



06th July 2022

Strategic Housing Unit,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

Re:

Application for Strategic Housing Development

Site Location: Junction of Santry Avenue & Swords Road, Santry, Dublin 9

Applicant: Dwyer Nolan Developments Ltd.

An Bord Pleanála Ref: ABP-312127-21

Dear Sir / Madam,

1.0. Introduction

- 1.1.** On behalf of our clients, Dwyer Nolan Developments Ltd. please find enclosed an application for Strategic Housing Development (SHD) on a site located at the junction of Santry Avenue & Swords Road, Santry, Dublin 9. The SHD application is being made under the Planning and Development (Housing) and Residential Tenancies Act 2016, and pursuant to the Notice of Pre-Application Consultation Opinion issued by An Bord Pleanála dated 22nd April 2022 (Case Reference ABP-312127-21).
- 1.2.** The application submitted consists of 2 no. hard copies together with 3 no. soft copies (on USB stick) in machine readable format, as required under Article 297(5) of the Planning and Development (Strategic Housing Development) Regulations 2017. A full list of enclosures is set out in Appendix B to this cover letter – please refer to same.
- 1.3.** In accordance with Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act (as amended)(the “2016 Act”), the applicant intends to apply for planning permission in respect of a proposed Strategic Housing Development (SHD) at Santry Avenue & Swords Road, Santry, Dublin 9. Section 17(1) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 (the “Act of 2021”) repealed Section 4(1) of the 2016 Act, however, the proposed SHD application is being made pursuant to the transitional arrangements of Section 17(3) of the Act of 2021 i.e. Sections



17(3)(a) & 17(3)(b) as follows:

(3) Notwithstanding the repeal of section 4(1) of the Act of 2016, a prospective applicant who on the date on which subsection (1) comes into operation—

(a) has made a request to the Board in accordance with section 5 of the Act of 2016 to enter into consultations with the Board in relation to a proposed strategic housing development, and

(b) has not been issued with a notice under section 6(7)(b) of the Act of 2016 in relation to the proposed strategic housing development, may, subject to complying with Part 2 of the Act of 2016, proceed to apply for permission in relation to such development in accordance with that subsection provided that—

(i) the prospective applicant notifies the Board of the prospective applicant's intention to proceed with the application as soon as practicable after the date on which subsection (1) comes into operation, and

(ii) the application is made within the period of 16 weeks beginning on the date on which a notice under section 6(7)(b) of the Act of 2016 is issued in relation to the proposed strategic housing development.

1.4. With regard to 3(b)(i) above, Armstrong Fenton Associates submitted a letter to An Bord Pleanála, dated 11th May 2022, which informed An Bord Pleanála that the applicant intended to proceed with the application (copy attached in Appendix A to this cover letter). With regard to 3(b)(ii) above, the application is being made within the period of 16 weeks beginning on the date the notice under section 6(7)(b) of the Act of 2016 is issued in relation to the proposed strategic housing development.

1.5. The application submitted consists of 2 no. hard copies together with 3 no. soft copies (on USB stick) in machine readable format, as required under Article 297(5) of the Planning and Development (Strategic Housing Development) Regulations 2017. A full list of enclosures is set out in Appendix B to this cover letter – please refer to same.

1.6. A dedicated website for the application has been set up by the applicant which contains links to all the documentation, drawings, and details, submitted as part of the application. This website can be viewed online at www.santryavenueshd2.ie.

2.0. Proposed Development

2.1. The proposed development is described in full below, as per the public notices:

Dwyer Nolan Developments Ltd. intends to apply to An Bord Pleanála for permission for a strategic housing development, on a site of c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19).

The proposed development provides for 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 4 no. retail / commercial units, a medical suite / GP Practice unit and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.

The development consists of the following:

- (1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).**



- (2) Construction of 350 no. 1, 2, & 3 bed apartments, retail / commercial, medical suite / GP Practice and community uses in 4 no. buildings that are subdivided into Blocks A-G as follows:
- Block A is a 7 to 14 storey block consisting of 59 no. apartments comprised of 26 no. 1 bed, 27 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. commercial/retail units located on the ground floor (c. 132.4m² & 173m² respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. commercial/retail unit and 1 no. medical suite / GP Practice unit located on the ground floor (c. 162.3m² & 130.4m² respectively). Refuse storage areas are also provided for at ground floor level.
 - Block C is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. Refuse storage areas are provided for at ground floor level. Adjoining same is Block D which is a 7 to 10 storey block consisting of 51 no. apartments comprised of 25 no. 1 bed, 19 no. 2 bed, & 7 no. 3 bed dwellings, with 1 no. commercial unit / café located on the ground floor (c. 163.3m²). A refuse storage area is also provided for at ground floor level.
 - Block E is a 7 to 10 storey block consisting of 58 no. apartments comprised of 10 no. 1 bed & 48 no. 2 bed dwellings, with 1 no. community use unit located on the ground floor (c. 188.1m²). A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
 - Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
- (3) Construction of a 1 storey residential amenity unit (c. 187.9m²) located between Blocks A & D.
- (4) Construction of basement level car parking (c.5,470.8m²) accommodating 173 no. car parking spaces & 719 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 36 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
- (5) Public open space of c. 1,915m² is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122m² provided for between (i) Blocks E, F, & G, (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
- (6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
- (7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

