Helen's, Aderrig, Adamstown Square, Adamstown Boulevard, and Adamstown Station.

Of these, 6 have either been completed or have begun construction on site (at least in part). A further 2 have, at the time of writing, begun the planning application process, leaving 3 undeveloped areas: Aderrig, Adamstown Boulevard, and Adamstown Station. It is these three areas which are the subject of this review:

- Aderrig is located midway along the western boundary of the SDZ and is bounded by the Central Boulevard Park to the east and Airlie Park to the north. It is to also feature a new primary school at its northern point.
- Adamstown Boulevard is located directly south of Aderrig and similarly bounds the Central Boulevard Park to the east as well as the Dublin-Kildare railway line to the south.
- Adamstown station is located along the southern boundary of the SDZ, directly east of Adamstown Boulevard. It bounds the Central Boulevard Park to the north and the railway to the south, as well as featuring the Adamstown rail station along its southern boundary. As such, it is designated as an urban centre in the SDZ scheme and is to feature an increased number of non-residential development in order to act as a main focal point for the entire Adamstown scheme.

## Review of dwelling densities

In terms of prescribed densities, the 3 Development Areas represent the higher end of the Adamstown scheme, due to their proximity to the major transport link at the Adamstown rail station. As described in the SDZ document, they are as follows:

- Aderrig is specified as 'Medium Density', with a prescribed density between 52-65 dwellings per hectare. Given its area of 17.8 Ha, this results in a quantum of 925-1155 dwelling units.
- Adamstown Boulevard is set as 'High Density' with 60-75 dwellings per hectare. At an area of 11.5 Ha, this equates to 690-865 dwelling units.
- Adamstown Station is also set as 'High Density' with 75-90 dwellings per hectare. Its area is 6.5 Ha, resulting in 490-585 dwelling units.

## Review of building heights

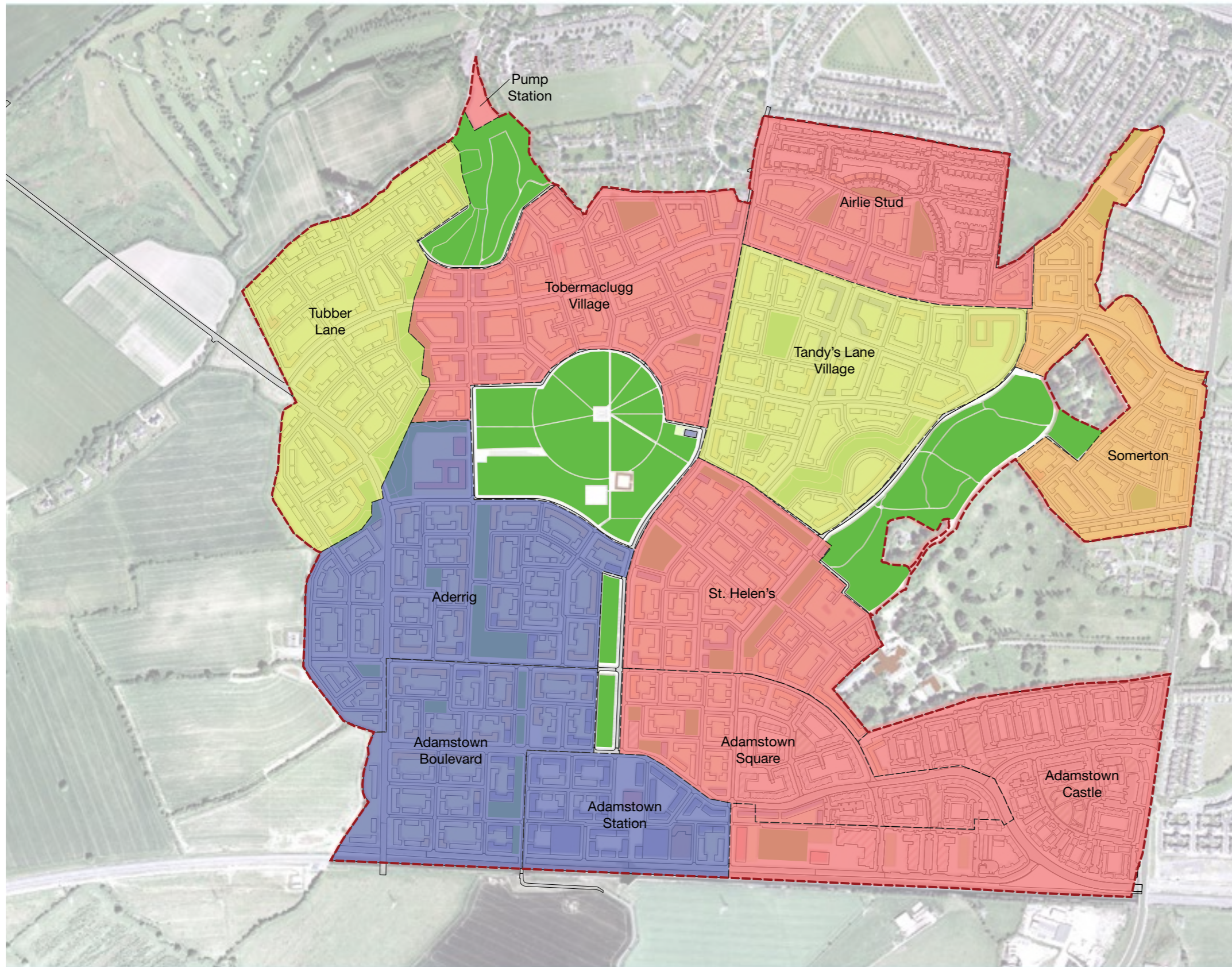
The SDZ sets out a means of prescribing building heights by Development Area. The indicative masterplan for each area defines two building types; 'Perimeter buildings'; which feature along main roads, parks, boundaries, etc. and 'Courtyard buildings'; which feature in the internal sections of the Development Areas. Generally the Perimeter buildings are to be 1-2 stories taller than the equivalent Courtyard buildings .

Each Development Area is then prescribed heights in the SDZ document for each of the two types, resulting in a characteristic for each area that also features a variance of building heights. For the undeveloped areas, the prescribed heights from the current SDZ document are shown overleaf.

Furthermore, a number of 'landmark' buildings are encouraged in the SDZ document at key locations throughout the plan. These buildings may have an increased height dependant on the Development Area's prescribed density; 5 for low-density, 7 for medium-density, and 10 for high-density



# Development Areas



Development Area	Net Area (ha.)	Target Density	
		Density (dph) - Low Margin	Density (dph) - High Margin
Aderrig	17.8	52	65
Adamstown Boulevard	11.5	60	75
Adamstown Station	6.5	75	90
<b>Sub-Total Total</b>	<b>35.8</b>		

Development Area	Target Quantum as SDZ	
	Total Dwellings - Low Margin	Total Dwellings - High Margin
Aderrig	925	1155
Adamstown Boulevard	690	865
Adamstown Station	490	585
<b>Sub-Total Total</b>	<b>2105</b>	<b>2605</b>

- Key
- Area complete / under construction
  - Area under construction
  - Area subject to planning application
  - Undeveloped area (subject of review)



# Building Heights

- Key
- 2-3 stories / 4 at corner
  - 2-4 stories / 5 at corner
  - 3-5 stories
  - 3 stories +1 setback - 5 stories +1 setback



# 2

## Impact of New Height Guidelines

Review of height guideline SPPRs

Key performance criteria

Impact on Adamstown SDZ



# Review of Height Guideline SPPRs

## Overview of new height guidelines

The new guidelines, entitled *Urban Development and Building Heights: Guidelines for Planning Authorities*, set out revised government policy regarding building heights, in line with other policies outlined in *Project Ireland 2040* and the *National Planning Framework*.

The main focus of the guidelines is to require planning authorities to support taller built developments subject to a number of key criteria, so as to bring about higher-density urban environments. These key criteria are set out in the document, and are also discussed in this report.

The policies are outlined via 4 Specific Planning Policy Requirements (SPPRs) which take precedence over any potential discrepancies with current Development Plans, Strategic Development, Local Area Plans, etc. The 4 SPPRs and their impacts on building height are presented below:

### SPPR 1

*'In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.'*

The first SPPR sets out the requirement on local authorities to identify locations where taller building heights should be pursued. It highlights that these areas should be predominantly in already built-up areas with good public transport links. It also calls on local authorities to remove general building height limitations, a policy which limits good urban growth and design according to the text.

### SPPR 2

*'In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.'*

This places emphasis on creating good urban mix of uses within planning policy, as well as emphasising sequencing in plans to ensure that social and economic needs within an area are met in a sustainable manner as they are required.

### SPPR 3

*'It is a specific planning policy requirement that where;*

*(A) 1) an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2) the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.*

*(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme*

*(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.'*

This SPPR creates a mechanism for proposed developments to be approved in spite of specific objectives of a development plan, so long as that it can successfully demonstrate compliance with the criteria set out in the guidelines (discussed below) in addition to being aligned with wider planning policy.

It further requires local authorities to review current planning schemes (such as the Adamstown SDZ) to ensure they are aligned with the aforementioned criteria; specifically mentioning the policy of increased heights should be reflected in amendments to the scheme.

### SPPR 4

*'It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

*1) the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2) a greater mix of building heights and typologies in planning for the future development of suburban locations; and 3) avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.'*

The final SPPR of the guidelines focuses on development at the edge of cities and towns. (Such as with the Adamstown SDZ area) It requires a greater mix of building heights and units as well as for developments to avoid the overuse of a single building typology, particularly in relation to developments of 100 or more dwellings.

The guidelines further call for a mix of 2,3, and 4 storey buildings in these types of developments as well as the creating of a 'street-based traditional town environment with a good sense of enclosure, legible streets, squares, and parks'; specifically referencing the Adamstown SDZ as an example.

# Key Performance Criteria

Section 3.2 of the guidelines sets out a number of Development Management Criteria as discussed above. These are shown below:

“3.2 In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:

At the scale of the relevant city/town:

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.
- Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.
- On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

At the scale of district/ neighbourhood/ street:

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “*The Planning System and Flood Risk Management – Guidelines for Planning Authorities*” (2009).

- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

At the scale of the site/building:

- The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
- Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘*Site Layout Planning for Daylight and Sunlight*’ (2nd edition) or *BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’*.
- Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

## Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.
- In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.
- An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.
- An assessment that the proposal maintains safe air navigation.
- An urban design statement including, as appropriate, impact on the historic built environment.
- Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate. Where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).”



# Impact on Adamstown SDZ

## The Guidelines

In terms of the impact of the new guidelines on the Adamstown SDZ, given the site's location on the outer edges of Dublin city SPPR 4 would appear to be of particular relevance. It is worth noting that the text of the guideline documents discussing this SPPR reference the Adamstown SDZ as an example of the aspirations of this point.

Further examination of the referenced density guidelines (*Residential Development in Urban Areas (2007)*) suggests a minimum density for lands within proximity of a transport hub (i.e. Adamstown rail station) of 50 dwellings per hectare. The densities prescribed in the current SDZ document for the undeveloped lands are all above this minimum though notably they are not much above the threshold.

The guidelines additionally set out a requirement for developments on the edges of towns / cities to feature a mix of 2-4 story building heights. A review of the prescribed building heights in the current SDZ document shown a range for the undeveloped areas of 2-6 (including a top-level setback) stories. Thus the current SDZ appears to be aligned with the requirements of the guidelines in relation to building height.

Furthermore, much of the key performance criteria set out in Section 3.2 of the guidelines feature as part of the aspirations of the Adamstown SDZ. It is therefore likely that any new development that is in compliance with the SDZ scheme will meet those criteria regardless, thus the impact of these criteria on the current scheme is likely to be minimal.

## The Viability Question

The above notwithstanding, the economic viability of developing units of given heights should also be considered in this context. According to the Department of Housing's publication *Review of Delivery Costs and Viability for Affordable Residential Developments*:

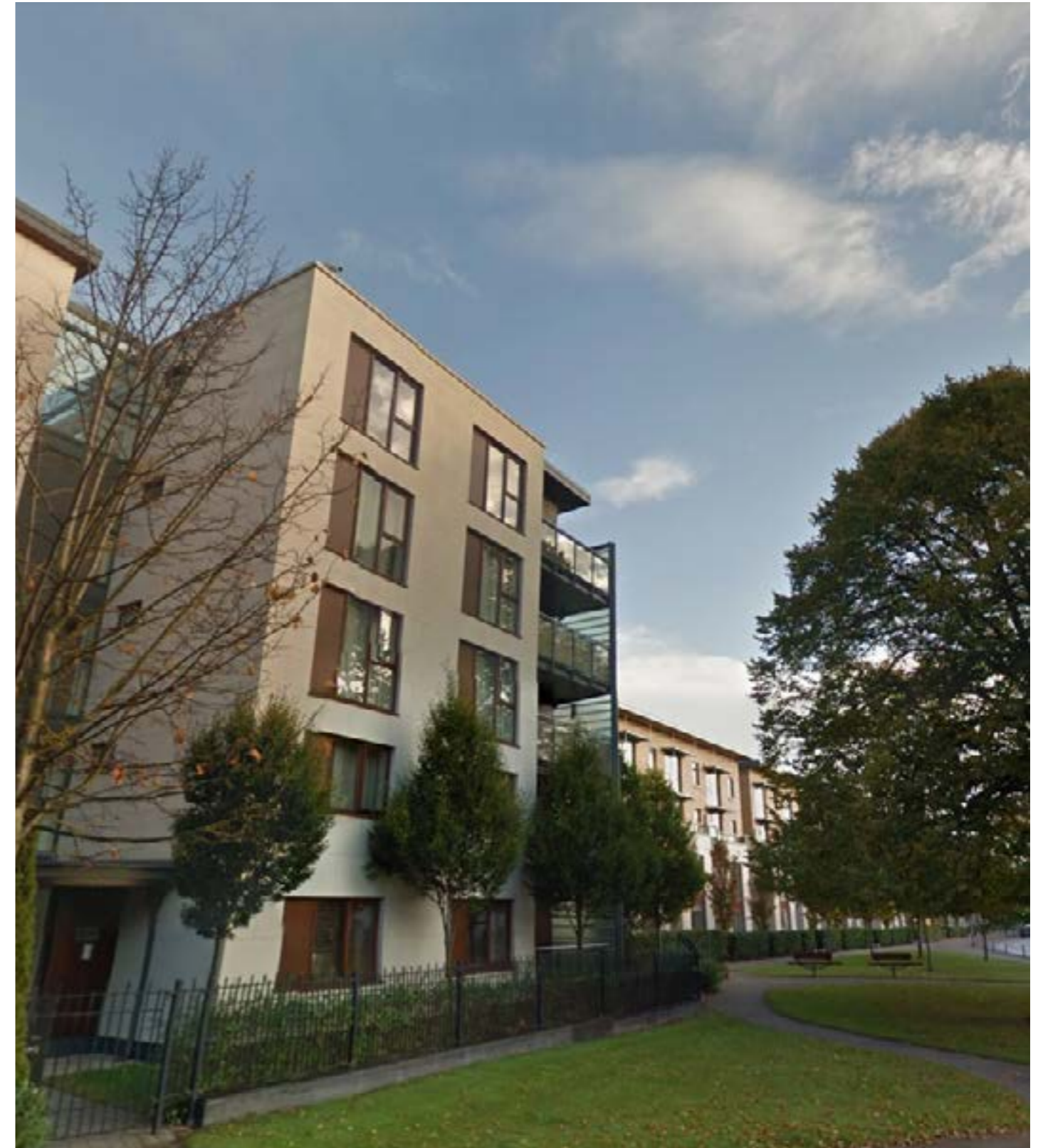
*"this current study identifies heights of up to 6 storeys as being the optimal height from a viability perspective for affordable apartment buildings"*

The impact of these findings makes it clear that in order for apartment developments to be economically viable 6 stories is the optimal target.

The potential knock-on effect of this is that in areas currently prescribed as 3-5 stories, higher-density developments may be a less desirable option for development as few developer led apartment buildings are currently being built in suburban locations below 5 storeys. This may lead to reduced densities, lack of variety, and poor urban form, which goes against the performance criteria of the new guidelines.

## The Density + Height Question

The planning scheme sets out criteria around several issues which have an interrelationship with building heights and this is particularly the case with density. Along with height ranges each Development Area sets out target densities (set within a range; e.g. 52-65 dwellings per hectare) which in turn give a minimum and maximum quantum range. Therefore it may be that the maximum specified quantum is achievable within the existing height ranges and any suggestion to increase the height in one area may require an upward adjustment to the maximum quantum or accept that there is a lesser amount of accommodation in one part of the Development Area to facilitate increased height in another (i.e. a push-pull effect) The methodology on page 17 sets out how the study establishes a base case from which to work.



# 3

## Further Considerations

Additional height policies

Aviation safety height restrictions



# Additional Height Policies

## International policies

In relation to the revised Irish building height guidelines, it is worth placing these in the context of similar guidance from other countries. This can provide a sense of the principals of urban design in relation to building height and density that are most important. Below is an overview of two relevant building height policies that discuss height in relation to developments at the edge of cities and what advice they offer:

## CABE tall buildings guidance

*The CABE Guidance on Tall Buildings* document highlights the importance of placement of tall buildings in relation to their context. Its main recommendation is that local authorities should be responsible for determining the areas best suited for taller development through local plans.

It goes on to further highlight the importance of good urban design in relation to taller buildings, setting out a number of criteria which proposed tall buildings should be examined against:

- Relationship to context
- Effect on Historic Context
- Effect on World Heritage Sites
- Relationship to Transport Infrastructure
- Architectural Quality of the Building
- Sustainable Design + Construction
- Credibility of Design
- Contribution to Public Space and Facilities
- Effect on Local Environment
- Contribution to Site Permeability
- Provision of Well-Designed Environment

These criteria for the most part are aligned with those set out in the Irish guidelines and so further emphasise the importance of ensuring these are met in any proposed development.

## Historic England tall buildings advice notes

Similarly in *Tall Buildings, Historic England Advice Note 4*, tall building policies within local plans are advocated. There is also further emphasis placed on good quality of design in order to provide a positive impact on the surrounding context.





# Aviation Safety Height Restrictions

## Adjacent airports

The undeveloped areas of the Adamstown SDZ are in proximity to two active airfields; Weston Airport and Casement Aerodrome.

Weston Airport is a small executive airport approximately 1.9 km north-northwest of the site featuring a single northeast/southwest runway of 924m.

Casement Aerodrome (also known as Baldonnell Aerodrome) is an Irish Air Force operated airfield located approximately 3.8km south-southeast of the site. It features 2 no. runways; a northeast/southwest runway of 1,483m and an east/west runway of 1,829m.

## IAA Guidelines

The Irish Aviation Authority (IAA), the relevant authority in relation to airfields in Ireland, have produced guidelines in relation to obstacles (i.e. any permanent or temporary object that may have an effect on aeronautical navigation). This includes *Guidance Material on Aerodrome Annex 14 Surfaces*, which sets out height restrictions in areas surrounding airfields above which should be free from obstacles.

The geometry of these height restrictions can be broadly divided into two elements; firstly the areas on approach to the runways and secondly the wider airspace surrounding the airfield.

## Runway approaches

The IAA guidelines designate restricted areas in relation to the approach zones at the ends of runways which should form 'obstacle free zones'. The precise geometry of these zones are dependant on the length of the runway and widen in plan as they propagate out.

However in the case of all three runways in proximity to the site the approach zones have no effect due to their orientations, as can be seen on the plan opposite.

## Wider airspace

Beyond the runway approaches, the guidelines set out additional areas of obstacle limitation in the area surrounding runways. These areas consist of an inner horizontal surface 45m above the runway and its surrounds, an outer horizontal surface, and a conical surface (pitched at 1:20) which connects the two. The exact extents and height of the outer surface are again dependant on the length of the runway in question.

The guidelines recommend that any object should be lower than the inner + conical surfaces and that objects taller than 30m above local ground level should be lower than the outer surface.

As shown in the plan opposite, the entire site falls under the inner surface of Weston Airport as well as partially under the inner surface for Casement Aerodrome. According to the IAA guidelines:

*'New objects or extensions of existing objects should not be permitted above the conical surface and the inner horizontal surface except when an object would be shielded by an existing immovable object, or after aeronautical study it is determined that the object would not adversely affect the safety or significantly affect the regularity operations of aeroplanes.'*

Given the lands between the site and both aerodromes are relatively undeveloped there is unlikely to be any significant existing shielding. Thus the erection of any object, permanent or otherwise, greater than 45m above the runways would be subject to an aeronautical study as described above.

The elevations of Weston Airport and Casement Aerodrome are +47m and +97m above sea level respectively. This would place the lowest inner surface at +92m above sea level. The site is at approximately +60m above sea level, resulting in a working limit of 32m in height.

It is worth noting that 32 metres is the equivalent of approximately 10 residential stories. If any potential height increase close to this level is to be considered, further liaison with the IAA is highly recommended. In addition, the height limits discussed above apply to any object; temporary or permanent. Thus it would also apply to the use of cranes in the development areas during construction even if the associated development does not exceed the height limits.

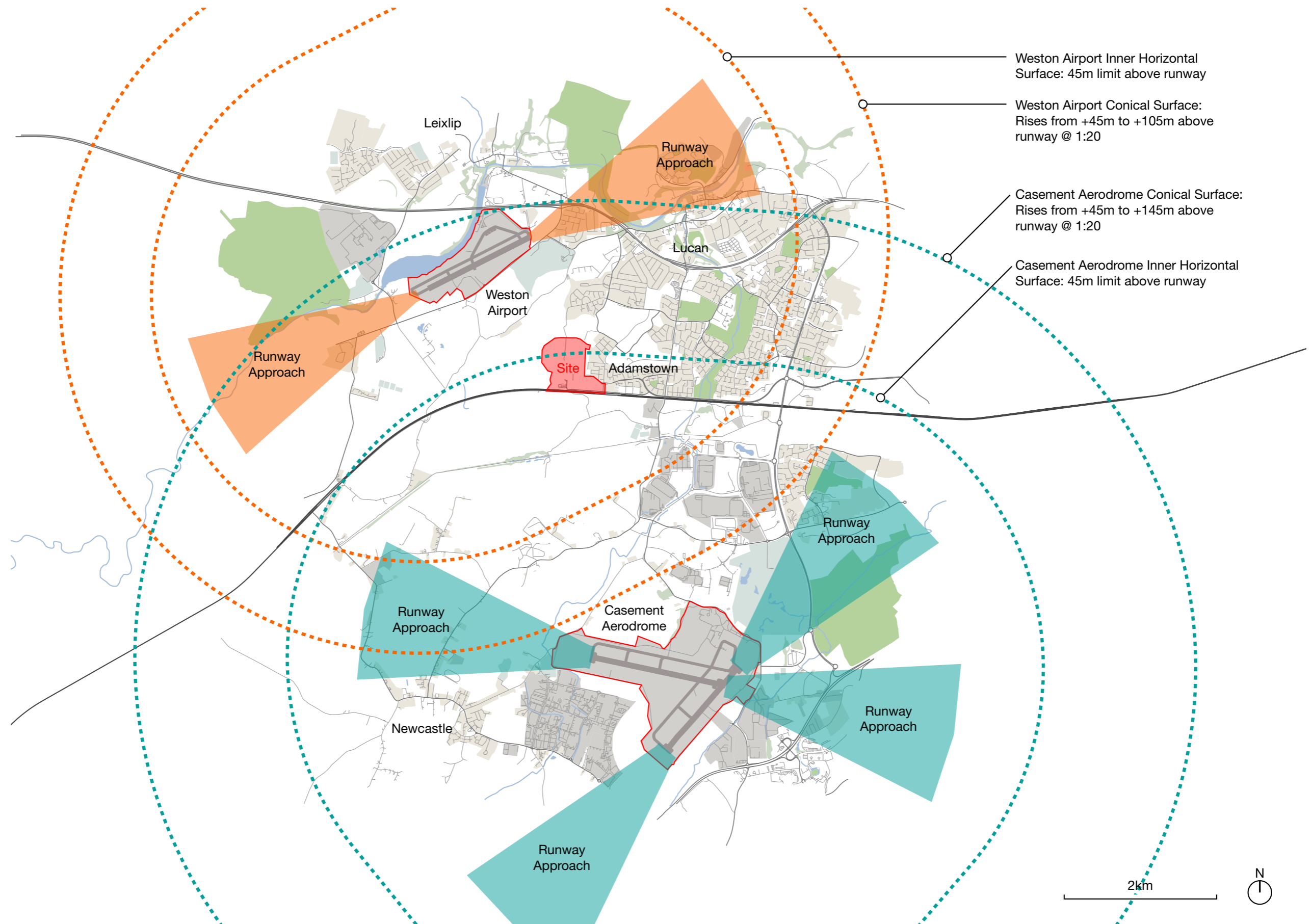
## Notifying the IAA

It is worth noting the under Section 5 (2) of the *Obstacles To Aircraft In Flight Order (S.I. 215/2005)*;

*'A person shall not cause to be erected or constructed any object as defined in Article 4 of this Order within a radius of 10 kilometres of a licensed aerodrome without first notifying the aerodrome licensee of that aerodrome in writing of that intended erection or construction at least thirty days prior to such erection or construction and shall, additionally and where requested, provide such information in relation thereto to the Authority as may be required under paragraph (3) of this Article. (Note: This requirement is separate from any permission required to be obtained under the Planning and Development Act, 2000 in respect of the said erection or construction)'*

The erection of any object that would penetrate the inner horizontal or conical surfaces would satisfy this requirement and thus require notification to both airfields as per the above.

# Aviation Safety Height Restrictions



# 4

## Height Strategy Reviews

Methodology

Capacity study 1

Capacity study 2

Capacity study 3

Capacity study 4



# Methodology

In light of the above considerations, a series of capacity studies for the undeveloped areas of the Adamstown SDZ (Aderrig, Adamstown Boulevard, and Adamstown Station) were undertaken to determine where increased prescribed heights for these areas may be recommended.

In all cases, in order to ensure best practice of urban design a number of constraints were applied to the studies, including: Avoidance of overlooking to protect residential amenity; Providing a diverse mix of dwelling types and sizes to promote better social cohesion; Ensuring economic viability of development; Avoidance of north facing single-aspect apartments; Generally providing at least 6 units per floor per core; and Ensuring continuous but varied road frontage to create better urban form.

1. The first capacity study was carried out using the existing densities and building heights currently prescribed in the Adamstown SDZ document. This would determine a baseline feasibility for the development of these areas without any change to the planning scheme.

2. The second study used the same parameters however utilised mainly duplex dwellings in place of apartment units, resulting in much poorer urban form, although a fully compliant scheme. This would demonstrate that the current scheme may be developed in such a manner, given that the current heights may limit apartment development to the extent they are not seen as economically viable as duplex units.

3. The third study was to examine the effect of increasing the dwelling yield beyond the prescribed densities while still constrained by the heights of those in the current planning scheme. This would examine both whether the current heights were too low to facilitate higher-density development (in-line with more recent national planning policy) as well as providing more optimal urban form, particularly in relation to Adamstown Station, wherein a major transport link for the SDZ is located.

4. The fourth capacity study aims to reconcile the densities of the first study, improve the poorer urban form of the second, and add to the better urban form of the third to produce an optimised scheme from both urban design and economic viability points of view. In selected locations, an increased use of 'landmark' buildings were utilised to increase the overall positive impact of the changes to the scheme as well as increasing the maximum height of buildings adjacent to the Central Boulevard Park in Aderrig to 6 stories.

The capacity studies were undertaken using tested building typologies that are in-line with current housing guidelines and building regulations. These are shown in Appendix A





# Capacity study 1

 = Location of proposed view opposite





# Capacity study 1

Development Area	Net Area (ha.)	Target Density		Target Quantum as SDZ		Achieved				Non-Residential		Breakdown				
		Density (dph) - Low Margin	Density (dph) - High Margin	Total Dwellings - Low Margin	Total Dwellings - High Margin	Houses	Duplex Units	Apartments	Total Dwellings	Density (dph)	Retail GFA (sqm)	Employment / Other GFA (sqm)	Houses	Duplex Units	Apartments	Total
Aderrig	17.8	52	65	925	1155	342	200	528	1070	60.1	0	0	32.0%	18.7%	49.3%	100.0%
Adamstown Boulevard	11.5	60	75	690	865	206	166	470	842	73.2	0	0	24.5%	19.7%	55.8%	100.0%
Adamstown Station	6.5	75	90	490	585	33	112	434	579	89.1	14580	13975	5.7%	19.3%	75.0%	100.0%
<b>Sub-Total Total</b>	<b>35.8</b>			<b>2105</b>	<b>2605</b>	<b>581</b>	<b>478</b>	<b>1432</b>	<b>2491</b>	<b>69.6</b>	<b>14580</b>	<b>13975</b>	<b>23.3%</b>	<b>19.2%</b>	<b>57.5%</b>	<b>100.0%</b>

Development Area	Unit Type Floor Area (sqm)	Unit Breakdowns										
		Houses-2 Storey 107	Houses-3 Storey 146	Houses-Total	Duplexes-Type A 99	Duplexes-Type B 88	Duplexes-Total	Apartments-1 Bed 55	Apartments-2 Bed 81	Apartments-3 Bed 112	Apartments-Total	Total
Aderrig	Unit Numbers	268	74	342	116	84	200	93	313	122	528	1070
	%	78.4%	21.6%	100.0%	58.0%	42.0%	100.0%	17.6%	59.3%	23.1%	100.0%	-
	Total Floor Area	28676	10804	39480	11484	7392	18876	5115	25353	13664	44132	102488
Adamstown Boulevard	Unit Numbers	73	133	206	166	0	166	152	232	86	470	842
	%	35.4%	64.6%	100.0%	100.0%	0.0%	100.0%	32.3%	49.4%	18.3%	100.0%	-
	Total Floor Area	7811	19418	27229	16434	0	16434	8360	18792	9632	36784	80447
Adamstown Station	Unit Numbers	0	33	33	112	0	112	162	200	72	434	579
	%	0.0%	100.0%	100.0%	100.0%	0.0%	100.0%	37.3%	46.1%	16.6%	100.0%	-
	Total Floor Area	0	4818	4818	11088	0	11088	8910	16200	8064	33174	49080

Note: Unit floor areas are averages of typologies used and may vary between typologies



Proposed view of Adamstown Station streetscape based on Capacity study 1

## Commentary on Capacity study 1

**Aderrig:** The urban form and street frontage is reasonably in-line with aspirations of planning scheme however there may be an over-reliance on 4-5 storey apartment buildings which may not be built due to viability issues.

**Adamstown Boulevard:** Reasonably comfortable as 6 storeys permitted.

**Adamstown Station:** Higher density area has poor urban form including discontinuous street frontage, leaky spaces, etc. when built out at 6 storeys. (where allowed) This form of development very quickly reaches the upper levels of quantum with a built form which looks underdeveloped. This suggests that there is scope for increased density in this location without having to necessarily increase the existing height limits.



# Unit Types\_Capacity study 1






# Building Heights\_Capacity study 1





# Capacity study 2

 = Location of proposed view opposite





# Capacity study 2

Development Area	Net Area (ha.)	Target Density		Target Quantum as SDZ		Achieved				Non-Residential		Breakdown				
		Density (dph) - Low Margin	Density (dph) - High Margin	Total Dwellings - Low Margin	Total Dwellings - High Margin	Houses	Duplex Units	Apartments	Total Dwellings	Density (dph)	Retail GFA (sqm)	Employment / Other GFA (sqm)	Houses	Duplex Units	Apartments	Total
Aderrig	17.8	52	65	925	1155	230	558	150	938	52.7	0	0	24.5%	59.5%	16.0%	100.0%
Adamstown Boulevard	11.5	60	75	690	865	165	420	110	695	60.4	0	0	23.7%	60.4%	15.8%	100.0%
Adamstown Station	6.5	75	90	490	585	33	179	278	490	75.4	14580	13975	6.7%	36.5%	56.7%	100.0%
<b>Sub-Total Total</b>	<b>35.8</b>			<b>2105</b>	<b>2605</b>	<b>428</b>	<b>1157</b>	<b>538</b>	<b>2123</b>	<b>59.3</b>	<b>14580</b>	<b>13975</b>	<b>20.2%</b>	<b>54.5%</b>	<b>25.3%</b>	<b>100.0%</b>

Development Area	Unit Type Floor Area (sqm)	Unit Breakdowns										
		Houses-2 Storey 107	Houses-3 Storey 146	Houses-Total	Duplexes-Type A 99	Duplexes-Type B 88	Duplexes-Total	Apartments-1 Bed 55	Apartments-2 Bed 81	Apartments-3 Bed 112	Apartments-Total	Total
Aderrig	Unit Numbers	221	9	230	252	306	558	40	80	30	150	938
	%	96.1%	3.9%	100.0%	45.2%	54.8%	100.0%	26.7%	53.3%	20.0%	100.0%	-
	Total Floor Area	23647	1314	24961	24948	26928	51876	2200	6480	3360	12040	88877
Adamstown Boulevard	Unit Numbers	45	120	165	350	70	420	35	55	20	110	695
	%	27.3%	72.7%	100.0%	83.3%	16.7%	100.0%	31.8%	50.0%	18.2%	100.0%	-
	Total Floor Area	4815	17520	22335	34650	6160	40810	1925	4455	2240	8620	71765
Adamstown Station	Unit Numbers	0	33	33	179	0	179	108	128	42	278	490
	%	0.0%	100.0%	100.0%	100.0%	0.0%	100.0%	38.8%	46.0%	15.1%	100.0%	-
	Total Floor Area	0	4818	4818	17721	0	17721	5940	10368	4704	21012	43551

Note: Unit floor areas are averages of typologies used and may vary between typologies



Proposed view of Adamstown Station streetscape based on Capacity study 2

## Commentary on Capacity study 2

**Aderrig:** Possible to achieve lower end of target quantum with minimal apartment units, however overuse of long lines of duplex units, particularly along park frontage results in monotonous and wall-like development, likely to be in contravention of guideline key performance criteria.

**Adamstown Boulevard:** Similar to Aderrig; possible to achieve lower end of target quantum with large monotonous blocks. Likely to be in contravention of key performance criteria of new guidelines.

**Adamstown Station:** A lower-density solution than Capacity study 1, with similarly poor urban form from leaky spaces etc. Has additional issue of monotonous blocks similar to the other two Development Areas.



# Unit Types\_Capacity study 2






# Building Heights\_Capacity study 2





# Capacity study 3

 = Location of proposed view opposite





# Capacity study 3

Development Area	Net Area (ha.)	Target Density		Target Quantum as SDZ		Achieved				Non-Residential		Breakdown				
		Density (dph) - Low Margin	Density (dph) - High Margin	Total Dwellings - Low Margin	Total Dwellings - High Margin	Houses	Duplex Units	Apartments	Total Dwellings	Density (dph)	Retail GFA (sqm)	Employment / Other GFA (sqm)	Houses	Duplex Units	Apartments	Total
Aderrig	17.8	52	65	925	1155	320	200	658	1178	66.2	0	0	27.2%	17.0%	55.9%	100.0%
Adamstown Boulevard	11.5	60	75	690	865	184	194	610	988	85.9	0	0	18.6%	19.6%	61.7%	100.0%
Adamstown Station	6.5	75	90	490	585	0	110	873	983	151.2	14580	13975	0.0%	11.2%	88.8%	100.0%
<b>Sub-Total Total</b>	<b>35.8</b>			<b>2105</b>	<b>2605</b>	<b>504</b>	<b>504</b>	<b>2141</b>	<b>3149</b>	<b>88.0</b>	<b>14580</b>	<b>13975</b>	<b>16.0%</b>	<b>16.0%</b>	<b>68.0%</b>	<b>100.0%</b>

Development Area	Unit Type	Unit Breakdowns										
		Houses-2 Storey	Houses-3 Storey	Houses-Total	Duplexes-Type A	Duplexes-Type B	Duplexes-Total	Apartments-1 Bed	Apartments-2 Bed	Apartments-3 Bed	Apartments-Total	Total
	Floor Area (sqm)	107	146		99	88		55	81	112		
Aderrig	Unit Numbers	256	64	320	76	124	200	113	393	152	658	1178
	%	80.0%	20.0%	100.0%	38.0%	62.0%	100.0%	17.2%	59.7%	23.1%	100.0%	-
	Total Floor Area	27392	9344	36736	7524	10912	18436	6215	31833	17024	55072	110244
Adamstown Boulevard	Unit Numbers	73	111	184	194	0	194	137	341	132	610	988
	%	39.7%	60.3%	100.0%	100.0%	0.0%	100.0%	22.5%	55.9%	21.6%	100.0%	-
	Total Floor Area	7811	16206	24017	19206	0	19206	7535	27621	14784	49940	93163
Adamstown Station	Unit Numbers	0	0	0	110	0	110	325	410	138	873	983
	%	-	-	-	100.0%	0.0%	100.0%	37.2%	47.0%	15.8%	100.0%	-
	Total Floor Area	0	0	0	10890	0	10890	17875	33210	15456	66541	77431

Note: Unit floor areas are averages of typologies used and may vary between typologies



Proposed view of Adamstown Station streetscape based on Capacity study 3

## Commentary on Capacity study 3

**Aderrig:** Urban form in line with aspirations of planning scheme similar to Capacity study 1, albeit with a slightly monotonous street frontage to the park frontages.

**Adamstown Boulevard:** Reasonably comfortable as 6 storeys permitted, however additional apartment units may create monotonous street frontage in selected locations along the park frontage.

**Adamstown Station:** Improved urban form with more continuous street frontage and less leaky spaces in comparison to the first and second capacity studies. However with heights set to the maximum existing height limits, the development may be somewhat monotonous and in contravention of the key performance criteria of the new guidelines.



# Unit Types\_Capacity study 3






# Building Heights\_Capacity study 3





# Capacity study 4

 = Location of proposed view opposite





# Capacity study 4

Development Area	Net Area (ha.)	Target Density		Target Quantum as SDZ		Achieved				Non-Residential		Breakdown				
		Density (dph) - Low Margin	Density (dph) - High Margin	Total Dwellings - Low Margin	Total Dwellings - High Margin	Houses	Duplex Units	Apartments	Total Dwellings	Density (dph)	Retail GFA (sqm)	Employment / Other GFA (sqm)	Houses	Duplex Units	Apartments	Total
Aderrig	17.8	52	65	925	1155	320	282	457	1059	59.5	0	0	30.2%	26.6%	43.2%	100.0%
Adamstown Boulevard	11.5	60	75	690	865	202	186	519	907	78.9	0	0	22.3%	20.5%	57.2%	100.0%
Adamstown Station	6.5	75	90	490	585	33	110	756	899	138.3	14580	13975	3.7%	12.2%	84.1%	100.0%
<b>Sub-Total Total</b>	<b>35.8</b>			<b>2105</b>	<b>2605</b>	<b>555</b>	<b>578</b>	<b>1732</b>	<b>2865</b>	<b>80.0</b>	<b>14580</b>	<b>13975</b>	<b>19.4%</b>	<b>20.2%</b>	<b>60.5%</b>	<b>100.0%</b>

Development Area	Unit Type Floor Area (sqm)	Unit Breakdowns										
		Houses-2 Storey 107	Houses-3 Storey 146	Houses-Total	Duplexes-Type A 99	Duplexes-Type B 88	Duplexes-Total	Apartments-1 Bed 55	Apartments-2 Bed 81	Apartments-3 Bed 112	Apartments-Total	Total
Aderrig	Unit Numbers	256	64	320	158	124	282	91	274	92	457	1059
	%	80.0%	20.0%	100.0%	56.0%	44.0%	100.0%	19.9%	60.0%	20.1%	100.0%	-
	Total Floor Area	27392	9344	36736	15642	10912	26554	5005	22194	10304	37503	100793
Adamstown Boulevard	Unit Numbers	73	129	202	186	0	186	122	286	111	519	907
	%	36.1%	63.9%	100.0%	100.0%	0.0%	100.0%	23.5%	55.1%	21.4%	100.0%	-
	Total Floor Area	7811	18834	26645	18414	0	18414	6710	23166	12432	42308	87367
Adamstown Station	Unit Numbers	0	33	33	110	0	110	252	384	120	756	899
	%	0.0%	100.0%	100.0%	100.0%	0.0%	100.0%	33.3%	50.8%	15.9%	100.0%	-
	Total Floor Area	0	4818	4818	10890	0	10890	13860	31104	13440	58404	74112

Note: Unit floor areas are averages of typologies used and may vary between typologies



Proposed view of Adamstown Station streetscape based on Capacity study 4

## Commentary on Capacity study 4

**Aderrig:** Urban form in line with the aspirations of the planning scheme while legibility along Central Boulevard Park is improved with increased building heights

**Adamstown Boulevard:** Reasonably comfortable.

**Adamstown Station:** Improved urban form with additional building variety due to increased amount of 'landmark' buildings which avoid potential monotony.



# Unit Types\_Capacity study 4





# Building Heights\_Capacity study 4



# 5

## Recommendations

Analysis

Conclusions

Revised Building Heights



# Analysis

From the above capacity studies it can be seen that under the current height constraints of the Adamstown SDZ, the three areas in question can be developed in-line with the prescribed densities. In addition it is worth noting that the Adamstown SDZ does appear to already be largely in alignment with the aspirations of the new guidelines; being given in at least one case as an example thereof. Thus any potential increase in building heights will do little to further align the SDZ with the guidelines.

However, the urban form of the resulting scheme does have a number of weaker locations, particularly in relation to the higher-density area of Adamstown Station, which is seen as an important urban zone given the adjacent rail station.

There is an additional risk that the current parameters of the SDZ would create barriers to the development of apartment units in selected area due to economic viability. This would further weaken the urban form of the undeveloped areas and be contrary to the aspirations of the new guidelines.

This risk is somewhat mitigated by the 'landmark' buildings which allow for taller buildings in selected areas. These should encourage apartment unit (and thus higher-density) development. However, allowing more opportunities to encourage slightly taller buildings in key locations would be recommended.

Moreover, there are several locations where the quantum of required car parking for apartment units can be obtained on-grade. (A key factor for delivering higher-density dwelling units in an economically viable manner) In particular, where there is park frontage it appears that parking spaces could be facilitated on both sides of the road; thereby reducing the need for on-curtilage or basement car parking facilities. This can be seen for example in the Accordia Housing Scheme, Cambridge, UK. or in Adamstown itself (Shown across)

In light of this, it is recommended that the maximum height to the Central Boulevard Park frontage in Aderrig is increased to 6 stories (5 stories + 1 Setback) to encourage higher density development in this location, with an associated increase in the adjacent buildings to promote a more gradual change in building height. An associated increase in dwelling numbers is also recommended.

The third capacity study demonstrates that it is possible to achieve a scheme of greater density than is set out in the current planning scheme while using the current heights. This is particularly true of Adamstown Station, where there is potential for almost double (~170%) the prescribed quantum of dwellings without altering the building heights. The urban form that results from this increased density would appear to be more optimal than that shown in the first capacity study.

It is therefore apparent that if the heights of the planning scheme were to be increased in any manner, the target densities should also be reviewed and revised upwards. In order to achieve a more optimal urban form, particularly in the development area of Adamstown Station, increasing the target densities should be considered regardless.

This is supported further by the final capacity study which demonstrates a higher quality urban form than may be achievable under the current planning scheme's densities. This version also encourages better urban form through an increased use of 'landmark' buildings. The recommended density increases are based primarily on the figures of the fourth capacity study.



Accordia Housing Scheme\_Example of park-side car parking\_ Feilden Clegg Bradley Architects



Adamstown\_Castlegate Grove



# Analysis - Key Performance Criteria

In addition to analysing the SDZ's alignment with the new height guidelines in terms of the capacity studies, it is also worth analysing the scheme against the Key Performance Criteria as set out in Section 3.2 of the Guidelines. (Discussed above)

As seen on the table opposite, the SDZ scheme in its current form meets the Key Performance criteria and therefore the scheme can be fully in alignment with the new Guidelines.

Performance Criteria	Commentary	Meets Criteria? (Y/N)
<b>At the scale of the relevant city/town:</b>		
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport	Site is in close proximity to Adamstown Rail Station and a number of Bus links	Y
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect	Site is a greenfield site adjacent to existing modern development of a similar nature and part of same SDZ scheme. Extremely likely all future development under current SDZ will integrate into the character and public realm of the existing area. The existing building height strategy and its effect on urban form has been well considered through various iterations of the plan	Y
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape	SDZ makes reference to providing positive contribution to place making. Furthermore, the scheme provides flexibility for a variety of building heights and building forms which will respond to adjacent development and create visual interest	Y
<b>At the scale of district/ neighbourhood/ street:</b>		
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	Site is a greenfield site adjacent to existing modern development of a similar nature and part of same SDZ scheme. Extremely likely all future development under current SDZ will integrate into the character and public realm of the existing area	Y
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered	Scheme provides flexibility for a variety of building heights and building forms which will avoid monolithic development	Y
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)	Scheme provides additional amenity and public spaces, as well as creating a sense of scale and enclosure to these spaces via the prescribed heights of adjacent buildings	Y
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner	Scheme utilises variety of building heights and 'landmark' buildings with increased height to aid navigation and legibility	Y
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood	Scheme provides both a mix of uses and dwelling types, particularly around Adamstown Station	Y
<b>At the scale of the site/building:</b>		
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light	Scheme utilises street layouts to ensure as few north-facing single aspect dwellings as possible, as well as ensuring adequate distances between buildings to avoid overshadowing	Y
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'	Scheme utilises adequate distances between buildings to avoid overshadowing and provide suitable levels of daylighting to buildings	Y
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution	N/A	N/A



# Conclusions

In summary, from the above analysis it can be concluded that in relation to the development areas of Arderrig, Adamstown Boulevard, and Adamstown Station the current overall SDZ appears to be fully compliant with *Urban Development and Building Heights: Guidelines for Planning Authorities*.

To offer more variation in the urban form and to enable a broader mix of typologies the following recommendations are proposed:

- To improve legibility along the linear parks it is recommended to increase the maximum height for in Aderrig along the Central Boulevard Park to 6 (5 + 1 setback) stories. [See Revised Building Heights Diagram - Page 38]
- Additionally, to promote a more gradual change in heights, it is recommended to increase the maximum heights for the buildings adjacent to the buildings altered above to 5 stories.
- It is recommended that the target densities of the three development areas which are the subject of this report should be increased to the following to facilitate higher-density urban form in line with current planning guidelines\*:
  - Aderrig = 52-70 dwellings per hectare (d/Ha)
  - Adamstown Boulevard = 60-80 d/Ha
  - Adamstown Station = 85-150 d/Ha

\*as dwelling yield is based on standardised average dwelling sizes, the total permissible development areas for the SDZ should be increased accordingly.

- In order to provide better urban form, in particular in Adamstown Station, it is recommended that 'landmark' buildings are favoured close to the train station.
- Proposed developments in excess of 32 meters will likely be subject to restrictions from the Irish Aviation Authority.
- The current SDZ does not appear to differentiate between residential and non-residential storeys in its prescription of heights. In practice, non-residential development is likely to be notably taller per storey and therefore there is potential for disparity in height that may have a negative impact on the urban form of future development. Any future amendment to the scheme in terms of building heights should acknowledge and address this.



Aerial view of proposed Capacity study 4



# Revised Building Heights



## Key

- 2-3 stories / 4 at corner
- 2-4 stories / 5 at corner
- 3-5 stories
- 3 stories +1 setback - 5 stories +1 setback
- 6-8 stories (Landmark Buildings)



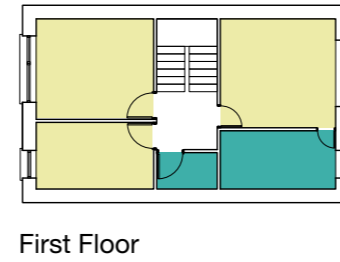
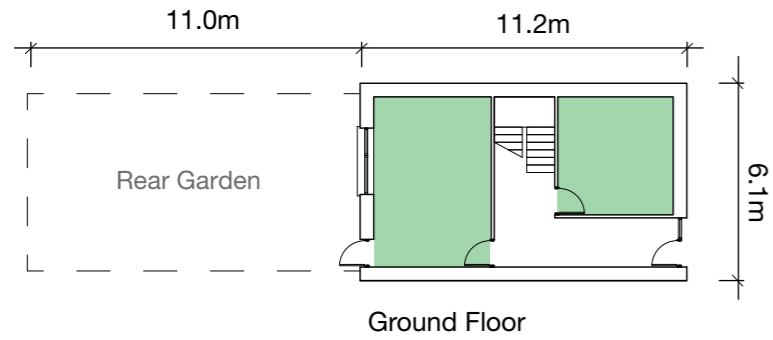
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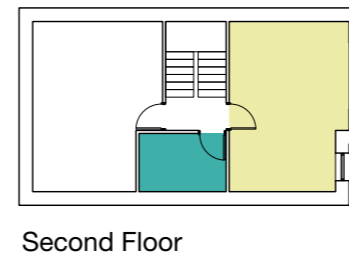
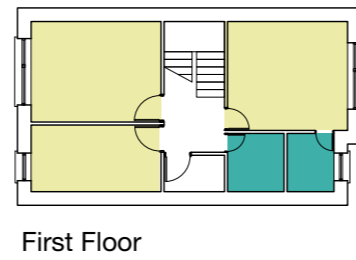
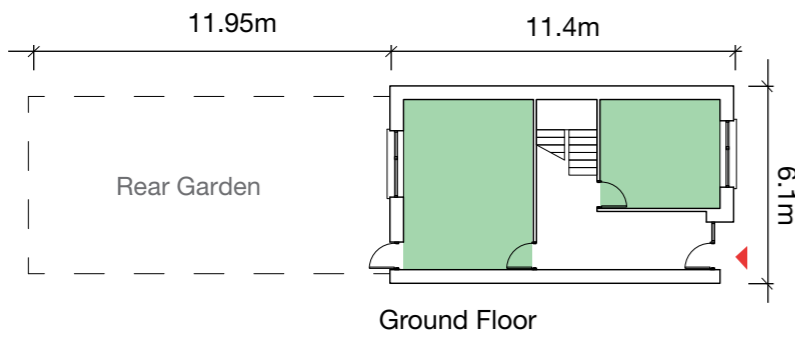
## Appendix A: Dwelling Typologies

# Dwelling Typologies - House Units

- Bedroom
- Kitchen/Living/Dining
- WC



TYPICAL 2 STOREY UNIT:  
 Bedrooms: 3  
 Internal Area: 106.6 sqm  
 Private Open Space: 64.4 sqm



TYPICAL 3 STOREY UNIT:  
 Bedrooms: 4  
 Internal Area: 146.2 sqm  
 Private Open Space: 70.1 sqm

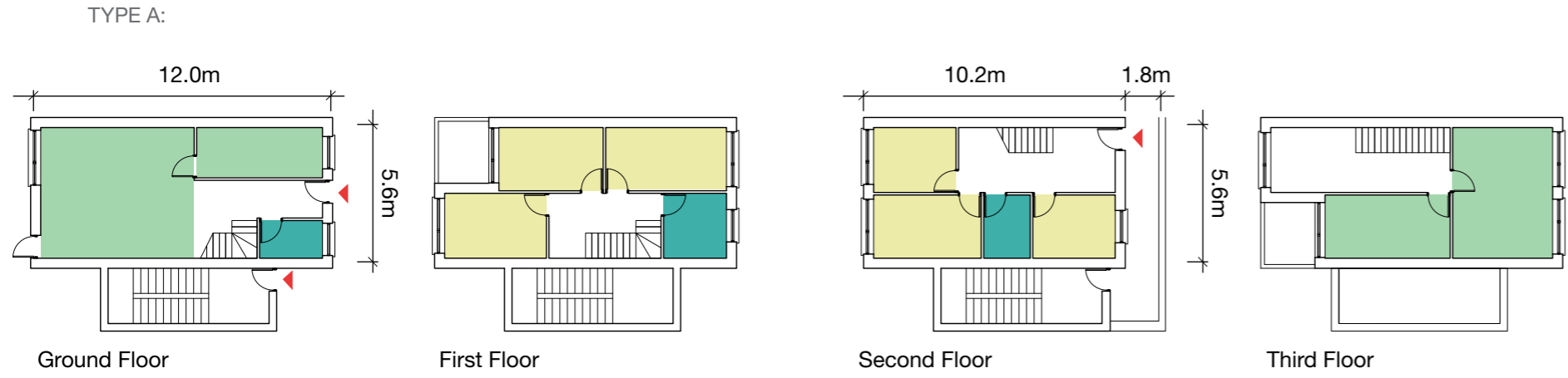
**Table 11.20: Minimum Space Standards for Houses**

Type of Unit	Houses	Private Open Space
One Bedroom	50 sq.m	48 sq.m
Two Bedroom	80 sq.m	55 sq.m
Three Bedroom	92 sq.m	60 sq.m
Four Bedroom or more	110 sq.m	70 sq.m

Minimum Area Standards  
 (Extract from p 205 of the SDCC Development Plan 2016-2022)

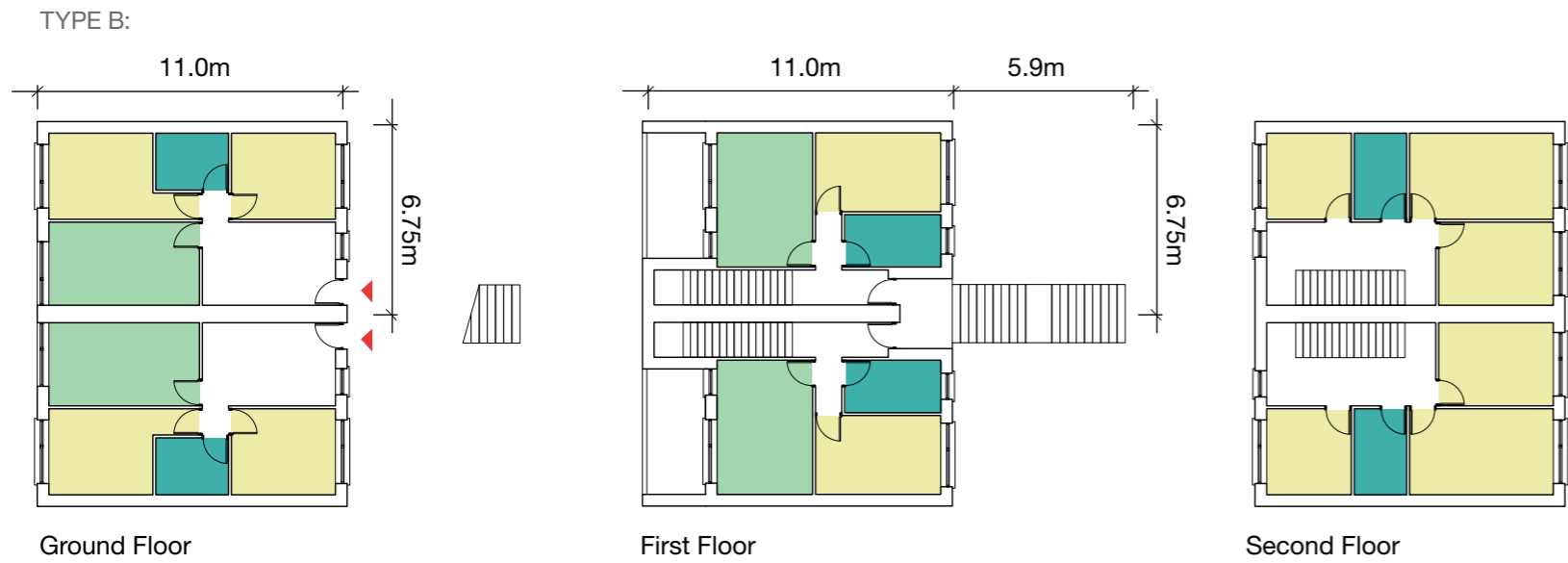


# Dwelling Typologies - Duplex Units



**LOWER UNIT:**  
 Bedrooms: 3  
 Internal Area: 115.5 sqm  
 Private Open Space: min. 10 sqm

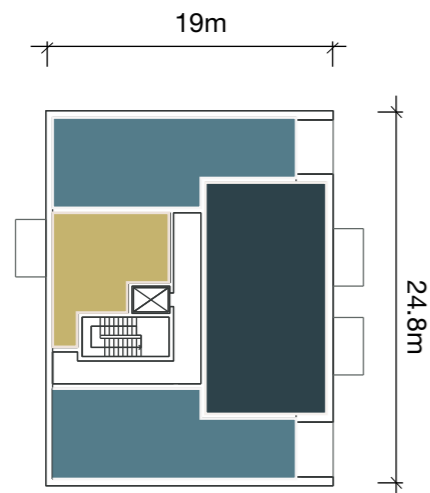
**UPPER UNIT:**  
 Bedrooms: 2  
 Internal Area: 82.8 sqm  
 Private Open Space: 9.2 sqm



**LOWER UNIT:**  
 Bedrooms: 2  
 Internal Area: 74.2 sqm  
 Private Open Space: min. 10 sqm

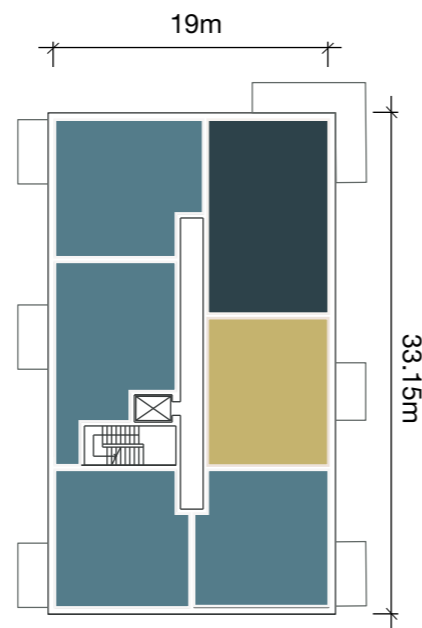
**UPPER UNIT:**  
 Bedrooms: 4  
 Internal Area: 101.2 sqm  
 Private Open Space: 9.8 sqm

# Dwelling Typologies - Apartment Units



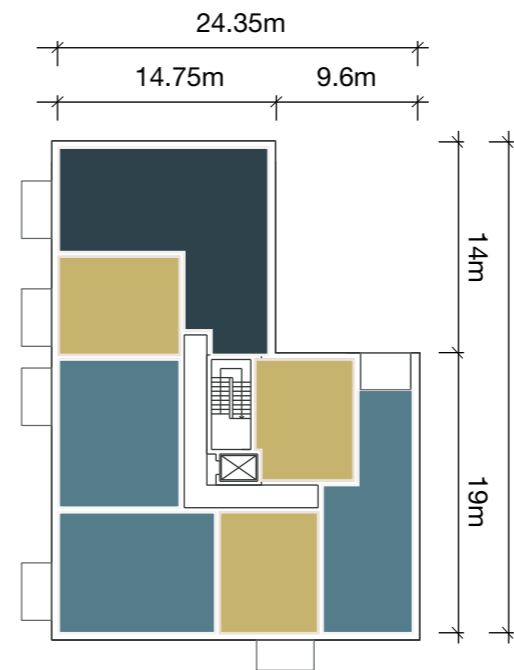
Block (4 units per core)

1-Beds: 25%  
 2-Beds: 50%  
 3-Beds: 25%  
 Dual Aspect Units: 50%



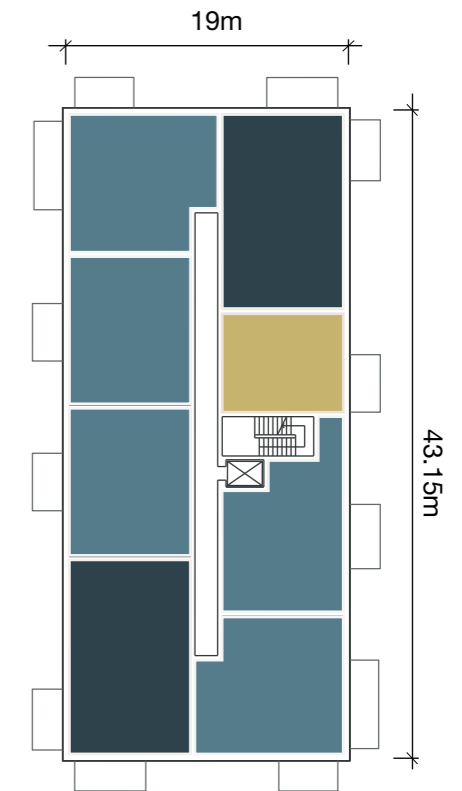
Block (6 units per core)

1-Beds: 17%  
 2-Beds: 66%  
 3-Beds: 17%  
 Dual Aspect Units: 66%



Block (7 units per core)

1-Beds: 43%  
 2-Beds: 43%  
 3-Beds: 14%  
 Dual Aspect Units: 43%



Block (8 units per core)

1-Beds: 13%  
 2-Beds: 61%  
 3-Beds: 26%  
 Dual Aspect Units: 50%

Table 11.21: Minimum Space Standards for Apartments

TYPE OF UNIT	APARTMENTS	PRIVATE OPEN SPACE	COMMUNAL OPEN SPACE	STORAGE
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7sq.m	6 sq.m
Three Bedrooms	90 sq.m	9 sq.m	9 sq.m	9 sq.m

Minimum Area Standards  
 (Extract from p 206 of the SDC Development Plan 2016-2022)





# APPENDIX



# 2

'Proposed Amendments in response to New Planning Policy and Guidance', South Dublin County Council, March 2020.

## Section 1: Introduction

### 1.1 General

South Dublin County Council, as the specified Development Agency for Adamstown Strategic Development Zone (SDZ) designated under Government Order S.I. 272 of 2001, makes this application to An Bord Pleanála, to amend the approved Adamstown Strategic Development Zone Planning Scheme 2014 under Section 170A of the Planning and Development Act, 2000 (as amended).

It is proposed to amend elements of the Scheme as a result of policy and guidance within the *National Planning Framework, 2018 (NPF)* and *Regional Spatial and Economic Strategy, 2019 (RSES)* relating to compact growth and sustainable development; and changes arising from new guidelines including the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018* (the 'Apartments Guidelines') and the *Urban Development and Building Heights: Guidelines for Planning Authorities, 2018* (the 'Building Heights Guidelines'). Other minor amendments are also proposed.

South Dublin County Council requests that An Bord Pleanála considers these amendments as non-material. The justification for the amendments and a demonstration of their compliance with the relevant legislation is set out in later sections of this report.

The Adamstown SDZ Planning Scheme comprises 223.5 hectares of land located in West Dublin, south of Lucan and the N4 national primary road, and north of the railway line from Dublin to the South and West of Ireland (see Figure 1). The SDZ Planning Scheme divides the plan lands into eleven development areas or 'tiles' and sets out parameters for development within each area. The amendments proposed relate primarily to the development areas of Adamstown Station (identified in the SDZ Planning Scheme as a high-density area) and Aderrig (identified in the SDZ Planning Scheme as a medium-density area). No development has taken place in either of these development areas.

### 1.2 Summary of Proposed Amendments

The three main amendments proposed are as follows:

- An increase in unit numbers, density and residential floor area within the Adamstown Station development area.
- An increase in unit numbers, density and residential floor area and a location-specific increase in building height within the Aderrig development area.
- Relocation of a proposed enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centre to the Adamstown Station district centre.

The following minor amendments are also proposed:

- Updated references to and summaries of national and regional policy and guidance including the National Planning Framework, the Regional Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines.
- Correction of typographical error relating to Airlie House (a protected structure); identification of Airlie House and other protected structures in the vicinity of the SDZ Planning Scheme in text, maps and keys.
- Updating of other references in SDZ Planning Scheme document.

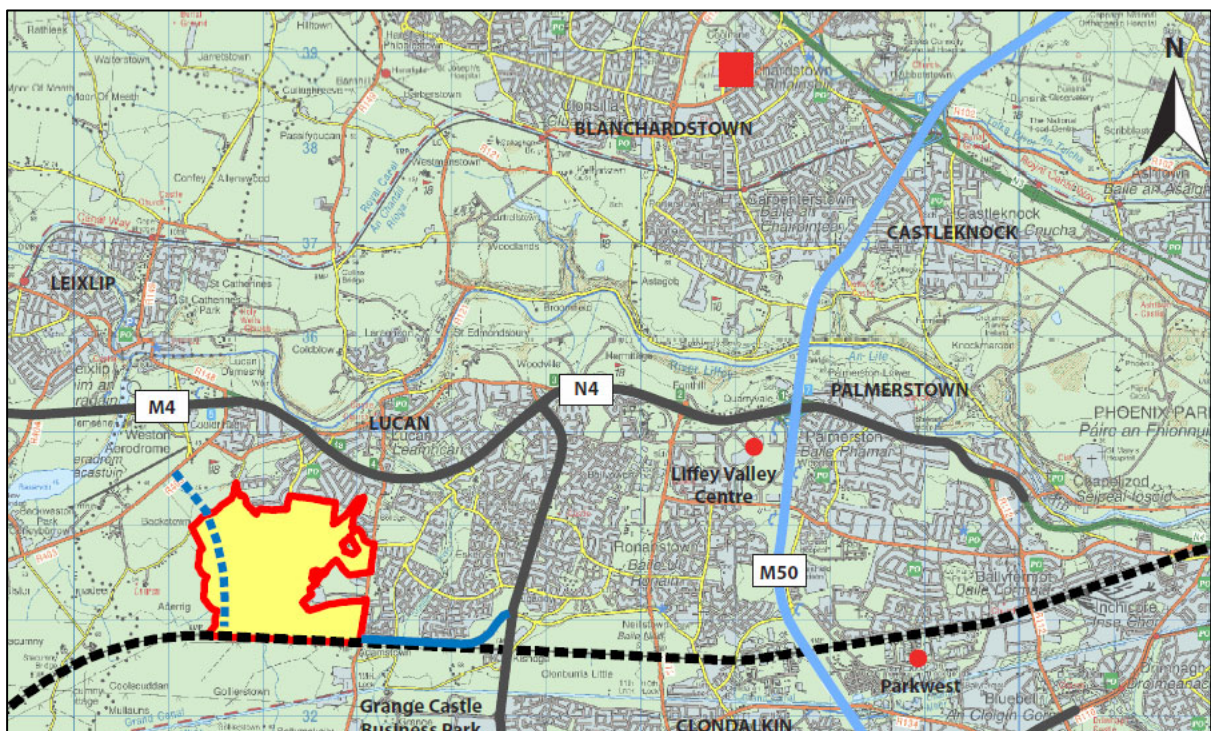


Figure 1: Adamstown SDZ Planning Scheme Lands – Wider Context

### 1.3 Layout of Report

**Section 2** of this report outlines the background and context for the Adamstown SDZ Planning Scheme and sets out recent planning history. **Section 3** gives reasons and justifications for the proposed amendments. **Section 4** outlines how the proposed amendments comply with legislation i.e. Section 170A of the Planning and Development Act, 2000 (as amended). **Section 5** sets out the conclusion. **Section 6** contains appendices, as follows:

- Proposed amendments to the text and associated tables and maps of the Adamstown SDZ Planning Scheme 2014 are set out in **Appendix 1**.



- A map indicating the development status of Adamstown in Q1 2020 is attached at **Appendix 2.**
- The Appropriate Assessment Screening Report carried out by Doherty Environmental Consultants is set out at **Appendix 3.**
- The Strategic Environmental Assessment Screening Report carried out by Minogue and Associates Environmental Consultants is set out at **Appendix 4.**
- The '*South Dublin County Council Adamstown SDZ Planning Scheme 2014: Proposed Amendments 1-4*' approved by An Bord Pleanála in May 2017 is attached at **Appendix 5.**
- The '*Adamstown Strategic Development Zone: Building Height Review*' carried out by Metropolitan Workshop Architecture and Urban Design Consultants is set out at **Appendix 6.**
- The Adamstown SDZ Planning Scheme 2014 is attached at **Appendix 7.**

## Section 2: Background and Context

### 2.1 History

On 1st July 2001, the Government ordered the designation of 223.5 hectares of privately-owned land at Adamstown, as a site for the establishment of a Strategic Development Zone (SDZ) for the purpose of delivering residential development and associated infrastructure and facilities.

South Dublin County Council (SDCC) as the specified Development Agency for the Adamstown SDZ, prepared a draft Planning Scheme for the site in 2002. The Scheme was approved by An Bord Pleanála, on appeal, in September 2003.

### 2.2 Review of SDZ Planning Scheme, 2014

In 2013, having regard to the challenges presented by the economic crisis and collapse of the residential market, South Dublin County Council initiated a statutory process to review and amend the 2003 Planning Scheme. This review delivered a policy refocus away from high density apartment-led development, and toward life-cycle housing and associated reduced densities. The review of the Planning Scheme retained the overall principles for a sustainable urban community with a strong sense of identity that is attractive, safe and secure in a traditional town and village format, and with the aim of ensuring that residential development occurs at a pace whereby it is supported by all necessary facilities and infrastructure. The amended Planning Scheme was approved by An Bord Pleanála, on appeal, in December 2014.



Figure 2: Adamstown SDZ Planning Scheme 2014 Layout

### 2.3 Non-Material Amendment of SDZ Planning Scheme, 2017

Following publication of the document *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (DoHPLG, 2015), a number of amendments were proposed to the SDZ Planning Scheme 2014 to take account of the revised policy context. The amendments also sought to align the SDZ Planning Scheme with the provisions of the document *Quality Housing for Sustainable Communities* (DoEHLG, 2007). These amendments primarily related to making the minimum size of dwellings that could be accommodated in Adamstown consistent with national policy. These amendments to the Planning Scheme were approved by An Bord Pleanála in September 2017.

### 2.4 Recent Policy and Guidelines

Since the approval of these amendments to the Planning Scheme, new national and regional plans have been prepared (the *National Planning Framework* and *Regional Spatial and Economic Strategy*) and further guidelines – updated *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (the ‘Apartments Guidelines’) and the *Urban Development and Building Heights: Guidelines for Planning Authorities* (the ‘Building Heights Guidelines’) – were published in 2018 by the Department of Housing, Planning and Local Government. The Apartment Guidelines 2018 update the 2015 guidelines, providing for a number of revisions including changes to unit mix. The amendments currently proposed arise primarily in the context of the above planning policies and guidelines.

### 2.5 Development to Date in Adamstown

Development commenced in 2004 following the approval of the Planning Scheme. A total of 3,792 dwellings units have been granted permission to date. So far, the Adamstown model has delivered 2,410 homes (figures for Quarter 3, 2019) and significant supporting infrastructure and services, including a railway station, 2 primary schools, a post primary school, crèche, neighbourhood park, local retail services, a community centre and sports hall, water and sewerage infrastructure and internal strategic roads and upgrades to the adjoining road network. There are a further 621 units presently under construction. Development is currently in Phase 3 of the Planning Scheme.

In recent years following the economic recovery, an increasing number of planning applications have been submitted to and determined by South Dublin County Council Developments granted since the end of 2016 including planning register reference numbers are set out below:

- A Community Centre with Sports Hall was permitted in November 2016 (SDZ16A/0001) and has been constructed.
- Permission was granted for the construction of 267 dwelling units in the north western part of the SDZ lands at Tobermaclugg in January 2017 (SDZ16A/0003). This development has been completed.





**Figure 3: Adamstown SDZ Planning Scheme 2014 Development Areas**

- Planning permission was granted for 246 dwellings on the eastern part of the SDZ lands at Somerton in April 2017 (SDZ16A/0005).
- 135 dwellings were granted planning permission within the central part of the SDZ lands at St Helen's in June 2017 (SDZ17A/0002).
- Planning permission was granted for an All-weather Multi-Purpose Sports Pitch in July 2017 (SDZ17A/0004).
- 169 dwellings were granted planning permission on the western part of SDZ lands at Tubber Lane in August 2017 (SDZ17A/0006).
- Planning Permission was granted for Loop Road 1 in September 2017 (SDZ17A/0007); Loop Road 1 is fully constructed and operational.
- The Celbridge link road was granted permission in February 2018 (SDZ17A/0009); this application refers to the Celbridge Link Road, forming part of Loop Road 3 within the SDZ lands.
- 268 dwelling units were granted permission in Tobermaclugg Village in March 2018, (SDZ18A/0002).
- A Local Centre including provision of a supermarket, retail unit/coffee shop was granted permission in Tobermaclugg Village in February 2019 (SDZ18A/0015).
- Tandy's Lane Public Park was granted permission in April 2018 (SDZ18A/0003).
- Airlie Park which includes provision of all-weather pitches, cricket pitch, basketball, tennis courts, play areas and changing facilities on a 10.95ha site was granted permission in February 2019 and is currently under construction (SDZ18A/0014).

- Permission was granted for the construction of 343 dwelling units at St. Helen's in December 2018 (SDZ18A/0011) and is currently under construction.
- 237 dwelling units were granted permission in Airlie Stud Development Area in March 2018 (SDZ18A/0004) and construction has commenced.
- Permission was granted for the construction of 135 dwellings in Tobermaclugg Village Development Area in July 2019 (SDZ19A/0003).
- In February 2019, permission was granted for 148 dwellings on lands in the Tubber Lane Development Area (SDZ19A/0008).
- Planning permission has also recently been granted in October 2019 for 237 dwellings on the western part of the SDZ lands at Somerton and Airlie Stud (SDZ19A/0004).
- 158 residential units were granted planning permission in the Tubber Lane area in February 2020 (SDZ19A/0008).

Approximately 2,343 dwellings units have been granted permission since the beginning of 2017, and construction is currently under way in Somerton, Tobermaclugg Village, Airlie Stud, St Helen's and Tubber Lane development areas and in Airlie Park. Figure 4 below and Appendix 2 illustrate the development status of Adamstown in Q1, 2020.

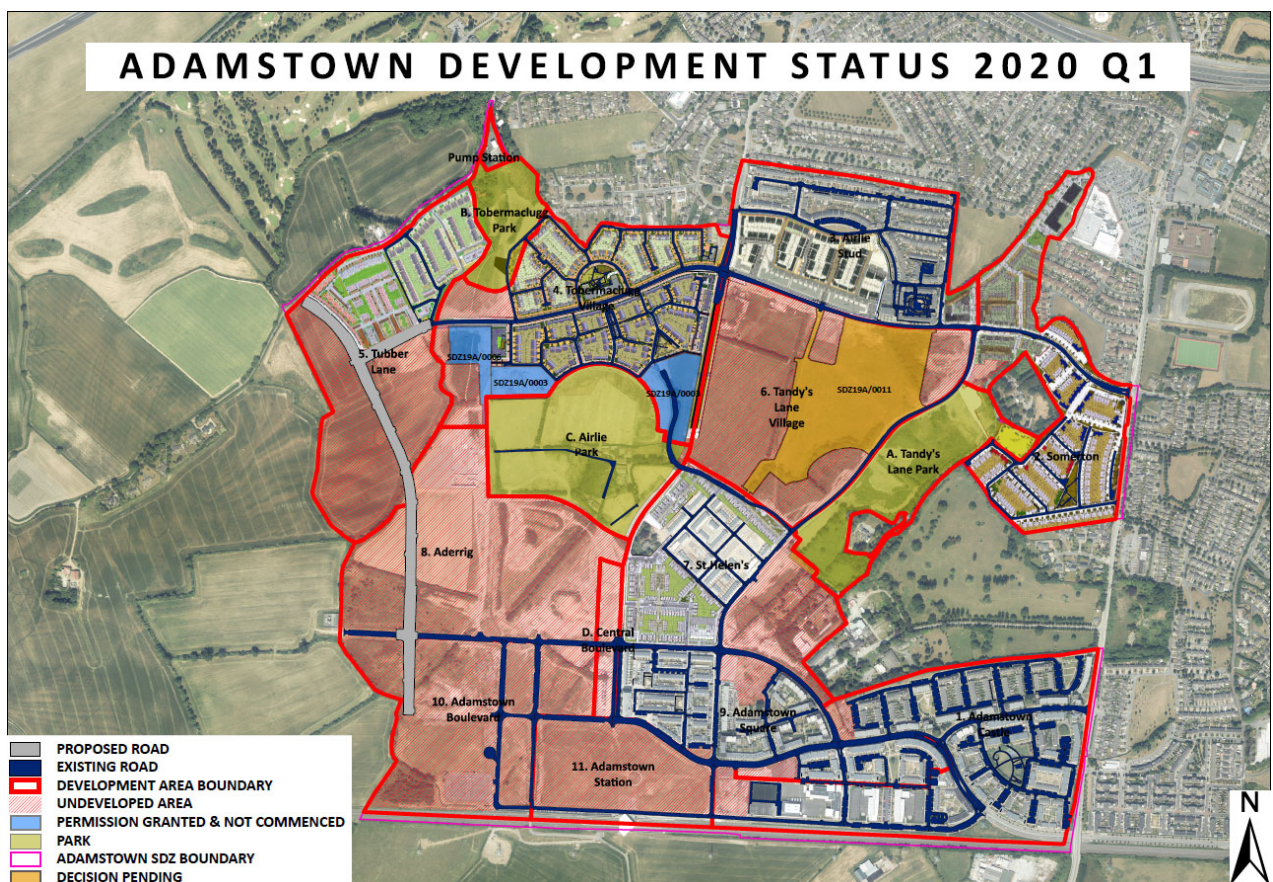


Figure 4: Development Status of Adamstown SDZ Planning Scheme, Q1 2020 (A larger version of this map is attached at Appendix 2).

## Section 3: Reasons for and Justification of Proposed Amendments to Adamstown SDZ Planning Scheme, 2014

### 3.1 Introduction

This section sets out reasons and justifications for the proposed amendments, having regard to:-

- Recent national and regional policies and guidelines;
- A Building Heights Review study of Adamstown commissioned by South Dublin County Council; and
- Development within the Adamstown SDZ to date.

The main amendments proposed are as follows:

- An increase in unit numbers, density and residential floor area within the Adamstown Station development area.
- An increase in unit numbers, density and residential floor area and a location-specific increase in building height within the Aderrig development area.
- Relocation of a proposed enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centres to the Adamstown Station district centre.

The following minor amendments are also proposed:

- Updated references to and summaries of national and regional policy and guidance including the National Planning Framework, the Regional Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines.
- Correction of typographical error relating to Airlie House (a protected structure); and amendment of text, maps and keys to identify Airlie House and other protected structures in the vicinity of the SDZ Planning Scheme.
- Updating of other references in SDZ Planning Scheme.

### 3.2 Policy and Guidelines

#### 3.2.1 National Planning Framework and Regional Spatial and Economic Strategy

The National Planning Framework (NPF) highlights Adamstown as a key future growth enabler for Dublin, due to its location on a public transport corridor.

*'Ireland's future homes should be located in places that can support sustainable development, which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling and help tackle climate change'.*



The NPF sets out national policy objectives to achieve set goals for shaping development within the state into the future. Relevant national policy objectives set out in the NPF include the following:

***National Policy Objective 33:***

*‘Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location’.*

and

***National Policy Objective 35:***

*‘Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights’.*

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly identifies Adamstown as being in the South-West Corridor strategic development area, with a focus on the continued development of Adamstown SDZ lands. A key ‘Growth Enabler’ outlined within the RSES is that at least 50% of all new homes to be built, should be within or contiguous to the existing built up area in Dublin city and suburbs.

There is now an opportunity to provide for greater density within Adamstown Station and Aderrig development areas with a modest increase in dwelling unit numbers in the context of the overall SDZ Planning Scheme. The proximity of Adamstown Station and Aderrig areas to the railway station, the existing and planned community, civic and commercial infrastructure in the vicinity and the district centre status of the Station area, combine to make this an appropriate location for densification, in line with the objectives of the NPF and RSES.

### **3.2.2 Apartment Guidelines**

The *Sustainable Urban Housing: Design standards for New Apartments: Guidelines for Planning Authorities (March 2018)* supersede and build upon the 2015 Apartment Guidelines. The new Guidelines have changed the unit mix which is considered acceptable, therefore allowing for increased residential density, in line with national and regional policy contained in the NPF (National Planning Framework) and the RSES (Regional Spatial and Economic Strategy). They have also relaxed restrictions on studio apartments to enable these unit types to potentially play a greater role in meeting Ireland’s current housing demand. Specific Planning Policy Requirement 1 of the Guidelines states:

### ***Specific Planning Policy Requirement 1:***

*“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)”.*

SPPR 2 of the Guidelines expands on unit mix in relation to schemes of different sizes. SPPR 3 sets out minimum apartment floor areas; the main change here is the specified minimum floor area of 37 sq. m. for studio apartments (reduced from 40sqm in the previous 2015 Guidelines). SPPR 4 refines the policy on the requirement for dual aspect apartments (minimum 33% dual aspect in central urban locations and minimum 50% in suburban/intermediate locations); SPPR 5 specifies a 2.7m minimum ground floor level apartment floor-to-ceiling heights (as before); SPPR 6 increases the maximum number of apartments per stair core from 8 to 12; SPPRs 7 and 8 specify requirements in relation to Build-To-Rent development (in general terms, many of the limitations applying to development generally, including unit mix and car parking, are relaxed in the case of BTR developments); while SPPR 9 sets out requirements in relation to Shared Accommodation.

The proposed increase in density and unit numbers within Adamstown Station and Aderrig to above the parameters in the SDZ Planning Scheme, arises in part from the greater flexibility regarding dwelling unit mix introduced by the Apartment Guidelines 2018. As set out in SPPR 1 above, this allows apartment developments to include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios), and no minimum requirement for apartments with three or more bedrooms.

The Guidelines also outline the appropriate scale and extent of apartment development having regard to proximity and accessibility considerations whereby increased density is promoted, the greater the proximity to urban cores and public transport links. The Guidelines identify three main location types: - Central and/or Accessible Locations; Intermediate Urban Locations; and Peripheral and/or Less Accessible Urban Locations. Adamstown would fall into the ‘Intermediate Urban Locations’ category. Sites identified within this category as suitable for apartment development include:

*‘Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up*

*to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided’.*

The Adamstown Station development area, the location for the designated Adamstown District Centre, is within a 5-minute walk of the railway station and as such is an appropriate location for an increase in residential density in line with the 2018 Apartment Guidelines.

Similarly, the minor density increase in Aderrig would also take advantage of the proximity to the train station (within a 10-minute walk) and the urban core of Adamstown district centre. The proposed increase in density and unit numbers in both Adamstown Station and Aderrig would therefore be in line with the provisions of the Apartment Guidelines and would not conflict with any of the objectives of the SDZ Planning Scheme. Siobhan

### 3.2.3 *Building Heights Guidelines*

The ‘*Urban Development and Building Heights: Guidelines for Planning Authorities, 2018*’ sets out national planning policy guidelines on building heights in relation to urban areas. It is noted that Adamstown is cited within the Guidelines as an exemplar of good urban form in suburban/edge-of-city/town locations, providing a choice of unit type and building typology.

SPPR 1 requires planning authorities to identify through their statutory plans, areas where increased building heights will be actively pursued. SPPR 2 requires planning authorities to ensure an appropriate mix of uses. SPPR 3(B) of the Building Heights Guidelines requires adopted planning schemes to be reviewed in light of the Guidelines. In this regard, South Dublin County Council appointed Metropolitan Workshop (architecture and urban design consultants) in July 2019 to carry out a study of building heights within the undeveloped parts of Adamstown SDZ Planning Scheme 2014 that are close to the railway station (see Appendix 6). A summary of the study findings is set out below.

SPPR 4 requires planning authorities to secure minimum densities as set out in the guidelines ‘*Sustainable Residential Development in Urban Areas (2007)*’; a greater mix of building heights and typologies in suburban locations; and avoidance of mono-type building typologies. Adamstown SDZ Planning Scheme satisfies all of the above objectives, with its focus on the creation of an urban place with a mix of land-uses providing housing, amenities, facilities, services and employment; urban form comprising a network of streets focussed on perimeter blocks and courtyards with opportunities for landmark buildings; the provision of a mix of house types, sizes and tenure options; and the emphasis on public transport, walking and cycling links.



### 3.3 Building Heights Review Study

South Dublin County Council engaged Metropolitan Workshop (architecture and urban design consultants) in July 2019 to carry out a study of building heights within the undeveloped parts of Adamstown SDZ Planning Scheme 2014 that are close to the railway station. As stated above, the study was carried out in light of the requirement set out in SPPR 3B of the *Urban Development and Building Height Guidelines (2018)*, that adopted planning schemes be reviewed to ensure that the criteria in the Guidelines are fully reflected.

In addition to building height, this review also examined and made recommendations in relation to the interconnected issue of density and as such, informs the Amendment now proposed to the SDZ Planning Scheme. The overall finding in relation to building height was that the Scheme is compliant with the Heights Guidelines, but that increased density is appropriate in particular locations including Adamstown Station and Aderrig.

The core methodology of the Building Height Review study involved carrying out a series of capacity studies which tested four different development scenarios for Adamstown Station, Adamstown Boulevard and Aderrig to determine where increased prescribed heights for these areas could be recommended (Adamstown Boulevard is not being considered as part of the current proposed Amendment). In all cases, in order to ensure best practice urban design, a number of constraints were applied to the capacity studies, including:

- Avoidance of overlooking to protect residential amenity;
- Providing a diverse mix of dwelling types and sizes to promote better social cohesion;
- Ensuring economic viability of development;
- Avoidance of north facing single-aspect apartments;
- Generally providing at least 6 units per floor per core; and
- Ensuring continuous but varied road frontage to create better urban form.

Specific tested building typologies were used and particular unit mixes were assumed. The four capacity studies are described as follows:

1. **Capacity Study 1** is particularly relevant as it tested a scenario using existing densities and building heights prescribed in the current Adamstown SDZ Planning Scheme. The purpose was to determine a baseline feasibility for the development of the areas without any changes to the Planning Scheme. This was found to result in poor urban form, particularly in the Adamstown Station area where there would be *'discontinuous street frontage, leaky spaces, etc. when built out at 6 storeys'*.

The report further stated that –

*‘this form of development very quickly reaches the upper levels of quantum with a built form which looks underdeveloped. This suggests that there is scope for increased density in this location without having to necessarily increase the existing height limits.’*

In relation to Aderrig, the finding was that –

*‘there may be an over-reliance on 4-5 storey apartment buildings which may not be built due to viability issues’.*

2. **Capacity Study 2** used the parameters above but utilising mainly duplex dwellings. The purpose of this was to demonstrate the potential that the 3/4 storey height limits in some areas within the current SDZ Planning Scheme may result in duplex units being proposed rather than apartments due to their greater economic viability at this height. This was viewed in the study as a risk in that a preponderance of duplexes would result in poor urban form.
3. **Capacity Study 3** used increased densities within the current height parameters of the Planning Scheme. This would examine whether the current heights are too low to facilitate higher density development, as well as providing more optimal urban form, particularly in the Adamstown Station area (being close to a major transport link).
4. **Capacity Study 4** comprised an ‘optimised’ scenario taking the best elements of the other scenarios. This aimed to reconcile the densities of the first scenario, avoid the overuse of duplexes arising from the second scenario, and add to the better urban form of the third scenario, to produce an optimised scheme from both the urban design and economic viability point of view.

The most significant finding of the study in the context of the current proposed Amendment is as follows:

*‘It is therefore apparent that if the heights of the planning scheme were to be increased in any manner, the target densities should also be reviewed and revised upwards. In order to achieve a more optimal urban form, particularly in the development area of Adamstown Station, increasing the target densities should be considered regardless’.*

Conclusions and recommendations contained in the Metropolitan Workshop study that are relevant to the current Amendment are as follows:

- *From the [analysis carried out for the Building Height Review] it can be concluded that in relation to the development areas of Aderrig.....and Adamstown Station*

*the current overall SDZ appears to be fully compliant with ‘Urban Development and Building Heights: Guidelines for Planning Authorities’.*

- *To offer more variation in the urban form and to enable a broader mix of typologies the following recommendations are proposed:*
  - *To improve legibility along the linear parks it is recommended to increase the maximum height for Aderrig along the Central Boulevard Park to 6 (5 + 1 setback) stories.*
  - *Additionally, to promote a more gradual change in heights, it is recommended to increase the maximum heights for the buildings adjacent to the buildings altered above to 5 stories.*
  - *It is recommended that the target densities of the...development areas which are the subject of this report should be increased to the following to facilitate higher-density urban form in line with current planning guidelines:*
    - *Aderrig: 52-70 dwellings per hectare (d/Ha)*
    - *Adamstown Station: 85-150 d/Ha*
  - *In order to provide better urban form, in particular in Adamstown Station, it is recommended that ‘landmark’ buildings are favoured close to the train station.*

Therefore, in accordance with the recommendations of the study, and in the context of recent national and regional policy and guidelines discussed earlier, increases in density (and consequent increases in unit numbers and total residential floor area) are being proposed within the Adamstown Station and Aderrig development areas and a one storey building height increase is being proposed within a confined area of Aderrig along Central Boulevard Park. These amendments are described in detail below.

### 3.4 Adamstown Station – Increase in Unit Numbers, Density and Floor Area

Adamstown Station is identified in the SDZ Planning Scheme as a high-density area. A minimum-maximum range is set out in the Planning Scheme in the case of each development area for total residential floor area, density and unit numbers. In the Adamstown Station area, it is proposed to increase the maximum element of these ranges by 66%. The current min-max range for density is 75-90 dwellings per hectare (dph). This would increase to 75-150 dph, which is in line with the density increase recommended in the Metropolitan Workshop report summarised above. The analogous increase in the unit numbers range would be from 490-585 to 490-975 dwelling units, a total potential additional 390 units. The maximum in the total residential floor area range would increase from 58,500 to 97,500sqm. These changes are set out in Table 1 below and are reflective of the policy refocus in the Building Height and Apartment Guidelines.





**Figure 5: Indicative layout for Adamstown Station development area, Adamstown SDZ Planning Scheme, 2014.**

As set out in section 3.3 above, the findings of the Building Heights Review carried out by Metropolitan Workshop was that the Scheme is compliant with the Building Heights Guidelines. In this regard, the SDZ Planning Scheme provides for up to 7 no. landmark buildings (of up to 30 metres/approximately 10 storeys each) within the Adamstown Station area. It is therefore considered that there is sufficient flexibility with regard to building height, such that no amendment is required in this respect within the Adamstown Station area.

<b>Table 1: ADAMSTOWN STATION</b>		
Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	49,000 – 58,500	<b>49,000 – 97,500</b>
Min-max dwellings per hectare (density)	75 - 90	<b>75 - 150</b>
Min-max total dwelling units	490 – 585	<b>490 - 975</b>

### 3.5 Aderrig – Increase in Unit Numbers, Density, Floor Area and Building Height

Aderrig is identified in the SDZ Planning Scheme as a medium-density area. The Metropolitan Workshop report contains recommendations relating to increased height and a minor increase in density within the Aderrig development area. A one-storey height increase is recommended within a confined area located beside Central Boulevard Park, resulting in an overall height of up to 6 storeys for the perimeter buildings addressing the Park; and up to 5 storeys for the courtyard buildings directly behind to the west.

Metropolitan Workshop also recommend a minor increase in the maximum element of the density range such that the range would be amended from the current 52-65 dwellings per hectare (dph) to 52-70dph (an 8% increase). The resultant change in the unit numbers range would be from the current 925-1,155 units to 925-1,246 units (a total potential additional 91 units), while max floor area would increase from 121,275sqm to 130,830sqm. The proposed changes are set out in Tables 2 and 3 below.

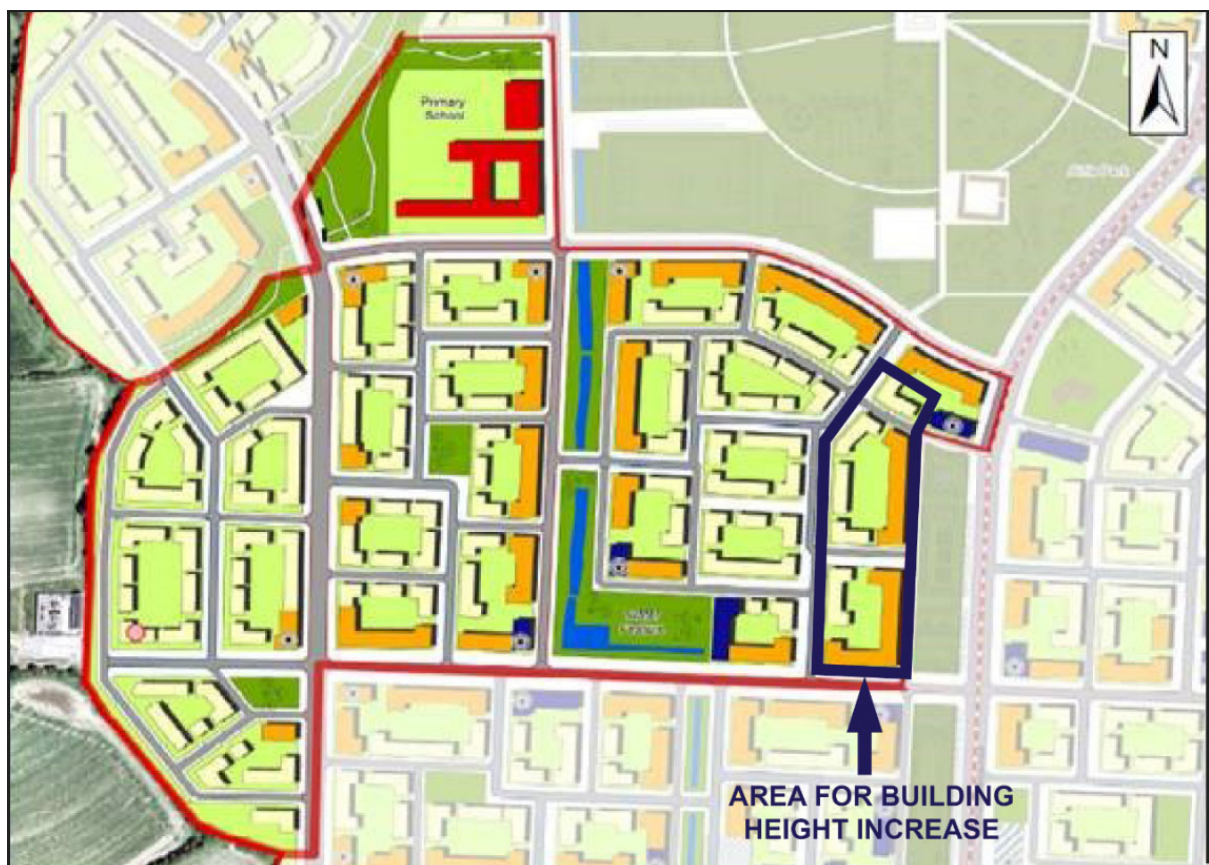


Figure 6: Indicative layout for Aderrig development area, Adamstown SDZ Planning Scheme 2014, indicating location for proposed building height increase

<b>Table 2: ADERRIG</b> Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
<b>ADERRIG</b>	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	97,125 – 121,275	<b>97,125 - 130,830</b>
Min-max dwellings per hectare (density)	52 - 65	<b>52 - 70</b>
Min-max total dwelling units	925 – 1155	<b>925 - 1,246</b>

<b>Table 3: ADERRIG</b> Building Heights as Per SDZ Planning Scheme and as Now Proposed		
<b>Building Type</b>	<b>Heights in SDZ Planning Scheme 2014</b>	<b>Proposed Heights (adjoining Central Boulevard Park only)</b>
Courtyard Building	2-3 storeys with up to 4 storeys at corner/feature building	<b>3 to 5 storeys (i.e. 1 storey increase)</b>
Perimeter Building	3-5 storeys	<b>3 + 1 setback – 5 + 1 setback (i.e. 1 storey increase)</b>
Landmark Building	Up to 7 storeys	Up to 7 storeys (No change)

### 3.6 Total Potential Additional Units – Adamstown Station and Aderrig

The combined potential additional units arising from the density increases in Adamstown Station and Aderrig is 481. However, the SDZ Planning Scheme provides for further floor space to facilitate landmark buildings. In this regard, paragraph 2.2.9 states:

*‘To increase potential for future infill development, up to 2% on top of the maximum floorspace in each net development area may be provided to facilitate landmark buildings at the locations identified.....throughout Adamstown. This permits up to a maximum of 17,500 square metres of further development which may include up to 175 extra dwelling units’.*

It should be noted that it is proposed to amend the above paragraph (see Appendix 1, Amendment Ref. No. 6 of this report) by replacing the term ‘maximum floorspace’ with ‘maximum unit numbers’. This is in order to correct an ambiguity and to correctly reflect the figures in Table 2.4 of the SDZ Planning Scheme, ‘Development



by Net Development Area', in the interest of clarity. Therefore, the landmark building provision arising from the proposed additional development capacity in Adamstown Station and Aderrig is calculated below on the basis of maximum unit numbers (and not maximum floorspace).

As stated above, the existing 2014 SDZ Planning Scheme provided for up to 175 additional units for landmark buildings. The additional floor space allowance for Adamstown and Aderrig would result in a further potential 9 units as a result of the 2% landmark building provision. This would bring the total potential additional units for Adamstown Station and Aderrig to **490 units**. Similarly, the total maximum extent of residential floor space would increase by **50,045sq.m**, while the density range would increase from 47 – 56 to **47 – 64dph**.

### 3.7 Impact on Total Extent of Development in Adamstown

The table below illustrates the impact on the total extent of development permissible in Adamstown. The current maximum extent and the proposed maximum extent are indicated, along with the differences between the figures (including the 2% landmark buildings provision).

<b>Table 4: Impact on Total Extent of Development Permissible in Adamstown</b>				
Development Type	Current Minimum Extent	Current Maximum Extent	Proposed Maximum Extent	Difference Between Existing and Proposed Maximum Extent
Total Residential Floor Area	765,000 sq.m	970,000sq.m	<b>1,020,045sq.m</b>	increase of <b>50,045sq.m</b> (5%)
Total Dwelling Units	7,010 units	8,905 units	<b>9,395 units</b>	increase of <b>490 units</b> (5.5%)
Overall Density (dph)	47	56	<b>64</b>	Increase of <b>8 dph</b> (14%)
Total Non-Residential Development Floor Area	22,500 sq.m	127,000 sq.m		No Change
Additional development	Railway Station / transport interchange Four primary schools (2 in place on existing 4 hectare site) One Secondary school (in place on existing 4 hectare site) Fire Station (if required) Primary Health care Facility			No Change

Table 5 below indicates development permissible by net development area (floor area and unit numbers), which allows the proposed changes to Adamstown Station and Aderrig to be viewed in the context of the other development areas. The impact on floor space and unit numbers for the overall SDZ Planning Scheme is also indicated. Current figures in the Planning Scheme that would be superseded by the proposed Amendment are crossed out, while proposed figures are in bold.

<b>Table 5:</b> Residential Development Permissible by Net Development Area – Floor Space and Unit Numbers					
	Development Area	Total Development (sq.m)		Total Dwelling Units (number)	
		Min	Max	Min	Max
<b>1</b>	Adamstown Castle	57,775	58,975	630	640
<b>2</b>	Somerton	54,000	64,800	450	540
<b>3</b>	Airlie Stud	67,425	72,600	630	675
<b>4</b>	Tobermaclugg Village	84,700	106,150	770	965
<b>5</b>	Tubber Lane	73,800	94,800	615	790
<b>6</b>	Tandy's Lane Village	74,800	102,850	680	935
<b>7</b>	St Helen's	81,400	101,750	740	925
<b>8</b>	Aderrig	97,125	<del>121,275</del> <b>130,830</b>	925	<del>1155</del> <b>1,246</b>
<b>9</b>	Adamstown Square	78,720	80,565	640	655
<b>10</b>	Adamstown Boulevard	72,450	90,825	690	865
<b>11</b>	Adamstown Station	49,000	<del>58,500</del> <b>97,500</b>	490	<del>585</del> <b>975</b>
	<b>Subtotal</b>	791,195	<del>953,090</del> <b>1,001,645</b>	7,260	<del>8,730</del> <b>9211</b>
	<b>Landmark Sites</b>		<b>18,400</b>		<del>+175</del> <b>+184</b>
	<b>Employment Use Transfer of Units</b>			-250	
	<b>TOTAL</b>	765,000	<del>970,000</del> <b>1,020,045</b>	7,010	<del>8,905</del> <b>9,395</b>

Table 6 below indicates the proposed maximum densities for Adamstown Station and Aderrig in the context of the broader SDZ Planning Scheme. The proposed density for the overall Planning Scheme (48-64 dwellings per hectare) would remain within the *medium density* bracket. As before, current figures in the Planning Scheme that would be superseded by the proposed Amendment are crossed out, while proposed figures are in bold.

<b>Table 6: Min-Max Development Density and Residential Yield by Net Development Area</b>			
	Development Area	Residential Yield (dwellings per hectare)	Area Character Type
<b>1</b>	Adamstown Castle	46 – 47	Mainly Developed
<b>2</b>	Somerton	35 – 42	Fully Developed
<b>3</b>	Airlie Stud	44 – 47	Fully Developed
<b>4</b>	Tobermaclugg Village	40 – 50	Low Density
<b>5</b>	Tubber Lane	35 – 45	Low Density
<b>6</b>	Tandy’s Lane Village	40 – 55	Medium Density
<b>7</b>	St Helen’s	52 – 65	Medium Density
<b>8</b>	Aderrig	52 – <del>65</del> <b>70</b>	Medium Density
<b>9</b>	Adamstown Square (Total)	59 – 60	Mainly Developed
<b>10</b>	Adamstown Boulevard	60 - 75	High Density
<b>11</b>	Adamstown Station	75 – <del>90</del> <b>150</b>	High Density
	<b>OVERALL</b>	47 – <del>56</del> <b>64</b>	<b>Medium Density</b>



### 3.8 Planning Scheme Impact Analysis

South Dublin County Council carried out an analysis of density and capacity within the SDZ Planning Scheme area taking into account development to date, forecasted development and the impact of the proposed amendments (which would increase density) on the overall Scheme. The analysis comprised the following:

- A review of unit numbers granted to date in each tile/development area
- A review of densities achieved to date in each tile
- A comparison with density ranges prescribed in the SDZ Planning Scheme
- A calculation of 'lost potential' arising from tiles not developed to their maximum densities
- A forecast of potential units on remaining lands
- An analysis of the impact of proposed unit number increases in Adamstown Station and Aderrig on overall Planning Scheme unit numbers.

Table 7 below sets out a comparison of densities achieved to date within each partly or fully developed tile, with the prescribed density range set out in the Planning Scheme.

<b>Table 7:</b> Achieved Density (for areas partly and fully developed) Compared with Min-Max SDZ Planning Scheme Density				
<b>Area No.</b>	<b>Development Area</b>	<b>Density as per SDZ Scheme (dwellings per hectare)</b>	<b>Development Status</b>	<b>Achieved Density (to date)</b>
<b>1</b>	Adamstown Castle	46 – 47	Mainly developed	47
<b>2</b>	Somerton	35 – 42	Fully-developed	35
<b>3</b>	Airlie Stud	44 – 47	Fully-developed	47
<b>4</b>	Tobermaclugg Village	40 – 50	Mainly developed	43
<b>5</b>	Tubber Lane	35 – 45	Part-developed	45
<b>7</b>	St Helen's	52 – 65	Part-developed	60
<b>9</b>	Adamstown Square	59 – 60	Mainly developed	54
	<b>Overall Planning Scheme Density (including undeveloped areas not listed in table)</b>	<b>47-56</b>	<b>Part-developed</b>	<b>47</b>

Airlie Stud (fully developed) and Tubber Lane (part-developed) are achieving the top of their density ranges, at 47dph and 45dph, respectively. However, Somerton (fully developed) is at the lowest end of its range (35dph) while Adamstown Square (mainly developed) falls short of its minimum density (59dph), achieving 54dph (it should be noted that there are remaining areas to be developed within Adamstown Square which will provide opportunities for increasing the overall tile density – the SDZ Planning Scheme sets out a density of up to 75dph for the remaining areas of this tile). Adamstown Castle (mainly developed) is on target at 47dph, Tobermaclugg Village (43dph) is at the lower end of its density range (40-50dph), while St. Helen’s (60dph) is mid-range.

Notwithstanding the fact that apart from Adamstown Square, only lower and medium density tiles have been developed to date, it is evident that development so far has tended towards the middle to lower end of the density ranges within most development areas, mainly due to market changes as a result of the economic downturn. However, the most significant factor arising from the density analysis from the perspective of the current proposed Amendment, is that when achieved densities are averaged out across the Scheme, the overall density to date only attains the minimum of the density range for the overall SDZ Planning Scheme (i.e. 47dph). It is therefore clear that on this basis, there is particular scope for increasing the density in the high density area of Adamstown, focussed on the district centre urban core and train station; and within the medium density area of Aderrig, also in close proximity to the district centre and station. This would serve to align the Scheme with recent government guidance and policies on compact growth focussed on urban cores and public transport links.

Table 8 below sets out the results of a capacity analysis of the SDZ Planning Scheme, taking into consideration how development has proceeded to date. The development potential of residual sites on tiles which have not been fully developed is accounted for, as are potential additional units on undeveloped tiles. ‘Lost potential’, where developed areas were not built out to the maximum of the prescribed density ranges, or where permissions are not at the maximum of the prescribed density ranges, is also factored in. The potential additional units due to the proposed increased density within Adamstown Station and Aderrig is included, along with the 2% additional provision for landmark buildings.

The outcome of this exercise indicates that when the proposed additional units in Adamstown Station and Aderrig are combined with existing, permitted and potential development, this results in a total of 8,950 units which is just 45 units above the 8,905 maximum unit numbers set out in the existing 2014 SDZ Planning Scheme.

<b>Table 8:</b> Capacity Analysis	
No. units granted to date	3,792
Potential units on residual undeveloped sites within mainly/partly-developed tiles (Adamstown Castle, St. Helen's, Adamstown Square, Tobermaclugg Village, Tubber Lane)	1,175
Potential additional units on undeveloped tiles (Tandy's Lane Village, Adamstown Boulevard, Aderrig, Adamstown Station)	3,540
<i>Subtotal</i>	<i>8,507</i>
'Lost potential' due to development carried out below maximum densities	-222
<i>Subtotal</i>	<i>8,285</i>
Potential additional units due to proposed increased density at Adamstown Station and Aderrig (excluding landmark building provision)	+481
Overall number of units including increase in Adamstown Station and Aderrig	8,766
Additional 2% landmark buildings provision (calculated on total max unit numbers in current Scheme plus proposed additional for Adamstown Station and Aderrig)	+184
<b>Total Overall Unit Numbers (existing and potential)</b>	<b>8,950</b>
Max units as per SDZ Planning Scheme 2014	8,905
<b>Difference between Total Overall Unit Numbers (existing and potential) and 2014 Planning Scheme Max</b>	<b>45</b>

### 3.9 Infrastructure Requirements

An analysis of infrastructure requirements in the current SDZ Planning Scheme 2014 and the original SDZ Planning Scheme 2003 has also been undertaken. The tables below indicate the requirements set out in both Schemes.

**(Note: Tables are as set out in Planning Scheme documents; Information presentation varies between tables.)**



<b>Table 9:</b> Adamstown SDZ Planning Scheme <b>2003</b> , Total Extent of Development Permissible		
Development Type	Minimum Extent	Maximum Extent
Total Residential and Non-Residential	840,000 square metres	1,035,000 square metres
Total Dwelling Units	8,250 units	10,150 units
Total Non-Residential Development	32,600 square metres	125,500 square metres
Additional Development	Railway station/transport interchange Three primary schools One secondary school Fire Station	

<b>Table 10:</b> Adamstown SDZ Planning Scheme <b>2014</b> , Total Extent of Development Permissible		
Development Type	Minimum Extent	Maximum Extent
Total Residential	765,000 square metres	970,000 square metres
Total Dwelling Units	7,010 units	8,905 units
Total Non-Residential Development	22,500 square metres	127,000 square metres
Additional Development	Railway station/transport interchange Four primary schools (2 in place on existing 4 hectare site) One secondary school (in place on existing 4 hectare site) Fire station (if required) Primary Health Care Facility	

The original Adamstown SDZ Planning Scheme (2003) provided for up to a maximum of 10,150 residential units (the min-max range was 8,250 units to 10,150 units – see Table 9). As stated previously, due to the economic downturn, the SDZ Planning Scheme was revised in 2014 and the amended min-max unit numbers range was reduced to its current range of 7,010 – 8,905 units (see Table 10). This is a reduction of 15% in the minimum figure and 12% in the maximum figure.

Regarding infrastructure requirements, it is significant that the min-max range for non-residential development was widened in the 2014 Planning Scheme when compared with the 2003 Planning Scheme, with a lower minimum extent but a higher maximum extent. This is despite the overall reduction in dwelling unit numbers. Moreover, it is noted that additional community facilities – a further primary school and a primary health care facility – were added to the requirements in the 2014 Planning Scheme.

The proposed increase in the maximum unit numbers permitted within the Adamstown Station area and Aderrig areas would give rise to a combined maximum total of 490 additional units. The capacity analysis in section 3.8 above forecasts potential total unit numbers, taking into account how development has proceeded to date. It demonstrates that when the additional units for Adamstown Station and Aderrig are added to existing, proposed and potential units, dwelling unit numbers for the overall SDZ Planning Scheme area are projected to exceed the current maximum of the dwelling unit range (8,905) by just 45 units. Given that infrastructure, services and amenity requirements including transport, schools, childcare, health care, retail, parks, community centres, water supply and drainage, etc. were designed for a scheme within the minimum-maximum range of 7,010 - 8,905 dwelling units, it is therefore submitted that the scope provided in the current SDZ Planning Scheme for non-residential development will be more than adequate to cater for the proposed modest increase in unit numbers in the Adamstown Station and Aderrig areas.

### 3.10 Explanatory Note – Minimum Figures, Unit Size and Total Residential Floor Area

#### *Minimum Figures in Ranges*

South Dublin County Council has taken the view that the minimum figures in the ranges for total residential development, density and total dwelling units within the SDZ Planning Scheme should remain unchanged. This is to retain flexibility and to obviate the necessity for future amendments to the SDZ Planning Scheme, in the event of changes in the residential market or an economic downturn which results in pressure for lower densities.

#### *Unit Sizes and Total Residential Floor Area*

The Apartment Guidelines 2018 specify minimum internal floor areas for individual apartment types (Studio 37sqm; One-bed 45sqm; Two bed 73sqm; Three-bed 90sqm). There is no reference to sizes of internal communal areas. In the Building Height Review study carried out by Metropolitan Workshop, the average floor area for apartment units is assumed to be 76 to 77sqm (depending on which capacity study is used). The measure used is Net Internal Area (NIA) and does not include communal areas such as entrance halls to buildings, landings, circulation areas and

corridors, etc. The SDZ Planning Scheme uses a Gross Internal Area (GIA) measurement for total residential floor area ranges. This is the same as Gross Floor Area (GFA) and includes communal areas such as those listed above.

Assuming that NIA is approximately 75% to 80% of GIA, it was considered prudent to maintain the 100sqm per unit size assumed in the SDZ Planning Scheme for the calculation of proposed total residential floor area within the Adamstown Station Area. This is a development area which is identified as high density in the SDZ Planning Scheme where it is likely that development will be almost entirely comprised of apartments, with their attendant communal areas. In Aderrig (which is identified as a medium density area in the SDZ Planning Scheme) a 105sqm unit size is assumed in the Planning Scheme for the calculation of overall residential floor area. Similarly, it was considered prudent to maintain this assumption for unit size in the proposed Amendment, balancing the likelihood of a sizeable number of apartments (with communal areas) and a sizeable number of other unit types which may be larger than apartments (given its medium density designation).

### 3.11 Comparison with Clonburris SDZ Planning Scheme, 2019

Clonburris SDZ Planning Scheme (2019) was approved by An Bord Pleanála in May 2019. The north-western corner of the Clonburris SDZ area adjoins the south-eastern corner of Adamstown; therefore given their contiguous locations, they are particularly comparable.

Clonburris SDZ Planning Scheme provides for two primary urban centres: Clonburris Urban Centre, based around the train station at Clondalkin-Fonthill; and Kishogue Urban Centre, focussed on Kishogue station (due to become operational by Q3, 2021). While these two centres will provide for a broad mix of uses, they will predominantly comprise residential development. It is significant in the context of the Amendment currently being proposed, that the density ranges for the Clonburris urban centres were increased by An Bord Pleanála in May 2019 when determining the Planning Scheme on appeal. The original proposed densities were approximately 63 – 83 units per hectare in the Clonburris Urban Centre and 58 – 75 units per hectare in the Kishogue Urban Centre in the Draft Planning Scheme (September 2017). An Bord Pleanála increased these to 65 – 125 and 65 – 150 units per hectare in Kishogue and Clonburris Urban Centres, respectively. Therefore, it is contended that a corresponding density of 75 – 150 units per hectare, as proposed in the Adamstown Station development area, which is similar to the Clonburris densities, is entirely appropriate.



It is also noteworthy that An Bord Pleanála made the above changes by modification (Order ABP-301962-18 dated 8<sup>th</sup> May 2019) and states in relation to these (and other) modifications: -

*'the Board is satisfied that the modifications made would not constitute the making of material changes in the overall objectives of the Planning Scheme.....and would not be likely to have significant effects on the environment and would not be likely to have significant effects on the integrity of a European site).'*

**(Note: Underline added for emphasis).**

It is submitted that the amendments now proposed to the Scheme including the increases in density are analogous and as such, should also be deemed to be non-material in nature.

### 3.12 Conclusion – Adamstown Station and Aderrig Proposals

In summary, the entire Adamstown Station area is within a 5-minute walk of the railway station and as such it is contended that the densities currently provided for are under-scaled. Similarly, the Aderrig area is within a 10-minute walk of the station. The proposed increase in densities and unit numbers, which is modest in the context of the overall SDZ Planning Scheme, will align the SDZ Planning Scheme more closely with recent national and regional policies and guidelines which seek compact growth focussed on urban cores and public transport links and will support the overall objectives of the SDZ Planning Scheme.

### 3.13 Relocation of Proposed Enterprise Centre

The SDZ Planning Scheme 2014 requires an enterprise centre with a floor area of at least 1,500sqm to be located in one of the two proposed local centres at Tandy's Lane Village and Tobermaclugg Village. The purpose of the enterprise centre is to provide office, studio and workshop accommodation backed up by support and training facilities for local business start-ups.

It is now intended to relocate the proposed enterprise centre from Tandy's Lane Village/Tobermaclugg Village to the Adamstown Station area. This is considered appropriate having regard to the district centre status of the Station area where the SDZ Planning Scheme provides for a sizeable quantum of retail development including a supermarket and comparison shopping floorspace, in addition to community, leisure, employment, civic and cultural uses. The enterprise centre

would complement the uses outlined above and would benefit from a location adjacent to high quality public transport.

It would comprise a very small proportion of the overall non-residential floor area envisaged for the Adamstown Station area (the SDZ Planning Scheme specifies a minimum of 220 childcare spaces and 11,700sqm retail/retail services; and a maximum of 50% of total development up to 29,250sqm). Furthermore, the impact of the relocation would be neutral in the context of the overall floor space within the SDZ Planning Scheme as it involves transferring from one location to another. For the foregoing reasons, the proposed relocation of the enterprise centre would not conflict with any of the objectives of the SDZ Planning Scheme.

### 3.14 Screening for Appropriate Assessment and Strategic Environmental Assessment

Screening for Appropriate Assessment (AA) has been carried out by and Doherty Environmental Consultants and Screening for Strategic Environmental Assessment (SEA) has been carried out by Minogue and Associates Environmental Consultants (Reports attached at Appendices 3 and 4, respectively).

The finding of the AA screening report is that the proposed amendment is unlikely to result in any significant effect on any European Sites. In this regard, the conclusion of the report states:

*'In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by South Dublin County Council that the proposed amendment to the SDZ is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion'.*

The finding of the SEA screening report was that no significant environmental effects are identified for the proposed amendments to the Adamstown SDZ Planning Scheme and that full Strategic Environmental Assessment is not required.

In this regard, the concluding paragraph of section 3.2 of the SEA Screening Report states:

*'The proposed amendments to the Adamstown Planning Scheme seeks to respond to changes in national policy in particular the Regional Spatial Economic Strategy (RSES) for the Eastern and Midland region and the National Planning Framework (NPF). The principal amendments are positive in relation to the promotion of higher densities close to public transport, thus better integrating land use and transport considerations. The relocation of*

*enterprise centre to the Adamstown Station area further supports this approach. The amendment relating to increased height relates to one specific location and again meets compliance with the Height Guidelines. The remaining amendments are minor in nature, and have not been identified as generating strategic environmental effects. As the assessment against the above criteria in the SEA Directive and SI 436 of 2004 (as amended) demonstrate, no significant environmental effects are identified for these proposed amendments to the Adamstown Planning Scheme and therefore are determined not to require full Strategic Environmental Assessment’.*

### 3.15 Airlie House – Typographical Error

Airlie House is a Protected Structure (Ref. 109 on the Record of Protected Structures, contained at Schedule 2 of the South Dublin County Development Plan, 2016-2022. The reference is as follows: ‘*Airlie House, Off Tandy’s Lane, Lucan; Detached three bay two storey house*’). It is incorrectly stated within the text of the SDZ Planning Scheme that Airlie House is not a protected structure, as follows:

*‘2.6.11 Airlie House is located between Airlie Park and the Central Boulevard. It is not a protected structure but is a feature of Adamstown that is of local historic interest and is in architectural terms, typical of a mid-19th Century farmhouse. The original part of the House is considered to be of local amenity value and it is proposed that it be retained. Appropriate uses could include community, residential or commercial Activities’.*

(Note: underline added for emphasis).

As Airlie House **is** a Protected Structure, the word ‘not’ should be deleted. Other references within the Planning Scheme also require amending for clarity. In addition, Airlie House requires to be identified on all relevant maps and keys within the SDZ document. For clarity, all protected structures in the vicinity of the SDZ lands including Airlie House, will now also be identified by a pentagon symbol with the Record of Protected Structures (RPS) reference number (as on the County Development Plan zoning maps). All text references to protected structures will also be followed by the RPS reference. The relevant protected structures are as follows:

- Airlie House (RPS 109) (within SDZ Planning Scheme lands)
- Somerton (RPS 107) (not included in Planning Scheme)
- St. Helen’s (RPS 108) (not included in Planning Scheme)
- Finnstown House (RPS 112) (not included in Planning Scheme).



### 3.16 Policies and Guidelines – Updated References and Summaries

Since the previous amendment to the SDZ Planning Scheme in 2017, several new policy and guidance documents have been published including the National Planning Framework, the Regional Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines. It is proposed to take this opportunity to amend the Scheme by providing updated references to and summaries of these and other documents.

## Section 4: Compliance with Section 170A of the Planning and Development Act 2000, (as amended)

### 4.1 Legislation

Section 170A (3)(b) of the Planning and Development Act, 2000 (as amended) sets out criteria against which proposed amendments to a Planning Scheme must be assessed. South Dublin County Council, as the specified Development Agency, has evaluated the proposed amendments against these criteria. It is contended that the proposed amendments do not represent a material change to the Adamstown SDZ Planning Scheme 2014.

### 4.2 Summary of Amendments

The relevant amendments are as follows:

- An increase in unit numbers, density and total residential floor area within the Adamstown Station and Aderrig development areas.
- A location-specific increase in height within the Aderrig development area.
- Relocation of an enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centre to the Adamstown Station district centre.

Other minor amendments are not relevant to this section as they relate to updating references, summaries of policy and guidance, updating of a typographical error and other clarifications.

### 4.3 Section 170A, Subsection 3(b)(i): Planning Scheme Objectives

Section 170A, subsection 3(b)(i) of the Planning and Development Act, 2000 (as amended), requires that the amendment to the planning scheme concerned '*would not constitute a change in the overall objectives of the Planning Scheme concerned*'.

The Planning Scheme is based on a holistic approach that integrates urban design, land use, housing, transportation, ecology and landscape, conservation, energy efficiency and phased delivery (as set out in paragraph 1.1.1 of the Scheme).

Section 2.3 of the SDZ Planning Scheme ('*Overall Design of Development*') details the guiding principles of planning and design on which Adamstown is based and against which planning applications are assessed. These include connectivity and permeability; integration of building and public amenity space; a mix of activities and uses; and a greater variety of residential density and building height.

Section 2.3.2 states:

*These principles support a deliberate shift in the planning and design of Adamstown, away from the traditional suburban housing estate form at towards a more sustainable, compact and integrated urban form at of development.*

The proposed amendments to increase unit numbers and density within the Adamstown Station and Aderrig development areas and the location-specific height increase within the Aderrig development area would support the above objectives, particularly the aim of delivering a more compact and integrated form of development. Indeed, the increase in density of the Adamstown Station area, being an urban core adjacent to a high capacity public transport link, would enhance the sustainability of Adamstown in line with the core objectives of the SDZ Planning Scheme. Likewise, the proposed amendment to relocate the enterprise centre from a local centre to the Adamstown Station area would also enhance the district centre offer, would complement other uses and would be appropriate in the context of an urban core located beside high quality public transport.

Therefore, with respect to Section 170A, subsection 3(b)(i) of the Planning and Development Act, 2000 (as amended), the proposed amendments would not constitute a change in the overall objectives of the Planning Scheme concerned.

#### 4.4 *Section 170A, Subsection 3(b)(ii): Already Developed Land*

Section 170A, subsection 3(b)(ii) of the Planning and Development Act, 2000 (as amended), requires that the amendment to the planning scheme concerned *'would not relate to already developed land in the planning scheme'*.

To date, approximately 95 hectares of the SDZ lands have been developed or are under construction in Adamstown. There are approximately 60 hectares yet to be developed on the SDZ lands. No development has taken place in Adamstown Station or Aderrig where increased density and/or increased building height are now proposed. Regarding the proposed relocation of the enterprise centre from Tandy's Lane Village/Tobermaclugg Village to Adamstown Station, no development has taken place in Tobermaclugg Village, while a local centre is under construction in Tandy's Lane Village. Therefore, aside from Tandy's Lane Village local centre which is under construction, the proposed amendments do not relate to any area of the Planning Scheme that has already been developed and would be applicable to future planning applications on undeveloped lands only.

Thus, with respect to Section 170A, subsection 3(b) (ii) of the Planning and Development Act 2000 (amended), the proposed amendments would not relate to already developed land in the Planning Scheme.

#### 4.5 *Section 170A, Subsection 3(b)(iii): Impact on Floor Area and Density*

Section 170A, subsection 3(b)(iii) of the Planning and Development Act, 2000 (as amended), requires that the amendment to the planning scheme concerned *'would*



*not significantly increase or decrease the overall floor area or density of proposed development’.*

Table 4 (in the previous section of this report) illustrates the impact of the proposed increases in density, floor area and unit numbers on the overall extent of development currently set out in the SDZ Planning Scheme. It can be seen that the maximum of the range for floor area would increase by 5% and the maximum of the range for density would increase by 14%. However, the density analysis carried out by SDCC indicates that the density actually achieved to date within Adamstown (47dph) is at the lowest end of the 47-56 dph density range for the overall Adamstown area as set out in the SDZ Planning scheme (refer to Table 7 in the previous section of this report). Therefore, actual density for the overall Planning Scheme would increase by less than the 14% figure. Consequently, when the proposed increased densities in Adamstown Station and Aderrig are factored in, it is contended that there would be no significant increase in the overall floor area or density envisaged for the Planning Scheme. The capacity analysis carried out by SDCC also demonstrates that when the proposed additional unit numbers in Adamstown Station and Aderrig are combined with existing, proposed and potential development, unit numbers are projected to exceed the 8,905 maximum set out in the Planning Scheme by just 45 units.

The impact of the relocation of the proposed enterprise centre from Tobermaclugg Village/Tandy’s Lane village to Adamstown Station would be neutral in the context of the overall floor space within the SDZ Planning Scheme as it involves transferring from one location to another.

Other proposed amendments will have no impact on floor area or density.

Therefore, with respect to Section 170A, subsection 3(b) (iii) of the Planning and Development Act 2000 (amended), the proposed amendments would not significantly increase or decrease the overall floor area or density of the proposed development.

#### 4.6 *Section 170A, Subsection 3(b)(iv): Impact on Amenity of the Area*

Section 170A, subsection 3(b)(iv) of the Planning and Development Act, 2000 (as amended), requires that the amendment to the planning scheme concerned *‘would not adversely affect or diminish the amenity of the area that is the subject of the proposed amendment’.*

The master-plan layout of Adamstown SDZ is based on a traditional town layout incorporating a loose grid of connected through streets, on-street carparking and buildings addressing streets, as well as contemporary architecture and good quality urban design.

The proposed amendments do not alter this approach and would not compromise the block or street structure, which forms the basis for the SDZ layout. Furthermore, the proposed amendments would not impact on the delivery of any planned amenities within the SDZ lands. The layout, location and quantum of parks, open spaces and other social infrastructure to be provided within the SDZ would remain unchanged.

As discussed in earlier sections, infrastructure, non-residential development and community facility requirements including amenities such as parks have been designed for a scheme within the range 7,010-8,905 units. The capacity analysis undertaken demonstrates that when the additional 490 units for Adamstown Station and Aderrig are added to existing, proposed and potential units, dwelling unit numbers for the overall SDZ Planning Scheme area are projected to exceed the maximum of the dwelling unit range (8,905) by just 45 units. It is therefore submitted that Infrastructure, services and amenity requirements as set out in the current Adamstown SDZ Planning Scheme 2014 will be more than adequate to cater for the proposed modest increase in unit numbers in the Adamstown Station and Aderrig areas.

The Adamstown SDZ Planning Scheme, including the proposed amendments, will continue to embrace the delivery of appropriate densities, mixed use neighbourhoods, a variety of building types and high-quality public spaces. The proposed amendments will support the emphasis on walking and cycling permeability links and public transport as the preferred mode of travel. The overall integrity of the SDZ Planning Scheme objectives, which have amenity as a pivotal element, will not be compromised through the implementation of the proposed amendments.

Therefore, with respect to Section 170A, subsection 3(b) (iv) of the Planning and Development Act 2000 (amended), the proposed amendments would not adversely affect or diminish the amenity of the area that is the subject of the proposed amendment.

## Section 5: Conclusion

### 5.1 Non-Material Amendment

In submitting this proposal, South Dublin County Council, as the Planning Authority and Development Agency for Adamstown SDZ, contend that the proposed amendments, as outlined in this report, do not represent a material change to the Planning Scheme and satisfy the criteria, as set out in Section 170A (3)(b) of the Planning and Development Act, 2000 (as amended). In this regard, the Board's attention is drawn to its decision to increase the densities within the Clonburris SDZ Planning Scheme by modification (Order no. ABP-301962-18) in which a similar increase in density to that now proposed was deemed to be non-material.

### 5.2 Adamstown Station and Aderrig Density Increase

The Adamstown Station development area is a district centre within a 5-minute walk of the railway station, and it is contended that the 75-90 dph density range currently set out in the Planning Scheme, is under-scaled. The proposed increased density within the Station Area and Aderrig and the proposed increased height in part of Aderrig would align the Planning Scheme more closely with recent national and regional policy and guidance including the NPF, the RSES, the Apartment Guidelines and the Building Height Guidelines which together, seek compact growth focussed on urban cores and public transport links. It would also make more efficient use of land within development areas in close proximity to the railway station, and would contribute to the urgent need to meet current housing requirements.

### 5.3 Clonburris SDZ

The increase in density to 75-150 dph would align Adamstown Station with analogous areas within the nearby Clonburris SDZ where An Bord Pleanála increased the densities in Kishogue and Clonburris Urban Centres, which are both beside railway stations, to 65 – 125 and 65 – 150 units per hectare, respectively.

### 5.4 Density Achieved to Date

The overall density achieved to date within the Adamstown area (47dph) is at the lowest end of the current 47-56dph density range for the entire SDZ Planning scheme area. Therefore, an increase in density within a high density area such as Adamstown Station and a medium density area in close proximity to the urban core and train station such as Aderrig, is entirely appropriate in the context of the emphasis in recent policy and guidelines on compact sustainable growth.

### 5.5 Capacity Analysis and Infrastructure

The capacity analysis undertaken by SDCC demonstrates that when the additional units proposed for Adamstown Station and Aderrig are added to existing, proposed and potential units, dwelling unit numbers for the overall SDZ Planning Scheme area



are projected to exceed the current maximum of the dwelling unit range (8,905) by just 45 units.

Infrastructure, non-residential development and community facility requirements including amenities such as parks have been designed for a scheme within the range 7,010-8,905 units. Infrastructure and amenity provision will therefore be more than adequate to cater for the proposed modest increase in unit numbers.

#### 5.6 Aderrig Height Increase

The proposed one-storey height increase in Aderrig is in a confined location and would provide a stronger urban edge addressing Boulevard Park. The blocks where additional height is proposed are located beside or close to a major street and quality bus corridor (QBC) and are within a 5-7-minute walk of the train station and district centre.

#### 5.7 Enterprise Centre Location

The relocation of the enterprise centre would optimise the use, would complement other district centre activities and would benefit from proximity to the railway station. It would also have a neutral impact in terms of the overall Planning Scheme as it involves transferring a use from one location to another.

#### 5.8 Screening for AA and SEA

The screening carried out for AA found that the proposed amendment is unlikely to result in any significant effect on any European Sites, while the SEA screening found that no significant environmental effects are identified for the proposed amendments to the Adamstown SDZ Planning Scheme and that full Strategic Environmental Assessment is not required.

#### 5.9 Conclusion

For the above reasons, it is considered that the proposed amendments; -

- would align the Adamstown SDZ Planning Scheme with recent government policy and guidelines,
- would contribute to the successful implementation of the Planning Scheme,
- would not undermine the policies and objectives of the SDZ,
- would not represent a material change to the Planning Scheme,
- would be unlikely to have any significant effect on any European Sites or any significant environmental effects,
- and would satisfy the criteria, as set out in Section 170A (3)(b) of the Planning and Development Act 2000 (as amended).



# APPENDIX

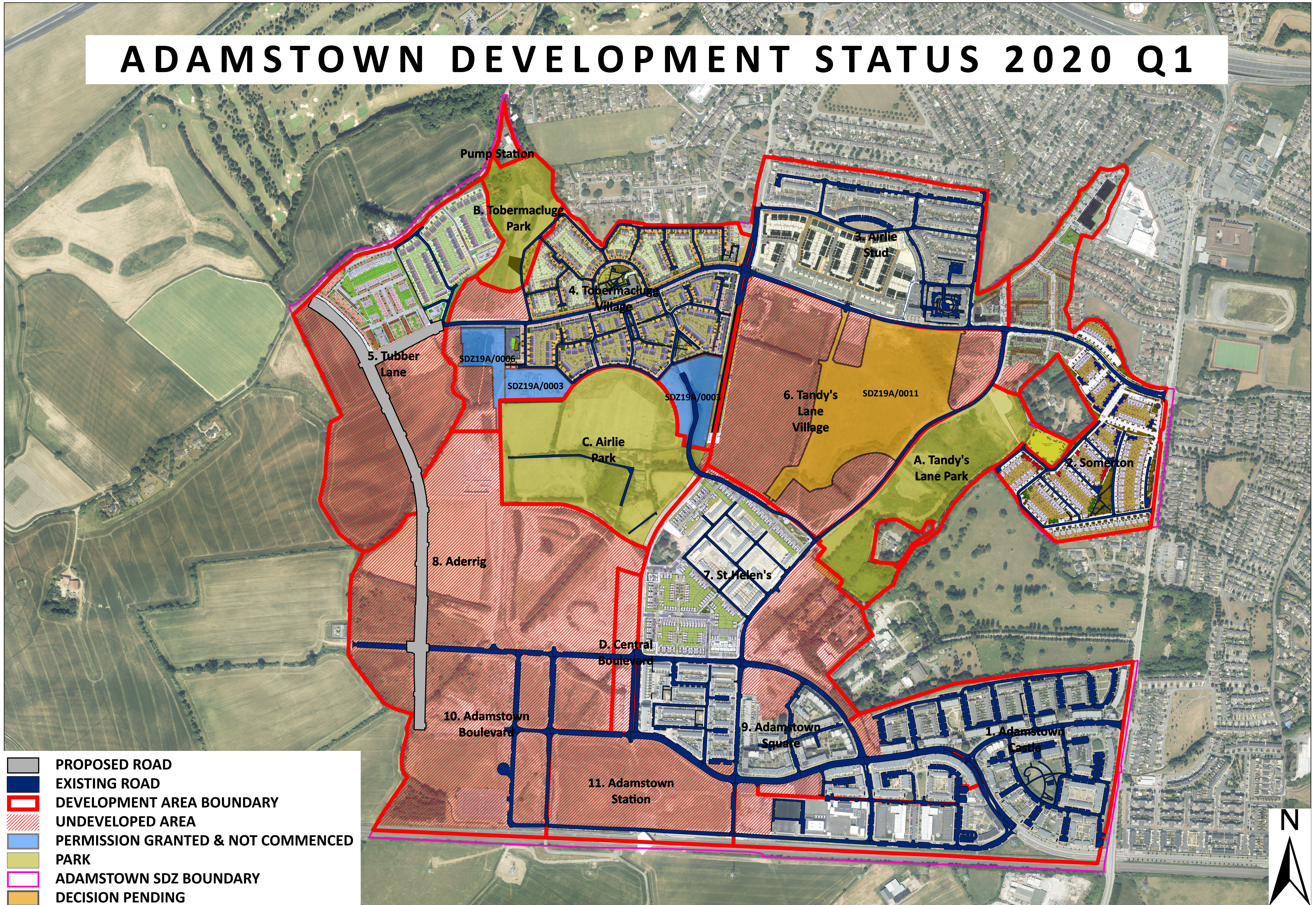


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Map – Adamstown Development Status, Q1 2020.



# ADAMSTOWN DEVELOPMENT STATUS 2020 Q1





# APPENDIX

# 4

Appropriate Assessment Screening Report carried out by  
Doherty Environmental Consultants.



Proposed Amendments to  
Adamstown Strategic Development  
Zone

Screening Report for Appropriate  
Assessment

19th March 2020



**South Dublin County Council**

**Proposed Amendments to Adamstown Strategic  
Development Zone Planning Scheme**

**Screening Report for Appropriate Assessment**

Document Stage	Document Version	Prepared by
Draft Final	1	Pat Doherty MSc, MCIEEM Reviewed R. Minogue MCIEEM
Following comments Final	2	RM

This report has been prepared by DEC Ltd. with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for South Dublin County Council and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

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## 1.0 INTRODUCTION

South Dublin County Council, as the specified Development Agency for Adamstown Strategic Development Zone (SDZ) (Figure 1), designated under Government Order S.I. 272 of 2001, intends to make an application to An Bord Pleanála, to amend the approved Adamstown Strategic Development Zone Planning Scheme 2014 under Section 170A of the Planning and Development Act, 2000 (as amended).

It is proposed to amend elements of the Scheme as a result of provisions within the *National Planning Framework* (NPF) and *Regional Spatial and Economic Strategy* (RSES) relating to compact growth and sustainable development and changes arising from new guidelines including the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018) (the ‘Apartments Guidelines’) and the *Urban Development and Building Heights: Guidelines for Planning Authorities* (the ‘Building Heights Guidelines’). Other minor amendments are also proposed

The function of this Screening Report is to identify the potential for the proposed amendments to result in likely significant effects to European Sites and to provide information so that the South Dublin County Council can determine whether a Natura Impact Report and Appropriate Assessment is required for the amendments to the Adamstown Planning Scheme.

### 1.1 HABITATS DIRECTIVE ASSESSMENT

Article 6(3) of the Habitats Directive requires an assessment of the potential effects of a land use plan or project on one or more Natura 2000 (N2K) Sites. It is noted that a Habitats Directive Assessment is commonly referred to as an “Appropriate Assessment” (Dodd *et al*, 2007). However “Appropriate Assessment” forms only one stage of the HDA process (all stages making up the assessment process are outlined in detail below). The EU Habitats Directive provides the legislative framework for the protection of habitats and species throughout Europe through the establishment of a network of designated conservation areas known as the N2K network. The N2K network includes sites designated as Special Areas of Conservation (SACs), under the EU Habitats Directive and Special Protection Areas (SPAs) designated under the EU Birds Directive. Under the European Communities (Birds and



Natural Habitats Regulations 2011, as amended) SACs and SPAs are referred to as European Sites. SACs are designated in areas that support habitats listed on Annex I and/or species listed on Annex II of the Habitats Directive. SPAs are designated in areas that support: 1% or more of the all-Ireland population of bird species listed on Annex I of the EU Birds Directive; 1% or more of the population of a migratory species; and more than 20,000 waterfowl.

Articles 6(1) & (2) of the Habitats Directive set out provisions for the conservation management of European Sites. Articles 6(3) and 6(4) of this Directive set out a series of procedural steps to test whether or not a plan or project is likely to affect a European Sites. Article 6(3) also establishes the requirement for a HDA:

*“any plan or project not directly connected with or necessary to the management of the (European) site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subjected to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implication for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public”.*

Therefore, the objective of this Screening is to identify whether or not land use measures supported by the proposed amendment will have the potential to negatively affect the Conservation Objectives of European Sites. Such a conclusion will be arrived at by examining the implications of future developments that will be supported by the Planning Scheme and the proposed amendment on each European Site occurring within its zone of influence.

The Screening Report is underpinned by the precautionary principle. Therefore, if the risk of negative impacts to the conservation objectives of a European Site cannot be ruled out it is assumed that the potential for an adverse impact will exist. Where such uncertainties are identified during the assessment, measures will be proposed to avoid or mitigate the risk of adverse impacts occurring.

The Screening was undertaken with reference to the following guidance documents on Habitats Directive Assessments:

- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009). DEHLG.
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats directive 92/43/EEC. European commission (2000). (To be referred to as MN 2000).
- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC. European Commission (2001).

## 1.2 STAGES OF THE HABITATS DIRECTIVE ASSESSMENT

The European Commission (2001) Guidance has outlined a staged process for the completion of a HDA.

- Stage 1 – Screening: This stage defines the proposed plan, establishes whether the proposed plan is necessary for the conservation management of the European Site and assesses the likelihood of the plan to have a significant effect, alone or in combination with other plans or projects, upon a European Site.
- Stage 2 – Appropriate Assessment: If a plan or project is likely to have a significant effect an Appropriate Assessment must be undertaken. In this stage the impact of the plan or project to the Conservation Objectives of the European Site is assessed. The outcome of this assessment will establish whether the plan will have an adverse effect upon the integrity of the European Site.
- Stage 3 – Assessment of Alternative Solutions: If it is concluded that, subsequent to the implementation of mitigation measures, a plan has an adverse impact upon the integrity of a European Site it must be objectively concluded that no alternative solutions exist before the plan can proceed.
- Stage 4 – Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation

of a plan or project an assessment of compensatory measures that will effectively offset the damage to the Natura site 2000 will be necessary.

## 2.0 SCREENING METHODOLOGY

The function of the Screening Assessment is to identify whether the proposed amendment will have a likely significant effect on European Sites. In this context “likely” means any effect that may be reasonably predicted and “significant” means not trivial or inconsequential but an effect that is potentially relevant to the Site’s conservation objectives<sup>1</sup>. Any effect, which would compromise the functioning and viability of a Site and interfere with achieving the conservation objectives of the Site would constitute a significant effect.

The nature of the likely interactions between the proposed amendment and the Conservation Objectives of European Sites will depend upon the potential for future land use activities supported by the proposed amendment to interact with European Sites and their associated qualifying features of interest; the sensitivity of European Site qualifying features to potential impacts associated with land use activities facilitated by the proposed amendment; the current conservation status of the European Site qualifying features; and the likely changes that will result from the implementation of the Proposed amendment, in combination with other plans and projects.

The European Commission Guidelines (2001) outline the stages involved in undertaking a Screening assessment of a plan or project that has the potential to have likely significant effects on European Sites. The methodology adopted for the Screening of the Proposed amendment is informed by these guidelines and was undertaken in the following stages:

1. A brief description of the Proposed amendment is provided and determine whether it is necessary for the conservation management of European Sites;

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<sup>1</sup> See English Nature’s Habitat Regulations Guidance Note No. 3, 1999.



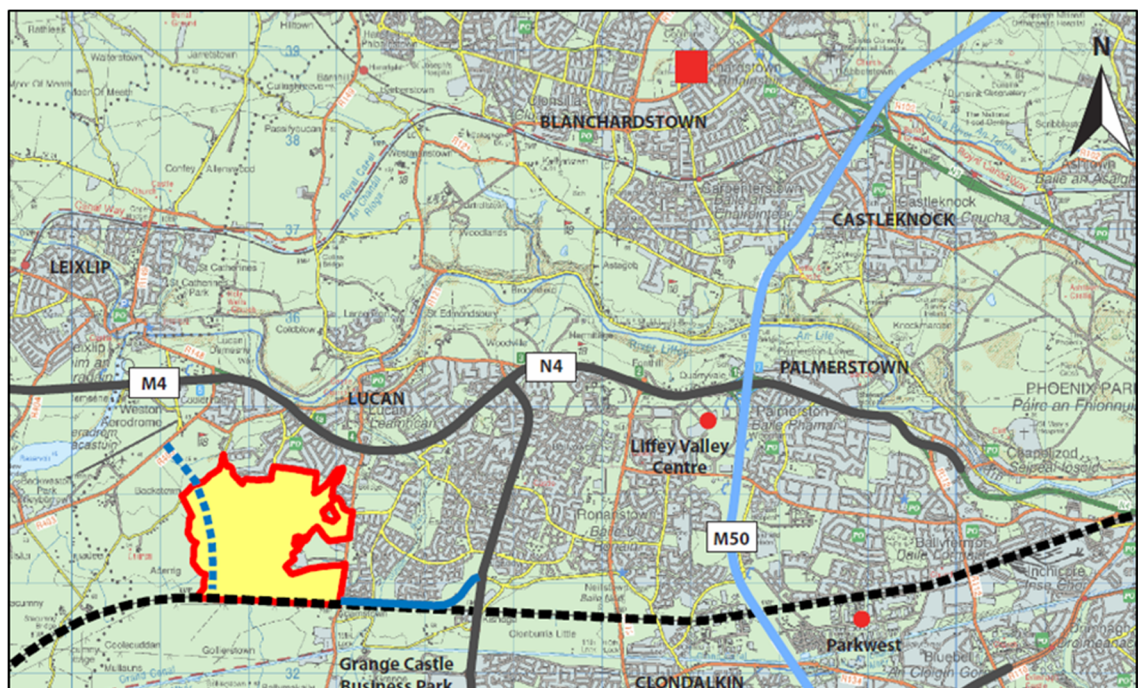
2. Identification of European Sites occurring within the zone of influence of the Proposed amendment;
3. Identification of potential likely significant effects to European Sites; and
4. Identification of other plans or projects that, in combination with the Proposed amendment, have the potential to affect European Sites.

### 3.0 BRIEF DESCRIPTION OF THE PROPOSED AMENDMENTS TO THE ADAMSTOWN PLANNING SCHEME

On 1st July 2001, the Government ordered the designation of 223.5 hectares of privately-owned land at Adamstown, as a site for the establishment of a Strategic Development Zone (SDZ) for the purpose of delivering residential development and associated infrastructure and facilities.

South Dublin County Council (SDCC) is the specified Development Agency for the SDZ. SDCC, as Development Agency, prepared a draft Planning Scheme for the site in 2002. The Scheme was approved by An Bord Pleanála, on appeal, in September 2003. Figure 3.1 shows the boundary and location of the Planning Scheme within the South Dublin County.

**Figure 3.1: Adamstown Planning scheme Boundary and location**



In 2013, having regard to the challenges presented by the economic crisis and collapse of the residential market, South Dublin County Council initiated a statutory process to review and amend the 2003 Planning Scheme. This review delivered a policy refocus away from high density apartment-led development, and toward life-cycle housing and associated reduced densities. The review of the Planning Scheme retained the overall principles for a sustainable urban community with a strong sense of identity that is attractive, safe and secure in a traditional town and village format, and with the aim of ensuring that residential development occurs at a pace whereby it is supported by all necessary facilities and infrastructure. The amended Planning Scheme was approved by An Bord Pleanála, on appeal, in December 2014.

Following publication of the document *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (DoHPLG, 2015), a number of amendments were proposed to the Planning Scheme 2014 to take account of the revised policy context. The amendments also sought to align the Planning Scheme with the provisions of the document *Quality Housing for Sustainable Communities - Design Guidelines* (DoEHLG, 2007). These amendments primarily related to aligning the minimum size of dwellings that could be accommodated in Adamstown with national policy. These amendments to the Planning Scheme were approved by An Bord Pleanála in September 2017.

Since the approval of these Planning Scheme amendments, new national and regional plans have been prepared (the National Planning Framework and Regional Spatial and Economic Strategy) and further guidelines – updated *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (the ‘Apartments Guidelines’) and the *Urban Development and Building Heights: Guidelines for Planning Authorities* (the ‘Building Heights Guidelines’) – were published in 2018 by the Department of Housing, Planning and Local Government. The Apartment Guidelines 2018 update the 2015 guidelines, providing for a number of changes including changes to unit mix. The amendments currently proposed arise primarily in the context of the above planning policies and guidelines.

The main amendments proposed are as follows:

- An increase in unit numbers, density and residential floor area within the Adamstown Station development area.

- An increase in unit numbers, density and residential floor area and a location-specific increase in building height within the Aderrig development area.
- Relocation of a proposed enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centres to the Adamstown Station district centre.

**TABLE 1 ADAMSTOWN STATION-DENSITIES**

<b>ADAMSTOWN STATION</b>		
<ul style="list-style-type: none"> <li>• Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed</li> </ul>		
	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	49,000 – 58,500	<b>49,000 – 97,500</b>
Min-max dwellings per hectare (density)	75 - 90	<b>75 - 150</b>
Min-max total dwelling units	490 – 585	<b>490 - 975</b>

**TABLE 2 ADERRIG DENSITIES**

<b>Table 2: ADERRIG</b>		
Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
<b>ADERRIG</b>	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	97,125 – 121,275	<b>97,125 - 130,830</b>
Min-max dwellings per hectare (density)	52 - 65	<b>52 - 70</b>
Min-max total dwelling units	925 – 1155	<b>925 - 1,246</b>



**TABLE 3 ADERRIG BUILDING HEIGHTS**

Building Heights as Per SDZ Planning Scheme and as Now Proposed		
Building Type	Heights in SDZ Planning Scheme 2014	Proposed Heights (adjoining Central Boulevard Park only)
Courtyard Building	2-3 storeys with up to 4 storeys at corner/feature building	<b>3 to 5 storeys (i.e. 1 storey increase)</b>
Perimeter Building	3-5 storeys	<b>3 + 1 setback – 5 + 1 setback (i.e. 1 storey increase)</b>
Landmark Building	Up to 7 storeys	Up to 7 storeys (No change)

**TABLE 4 IMPACT ON TOTAL EXTENT OF DEVELOPMENT PERMISSABLE IN ADAMSTOWN**

Impact on Total Extent of Development Permissible in Adamstown				
Development Type	Current Minimum Extent	Current Maximum Extent	Proposed Maximum Extent	Difference Between Existing and Proposed Maximum Extent
Total Residential Floor Area	765,000 sq.m	970,000sq.m	<b>1,020,045sq.m</b>	increase of <b>50,045sq.m</b> (5%)
Total Dwelling Units	7,010 units	8,905 units	<b>9,395 units</b>	increase of <b>490 units</b> (5.5%)
Overall Density (dph)	47	56	<b>64</b>	Increase of <b>8 dph</b> (14%)
Total Non-Residential Development Floor Area	22,500 sq.m	127,000 sq.m		No Change
Additional development		Railway Station / transport interchange Four primary schools (2 in place on existing 4 hectare site) One Secondary school (in place on existing 4 hectare site) Fire Station (if required) Primary Health care Facility		No Change

Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
	SDZ Planning Scheme	Proposed
Min-max total residential development (sqm)	49,000 – 58,500	<b>49,000</b> – <b>97,500</b>
Min-max dwellings per hectare (density)	75 - 90	<b>75 - 150</b>
Min-max total dwelling units	490 – 585	<b>490 - 975</b>

**Table 5 Aderrig**

Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
<b>ADERRIG</b>	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	97,125 – 121,275	<b>97,125 - 130,830</b>
Min-max dwellings per hectare (density)	52 - 65	<b>52 - 70</b>
Min-max total dwelling units	925 – 1155	<b>925 - 1,246</b>

**Table 6 Aderrig – Building Heights**

Building Heights as Per SDZ Planning Scheme and as Now Proposed		
<b>Building Type</b>	<b>Heights in SDZ Planning Scheme 2014</b>	<b>Proposed Heights (adjoining Central Boulevard Park only)</b>
Courtyard Building	2-3 storeys with up to 4 storeys at corner/feature building	<b>3 to 5 storeys (i.e. 1 storey increase)</b>



Perimeter Building	3-5 storeys	<b>3 + 1 setback – 5 + 1 setback (i.e. 1 storey increase)</b>
Landmark Building	Up to 7 storeys	Up to 7 storeys (No change)

<b>Table 4: Impact on Total Extent of Development Permissible in Adamstown</b>				
Development Type	Current Minimum Extent	Current Maximum Extent	Proposed Maximum Extent	Difference Between Existing and Proposed Maximum Extent
Total Residential Floor Area	765,000 sq.m	970,000sq.m	<b>1,020,045sq.m</b>	increase of <b>50,045sq.m</b> (5%)
Total Dwelling Units	7,010 units	8,905 units	<b>9,395 units</b>	increase of <b>490 units</b> (5.5%)
Overall Density (dph)	47	56	<b>64</b>	Increase of <b>8 dph</b> (14%)
Total Non-Residential Development Floor Area	22,500 sq.m	127,000 sq.m		No Change
Additional development	Railway Station / transport interchange Four primary schools (2 in place on existing 4 hectare site) One Secondary school (in place on existing 4 hectare site) Fire Station (if required) Primary Health care Facility			No Change

The following minor amendments are also proposed:

- Updated references to and summaries of national and regional policy and guidance including the National Planning Framework, the Regional Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines.
- Correction of typographical error relating to Airlie House (a protected structure); and amendment of text, maps and keys to identify Airlie House and other protected structures in the vicinity of the SDZ Planning Scheme.

Updating of other references in SDZ Planning Scheme.

#### **4.0 PROPOSED AMENDMENTS TO THE ADAMSTOWN PLANNING SCHEMES & NATURA CONSERVATION MANAGEMENT**

From the description of the proposed amendments outlined in Section 3.0 above it is clear that the proposed amendments are not necessary for the management of any European Site for nature conservation purposes. Therefore consideration is given to the proposed amendments and whether they have the potential to result in likely significant effects to European Sites and their Conservation Objectives.

#### **5.0 IDENTIFICATION OF EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE OF THE PROPOSED AMENDMENT**

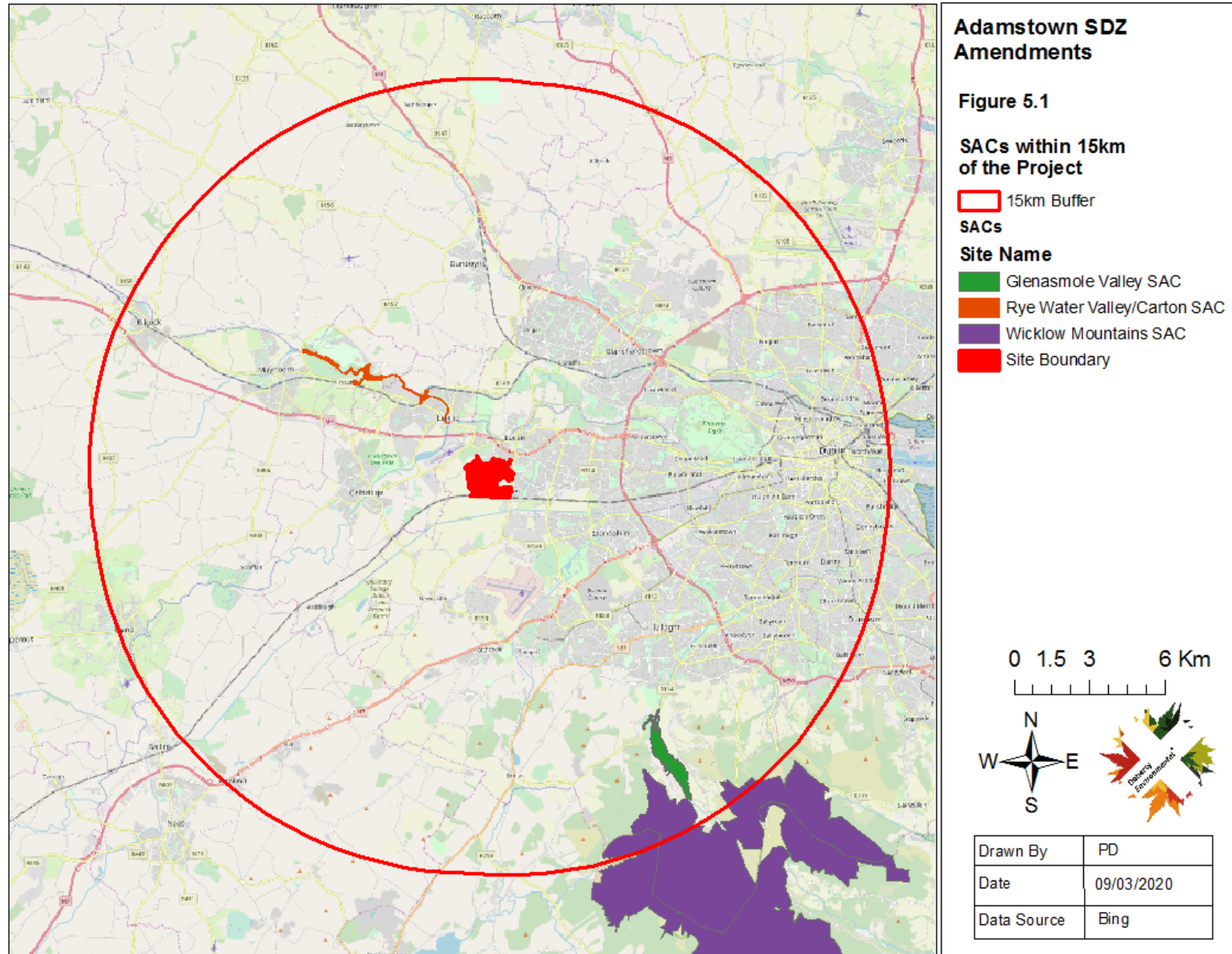
In order to identify the European Sites that could be significantly affected by the implementation of the proposed amendment an initial long-list of sites occurring within a 15km radius of the amendment area (to be referred to as the study area) has been compiled. The establishment of a 15km buffer area surrounding the amendment area is in line with the DAHLG recommended procedures for identifying European Sites. A total number of five European Sites, comprising three SACs and two SPAs, were identified within a 15km radius of the SDZ area (see Figures 5.1 and 5.2). These European Sites along with their qualifying features of interest are presented in Table 5.1 below.

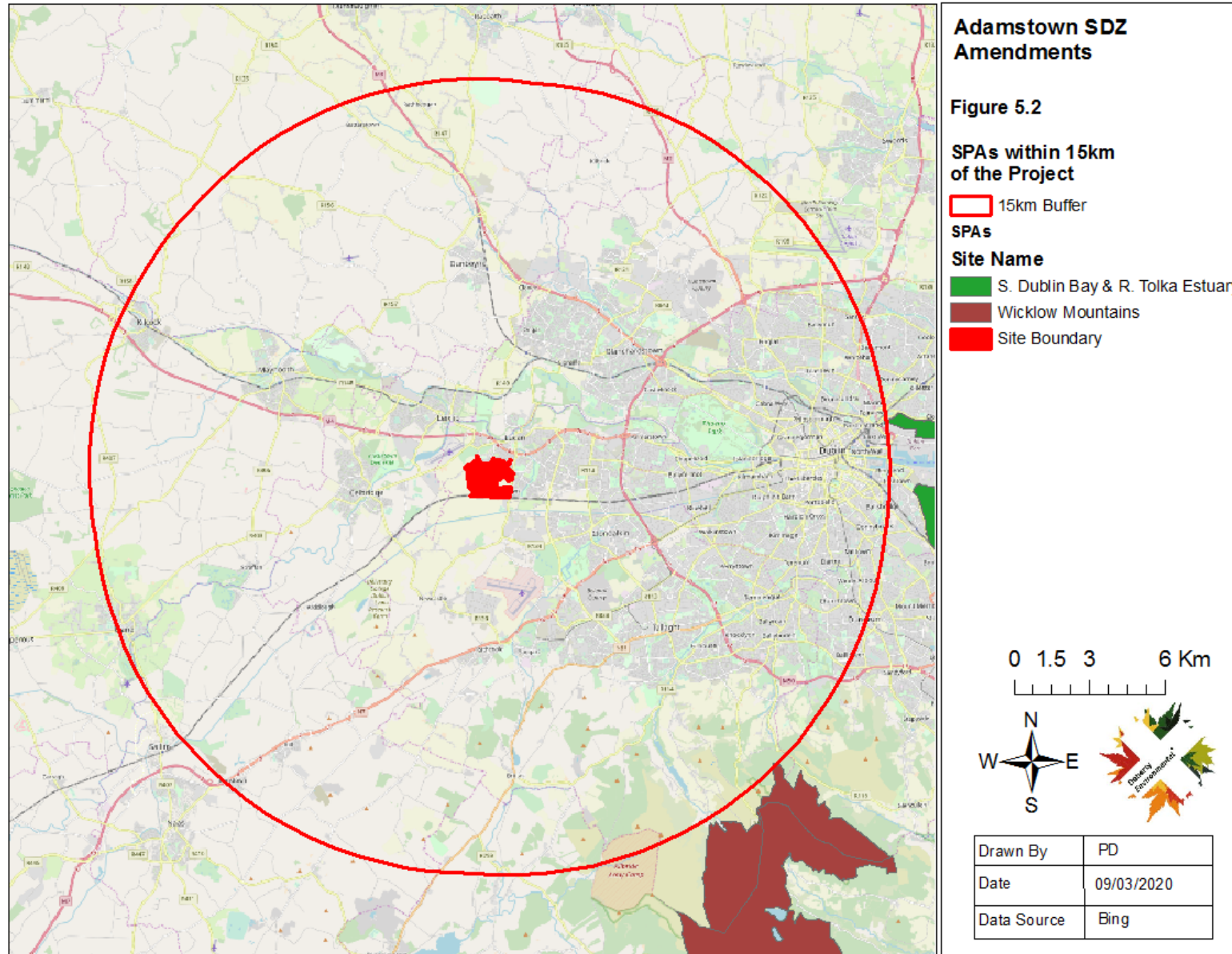
In addition to the European Sites occurring within a 15km area of the project site the DEHLG 2010 guidelines on Appropriate Assessment of Plans and Projects in Ireland also advise that where the potential exists for a hydrological pathway to occur between the project site and European Sites beyond the 15km distance, then these sites should also be included as part of

the Screening. As such the European Sites hydrologically linked to the study area are also included. The River Liffey, which receives surface waters draining the SDZ area, drains to Dublin Bay, where a number of European Sites are located. A total of four European Sites are located at Dublin Bay. One of these sites the South Dublin Bay & Tolka Estuary SPA occurs within 15km of the project site, while the other three are located outside the 15km buffer area. These European Sites are shown in Figure 5.3 and are also listed in Table 5.1.

A total of eight European Sites have been included in the list of European Sites occurring within the wider area surrounding the project site. The next step of this Screening is to identify which, if any of these European Sites, occur within the zone of influence of the SDZ and the proposed amendments.









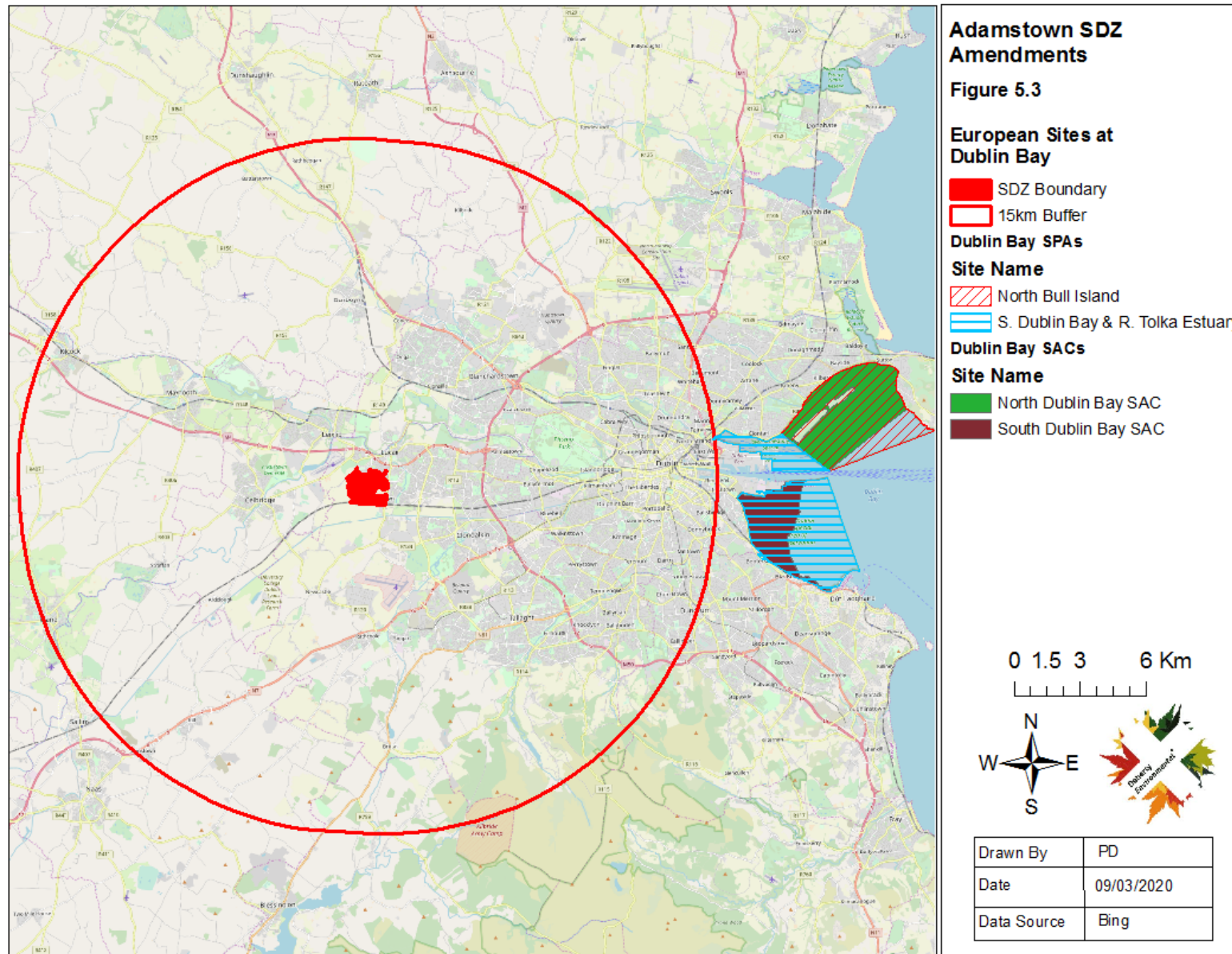




Table 5.1: European Sites within 15km of the Proposed amendment Area

European Sites	Distance from Study Area	Qualifying Features of Interest/Special Conservation Interests
Rye Water Valley SAC	2km to the northwest	Petrifying springs with tufa formation (Cratoneurion) [7220]
		Vertigo angustior (Narrow-mouthed Whorl Snail) [1014]
		Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]
Glenasmole Valley SAC	10km to the south	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]
		Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410]
		Petrifying springs with tufa formation (Cratoneurion) [7220]
South Dublin Bay SAC	16km to the east	Mudflats and sandflats not covered by seawater at low tide [1140]
		Annual vegetation of drift lines [1210]

		Salicornia and other annuals colonising mud and sand [1310]
		Embryonic shifting dunes [2110]
North Dublin Bay SAC	16km to the east	Mudflats and sandflats not covered by seawater at low tide [1140]
		Annual vegetation of drift lines [1210]
		Salicornia and other annuals colonising mud and sand [1310]
		Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> ) [1330]
		Mediterranean salt meadows ( <i>Juncetalia maritimi</i> ) [1410]
		Embryonic shifting dunes [2110]
		Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]
		Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]
		Humid dune slacks [2190]

		Petalophyllum ralfsii (Petalwort) [1395]
South Dublin Bay & Tolka Estuary SPA	15km to the east	Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> )
		Oystercatcher ( <i>Haematopus ostralegus</i> )
		Ringed Plover ( <i>Charadrius hiaticula</i> )
		Grey Plover ( <i>Pluvialis squatarola</i> )
		Knot ( <i>Calidris canutus</i> )
		Sanderling ( <i>Calidris alba</i> )
		Dunlin ( <i>Calidris alpina</i> )
		Bar-tailed Godwit ( <i>Limosa lapponica</i> )
		Redshank ( <i>Tringa totanus</i> )
		Black-headed Gull ( <i>Croicocephalus ridibundus</i> )



		Roseate Tern ( <i>Sterna dougallii</i> )
		Common Tern ( <i>Sterna hirundo</i> )
		Arctic Tern ( <i>Sterna paradisaea</i> )
North Bull Island SPA	16km to the east	Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> )
		Shelduck ( <i>Tadorna tadorna</i> )
		Teal ( <i>Anas crecca</i> )
		Pintail ( <i>Anas acuta</i> )
		Shoveler ( <i>Anas clypeata</i> )
		Oystercatcher ( <i>Haematopus ostralegus</i> )
		Golden Plover ( <i>Pluvialis apricaria</i> )
		Grey Plover ( <i>Pluvialis squatarola</i> )

		Knot ( <i>Calidris canutus</i> )
		Sanderling ( <i>Calidris alba</i> )
		Dunlin ( <i>Calidris alpina</i> )
		Black-tailed Godwit ( <i>Limosa limosa</i> )
		Bar-tailed Godwit ( <i>Limosa lapponica</i> )
		Curlew ( <i>Numenius arquata</i> )
		Redshank ( <i>Tringa totanus</i> )
		Turnstone ( <i>Arenaria interpres</i> )
		Black-headed Gull ( <i>Larus ridibundus</i> )
		Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
	12km to the south	Merlin ( <i>Falco columbarius</i> )

Wicklow SPA	Mountain		Peregrine ( <i>Falco peregrinus</i> )
Wicklow SAC	Mountain	12km to the south	Oligotrophic waters containing very few minerals of sandy plains ( <i>Littorelletalia uniflorae</i> ) [3110]
			Natural dystrophic lakes and ponds [3160]
			Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]
			European dry heaths [4030]
			Alpine and Boreal heaths [4060]
			Calaminarian grasslands of the <i>Violetalia calaminariae</i> [6130]
			Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) [6230]
			Blanket bogs (* if active bog) [7130]
			Siliceous scree of the montane to snow levels ( <i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i> ) [8110]



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		Calcareous rocky slopes with chasmophytic vegetation [8210]
		Siliceous rocky slopes with chasmophytic vegetation [8220]
		Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]
		Lutra (Otter) [1355]

## **5.1 EUROPEAN SITES WITHIN THE ZONE OF INFLUENCE OF THE PROPOSED AMENDMENT**

The next step of this Screening exercise is to identify which, if any of these sites listed in Table 5.1 above occur within the zone of influence of the SDZ and the proposed amendment. As the nearest European Site (Rye Water Valley SAC) is located at a remote distance (approximately 2km) from the SDZ boundary, the proposed amendment will not have the potential to result in direct impacts to European Sites. Thus this Screening exercise focuses on investigating whether the proposed amendments will have the potential to result in indirect effects to European Sites or affect mobile species associated with European Sites beyond the boundaries of their designated conservation areas.

A source-pathway-receptor model has been used to establish which European Sites could occur within the zone of influence of potential indirect impacts. Under such a model the project, as described above, represents the source.

Potential impact pathways are restricted to hydrological and aerial pathways as these represent the principal emissions generated by activities at the project site. Any European Sites occurring downstream of, or otherwise linked to the SDZ via hydrological pathways are considered to occur within the zone of influence of the proposed amendments. Other potential emission pathways such as noise, emissions to atmosphere etc. are not considered due to the distance between the SDZ and the nearest European Sites, which is approximately 2km. The potential for qualifying species of surrounding European Sites to interact with the study area is also included as a potential impact pathway.

The receptors represent European Sites and their associated qualifying features of interest.

European Sites and their associated qualifying features are likely to occur in the zone of influence of the project only where the above pathways establish a link between the SDZ lands and European Sites or where the project site is likely to play an important role in supporting populations of mobile species that are listed as special conservation interests/qualifying species for surrounding European Sites. Table 5.2 provides a determination as to whether each European Site within a 15km buffer distance of the project site occur within the sphere of influence of the project. This determination has been undertaken in line with the following assessment questions:

- Is there a hydrological pathway linking the Project site to European Sites and does this pathway have the potential to function as an impact pathway?
- Are qualifying habitats of these European Sites at risk of experiencing impacts as a result of the project?
- Does the project site have the potential to interact with or support Annex II qualifying species/special conservation interest species of these European Sites?



**Table 5.2: Identification of European Sites within the Zone of Influence of the proposed amendment**

European Sites	Is there a Hydrological Pathway and does it have the potential to function as an Impact Pathway	Do the Project have the potential to interact with Mobile Species within the SDZ lands	Do European Sites occur within the Projects Zone of Influence?
Rye Water Valley SAC	No. While the SDZ and this SAC are both located within the Liffey Catchment, the SAC is located upstream of the SDZ and given the nature of its qualifying features of interest, which are sedentary species and a groundwater dependent habitat there will be no potential for the proposed amendments to result in any interactions between with these features.	No. No mobile species are listed as qualifying features of interest for this SAC. Two sedentary snail species are listed as qualifying features of interest for this SAC. These species are located upstream in the catchment and there will be no potential for land use activities at the SDZ to interact with these species or the habitats upon which they rely.	No. This SAC is not located within the zone of influence of the proposed amendments.
Glenasmole Valley SAC	No. This SAC is designated for the presence of the Annex 1 habitats grassland habitats and petrifying spring. The grassland habitats do not rely on lotic processes while the spring relies on	No. No Annex 2 species are listed as qualifying features of interest for this SAC.	No. No impact pathways link the SDZ lands to this SAC.

	soligenous hydrological processes. Furthermore this SAC is located within a separate surface water sub-catchment to the proposed SDZ lands.		
Wicklow Mountains SAC	No. This SAC is designated for the presence of the Annex 1 upland peatland and grassland habitats. Furthermore this SAC is located within a separate surface water catchment to the proposed SDZ lands.	No. Otters are the only Annex 2 species listed as qualifying species for this SAC. The SDZ is located in an urban area at a considerable distance from the nearest watercourses associated with this SAC. There are no direct hydrologically connected between the SDZ lands and the	No. This SAC and its qualifying features of interest are not located within the zone of influence of the SDZ lands.
Wicklow Mountain SPA	No. This is an upland SPA designated for its role in supporting merlin and Peregrine falcon. There is no hydrological pathway linking the study area to this SAC.	No. The SDZ area does not support habitat for these species.	No. No potential impact pathways link the project site to this SPA.
South Dublin Bay SAC	No. Modelling of the Liffey Estuary and Dublin Bay has shown that the waters from the Liffey draining into Dublin Bay are deflected east and north towards Dollymount and Howth. The presence of the South Great Wall in Dublin Bay	No. No Annex 2 species are listed as qualifying features of interest for this SAC.	No. No potential impact pathways link the project site to this SAC.

	provides a barrier to the movement of waters towards the south (Bedri et al., 2012; Camp, Dresser & McKee, 2012). As such there is no effective hydrological pathway between the project site and this SAC.		
North Dublin Bay SAC	Yes. This SAC is located downstream of the SDZ and the waters from the Tobermaclugg Stream the Laraghcon Stream and the Adamstown Stream (the latter 2 being tributaries of the Griffeen River) all drain into the River Liffey approximately 1km downstream of the SDZ lands.	No. This SAC supports a population of the liverwort <i>Petalophyllum ralfsii</i> . This is a sedentary species, reliant on terrestrial dune slack habitats occurring on Bull Island and there is no potential for the Amendment to interact with this species.	Yes. The potential hydrological pathways linking the SDZ Lands to this SAC require further examination to establish whether or not they have the potential to function as impact pathways.
North Bull Island SPA	Yes. This SPA is located downstream of the SDZ and the waters from the Tobermaclugg Stream, the Laraghcon Stream and the Adamstown Stream (the latter 2 being tributaries of the Griffeen River) all drain into the River Liffey	No. This SPA is designated for its role in supporting a number of wetland bird species. Individuals associated with the SPA populations of these species are very unlikely to rely on the SDZ lands which are comprised of dense urban land use.	Yes. The potential hydrological pathways linking the SDZ Lands to this SPA require further examination to establish whether or not they have the potential to function as impact pathways.



	approximately 1km downstream of the SDZ lands.		
South Dublin Bay & Tolka Estuary SPA	Yes. This SPA is located downstream of the SDZ and the waters from the Tobermaclugg Stream the Laraghcon Stream and the Adamstown Stream (the latter 2 being tributaries of the Griffeen River) all drain into the River Liffey approximately 1km downstream of the SDZ lands.	No. This SPA is designated for its role in supporting a number of wetland bird species. Individuals associated with the SPA populations of these species are very unlikely to rely on the SDZ lands which are comprised of dense urban land use.	Yes. The potential hydrological pathways linking the SDZ Lands to this SPA require further examination to establish whether or not they have the potential to function as impact pathways.

Table 5.2 above outlines the relationship between the project site and the European Sites occurring within the wider surrounding area of the SDZ lands. Of the eight European Sites occurring within this area, three have been identified as occurring within the zone of influence of the proposed amendments. These European Sites are:

1. South Dublin Bay River Tolka Estuary SPA
2. North Dublin Bay SAC
3. North Bull Island SPA

The remainder of this Screening aims to identify whether the project will have the potential to result in likely significant effects to these European Site

## **5.2 CONSERVATION OBJECTIVES FOR INTEREST FEATURES OF EUROPEAN SITES OCCURRING WITHIN THE ZONE OF INFLUENCE OF THE PROJECT**

Generic conservation objectives for all European Sites have been established by the National Parks and Wildlife Service (NPWS). The generic conservation objective for the two habitats occurring within the zone of influence of the project is to maintain the favourable conservation status of these habitats. The favourable conservation status of these habitats is achieved when:

- its natural range, and area it covers within that range, are stable or increasing, and
- the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and
- the conservation status of its typical species is favourable.

The generic conservation objective for the qualifying species occurring within the zone of influence of the project is to maintain or restore the favourable conservation status of these species. This is achieved when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long- term basis as a viable component of its natural habitats, and

- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

### 5.3 THREATS & PRESSURE TO THE EUROPEAN SITES OCCURRING WITHIN THE PLAN ZONE OF INFLUENCE

Threats and pressures to the European Sites and qualifying features of interest in Ireland have been documented by the National Parks and Wildlife Service at two levels, namely at the European Sites level and at the qualifying feature of interest/ Annex 1 habitat and Annex 2 species level. The threats and pressures to European Sites are documented by the NPWS in the Natura 2000 - Standard Data Forms for each SAC. The Natura 2000 - Standard Data Forms for the South Dublin Bay River Tolka Estuary SPA; North Dublin Bay SAC; and North Bull Island SPA. The threats and pressures to individual habitats and species listed on Annex 1 and Annex 2 of the Habitats Directive have been documented at a national level in Ireland's most recent Article 17 submission to the EU, titled *The Status of EU Protected Habitats and Species in Ireland* (NPWS, 2019a and NPWS 2019b). The threats and pressures identified at the three European Sites occurring within the zone of influence of the project are outlined in Table 5.3 below.

**Table 5.3: Threats and Pressures to European Sites occurring within the Zone of Influence of the SDZ lands**

European Sites	Threats & Pressures
North Dublin Bay SAC	<ul style="list-style-type: none"> <li>• Urbanised areas, human habitation</li> </ul>



	<ul style="list-style-type: none"> <li>• Walking, horseriding and non-motorised vehicles</li> <li>• Golf course</li> <li>• Industrial or commercial areas</li> <li>• Discharges</li> </ul>
<p>North Bull Island SPA</p>	<ul style="list-style-type: none"> <li>• Disposal of household / recreational facility waste</li> <li>• Golf Course</li> <li>• Industrial or commercial areas</li> <li>• Walking, horseriding and non-motorised vehicles</li> <li>• Bridge, viaduct</li> <li>• Roads, motorways</li> <li>• Discharges</li> </ul>
<p>South Dublin Bay River Tolka Estuary SPA</p>	<ul style="list-style-type: none"> <li>• Walking, horseriding and non-motorised vehicles</li> <li>• Reclamation of land from sea, estuary or marsh</li> <li>• Discharges</li> </ul>

	<ul style="list-style-type: none"><li>• Roads, motorways</li><li>• Industrial or commercial areas</li></ul>
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## **6.0 EVALUATION OF THE SDZ & PROPOSED AMENDMENTS TO THE ADAMSTOWN PLANNING SCHEME TO RESULT IN LIKELY SIGNIFICANT EFFECTS TO EUROPEAN SITES**

The proposed amendment provides for greater consistency with the national and regional policy and guidance in particular pertaining to integrated landuse and transport whereby higher densities are proposed for the area adjacent to Adamstown Train Station and nearby Arderrig within ten minutes' walk of the station. This also ensures greater consistency with the density provisions in the adjacent Clonburris Planning Scheme. The amendments do influence the location and size of developments in the Planning Scheme by facilitating higher densities at the Adamstown Train Station and Aderrig. The relocation of the Enterprise centre from Tandy's Lane to Adamstown Station District Centre further influences size and location but again is identified as consistent with the above policies and guidelines.

The capacity analysis undertaken by SDCC demonstrates that when the additional units proposed for Adamstown Station and Aderrig are added to existing, proposed and potential units, dwelling unit numbers for the overall SDZ Planning Scheme area are projected to exceed the current maximum of the dwelling unit range (8,905) by just 45 units.

Infrastructure, non-residential development and community facility requirements including amenities such as parks have been designed for a scheme within the range 7,010-8,905 units. Infrastructure and amenity provision will therefore be more than adequate to cater for the proposed modest increase in unit numbers.

The infrastructural capacity is therefore considered appropriate and capable of achieving this increase given the scheme was designed for supporting infrastructure within this range.

The amendments enhance environmental considerations further including increased support for higher densities around public transport provision in particular. The other amendments are

minor in nature and are not identified as significant at strategic level. Combined with the existing environmental measures and considerations in the Adamstown Planning Scheme, these measures contribute to the promotion of sustainable development in light of the SDZ Planning Scheme objectives.

The presence of the hydrological pathway connecting the SDZ to the three European Sites at Dublin Bay and the potential for this pathway to function as a conduit of negative hydrological emissions from the SDZ during the construction and operation of infrastructure is the reason why these sites were identified as occurring within the zone of influence of the SDZ.

It is noted that the Screening for Appropriate Assessment, completed by South Dublin County Council, for the previous amendments to the Adamstown SDZ also identified these European Sites as occurring within the zone of influence of the SDZ. The previous Screening for Appropriate Assessment also noted that these three European Sites rely on water quality for the maintenance of their conservation objectives. With regard to this it is noted that of the habitats supported by these three European Site and the habitats upon which special conservation interest bird species of the two SPAs rely, it is the intertidal mudflats, estuaries and saltmarsh habitats that are influenced by water quality. However a number of research studies have shown that the water quality of the River Liffey discharging to the Liffey estuary and Dublin Bay does not influence the status of water quality within the estuary and the bay area (see O'Higgins & Wilson, 2005; and Wilson and Jackson, 2011). AS such this research indicates that the River Liffey freshwater inputs to the bay area do not influence the status of the qualifying wetland habitats within these European Sites.

Furthermore it is also noted that the volumes of surface water draining developable areas within the SDZ will represent a miniscule fraction of the volumes discharging to the River Liffey and on to the Liffey estuary and it is therefore expected that any polluted surface water runoff generated during infrastructure development within the SDZ will be adequately diluted and attenuated within the Liffey catchment. Furthermore it is also noted that contaminants discharging from the Liffey estuary to Dublin Bay are known to further dilute and decay with the saline waters of the bay such that the freshwater inputs from the Liffey estuary do not influence the water quality status of the bay. This is also evident in the current moderate water quality of the Liffey estuary and the good water quality of Dublin Bay downstream as assigned under current Water Framework Directive monitoring.



Given the above assessment it is considered that the amendments to the SDZ will not have the potential to result in negative impacts to water quality at Dublin Bay and will not have the potential to negatively affect the status of coastal estuarine wetland habitats such as mudflats and saltmarshes occurring within the Dublin Bay European Sites.

## 6.1 IN-COMBINATION EFFECTS

It is possible that the construction phase of projects within the SDZ will overlap with other development projects within the area such as the development of a greenway along the Grand Canal towpath; the development of lands within Grange Castle West; and the development lands within the Clonburris SDZ.

The development of lands within Clonburris SDZ has been subject to Screening for Appropriate Assessment and it has been determined that such developments will not have the potential, alone or in-combination with other plans or projects, to result in likely significant effects to European Sites.

The planning approved Grand Canal Greenway has been subject to Screening for Appropriate Assessment and it has been determined that such developments will not have the potential, alone or in-combination with other plans or projects, to result in likely significant effects to European Sites.

The rezoning of lands in Grange Castle West to the south of the SDZ and the canal has been subject to Screening for Appropriate Assessment and it has been determined that the rezoning and future developments within these lands will not have the potential, alone or in-combination with other plans or projects, to result in likely significant effects to European Sites. It is further noted that future projects proposed within the Grange Castle West lands will be subject to Screening for Appropriate Assessment as part of the planning process for these applications and that only those projects where it can be demonstrated that significant adverse impacts to European Sites will be avoided will be permitted.

Table 5.3 above lists the documented threats and pressures to the European Sites at Dublin Bay. Of these threats and pressures the only relevant threat/pressure to the proposed amendment are “discharges”. However given the assessment outlined in Section 6.0 above there will be no

potential for projects within the SDZ, in view of the proposed amendments, to result in negative impacts to the conservation objectives of these European Sites.

## **7.0 SCREENING CONCLUSION**

During the preparation of this Screening Report for Appropriate Assessment of the proposed amendment to the SDZ it was found that eight European Sites occur within the wider area surrounding the SDZ lands. The nearest European Site the Rye Water Valley SAC to the SDZ lands is located approximately 2km to the northwest. Of these European Sites three have been identified as occurring within the zone of influence of the project by virtue of the presence of a hydrological pathway linking the project site to these European Sites. These European Sites are:

- North Dublin Bay SAC;
- South Dublin Bay River Tolka Estuary SPA; and
- North Bull Island SPA.

The potential for the hydrological pathway, that links the project to these European Sites, to function as an impact pathway was considered as part of this Screening for Appropriate Assessment. This evaluation has been prepared in the absence of any consideration of measures that will be implemented to control and manage surface water generated at future project sites within the SDZ lands during the construction and operation phases.

This Screening Report for Appropriate Assessment has found that development within the SDZ lands will not present a risk of negatively affecting water quality at Dublin Bay in the vicinity of the three European Site and will not have the potential to influence the status of wetland qualifying habitats of the SAC and the wetland habitats of the SPA upon which special conservation interest bird species rely.

In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by South Dublin County Council that the proposed amendment to the SDZ is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation

Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.

## 8.0 REFERENCES

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NPWS (2015b). Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

NPWS (2019a). The Status of EU Protected<sup>[1]</sup>Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill.

NPWS (2019b). The Status of EU Protected<sup>[1]</sup>Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill

# Screening Statement for Appropriate Assessment (AA) of Building Height Review of the Adamstown SDZ Planning Scheme, 2014

## 1. Introduction

The Adamstown SDZ Planning Scheme (2014) comprises 223.5 hectares of land located in West Dublin, south of Lucan and the N4 national primary road, and north of the railway line from Dublin to the South and West of Ireland (see Figure 1). The SDZ Planning Scheme divides the plan lands into eleven development areas or ‘tiles’ and sets out parameters for development within each area.

The original Adamstown SDZ Planning Scheme (2003) was reviewed and amended in 2014 and at that point, it was determined that an Appropriate Assessment of the Planning Scheme and Draft Amendments was not required having regard to:

- The AA Screening Report (October 2013) and Addendum to the Screening Report (January 2014);
- The characteristics of the Planning Scheme;
- The objectives of the Plan to protect Natura 2000 sites and biodiversity;
- The Strategic Environmental Assessment Environmental Report prepared; and
- The consultations with the Prescribed Bodies.

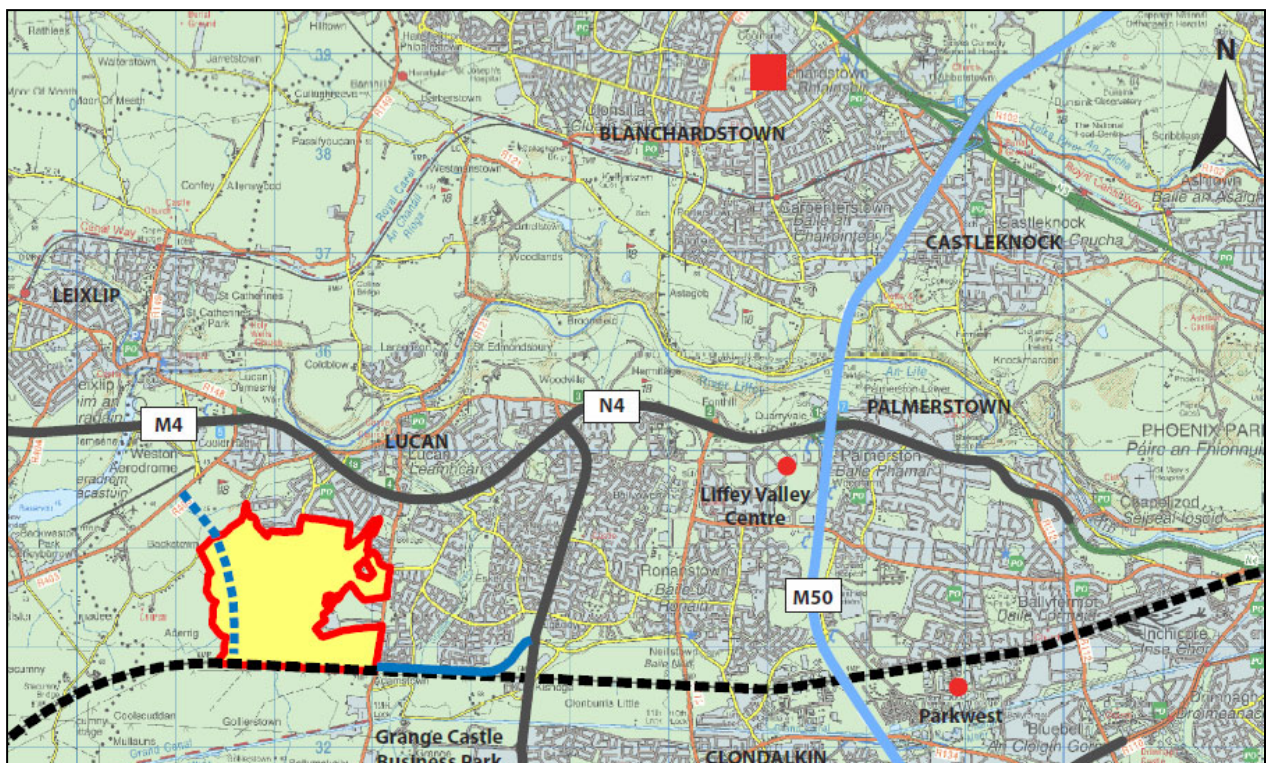


Fig. 1: Adamstown within the wider west Dublin context

## 2. Building Height Review

The Department of Housing, Planning and Local Government published the document *'Urban Development and Building Heights – Guidelines for Planning Authorities'* in 2018, which sets out national planning policy guidelines on building heights in relation to urban areas. The Guidelines contain a number of Strategic Planning Policy Requirements (SPPRs) including SPPR 3(B) which requires adopted planning schemes to be reviewed to ensure that the Guidelines are fully reflected.

Accordingly, a Building Height Review of Adamstown was carried out by South Dublin County Council, informed by an independent study of building height within the undeveloped parts of Adamstown, commissioned by the Council and carried out by Metropolitan Workshop (architecture and urban design consultants). Built-out areas, areas under construction and areas where there are live permissions were not included in the study.



**Fig.2: Indicative layout for Adamstown SDZ Planning Scheme, 2014**

The overall finding of the consultant's Study in relation to building height was that the Scheme is compliant with the Building Heights Guidelines. A number of recommendations were made including that a one-storey location-specific height increase would be appropriate within a confined part of the Aderrig development area. South Dublin County Council concur with this view and therefore recommend that the SDZ Planning Scheme be amended to include this proposal. This Screening Statement relates to that proposed amendment. The proposed one-storey height



increase within Aderrig and other findings/recommendations relating to density changes are included in a proposed Amendment submitted to An Bord Pleanála (the proposed building height increase is also addressed in a separate AA Screening Statement, along with the wider proposed amendments referred to above).

### 3. Screening for Appropriate Assessment

Screening for Appropriate Assessment (AA) was carried out by Doherty Environmental Consultants under Article 6(3) of the EU Habitats Directive. (This, in turn, informed the preparation of a separate Strategic Environmental Assessment (SEA) Screening Report by Minogue and Associates Environmental Consultants).

The AA Screening report identified that three European Sites occur within the zone of influence of the proposed amendments (including the proposed building height increase within Aderrig) in Adamstown, by virtue of the presence of a hydrological pathway – these are North Dublin Bay SAC; South Dublin Bay River Tolka Estuary SPA; and North Bulli Island SPA.

The AA Screening Conclusion states:

*‘This Screening Report for Appropriate Assessment has found that development within the SDZ lands will not present a risk of negatively affecting water quality at Dublin Bay in the vicinity of the three European Sites and will not have the potential to influence the status of wetland qualifying habitats of the SAC and the wetland habitats of the SPA upon which special conservation interest bird species rely.’*

The Screening Conclusion continues:

*‘In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by South Dublin County Council that the proposed amendment to the SDZ is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.’*

### 4. Conclusion

In accordance with the above, South Dublin County Council therefore conclude that the proposed one storey height increase within a confined part of the Aderrig development area (which is included as one of the proposed amendments submitted to An Bord Pleanála by SDCC and referred to in the Screening Conclusion above) is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives.

# APPENDIX

# 5

Strategic Environmental Assessment Screening Report carried out by Minogue and Associates Environmental Consultants.

Strategic Environmental Assessment Screening Report-  
Proposed Amendments to Adamstown Strategic  
Development Zone

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Prepared under the Planning and  
Development (Strategic Environmental  
Assessment) Regulations 2004. (S.I.  
436/2004) and (S.I. 201/2011)

Minogue and Associates

March 2020



This report has been prepared by Minogue & Associates with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for South Dublin County Council and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.



Minogue & Associates  
ENVIRONMENTAL CONSULTANCY

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# 1 PROPOSED AMENDMENTS TO ADAMSTOWN PLANNING SCHEME

## 1.1 INTRODUCTION

South Dublin County Council, as the specified Development Agency for Adamstown Strategic Development Zone (SDZ) (Figure 1), designated under Government Order S.I. 272 of 2001, intends to make an application to An Bord Pleanála, to amend the approved Adamstown Strategic Development Zone Planning Scheme 2014 under Section 170A of the Planning and Development Act, 2000 (as amended).

It is proposed to amend elements of the Scheme as a result of provisions within the *National Planning Framework (NPF)* and *Regional Spatial and Economic Strategy (RSES)* relating to compact growth and sustainable development and changes arising from new guidelines including the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018) (the 'Apartments Guidelines') and the *Urban Development and Building Heights: Guidelines for Planning Authorities* (the 'Building Heights Guidelines'). Other minor amendments are also proposed.

## 1.2 STRATEGIC ENVIRONMENTAL ASSESSMENT

Under Directive 2001/42/EC - *Assessment of Effects of Certain Plans and Programmes on the Environment*, certain plans and programmes require an environmental assessment. This is known as the Strategic Environmental Assessment (SEA) Directive. Article 1 of this Directive states that its objective is:

*'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'*

The purpose of this SEA Screening report and accompanying Determination is to evaluate the requirement for SEA to be undertaken on the Proposed Amendments to the Adamstown Planning Scheme.

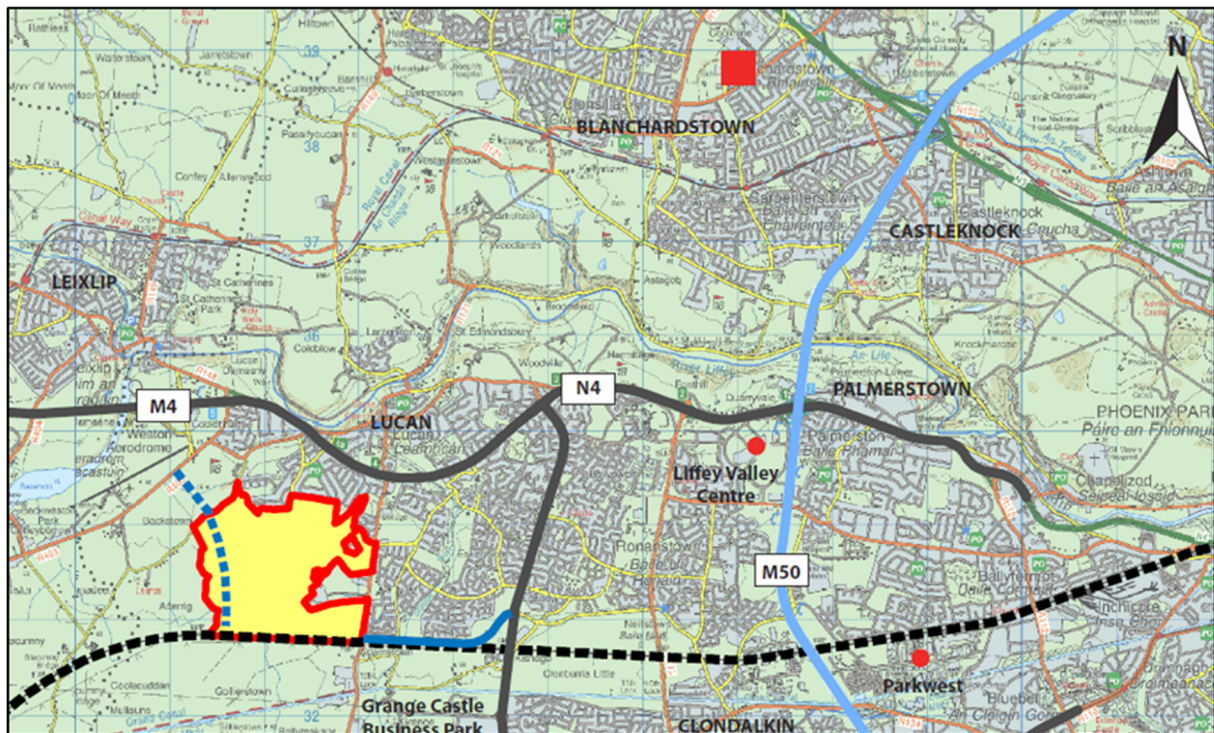
In deciding whether the amendments are likely to have significant environmental effects, regard must be had to the criteria set out in Annex II of the SEA Directive. The approach to this screening assessment is to assess each material amendment for potential environmental effects. Section Three of this report assesses these amendments against the criteria contained in Schedule 2a of the Planning and Development (Strategic Environmental Assessment) Regulations SI 436 of 2004

## 1.3 BACKGROUND AND CONTEXT TO PROPOSED AMENDMENTS TO THE ADAMSTOWN PLANNING SCHEME

On 1st July 2001, the Government ordered the designation of 223.5 hectares of privately-owned land at Adamstown, as a site for the establishment of a Strategic Development Zone (SDZ) for the purpose of delivering residential development and associated infrastructure and facilities. South Dublin County Council (SDCC) is the specified Development Agency for the SDZ. SDCC, as Development Agency, prepared a draft Planning Scheme for the site in 2002. The Scheme was

approved by An Bord Pleanála, on appeal, in September 2003. **Figure 1** shows the boundary and location of the Planning Scheme within the South Dublin County.

**FIGURE 1 ADAMSTOWN PLANNING SCHEME BOUNDARY AND LOCATION**



In 2013, having regard to the challenges presented by the economic crisis and collapse of the residential market, South Dublin County Council initiated a statutory process to review and amend the 2003 Planning Scheme. This review delivered a policy refocus away from high density apartment-led development, and toward life-cycle housing and associated reduced densities. The review of the Planning Scheme retained the overall principles for a sustainable urban community with a strong sense of identity that is attractive, safe and secure in a traditional town and village format, and with the aim of ensuring that residential development occurs at a pace whereby it is supported by all necessary facilities and infrastructure. The amended Planning Scheme was approved by An Bord Pleanála, on appeal, in December 2014.

Following publication of the document *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities* (DoHPLG, 2015), a number of amendments were proposed to the SDZ Planning Scheme 2014 to take account of the revised policy context. The amendments also sought to align the SDZ Planning Scheme with the provisions of the document *Quality Housing for Sustainable Communities - Design Guidelines* (DoEHLG, 2007). These amendments primarily related to aligning the minimum size of dwellings that could be accommodated in Adamstown with national policy. These amendments to the Planning Scheme were approved by An Bord Pleanála in September 2017.

Since the approval of these Planning Scheme amendments, new national and regional plans have been prepared (the National Planning Framework and Regional Spatial and Economic Strategy) and further guidelines – updated *Sustainable Urban Housing: Design Standards for New Apartments:*

*Guidelines for Planning Authorities* (the ‘Apartments Guidelines’) and the *Urban Development and Building Heights: Guidelines for Planning Authorities* (the ‘Building Heights Guidelines’) – were published in 2018 by the Department of Housing, Planning and Local Government. The Apartment Guidelines 2018 update the 2015 guidelines, providing for a number of changes including changes to unit mix. The amendments currently proposed arise primarily in the context of the above planning policies and guidelines.

### 1.3.1 MAIN AMENDMENTS PROPOSED TO ADAMSTOWN PLANNING SCHEME

The main amendments proposed are as follows:

- An increase in unit numbers, density and residential floor area within the Adamstown Station development area – see Table 1;
- An increase in unit numbers, density and residential floor area and a location-specific increase in building height within the Aderrig development area. -see Tables 2 and 3, and
- Relocation of a proposed enterprise centre from the Tobermaclugg Village/Tandy’s Lane Village local centres to the Adamstown Station district centre.
- Table 4 below presents a summary of the proposed amendments against the existing Planning Scheme.

**TABLE 1 ADAMSTOWN STATION-DENSITIES**

<b>ADAMSTOWN STATION</b> • Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	49,000 – 58,500	<b>49,000 – 97,500</b>
Min-max dwellings per hectare (density)	75 - 90	<b>75 - 150</b>
Min-max total dwelling units	490 – 585	<b>490 - 975</b>

**TABLE 2 ADERRIG DENSITIES**

<b>Table 2: ADERRIG</b> Residential Floor Area, Density and Unit Numbers as Provided for in SDZ Planning Scheme and as Now Proposed		
<b>ADERRIG</b>	<b>SDZ Planning Scheme</b>	<b>Proposed</b>
Min-max total residential development (sqm)	97,125 – 121,275	<b>97,125 - 130,830</b>
Min-max dwellings per hectare (density)	52 - 65	<b>52 - 70</b>
Min-max total dwelling units	925 – 1155	<b>925 - 1,246</b>



**TABLE 3 ADERRIG BUILDING HEIGHTS**

Building Heights as Per SDZ Planning Scheme and as Now Proposed		
Building Type	Heights in SDZ Planning Scheme 2014	Proposed Heights (adjoining Central Boulevard Park only)
Courtyard Building	2-3 storeys with up to 4 storeys at corner/feature building	<b>3 to 5 storeys (i.e. 1 storey increase)</b>
Perimeter Building	3-5 storeys	<b>3 + 1 setback – 5 + 1 setback (i.e. 1 storey increase)</b>
Landmark Building	Up to 7 storeys	Up to 7 storeys (No change)

**TABLE 4 IMPACT ON TOTAL EXTENT OF DEVELOPMENT PERMISSABLE IN ADAMSTOWN**

Impact on Total Extent of Development Permissible in Adamstown				
Development Type	Current Minimum Extent	Current Maximum Extent	Proposed Maximum Extent	Difference Between Existing and Proposed Maximum Extent
Total Residential Floor Area	765,000 sq.m	970,000sq.m	<b>1,020,045sq.m</b>	increase of <b>50,045sq.m</b> (5%)
Total Dwelling Units	7,010 units	8,905 units	<b>9,395 units</b>	increase of <b>490 units</b> (5.5%)
Overall Density (dph)	47	56	<b>64</b>	Increase of <b>8 dph</b> (14%)
Total Non-Residential Development Floor Area	22,500 sq.m	127,000 sq.m		No Change
Additional development		Railway Station / transport interchange Four primary schools (2 in place on existing 4 hectare site) One Secondary school (in place on existing 4 hectare site) Fire Station (if required) Primary Health care Facility		No Change

### 1.3.2 MINOR AMENDMENTS PROPOSED TO ADAMSTOWN PLANNING SCHEME

The following minor amendments are also proposed:

- Updated references to and summaries of national and regional policy and guidance including the National Planning Framework, the Regional Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines.
- Correction of typographical error relating to Airlie House (a protected structure); and amendment of text, maps and keys to identify Airlie House and other protected structures in the vicinity of the SDZ Planning Scheme.
- Updating of other references in SDZ Planning Scheme.

### 1.4 SEA SCREENING

The screening process is the first stage of the Strategic Environmental Assessment process and the purpose of this screening report is to determine whether the proposed amendments will or will not, lead to significant environmental effects for the Planning Scheme area and if it will require a full Strategic Environment Assessment. The following Regulations transpose this Directive into Irish law:

- The European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004),
- The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436 of 2004) and further amended by
- S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011) and S.I. No. 201 of 2011 (Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011).

In deciding whether a plan is likely to have significant environmental effects, regard must be had to the criteria set out in Annex II of the SEA Directive and listed in Schedule 2A of S.I 436/2004. The approach to this screening assessment is to assess the proposed amendments against these criteria and determine if the proposed amendments requires a Strategic Environmental Assessment (SEA). The Adamstown Planning Scheme was amended and subject to full SEA and AA Screening in 2014. The Strategic Environmental Objectives of the SEA ER (2014) are used as a means to assess the proposed amendments above and this can be found in Annex A of this SEA Screening report.

This Screening report is structured as follows:

- Section Two provides an overview of the known environmental baseline in and around the Adamstown Planning Scheme Area.
- Section Three of this report assesses these against the criteria contained in Schedule 2A of the Regulations.
- Annex A provides a commentary on the proposed amendments to the Adamstown Planning Scheme from the SEA, using the Strategic Environmental Objectives developed for the Adamstown Planning Scheme SEA ER in 2014.

This SEA screening report has been prepared in conjunction with a screening under Article 6 (3) of the EU Habitats Directive prepared by Doherty Environmental and has informed the preparation of this Screening report. This report has been prepared by Ruth Minogue, MCIEEM.

## 1.5 APPROPRIATE ASSESSMENT

The Habitats Directive (92/43/EEC) requires that proposed plans and programmes (including amendments) undergo screening for likely or potential effects on European Sites (Natura 2000 sites) arising from their implementation. A Screening Report for Appropriate Assessment of the Proposed Amendments to the Adamstown Planning Scheme has been undertaken<sup>1</sup>. The following statement is made

*In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by South Dublin County Council that the proposed amendment to the SDZ is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.*

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<sup>1</sup> DEC Ltd, 2020.



## 2 ADAMSTOWN PLANNING SCHEME

### 2.1 SUMMARY OF ENVIRONMENTAL CONSIDERATIONS<sup>2</sup>

The Adamstown SDZ site comprises 223.5 hectares of land. It is situated in the north western part of the county at the edge of the built up area of Lucan, c. 1 km east of the County boundary with Kildare, 16 km west of Dublin City Centre and 2.5 km south of Lucan Village. The site is bounded by the Dublin –Kildare rail line to the south, the R120 Regional Road to the east, the established residential area of Hillcrest to the north and agricultural lands to the west.

The lands were primarily in agricultural use at time of Planning Scheme approval in 2003, with ten habitable dwellings, mainly farmhouses, situated along Tandy's Lane, Dodsboro Road and Tubber Lane Road.

#### 2.1.1 POPULATION AND HUMAN HEALTH

The total population of South Dublin County in 2016 census was 278,749 and Tallaght is the county town. The Adamstown SDZ site is located in the Electoral Division (ED) of Lucan St. Helen's. The ED comprises established residential areas to west and south west of Lucan Village, the Adamstown SDZ site and surrounding agricultural lands.

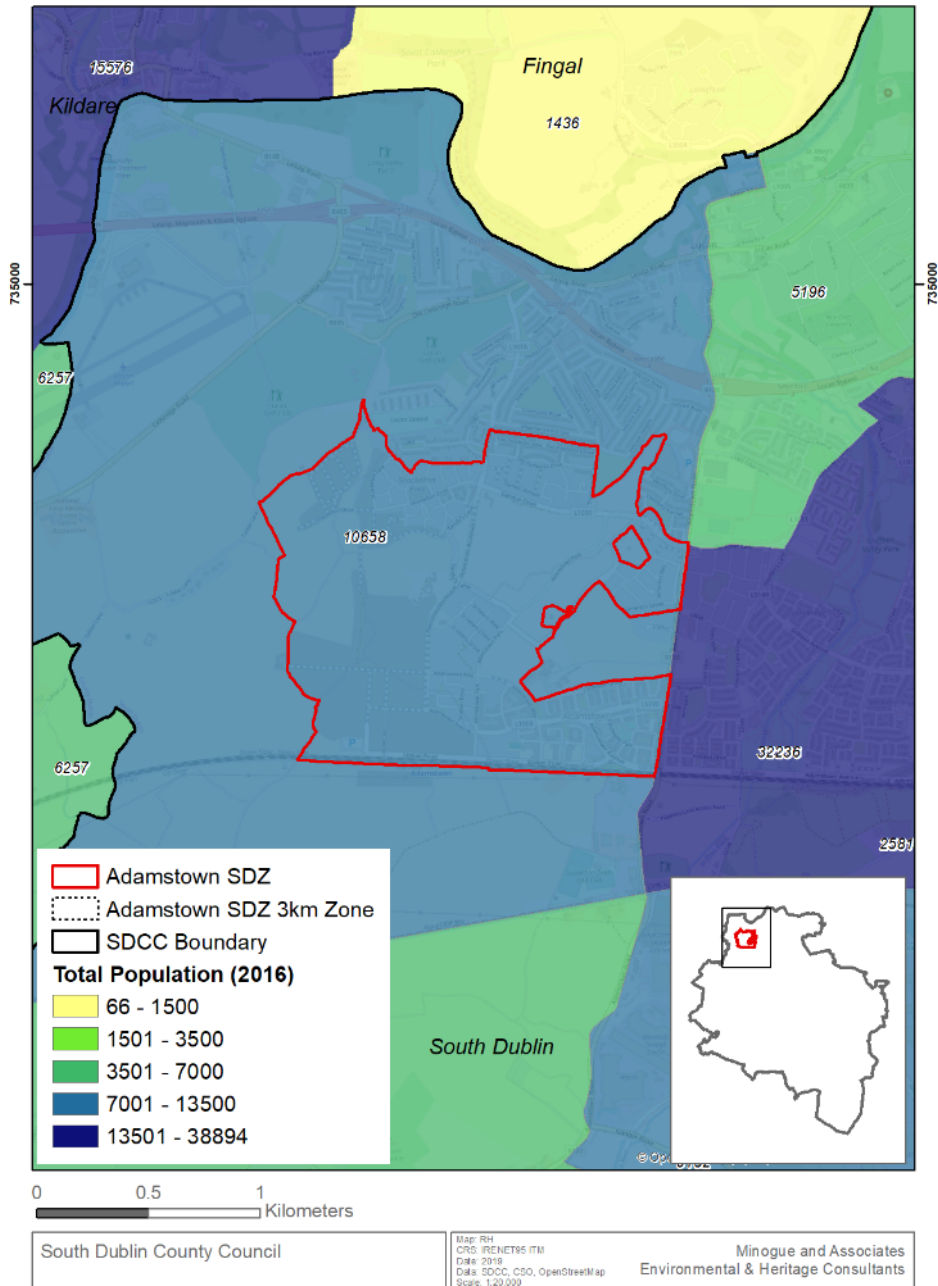
Development commenced on foot of the approved Planning Scheme in 2004. To date, the Adamstown model has delivered 2,410 homes (figures for Quarter 3, 2019) and significant supporting infrastructure and services, including a railway station, 2 primary schools, a post primary school, crèche, neighbourhood park, local retail services, water and sewerage infrastructure and internal strategic roads and upgrades to the adjoining road network. There are a further 621 units currently under construction. Development is currently in Phase 3 of the Planning Scheme.

**Figures 2 and 3** below present population total per Electoral District and population density per electoral district.

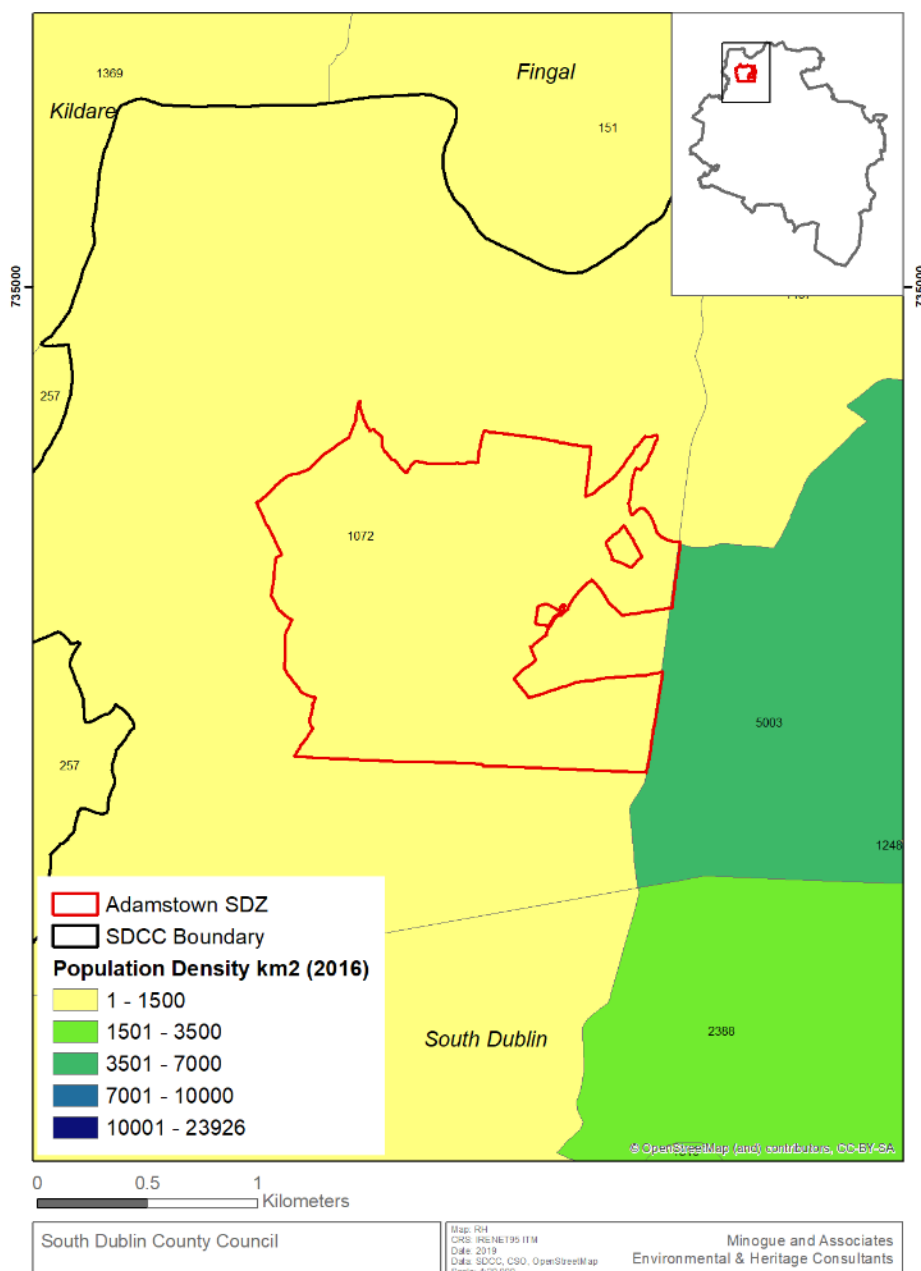
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<sup>2</sup> Description of Environmental Baseline summary from SEA Environmental Report for Adamstown Planning Scheme Amendments 2014 and updated where necessary.

**FIGURE 2 TOTAL POPULATION ADAMSTOWN AND SURROUNDING AREAS (2016 CENSUS)**



**FIGURE 3 POPULATION DENSITY ADAMSTOWN AND SURROUNDING AREA**



## HUMAN HEALTH

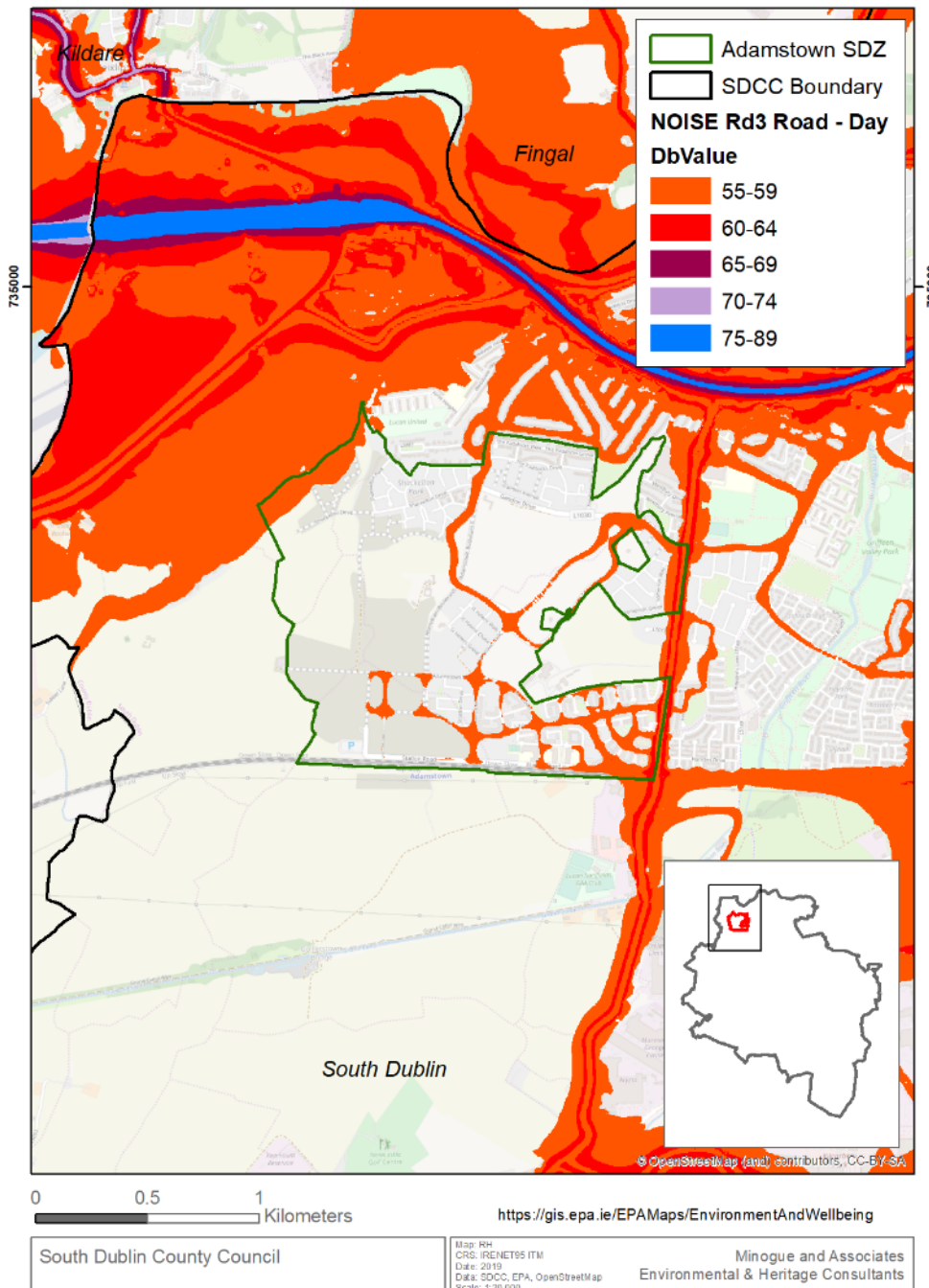
Human health has the potential to be impacted upon by environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors arising from a variety of factors, e.g. incompatible adjacent land uses.

The closest noise monitoring station to Adamstown is to the southeast at Moy Glas Way, Lucan. The primary source of environmental noise here is the N4 route and the R136. **Figure 4** presents daytime



noise levels from road sources where which were identified as those roads exceeding the flow threshold of 3 million passages per year, in the form of noise contours for the Lden (day, evening, night) period for Dublin. The dB value represents the average decibel value during the Lden time.

**FIGURE 4 AVERAGE DAYTIME NOISE LEVELS FROM ROADS**



### 2.1.2 BIODIVERSITY, FLORA AND FAUNA

There are no designated biodiversity areas within the SDZ lands which have a recognised National, European Union or International protection status. There are no Natura 2000 sites located either within or directly adjacent to the SDZ lands. There are three Natura 2000 sites within South Dublin County (Glenasmole valley SAC, Wicklow Mountains SAC, and Wicklow Mountains SPA). The impacts

of the plan lands on these Natura sites, as well as other Natura 2000 sites in adjoining counties, has been addressed in the Appropriate Assessment screening report. See **Figures 5,6 and 7** for SACs, SPAs and pNHAs in relation to Adamstown SDZ.

The Grand Canal proposed Natural Heritage Area (pNHA) is located c. 500 metres to the south of the SDZ lands; it is a man-made waterway linking the River Liffey in Dublin with the Shannon at Shannon Harbour and the Barrow at Athy. The River Liffey is located c. 750 metres to the north of the SDZ lands. It rises in the Wicklow Mountains and flows through Counties Wicklow, Kildare and Dublin before entering into Dublin Bay, a designated Special Area of Conservation (SAC). The Tobermaclugg Stream, which flows through the SDZ lands, flows into the River Liffey to the North.

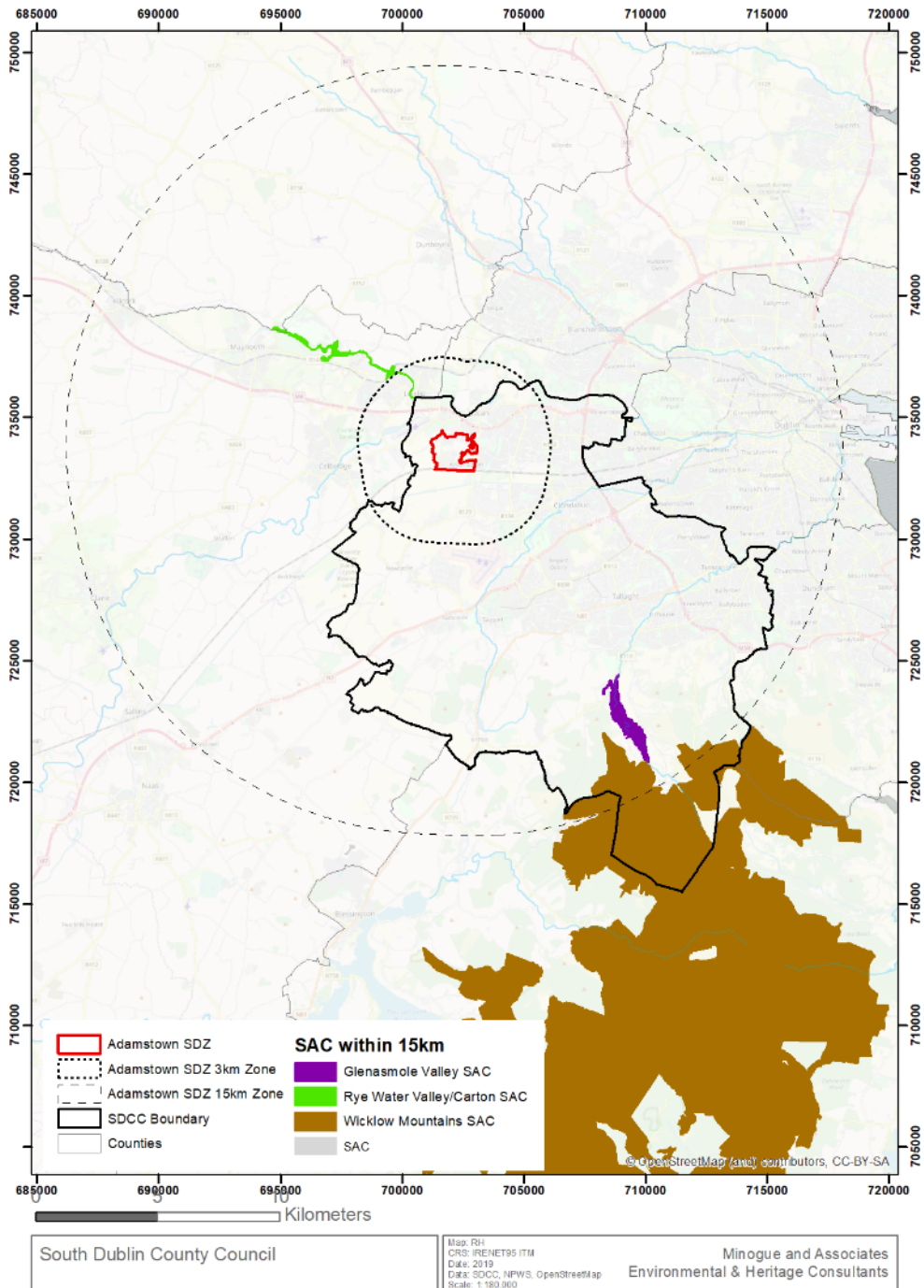
Adamstown SDZ is currently drained by a number of streams and ditches. The Tobermaclugg Stream flows northwards through the western part of the site. It is joined by the Backstown Stream on leaving the SDZ and continues along Tubber Lane and under the N4 via a culvert before discharging to the River Liffey in the vicinity of Lucan village. An overflow culvert and attenuation pond was installed between the SDZ lands and N4 to facilitate storm water drainage from the SDZ lands. The north-east Griffeen tributary flows in a north-easterly direction across the north-east of the site and later discharges to the main channel of the Griffeen River. The south-east Griffeen Tributary flows east through the southeastern corner of the site and later discharges to the Griffeen River. The Griffeen River feeds into the River Liffey at Lucan and crosses the under the Grand Canal via a culvert to the south of the site. No watercourses in the Adamstown SDZ lands drain to the Grand Canal.

The plan lands in Adamstown have been identified under three main habitat categories:

- disturbed ground,
- improved agricultural grassland and
- built land.

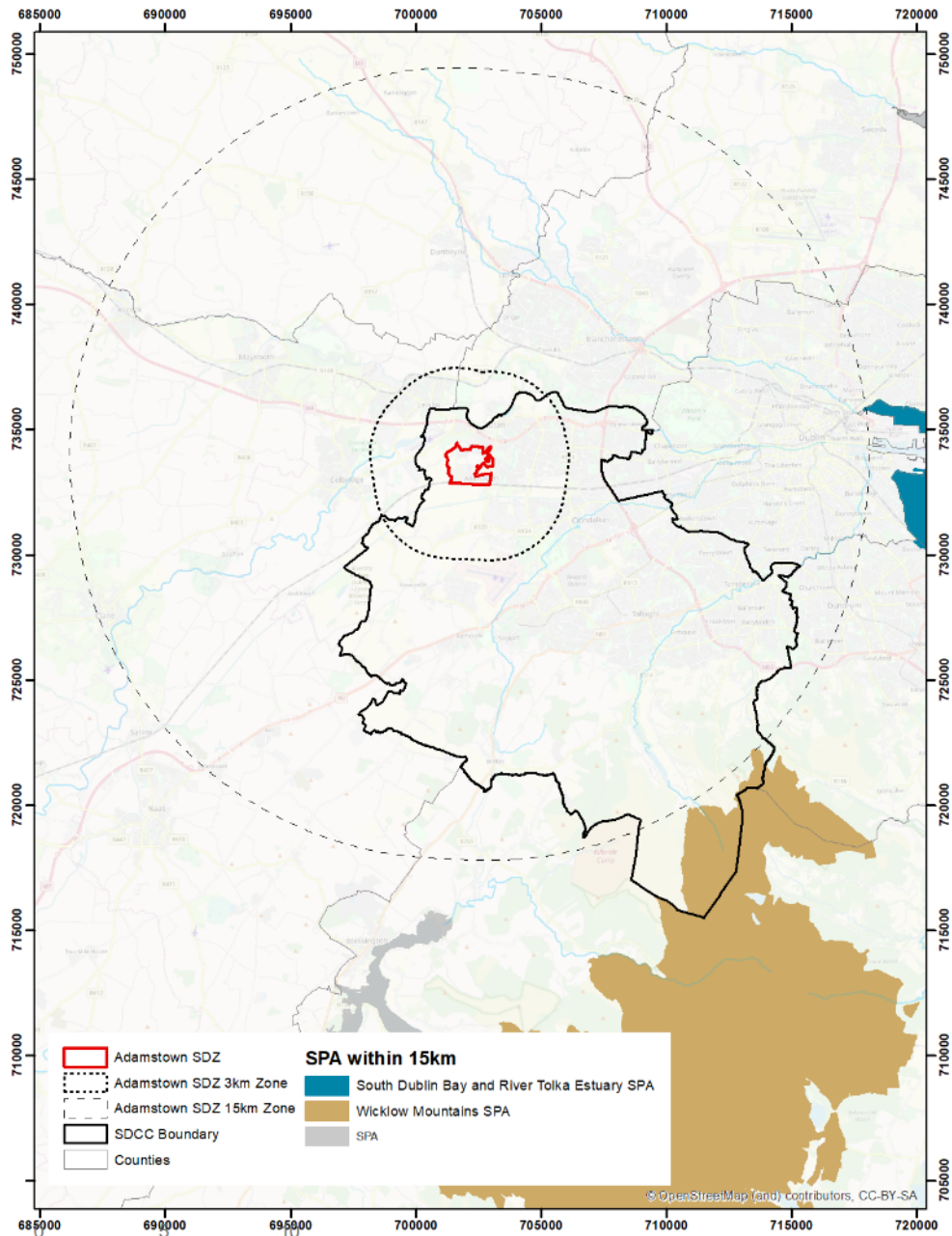
The streams, hedgerows and treelines represent the major ecological corridors within the planning scheme and significant for ecological connectivity with the Grand Canal. **Figure 8** presents ecological corridors within and adjacent to the Adamstown Planning Scheme.

**FIGURE 5 SPECIAL AREAS OF CONSERVATION**



**FIGURE 6 SPECIAL PROTECTION AREAS**



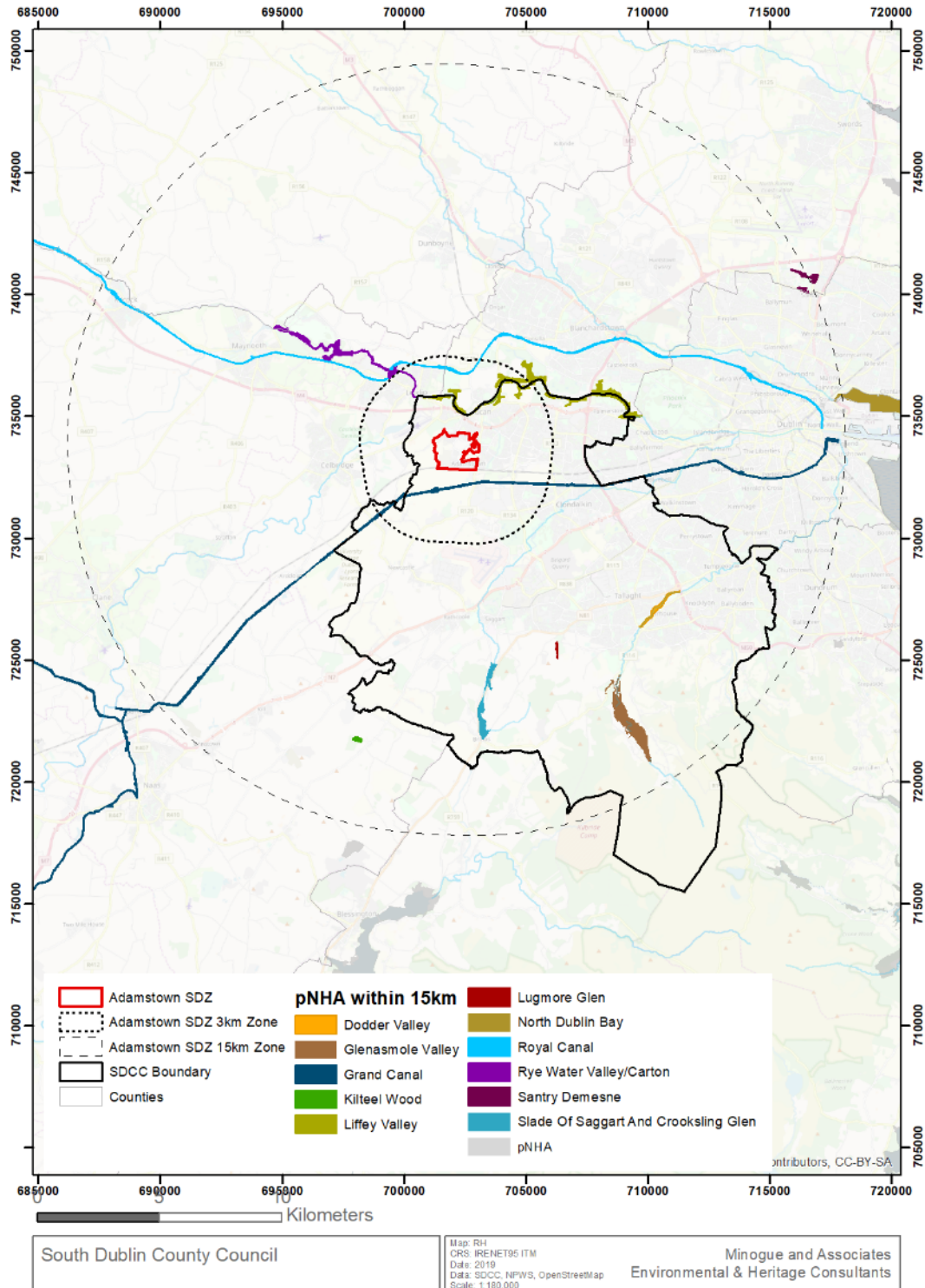


South Dublin County Council

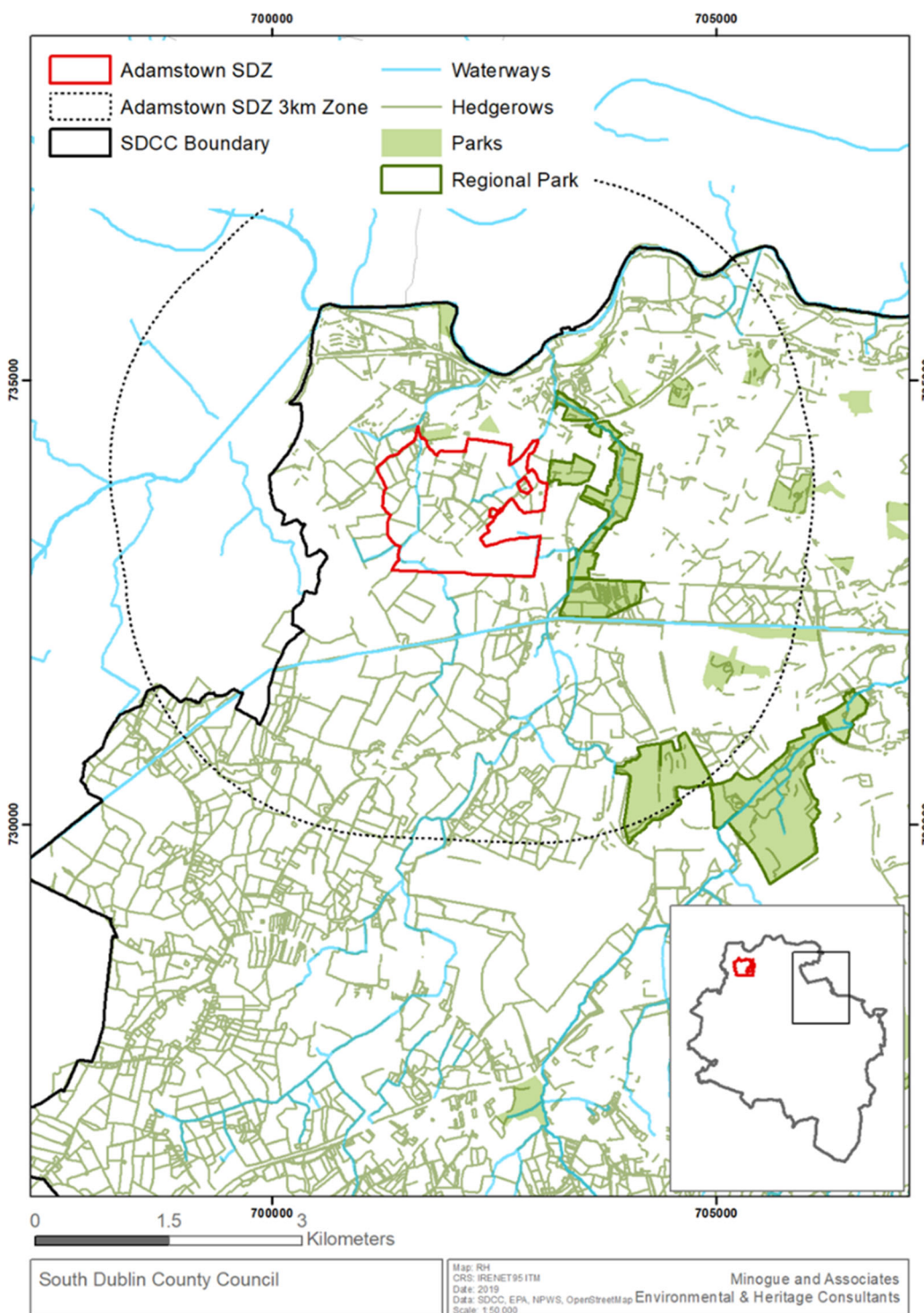
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 CRS: IRENET95-ITM  
 Date: 2019  
 Data: SDCC, NPWS, OpenStreetMap  
 Scale: 1:180,000

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 Environmental & Heritage Consultants

FIGURE 7 PROPOSED NATURAL HERITAGE AREAS



**FIGURE 8 ECOLOGICAL CORRIDORS**



### 2.1.3 WATER RESOURCES

Water resources and their quality have a clear interaction and impacts with other environmental parameters, therefore its protection and enhancement is of particular importance.

The Water Framework Directive (WFD) is a key initiative aimed at improving water quality throughout the EU. It applies to rivers, lakes, groundwater, estuarine and coastal waters. The Directive requires an integrated approach to managing water quality on a river basin basis; with the

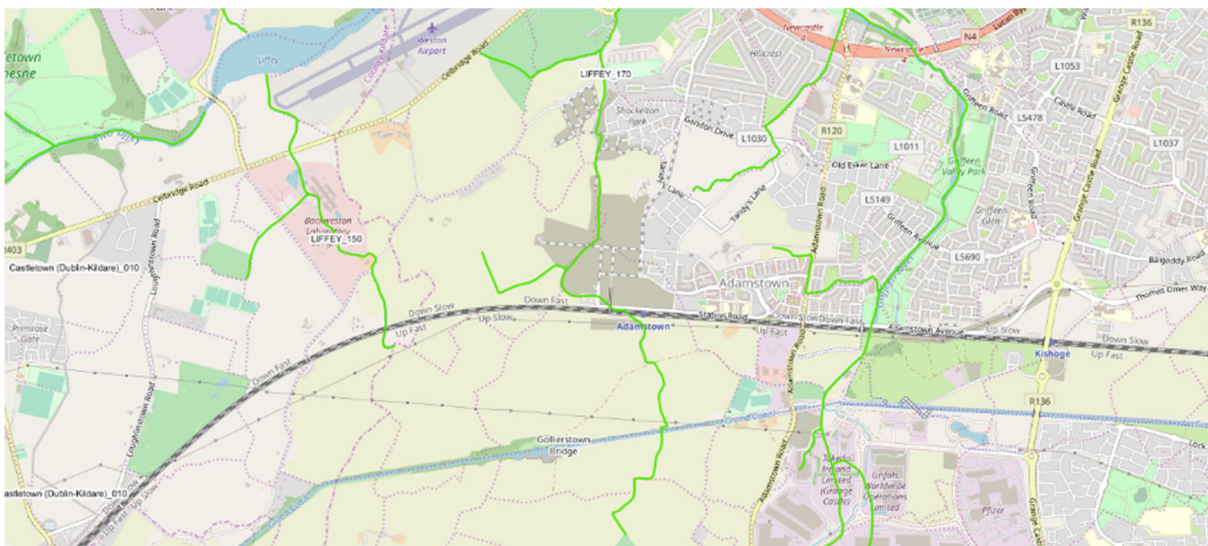


aim of maintaining and improving water quality. The WFD identifies River Basin Districts as the key management units with clearly defined water bodies forming the basis for assessment reporting and management. The first cycle of RBD management plans were from 2009 to 2015. For the second cycle the Eastern, South Eastern, South Western, Western and Shannon River Basin Districts have been merged to form one national River Basin District.

The most recent data for the new plans being prepared is from the catchments.ie website. A catchment is an area where water is collected by the natural landscape and flows from source through river, lakes and groundwater to the sea. Adamstown is situated within the Liffey and Dublin Bay Catchment (code: 09). The area of this catchment covers 1,624,42km<sup>2</sup> and supports a total population density of 777 people per km<sup>2</sup>.

As outlined above in Section 2.1.2 a number of streams drain the SDZ lands area- the Tobermaclug stream and Griffeen Stream and tributaries – all drain into the River Liffey. Water quality for surface water features draing through Adamstown are classified as Good according to catchments.ie (accessed on 18/02/2020). **Figure 9** presents surface water quality. However it is also noted that these watercourses are at risk of not meeting WFD objectives<sup>3</sup>.

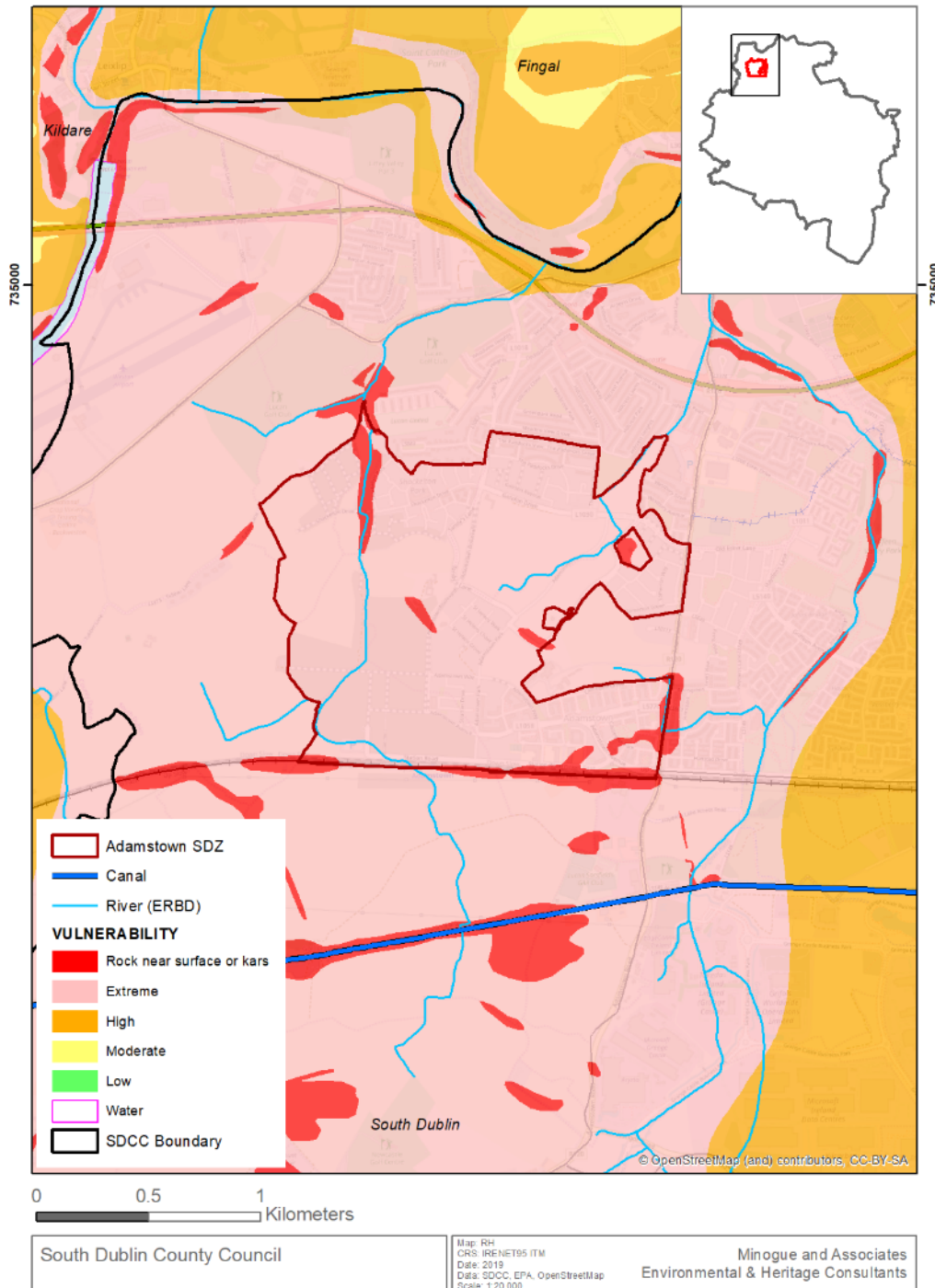
**FIGURE 9 SURFACE WATER QUALITY (WWW.CATCHMENTS.IE)**



The aquifer on which the entire plan lands are located is rated as “Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones”. **Figure 10** below presents Groundwater Vulnerability for the plan area.

<sup>3</sup> [www.catchments.ie](http://www.catchments.ie) accessed on 02.03.2020

FIGURE 10 GROUNDWATER VULNERABILITY



### Flood Risk Assessment

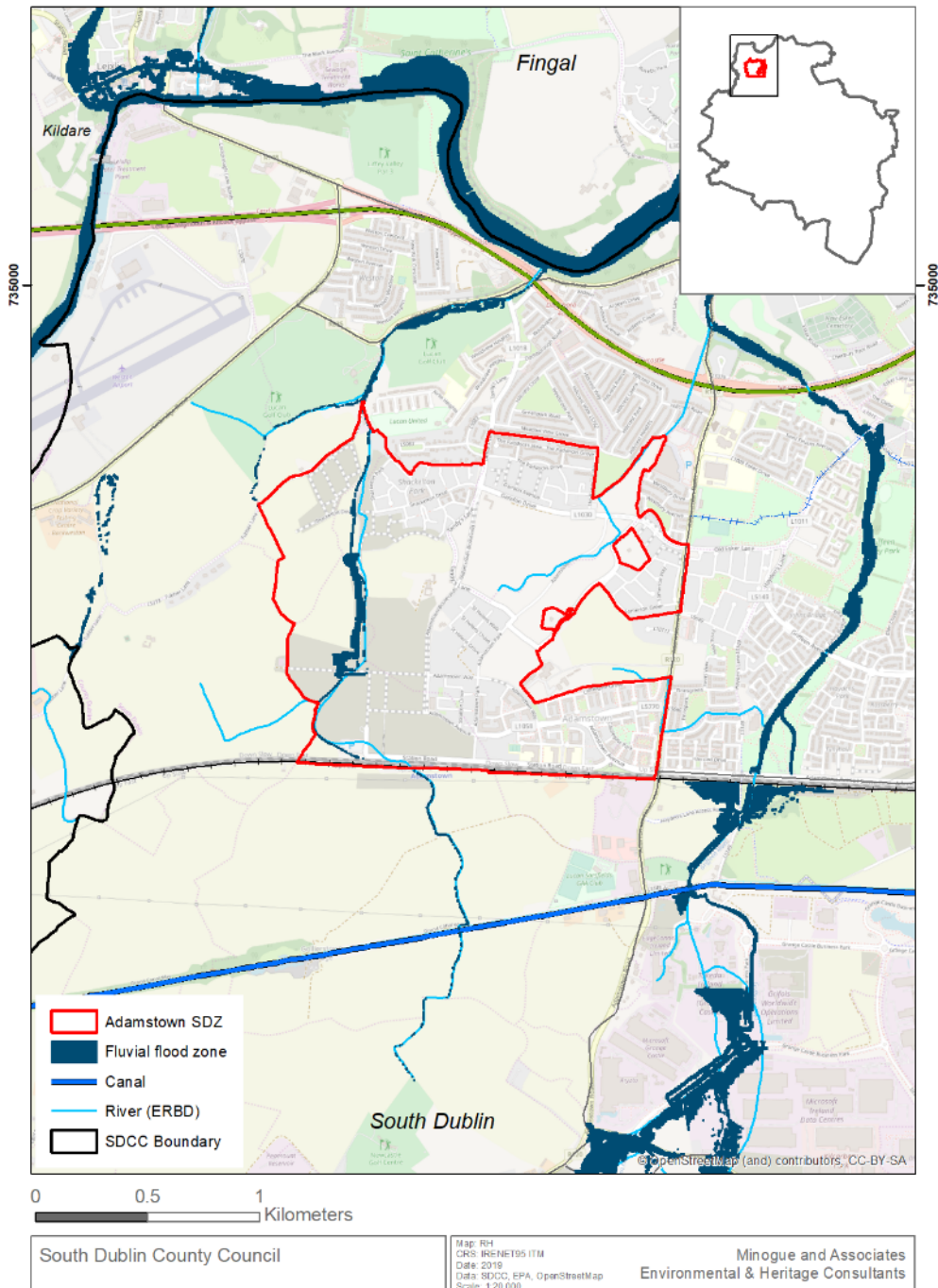
The Planning Guidelines on the Planning System and Flood Risk Management (2009) are aimed at ensuring a more consistent, rigorous and systematic approach to fully incorporate flood risk assessment and management into the planning system. The Guidelines require the planning system to, among other things, avoid development in areas at risk of flooding, particularly flood plains,

unless there are proven sustainability grounds that justify appropriate development and where flood risk can be reduced or managed to an acceptable level, without increasing flood risk elsewhere. It also requires the planning system to adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk.

The Office of Public Works (OPW) Draft Preliminary Flood Risk Assessment (PFRA)<sup>16</sup>, using fluvial and pluvial data records, identified a number of areas in and around the plan lands which would have potential flood risk. To the southeast of the plan lands, along the R120 Road, fluvial data identifies a 1% Annual Exceedance Probability (AEP) 100 year event occurring in this area, running in a north to southwest direction, within the River Griffeen upper catchment area. Fluvial data also identifies a 1% AEP to the east of the plan lands along the Tobermacclugg stream. It should be noted, however, that extensive flood alleviation works have been carried out on the Tobermacclugg Stream and Griffeen River since the Planning Scheme was adopted which have significantly reduced flood risk in this area. The Eastern Catchment Flood Risk Assessment and Management (CFRAM) study commenced in the Eastern district in June 2011 and ran until the end of 2016. Areas of Further Assessment were identified through this process. These were subject to more detailed assessment to determine the degree of flood risk and develop measures to manage and reduce flood risk. Adamstown was not identified as an Area of further Assessment which was the focus of CFRAM studies. Figure 11 presents fluvial flood risk at Adamstown.



**FIGURE 11 FLOOD RISK ASSESSMENT**



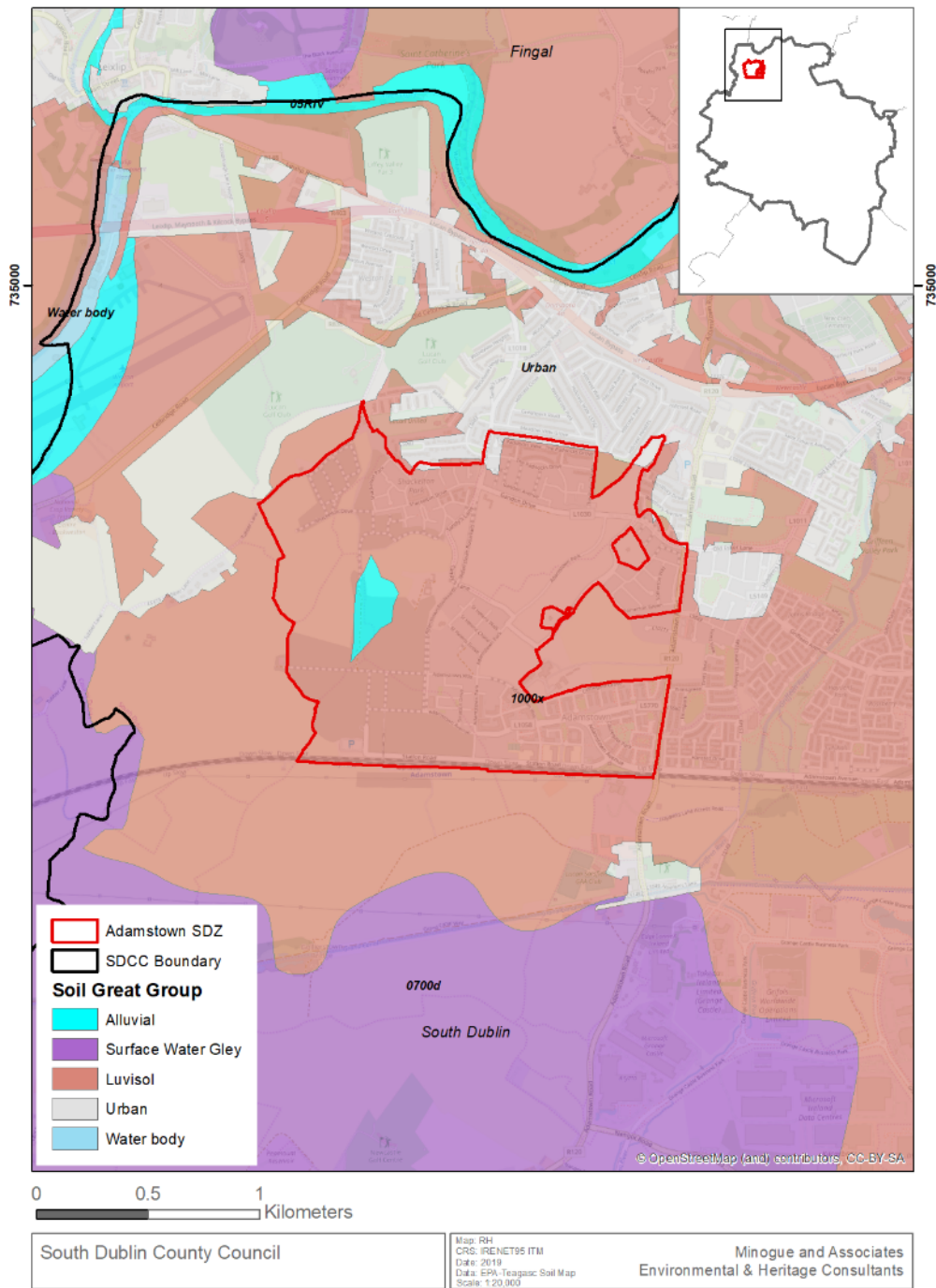
#### 2.1.4 SOIL AND GEOLOGY

The Geology of the Adamstown area is characterised by the presence of Carboniferous limestone bedrock overlain by glacial till deposits common to the Greater Dublin Area. Reference to the Bedrock Maps of the “Geological Survey of Ireland” indicates that bedrock in the Adamstown area is underlain by Calp Limestone and can be generally described as dark grey, fine grained, graded limestone with interbedded black, poorly fossiliferous shales. Presence of blocks of Leinster granite and lower Paleozoic greywacke indicates the close proximity of a shoreline or active fault margin to the south.

Soil can be considered as a non-renewable natural resource because it develops over very long timescales. It is an extremely complex, variable and living medium and performs many vital functions including: food and other biomass production, storage, filtration and transformation of many substances including water, carbon, and nitrogen. Soil has a role as a habitat and gene pool, serves as a platform for human activities, landscape and heritage and acts as a provider of raw materials. Such functions of soil are worthy of protection because of their socio-economic as well as environmental importance. Soils in any area are the result of the interaction of various factors, such as parent material, climate, vegetation and human action. Whilst much of the county soils are classified as urban according to the Teagasc soil map, reflecting the built up character of parts of the county. The predominant soil type of the SDZ lands is Limestone Till, with the developed lands urban/made ground.

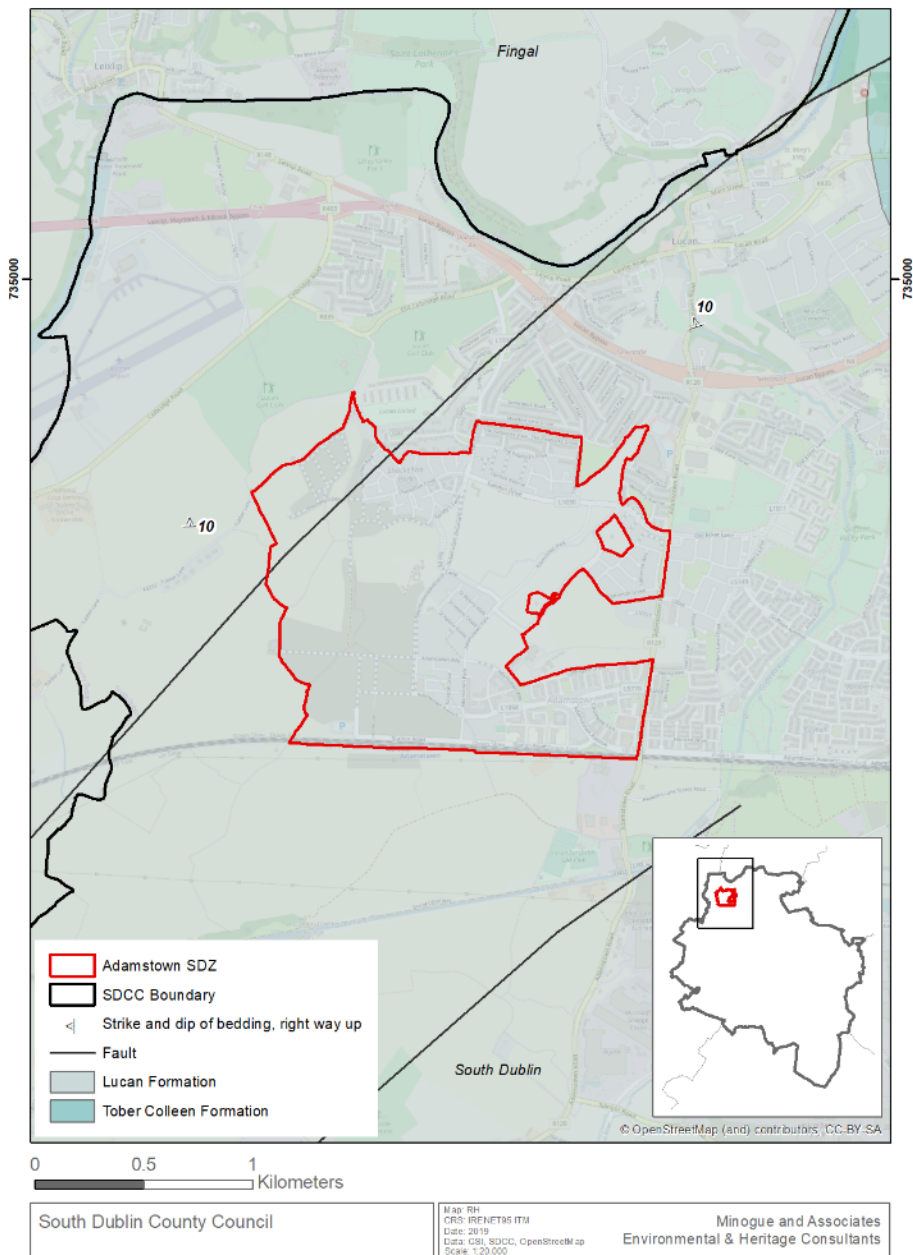
Figures 12 and 13 present soil type and geology present in the plan area and environs.

**FIGURE 12 SOIL MAP ADAMSTOWN AND SURROUNDING AREA**





**FIGURE 13 BEDROCK GEOLOGY ADAMSTOWN AND SURROUNDING AREA**



### 2.1.5 LANDSCAPES

Development commenced in Adamstown in 2004 And urbanisation to date has focused in the north of Adamstown, at the paddocks adjoining the existing built up area of Lucan and to the south, at Adamstown square and Adamstown castle, just west of the R120. There has also been disturbance of lands with construction of strategic road infrastructure in the eastern and southern areas of the site, a new railway station adjoining the rail line, an office building situated centrally and a foul sewerage pumping station and ESB transformer station to the west of the site.

There is suburban housing to the north and east of the SDZ lands and lands to south and west are largely agricultural, with the Cork-Dublin railway line bounding the site to the south.

There is some light industry and retail development in the surrounding area to the south east, primarily. Tubber lane, a rural roadway bounds the site to the west and the R120 bounds it to the east. Distinctive features within the area are Weston aerodrome and the railway line which runs through Kishoge, Adamstown and Stacumny. Although the area is quite close to the urban fringe, the landscape retains a rural quality and due to its flat topography, clear views of the open countryside can be obtained.

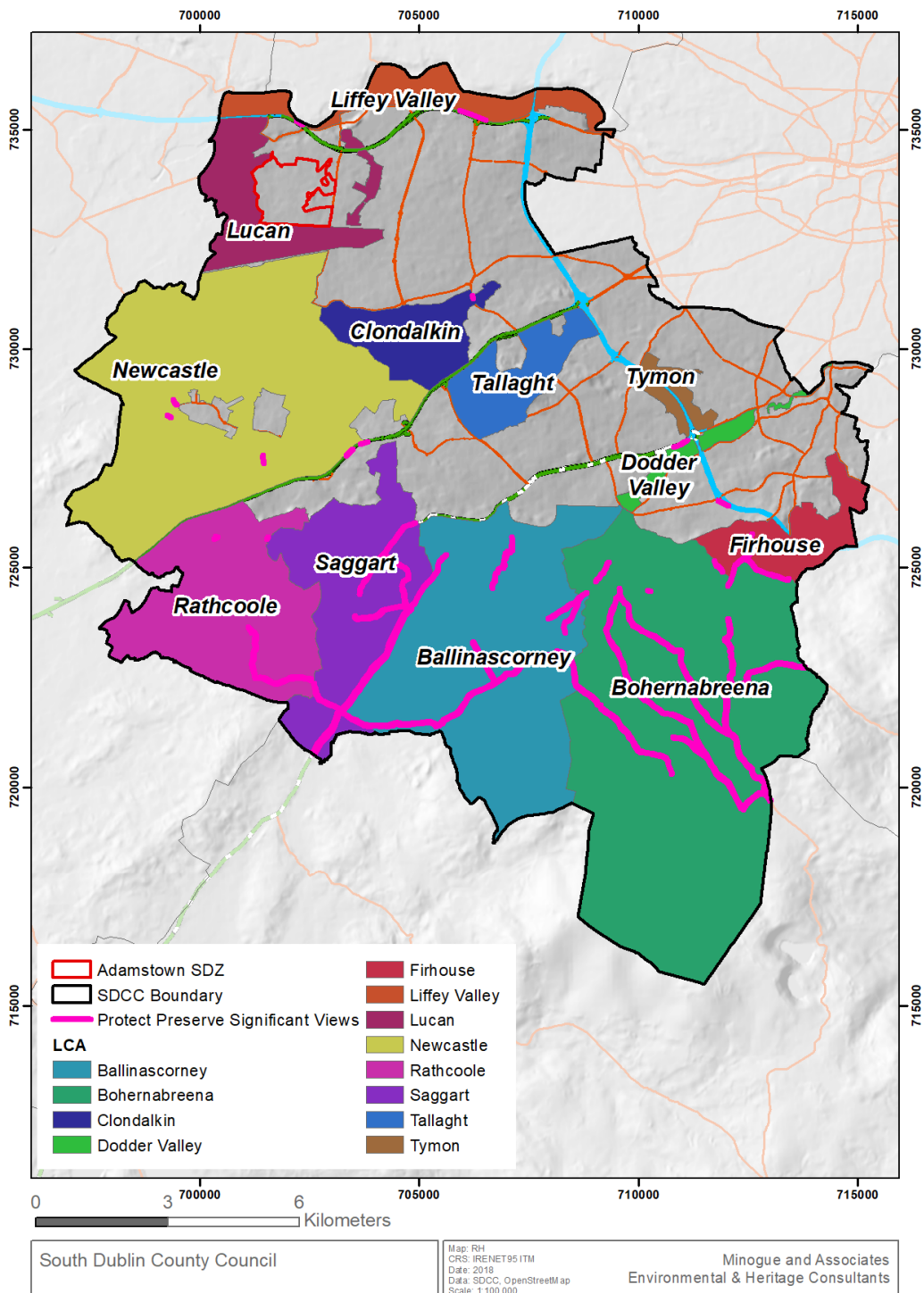
There are no protected views within the SDZ plan lands detailed in the planning scheme. Figure 14 presents the Landscape Character Assessment for South Dublin (2015);this identifies Adamstown within Suburban South Dublin with the following key characteristics for this LCA.

- Built – up urban area with extensive housing estates and industrial /commercial parks. Variety of house styles and layouts dating from the late 19<sup>th</sup> century to late 20<sup>th</sup> century
- Settlements of Rathfarnham, Templeogue and Clondalkin with important historical legacy and remnants
- Major traffic corridors with M50 traversing north- south through the area, and LUAS line travelling north from Tallaght, parallel to the M50,to city centre
- Corridors of natural and semi natural vegetation, notably along the River Dodder ( a linear park) and the Camac River
- Grass open spaces in gardens, industrial parks, golf courses, school playing fields, and miscellaneous spaces in housing areas
- Street trees planting
- Recreational facilities – public parks and golf courses - provide amenities and ecological resources

The area extends east from Tallaght/Oldbawn to Rathfarnham, and north/ north- west along the county boundary to Clondalkin.

LCA retains little of historical significance and the setting of its primary settlements have been radically altered by built developments, notably through the 20<sup>th</sup> Century.

FIGURE 14 LANDSCAPE CHARACTER ASSESSMENT SOUTH DUBLIN



### 2.1.6 CULTURAL HERITAGE

Archaeological heritage is defined as including structures, places, caves, sites, features or other objects, whether on land, underwater or in inter-tidal zones. All archaeological structures, constructions, groups of buildings, development sites, all recorded monuments as well as their contexts, and moveable objects, situated both on land and underwater are part of the Archaeological Heritage. Therefore, the archaeological heritage of the area is not confined to the archaeological sites within the Record of Monuments and Places. It also includes any archaeological



sites that may not have been recorded yet, as well as archaeology beneath the ground surface, or underwater as well as the context of any such site discovered.

There is one Recorded Monument located within the boundary of the SDZ lands. Tobermaclugg Holy Well (DU017-027) is located in the northwestern corner of the plan lands. Adamstown Castle (DU017-029) another Recorded Monument is located immediately adjacent to the south-eastern boundary.

Part IV of the Planning and Development Act 2000 (as amended) defines the term “architectural heritage” as structures and buildings together with their settings and attendant grounds, fixtures and fittings, groups of structures and buildings and sites, which are of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and “where a structure is protected, the protection includes the structure, its interiors and the land within its curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures”.

The only Protected Structure within the SDZ lands is Airlie House. A number of Protected Structures are also surrounded by the SDZ lands but are excluded from the Planning Scheme, these are St Helen’s and Somerton House. Finnstown House and Castle lies just outside the western boundary of the site and is also a Protected Structure. Figure 15 presents the sites and monuments record, and Figure 16 the Record of Protected Structures.

FIGURE 15 SITES AND MONUMENTS

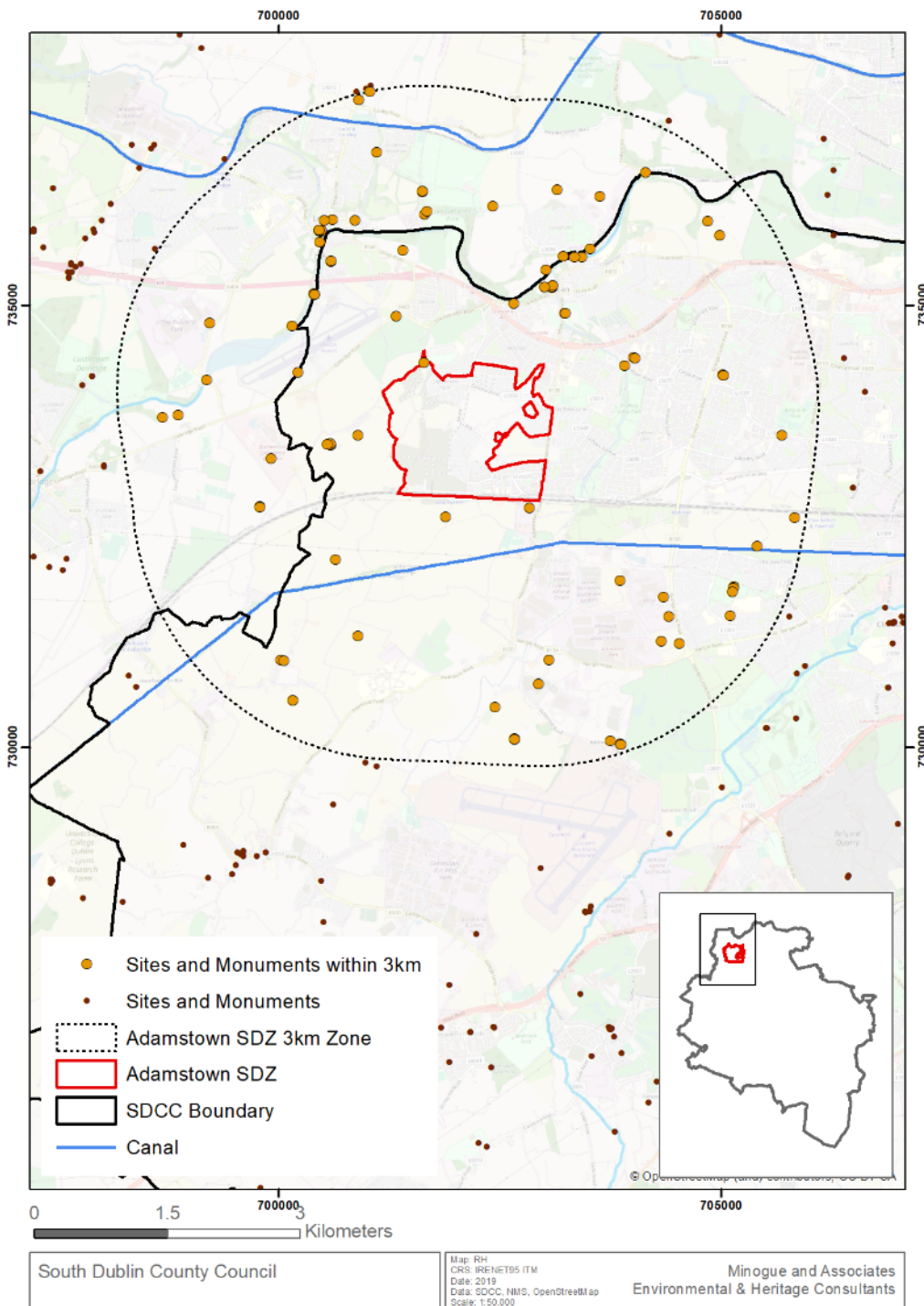
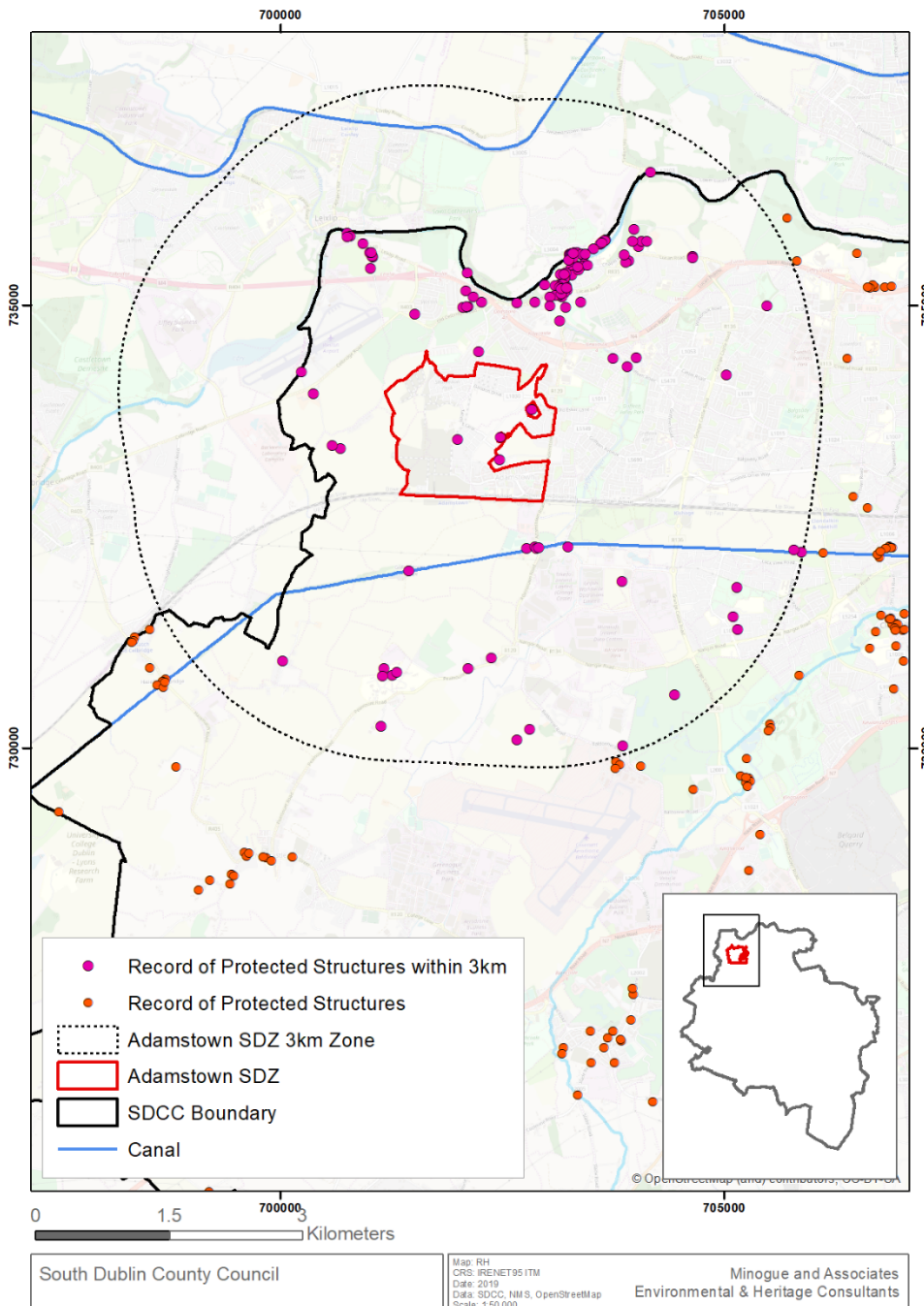


FIGURE 16 RECORD OF PROTECTED STRUCTURES SOUTH DUBLIN COUNTY



2.1.7 MATERIAL ASSETS

The Environmental Protection Agency (EPA) SEA Process Draft Checklist (2008) defines material assets as the critical infrastructure essential for the functioning of society such as: electricity generation and distribution, water supply, wastewater treatment, transportation, etc. An overview is provided below:

**Transport:** the lands are currently served by the railway line Kildare to Dublin, as well as a number of bus corridors. The area around Adamstown Train Station has not yet been developed. The SDZ plan lands are accessible to the national road network, situated between the N4 (National Primary) to the north and the N7 (National Primary) to the south, with the



M50 motorway and Outer Ring Road orbital distributor Road to the east. The R120 Regional Route bounds the site to the east. The Outer Ring Road and R120 connect to the N7 to the south and the N4 to the north.

**Wastewater:** Almost all of the waste water in South Dublin is currently treated in Ringsend Wastewater Treatment Works which discharges into Dublin Bay. The treated waters are treated to a Tertiary standard, which is in compliance with the Urban Wastewater Treatment Directive. The quality of the discharged waters is within the requirements of the Urban Waste Water Treatment Directive.

**Water supply:** The Greater Dublin Water Supply Area (GDWSA) serves much of the county. The GDWSA is served by 5 major water treatment plants, Ballymore Eustace, Srowland, Leixlip, Ballyboden and Vartry, and a number of smaller sources. It is anticipated that Dublin will need a new major water source by 2025, based on projection of growth in the Greater Dublin Area.

**Waste:** SDCC commits waste to the thermal treatment plant in Ringsend within Dublin City Councils administrative area, the construction and use of which forms a part of the waste management strategy for the Greater Dublin Area. This is in addition to the provision of recycling and waste transfer facilities in SDCC.

### 2.1.8 AIR QUALITY AND CLIMATE

The Air Quality Index for health (EPA) provides air quality information with health advice for both the general public and people sensitive to air pollution. As of 28<sup>th</sup> February 2020 air quality for the Dublin Region was classified as 'good'.<sup>4</sup>

Adaption to climate change will be guided by the Local Authority Adaptation Strategy Development Guidelines (EPA, 2016), Integrating Climate Change into SEA (EPA 2015) and the recent Sectoral Planning Guidelines for Climate Change Adaptation. The context for addressing climate change and energy issues in South Dublin County, are set within a hierarchy of EU and National Legislation and Policy. At a European level these directives include, the EU Climate and Energy Package 2008, EU Renewables Directive 2009/28/EC and EU Energy Efficiency Directive 2012/27/EU. The Climate Change Action Plan for South Dublin was recently launched and covers from 2019-2024 key actions are included around the areas of transport, energy, resource use, awareness and nature based solutions.

### 2.1.9 INTER-RELATIONSHIPS

In accordance with the SEA Directive, the interrelationship between the environmental parameters above must be taken into account. Although all such parameters may be considered interrelated and may impact on each other at some level environmental sensitivity mapping is commonly used to help identify areas of greater or lesser sensitivity. **Figure 17** below shows the overall environmental sensitivity for the plan area and sphere of influence and follows the same approach (i.e.: ranking of environmental parameters) as that used in the Development Plan SEA process. The map was compiled based on the following layers of information:

- Ecological Designations (SAC, pNHa etc)
- Cultural and Architectural Heritage
- Protected Views and Prospects
- High Amenity Areas, Green belt and Open Spaces
- Aquifer Vulnerability
- Streams and Watercourses
- Bat Habitat Survey Hedgerows
- Noise mapping.

By mapping key environmental layers (GIS) to produce an environmental sensitivities map, it provides a visual impression which can assist in identifying which areas within the Plan area experience the highest concentration of environmental sensitivities and consequently the areas potentially most vulnerable to potential environmental impacts from development.

Environmental sensitivities are indicated by colours which range from extreme vulnerability (brown) to high vulnerability (red) to moderate vulnerability (orange) and low vulnerability (yellow). Where the mapping shows a concentration of environmental sensitivities, there is an increased likelihood that development will conflict with these sensitivities and cause environmental deterioration..

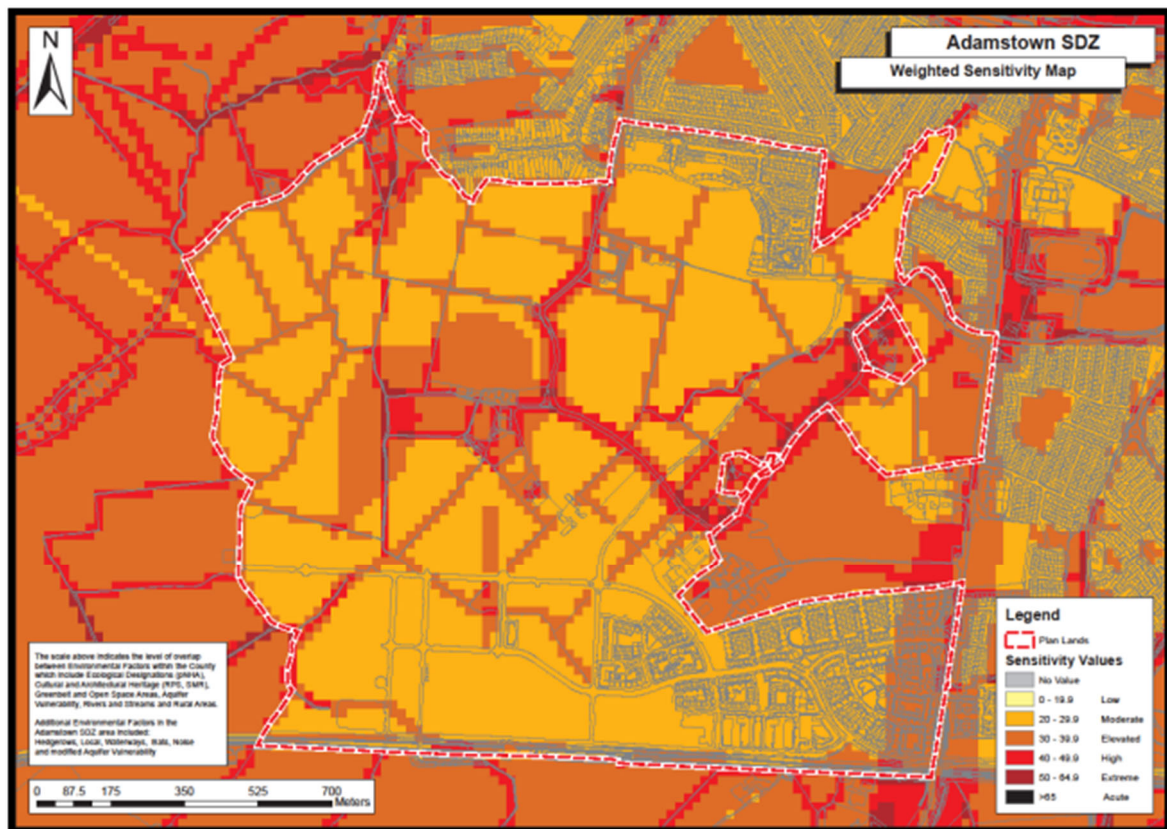
The elevated to highly sensitive areas correspond with hedgerows, watercourses and parklands with the SDZ lands. These areas include the northwest around Tobermacclugg Station (Tobermacclugg Park), Tandy's Lane in the centre of the lands and Airlie Park and Tandy's Lane Park, as designated in

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<sup>4</sup> Air Quality for Health map accessed on at 14:43 <https://www.epa.ie/air/quality/>

the Scheme. The boundary between Tandy's Lane and Finnstown House (a Protected Structure) is also indicated as high to extreme sensitive.

FIGURE 17 ENVIRONMENTAL SENSITIVITY MAPPING FOR ADAMSTOWN





### 3 SEA SCREENING ASSESSMENT

#### 3.1 INTRODUCTION

The following section presents the SEA screening assessment of the proposed amendments to the Adamstown Planning Scheme against the criteria provided in Schedule 2a of the Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 which details the criteria for determining whether a plan or programme is likely to have significant effects on the environment. The Screening assessment should be read in conjunction with the Habitats Directive Screening report.

**TABLE 5 SCHEDULE 2 A SCREENING ASSESSMENT**

<b>Criteria for determining whether the Proposed Amendments is likely to have significant effects on the environment</b>
<b>1. The characteristics of the plan having regard, in particular to:</b>
<b><i>the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,</i></b>
<p>The main purpose of the proposed amendments to the Adamstown Planning Scheme is to respond to the recent changes and provisions within the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) relating to compact growth and sustainable development and changes arising from new guidelines including the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the ‘Apartments Guidelines’) and the Urban Development and Building Heights: Guidelines for Planning Authorities (the ‘Building Heights Guidelines’).</p> <p>The NPF, RSES and the ‘Building Heights Guidelines’ have been subject to full SEA and Stage II Appropriate Assessment (note Building Heights was subject to AA Screening only with a finding of no likely significant effects made by the competent authority) whilst the ‘Apartment Guidelines’ have been subject to SEA and AA Screening and were determined not to require full SEA or AA..</p> <p>The amendments provide for greater consistency with the national and regional policy and guidance in particular pertaining to integrated landuse and transport whereby higher densities are proposed for the area adjacent to Adamstown Train Station. This also ensures greater consistency with the density provisions in the adjacent Clonburriss Planning Scheme. The amendments do influence the location and size of developments in the Planning Scheme by facilitating higher densities at the Adamstown Train Station. The relocation of the Enterprise centre from Tandy’s Lane to Adamstown Station District Centre further influences size and location but again is identified as consistent with the above policies and guidelines.</p> <p>The proposed increase in density results in a moderate increase in residential units of approximately 490. The overall density achieved to date within the Adamstown area (47dph) is at the lowest end of the current 47-56dph density range for the entire SDZ Planning scheme area. Therefore, an increase in density within a high density area such as Adamstown Station and a medium density area in close proximity to the urban core and train station such as Aderrig, is</p>

entirely appropriate in the context of the emphasis in recent policy and guidelines on compact sustainable growth.

#### Capacity Analysis and Infrastructure

The capacity analysis undertaken by SDCC demonstrates that when the additional units proposed for Adamstown Station and Aderrig are added to existing, proposed and potential units, dwelling unit numbers for the overall SDZ Planning Scheme area are projected to exceed the current maximum of the dwelling unit range (8,905) by just 45 units.

Infrastructure, non-residential development and community facility requirements including amenities such as parks have been designed for a scheme within the range 7,010-8,905 units. Infrastructure and amenity provision will therefore be more than adequate to cater for the proposed modest increase in unit numbers.

The infrastructural capacity is therefore considered appropriate and capable of achieving this increase given the scheme was designed for supporting infrastructure within this range.

Finally, the location specific increase in height within the Aderrig development area is consistent with the 'Building Height Guidelines 2018'.

#### ***the degree to which the plan influences other plans, including those in a hierarchy,***

The amendments relate to the approved Adamstown Planning Scheme which operate as the landuse framework for the SDZ lands. The purpose of the amendment are to update and ensure consistency with the above higher tier referenced plans/ policy and guidelines in particular.

#### ***the relevance of the plan in the integration of environmental considerations in particular with a view to promoting sustainable development,***

The amendments enhance environmental considerations further including increased support for higher densities around public transport provision in particular.

The other amendments are minor in nature and are not identified as significant at strategic level. Combined with the existing environmental measures and considerations in the Adamstown Planning Scheme, these measures contribute to the promotion of sustainable development in light of the SDZ Planning Scheme objectives.

#### ***Environmental problems relevant to the plan***

The SEA ER of the amendments to the Adamstown Planning Scheme (2014) identified the following environmental problems:

*Biodiversity, Flora and Fauna:* Habitat loss and fragmentation has occurred during construction works with vegetation and hedgerow removal. Significant portion of the strategic drainage network has been installed since 2003, with limited reference to Sustainable Urban Drainage technologies.

*Population and Human Health:* Legislative objectives governing population and human health are not identified as being conflicted with.

*Soil and Geology:* It is considered that there are no existing problems or environmental concerns in relation to this matter

*Water Resources including Flooding:* The groundwater vulnerability within the SDZ lands is “extreme vulnerability”; there are small areas of extreme vulnerability where rock is generally at or close to the surface located along the southern and south-eastern boundaries of the SDZ site. The extreme groundwater vulnerability is also located on a Locally Important Aquifer. The sensitivity of these areas could impact on the groundwater within the county, should inappropriate development be allowed to take place in close proximity to these locations.

The requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009), need to be taken into account to ensure that any potential flooding in this area does not impact on human health, property, or the ability to meet the requirements of the WFD or need to protect biodiversity. A significant proportion of the surface water drainage infrastructure required under the approved Planning Scheme is now in place. Infrastructure installed to date includes underground attenuation tanks and culverts with a more limited application of a Sustainable Urban Drainage system (SUDs) approach.

*Air and Noise:* Rail and road based traffic appears to be the most likely generator of noise and air pollution within the Adamstown site. Areas of impact should be noted and measures to remediate where necessary. The approved Planning Scheme is based on a sustainable transport vision that seeks to provide alternatives to the private car by aligning development with public transport and creating conditions for sustainable movement within the site. Reduction in private car movements will result in a reduction in emissions such as PM10 and NOx. Short-term noise and airborne pollution levels are also likely to increase in the SDZ during construction periods.

*Climate Change (Solutions):* At the Planning Scheme level, it is important to ensure development utilises best practice for development which at a minimum meet required Irish standards, in areas such as:-

- Optimising accessibility and use of environmental resources;
- Creating conditions for sustainable communities to develop;
- Promoting design excellence at macro and micro levels;
- Promoting quality public realm design;
- Providing for citizens, businesses and institutions to live and operate sustainably;
- Setting out and defining environmental performance indicators to guide development of the district towards the vision of a sustainable mixed use development.

The existing planning scheme has embraced these opportunities and it is important to ensure that any amendments to the scheme do not deviate away from these standards

*Cultural and Material Assets:* Ensure the satisfactory completion of the wastewater (foul drainage) network. It is considered that the completion of the GSDS will resolve the majority of issues regarding WwTw constraints in South Dublin up to 2031. This will allow for waste water treatment capable of serving sustainable and in some instances, appropriate higher density development of the county, without any negative impact on the WFD. Notwithstanding the increased capacity of the WwTw for the County, sustainable development along high quality public transport corridors



should continue to form the basis for growth. The approved Planning Scheme is based upon this vision.

*Cultural assets:* The context of archaeological and architectural heritage has changed over time within and surrounding the SDZ lands; however no active conflicts between development and legislative objectives governing archaeological and architectural heritage were identified.

*Landscape:* New residential, commercial and transportation developments and site preparation works that have developed as a result of the approved Planning Scheme 2003, have resulted in changes to the visual appearance of lands within and surrounding the Planning Scheme area. However legislative objectives governing landscape and visual appearance are not identified as being conflicted with.

***the relevance of the plan in the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).***

The amendments to the Adamstown Planning Scheme in 2014 facilitated an update to the scheme in terms of EU legislation between 2005 to 2014.

The purpose of these amendments are to provide consistency with national and regional plans and guidelines as listed above which have been assessed under the SEA and Habitats Directive Assessment and show compliance with EU legislation. In addition, all proposals relating to same will be required to show compliance with the environmental and development management standards in the Adamstown Planning Scheme (as amended) which includes policies relating to environmental protection, water supply, water quality, ground water, waste management, landscape and cultural heritage in compliance with EU legislation. These include the *Water Framework Directive, Groundwater Directive, Habitats Directive and Birds Directive*.

<p><b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b></p>
<p><b><i>the probability, duration, frequency and reversibility of the effects,</i></b></p>
<p>The Proposed Amendments would not be likely to result in significant environmental effects as detailed in the individual assessment of amendments and in combination assessment in Annex A of this SEA Screening Report.</p>
<p><b><i>the cumulative nature of the effects,</i></b></p>
<p>No cumulative effects at strategic level for the proposed amendments.</p>
<p><b><i>the transboundary nature of the effects</i></b></p>
<p>It is considered that with proper regard and consistency with the environmental protection policies and objectives contained in the Planning Scheme Development Plan and the completion of appropriate environmental assessments and planning process for any proposed development arising from the amendments, no negative transboundary environmental effects are predicted.</p>
<p><b><i>the risks to human health or the environment (e.g. due to accidents),</i></b></p>
<p>Given the protective policies and objectives contained in the Planning Scheme it is not identified at this stage as giving rise to effects that would present as risks to human health or the environment.</p>
<p><b><i>the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</i></b></p>
<p>As above, given the application of development management standards and environmental protection measures in the Planning Scheme, no significant environmental effects are identified given the absence of new/additional landuse effects associated with the amendments.</p> <p>The full range of policies and objectives contained within the South Dublin County Council Development Plan 2010 – 2016 are applicable to development in Adamstown and have been taken into consideration in the content of the Planning Scheme. Development within Adamstown is carried out in accordance with the Planning Scheme.</p>
<p><b><i>the value and vulnerability of the area likely to be affected due to:</i></b></p>
<p>(a) special natural characteristics or cultural heritage</p> <p>The amendments to the Adamstown Planning Scheme seeks to ensure consistency with the RSES and NPF which in turn supports protection of natural and cultural heritage. Given the application of development management guidelines and environmental protection measures no significant effects are identified on natural and cultural heritage associated with these amendments..</p>
<p>(b) exceeded environmental quality standards or limit values,</p> <p>Any landuse activities will be required to be compliant with relevant standards, policies and objectives of the current Adamstown Planning Scheme. No such effects are identified.</p>

<p>(c) intensive land-use, The amendments support intensification of landuse through higher densities in particular at the Adamstown Station area.</p>
<p>(d) the effects on areas or landscapes which have a <b>recognised</b> national, European Union or international protection status.</p> <p>A Screening Report for Appropriate Assessment has been prepared in tandem with this SEA Screening to assess if likely significant effects arise in relation to conservation management objectives of European Sites and the proposed amendments to the Planning Scheme. The Screening Statement in support of Appropriate Assessment has found that no likely significant effects are identified in relation to conservation management objectives of European Sites and proposed amendments to the Adamstown Planning Scheme. It is not considered that any significant effects will arise in relation to landscapes of national, EU or International protection status.</p>

### 3.2 SCREENING DECISION

Section 9 (1) of the (2004) Regulations (S.I. No. 436) (as amended) states *“subject to sub-article (2), an environmental assessment shall be carried out for all plans and programmes*

*(a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications and tourism, and town and country planning or landuse, and which set the framework for future development consent of projects listed in Annexes I and II to the Environmental Impact Assessment Directive, or*

*(b) which are not directly connected with or necessary to the management of a European site but, either individually or in combination with other plans, are likely to have a significant effect on any such site.”*

The purpose of this report is to screen the proposed amendments to the Adamstown Planning Scheme to ensure that there are no unexpected or significant environmental effects as a result of the Proposed Amendments.

The Proposed amendments to the Adamstown Planning Scheme seek to respond to changes in national policy in particular the Regional Spatial Economic Strategy (RSES) for the Eastern and Midland region and the National Planning Framework (NPF). The principal amendments are positive in relation to the promotion of higher densities close to public transport, thus better integrating landuse and transport considerations. The relocation of enterprise centre to the Adamstown Station area further supports this approach. The amendment relating to increased height relates to one specific location and again meets compliance with the Height Guidelines. The remaining amendments are minor in nature, and have not been identified as generating strategic environmental effects. As the assessment against the above criteria in the SEA Directive and SI 436 of 2004 (as amended) demonstrate, no significant environmental effects are identified for these proposed amendments to the Adamstown Planning Scheme and therefore are determined not to require full Strategic Environmental Assessment.

This determination will be concluded upon consultation with statutory environmental authorities.





## ANNEX A INDIVIDUAL AND IN -COMBINATION ASSESSMENT

This section provides an individual and in combination assessment of the proposed amendments to the Adamstown Planning Scheme.

It is presented as an assessment against the current Strategic Environmental Objectives of the SEA of the Adamstown Planning Scheme (2014) and provides an assessment in terms of positive, negative, mitigated or no interaction with the SEOs. A commentary for each amendment is also provided as well as an evaluation of the potential for in combination effects with other plans/programmes and the Planning Scheme.

TABLE A1 STRATEGIC ENVIRONMENTAL OBJECTIVES FROM THE SEA ENVIRONMENTAL REPORT OF ADAMSTOWN PLANING SCHEME (2014)

Text
<b>SEO B1</b> To sustain and enhance ecological habitats within the Adamstown SDZ site.
<b>SEO B2:</b> To avoid significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites by development within or adjacent to these sites
<b>SEO B3:</b> To sustain and enhance key ecological networks that connects to areas of local biodiversity.
<b>SEO PH1:</b> To protect and enhance people’s quality of life through the provision of high quality and sustainable urban environments that incorporate a full range of services and facilities, support sustainable travel and support sustainable energy use.
<b>SEO PH2:</b> To increase efficiencies across the urban system for the good of all citizens through the better alignment of population, services, facilities, employment and transport
<b>SEO S1:</b> To protect the quality of soils within Adamstown SDZ.
<b>SEO S2:</b> To minimise the amount of soil sent to landfill and reuse soil within the site.
<b>SEO W1:</b> To maintain and improve, where possible, the quality of the River Liffey and Griffeen, its tributaries and surface water.
<b>SEO W2:</b> To prevent pollution and contamination of ground water
<b>SEO W3:</b> To prevent development on lands which pose - or are likely to pose in the future – a significant flood risk

<b>SEO C1:</b> To minimise increases in travel related greenhouse emissions
<b>SEO M1:</b> To provide adequate wastewater treatment, water distribution networks and drainage networks.
<b>SEO M2:</b> To maintain and improve the quality of drinking water supplies
<b>SEO CH1:</b> To protect, conserve and enhance the archaeological heritage of the Adamstown SDZ
<b>SEO CH2:</b> To protect, conserve and enhance the architectural heritage of the Adamstown SDZ
<b>SEO L1:</b> Improve overall landscape character and quality in the area
<b>SEO L2:</b> To protect and enhance the natural and historic landscape features within and adjacent to the Adamstown SDZ, including views of adjacent countryside, protected structures and key features

#### TABLE A2 INDIVIDUAL AND IN COMBINATION ASSESSMENT OF PROPOSED AMENDMENTS

The potential for the amendments to interact with the existing provisions of the draft Planning Scheme, and potential in combination effects with other plans and projects are described in this section.

SEOs Positive effect: ↑ Adverse Effect likely to be mitigated: ⇅ Adverse Effect unlikely to be mitigated: ↓ No Interaction with SEOs: O	SEA Commentary
An increase in unit numbers, density and residential floor area within the Adamstown Station and Aderrig  <b>PH 1,PH 2,S1,C1</b>  <i>No significant interaction identified for other SEOS</i>	Adamstown is identified in the NPF as a key area for compact growth and this amendment is consistent with the following NPF policies:  <b>National Policy Objective 33:</b> <i>'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'.</i>  <b>National Policy Objective 35:</b>

SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: O</b>	SEA Commentary
development areas.	<p><i>'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights'</i></p> <p>Integrating landuse and transport to help reduce car dependency is a further objective of the RSES and the 'Apartment Guidelines 2018 provides for the following higher densities:</p> <p><i>Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided'.</i></p> <p>The Adamstown Station development area is within a 5-minute walk of the railway station and Aderrig is within a 10 minute walk to the railway station; as such these are appropriate locations for an increase in residential density in line with the 2018 Apartment Guidelines.</p> <p>This amendment to increase unit numbers and density is therefore proposed in order to make more efficient use of development land within a Strategic Development Zone and in close proximity to high quality public transport.</p>
A location-specific increase in height within the Aderrig development area.	<p><b>PH 1,PH 2,S1,C1</b></p> <p>The height increase proposed within the Aderrig development area arises from a recommendation contained in the Building Heights Review commissioned out by SDCC as required by the Building Heights Guidelines 2018. The 1-storey height increase would result in an overall height of up to 5 and up to 6 storeys within a confined area of Aderrig. The blocks are located beside or close to a major street and quality bus corridor (QBC) and are within a 10 minute walk to the train station and district centre (a 5 minute walk to the district centre and a 5-7 minute walk to the station). An increased height would also provide a stronger urban edge addressing the Central Boulevard Park. The proposed location-specific height increase would be in line with the provisions of the Building Heights Guidelines 2018 and would not conflict with any of the objectives of the SDZ Planning Scheme.</p>

<p>SEOs  <b>Positive effect: ↑</b>  <b>Adverse Effect likely to be mitigated: ⇅</b>  <b>Adverse Effect unlikely to be mitigated: ↓</b>  <b>No Interaction with SEOs: O</b></p>	<p>SEA Commentary</p>
	<p>This provides for consistency with national and regional planning policy and guidelines and provides for higher density within a 5 minute walk to the district centre, and a 5-7 minute walk to the train station.</p>
<p>Relocation of the enterprise centre from the Tobermaclugg Village/Tandy's Lane Village local centres to the Adamstown Station district centre.</p>	<p><b>PH 1,PH 2,S1,C1</b></p> <p>The purpose of the enterprise centre is to provide office, studio and workshop accommodation backed up by support and training facilities for local business start-ups. It is now proposed to relocate the enterprise centre from Tandy's Lane Village/Tobermaclugg Village to the Adamstown Station area. This is considered appropriate having regard to the district centre status of the Station area where the SDZ Planning Scheme provides for a sizeable quantum of retail development including a supermarket and comparison shopping floorspace, in addition to community, leisure, employment, civic and cultural uses. The enterprise centre would complement the uses outlined above and would benefit from location adjacent to high quality public transport. It is considered that the proposed relocation of the enterprise centre would not conflict with any of the objectives of the SDZ Planning Scheme.</p> <p>The increased residential densities would be supported by the potential district centre using, enhancing local service provision within this area.</p>
<p>The following minor amendments are also proposed</p>	
<p>Updated references to and summaries of national and regional policy and guidance including the National Planning Framework, the Regional</p>	<p><b><i>This ensures consistency with national and regional policy and guidance is clear and consistent in the Planning Scheme. No significant interaction identified for SEOS</i></b></p>



SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: O</b>		SEA Commentary
Spatial and Economic Strategy, the Building Heights Guidelines and the Apartments Guidelines.		
Correction of typographical error relating to Airlie House (a protected structure)	<b>No significant interaction identified for other SEOS</b>	
In-combination assessment with other plans and projects.		
National Planning Framework	The purpose of the NPF is to provide a focal point for spatial plans throughout the planning hierarchy	As presented above, the amendments to the Planning Scheme relate and are consistent with a number of National Policy Objectives.
Regional Economic and Spatial Strategy	Adamstown identified within the Strategic Development Areas and Corridors (South West) as follows: (Kildare line, DART expansion and Luas red line) The consolidation of the western suburbs of Clonburris, Kilcarbery and Adamstown, linked to	No adverse in combination effects are identified.

SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: ○</b>	SEA Commentary	
	improved services on the Kildare line, and at Grangecastle supported by bus. Brownfield regeneration at Naas Road and Tallaght and new residential communities at Fortunestown, on the LUAS redline.	
The Transport Strategy for the Greater Dublin Area, 2016-2035	This Strategy sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy and was subject to SEA and AA...	Positive effects in relation to the prioritisation of public transport modes above private transport.
Neighbouring County Development Plans	These plans were subject to full SEA and AA and concluded that subject to full adherence and implementation of measures likely significant effects were not identified. No in-combination impacts were predicted as a result of implementation of the Plans	No in-combination impacts are predicted as a result of implementation of the Plans
CFRAMS Study	The Eastern CFRAM study has been commissioned in order to meet the requirements of the Floods Directive, as well as to deliver on core components of the 2004 National Flood Policy, in the Eastern district	No in-combination impacts are predicted as a result of implementation of the Plans
Greater Dublin Drainage	Irish Water made a planning application for strategic infrastructure development to An Bord Pleanála for the Greater Dublin Drainage Project in June 2018. The GDD project proposes a new regional wastewater treatment facility to be	No adverse in combination effects are identified

SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: O</b>	SEA Commentary	
	<p>located in the townland of Clonshaugh in north county Dublin, an underground orbital sewer from Blanchardstown to Clonshaugh, a new pumping station at Abbotsown, a partial diversion of the north fringe sewer, and an outfall pipeline to return the treated water to the Irish Sea. The project also includes a regional sludge treatment centre at the new GDD facility and an associated biosolids storage facility at Newtown near Kilshane Cross. Chapter 23 of the EIAR was reviewed with a focus on the cumulative impacts,</p> <p>South Dublin Heritage Plan                      Key objectives as follows:</p> <p>Objective 1: Establish the existing resource information in the County</p> <p>Objective 2: Gather heritage information</p> <p>Objective 3: Provide better access to information</p> <p>Positive interactions with SEOs in relation to this plan; no adverse cumulative effects identified.</p>	
National River Basin District Management Plan is	The second cycle River Basin Management Plan aims to build on the progress made during the first cycle with a greater emphasis on ensuring the evidence base is available and the administration supports are fully in place to support key measures. The approach to the plan development involves characterisation of Ireland's water bodies	No in-combination impacts were predicted as a result of implementation of the Plans

SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: O</b>	SEA Commentary	
	<p>in order to develop a tailored programme of measures to allow for the protection of good status or the restoration of good status for all water bodies. The outcomes are then monitored in order to feed into further characterisation and measures setting as the cycle moves forward. The plan was subject to SEA and Appropriate Assessment.</p>	
Water Services Strategic Plan	<p>Ireland's first integrated national plan for the delivery of water services, the Water Services Strategic Plan (WSSP) addresses six key themes and was adopted in 2015. It was subject to full SEA and AA and concluded that Overall, the assessment has identified that the implementation of the draft WSSP is likely to have positive effects on the majority of the SEOs that have been used in the assessment to help characterise the environmental effects of the WSSP and no significant negative effects were identified.</p>	No in-combination impacts were predicted as a result of implementation of the Plans
Clonburris Planning Scheme (2019)	<p>The SDZ Planning Scheme lands, span 280 hectares, and are located between the established communities of Lucan, Clondalkin and Liffey Valley. The Adamstown SDZ is located to the west.</p> <p>The lands are considered highly connected, prime development land and have also been designated as a Major Urban Housing Development Site with the opportunity for delivering housing within the Dublin Region and over the next decade and</p>	No in-combination impacts were predicted as a result of implementation



SEOs <b>Positive effect: ↑</b> <b>Adverse Effect likely to be mitigated: ⇅</b> <b>Adverse Effect unlikely to be mitigated: ↓</b> <b>No Interaction with SEOs: O</b>	SEA Commentary	
	<p>beyond, Clonburris will fulfil its potential. It is also identified in the RSES as a Strategic Development Area (south west corridor).</p> <p>This was subject to SEA and AA Screening and potential interactions with Adamstown Planning Scheme was considered through this process.</p>	
Adamstown Planning Scheme	<p>Approximately 2,343 dwellings units have been granted permission since the beginning of 2017, and construction is currently under way in Somerton, Tobermaclugg Village, Airlie Stud, St Helen's and Tubber Lane Development Areas.</p>	<p>The development activity was considered through the preceding SEA processes and monitoring included in same. No adverse in combination effects are identified.</p>



# Screening Statement for Strategic Environmental Assessment (SEA) under the Planning and Development Act, 2000 (as amended) for Building Height Review of the Adamstown SDZ Planning Scheme, 2014

## 1. Introduction

The Adamstown SDZ Planning Scheme (2014) comprises 223.5 hectares of land located in West Dublin, south of Lucan and the N4 national primary road, and north of the railway line from Dublin to the South and West of Ireland (see Figure 1). The SDZ Planning Scheme divides the plan lands into eleven development areas or ‘tiles’ and sets out parameters for development within each area. The original Adamstown SDZ Planning Scheme (2003) was reviewed and amended in 2014 and at that point, was subject to full Strategic Environmental Assessment.

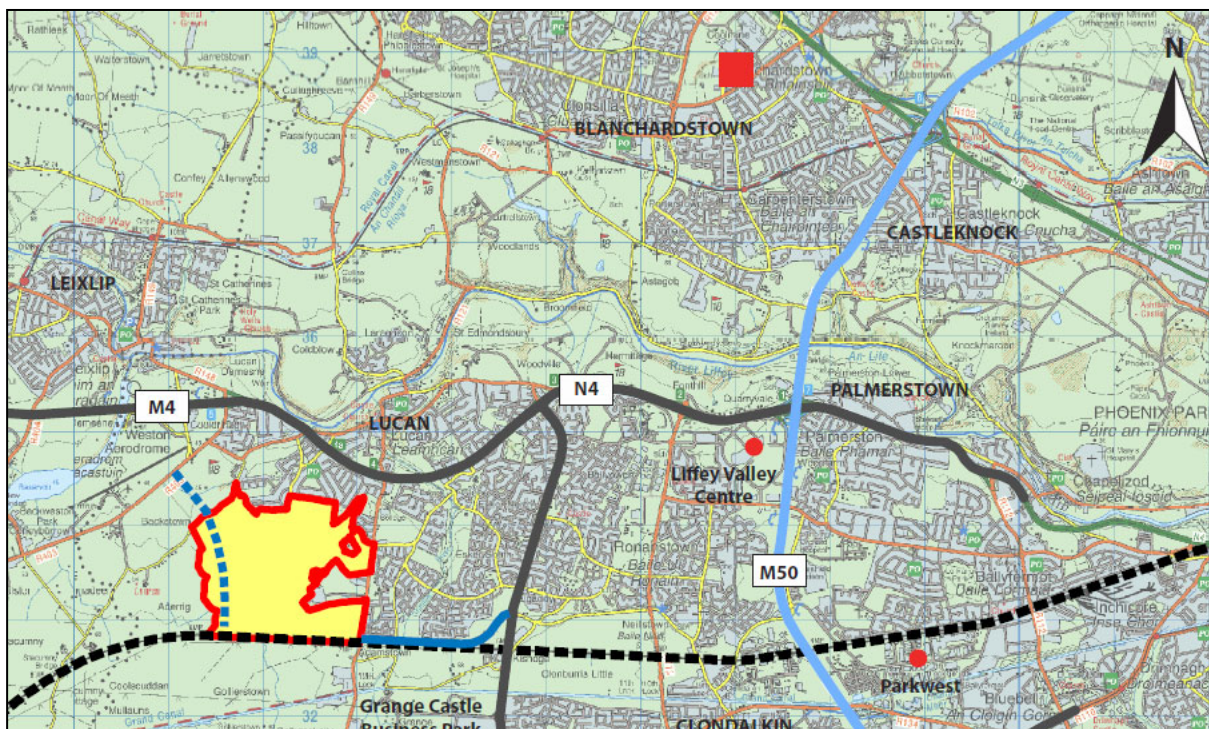


Fig. 1: Adamstown within the wider west Dublin context

## 2. Building Height Review

The Department of Housing, Planning and Local Government published the document ‘*Urban Development and Building Heights – Guidelines for Planning Authorities*’ in 2018, which sets out national planning policy guidelines on building heights in relation to urban areas. The Guidelines contain a number of Strategic Planning Policy Requirements (SPPRs) including SPPR 3(B) which requires adopted planning schemes to be reviewed to ensure that the Guidelines are fully reflected.



Accordingly, a Building Height Review of Adamstown was carried out by South Dublin County Council, informed by an independent study of building height within the undeveloped parts of Adamstown, commissioned by the Council and carried out by Metropolitan Workshop (architecture and urban design consultants). Built-out areas, areas under construction and areas where there are live permissions were not included in the study.

The overall finding of the consultant's Study in relation to building height was that the Scheme is compliant with the Building Heights Guidelines. A number of recommendations were made including that a one-storey location-specific height increase would be appropriate within a confined part of the Aderrig development area. South Dublin County Council concur with this view and therefore recommend that the SDZ Planning Scheme be amended to include this proposal. The proposed one-storey height increase within Aderrig and other findings/recommendations relating to density changes are included in a proposed Amendment submitted to An Bord Pleanála (this is addressed in a separate SEA Screening Statement).



**Fig.2: Indicative layout for Adamstown SDZ Planning Scheme, 2014**



### 3. Screening for Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) Screening Report was completed in March 2020 by Minogue and Associates Environmental Consultants, in light of the proposed non-material Amendment submitted to An Bord Pleanála. The SEA Screening Report includes screening of the recommendations arising from the Building Height Review.

The purpose of the SEA Screening report was to screen the proposed amendments to the Adamstown SDZ Planning Scheme (including the height increase within Aderrig proposed as a result of the Building Height Review) to ensure that there are no unexpected or significant environmental effects as a result. This SEA Screening was carried out in conjunction with a separate screening under Article 6(3) of the EU Habitats Directive prepared by Doherty Environmental which informed the preparation of the SEA Screening Report. The proposed building height increase (and other proposed amendments) were assessed against the criteria contained in Schedule 2a of the Planning and Development (Strategic Environmental Assessment) Regulations SI 436 of 2004.

The finding of the SEA screening report was that no significant environmental effects are identified for the proposed one storey increase in building height within part of Aderrig development area and that full Strategic Environmental Assessment is not required.

In this regard, the concluding paragraph of section 3.2 of the SEA Screening Report states:

*'The proposed amendments to the Adamstown Planning Scheme seeks to respond to changes in national policy in particular the Regional Spatial Economic Strategy (RSES) for the Eastern and Midland region and the National Planning Framework (NPF). The principal amendments are positive in relation to the promotion of higher densities close to public transport, thus better integrating land use and transport considerations. The relocation of enterprise centre to the Adamstown Station area further supports this approach. **The amendment relating to increased height relates to one specific location and again meets compliance with the Height Guidelines.** The remaining amendments are minor in nature, and have not been identified as generating strategic environmental effects. As the assessment against the above criteria in the SEA Directive and SI 436 of 2004 (as amended) demonstrate, no significant environmental effects are identified for these proposed amendments to the Adamstown Planning Scheme and therefore are determined not to require full Strategic Environmental Assessment'.*

**(Note: Bold added for emphasis)**

#### 4. Conclusion

In accordance with the above , South Dublin County Council conclude that no significant environmental effects are identified for the proposed one storey increase in building height within part of the Aderrig development area and that full Strategic Environmental Assessment is therefore not required.