The application contains a statement setting out how the proposal is consistent with the objectives of the Dublin City Development Plan 2016-2022, and also contains a statement indicating why



permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the development proposal and accompanies the application. The application, together with the Environmental Impact Assessment Report, may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dublin City Council. The application may also be inspected online at the following website set up by the applicant: www.santrypavenueshd2.ie.

3.0. Application Fee

3.1. Attached to this cover letter is a cheque made payable to An Bord Pleanála for €63,674.28 being the appropriate SHD application fee. The SHD application fee is based upon the following calculation:

Category	Basic Fee	Calculations	Fee
HA1A - Housing	€130 per unit	350 no. dwellings x €130	€45,500.00
HA1B - Other Uses	€7.20 per sq.m	1,137.4sq.m of commercial development x €7.20	€ 8,189.28
HA2 - Submission of EIAR	€10,000	EIAR Submission = €10,000	€10,000.00
Total Fee Calculation			€63,689.28

Table 1: Application Fee Calculation

4.0. Planning Authority & Prescribed Bodies Notification

4.1. In accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017, 6 no. hard copies and 1 no. soft copy of the application has been sent to the relevant Local Authority (Dublin City Council).

4.2. As requested by An Bord Pleanála in their Pre-Application Consultation Opinion dated 22nd April 2022, a copy of the application has also been sent to the following prescribed bodies:

1. Irish Water
2. Transport Infrastructure Ireland
3. The National Transport Authority
4. Dublin City Childcare Committee
5. Irish Aviation Authority
6. Dublin Airport Operator
7. Fingal County Council

Given the circumstances surrounding the ongoing Covid-19 pandemic and working restrictions related to same, all the above prescribed bodies have been contacted directly to establish if they required a hard copy of the application as well as a soft copy. All the above prescribed bodies indicated that they only wish to receive a soft copy of the application. For the purposes of transparency, we enclose as part of the application written confirmation from each prescribed body that they only wish to receive a soft copy of the application. We also enclose as part of the application copies of the cover letters sent to each prescribed body which gives details of the proposed development and the process for making a submission on the application to An Bord Pleanála.

5.0. Conclusion



- 5.1. We trust that the documentation submitted meets the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017, and SHD application guidance documents issued by An Bord Pleanála.
- 5.2. We look forward to hearing from An Bord Pleanála in due course; however, if you have any queries in the meantime, please do not hesitate to contact us using the details supplied on the enclosed SHD planning application form.
- 5.3. Please refer to the pages over for a full list of the documentation, drawings and details, enclosed as part of the application.


Yours faithfully,

A handwritten signature in blue ink that reads "Tracy Armstrong".

Tracy Armstrong
Managing Director
Armstrong Fenton Associates
Planning & Development Consultants



Appendix A: Copy of Letter Submitted to ABP informing them of the Applicant's intention to submit this SHD Application

	<p>ARMSTRONG FENTON ASSOCIATES</p>
	<p>11th May 2022.</p> <p>Strategic Housing Unit, An Bord Pleanála, 64 Marlborough Street, Dublin 1.</p> <p>Re:</p> <p style="text-align: center;">Proposed Strategic Housing Development Planning Application Pre-Application Consultation Ref. No. ABP-312127-21 Site at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.</p> <hr/> <p>Dear Sirs,</p> <p>On behalf of our client, Dwyer Nolan Developments Ltd., we wish to formally notify the Strategic Housing Unit of An Bord Pleanála, that it is our client's intention to submit a Strategic Housing Development (SHD) planning application in the coming weeks, on foot of the Pre-Application Consultation Opinion received under Ref. ABP-312127-21, in relation to their land at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.</p> <p>We notify you of this intention in accordance with Section 17(3)(b) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021. Furthermore, we confirm that the SHD planning application will be lodged with An Bord Pleanála within 16 weeks of the date of issue of the An Bord Pleanála Notice of Pre-Application Consultation Opinion in relation to the proposed strategic housing development.</p> <p>Yours sincerely,</p> <p></p> <p>Tracy Armstrong, Armstrong Fenton Associates.</p>
	<p>ARMSTRONG FENTON LTD TRADING AS ARMSTRONG FENTON ASSOCIATES. PLANNING AND DEVELOPMENT CONSULTANTS 13 THE SEAPOINT BUILDING, 66-68 CLONTARF ROAD, DUBLIN 3, D03 A0H3. TEL: 01-4793140 REG NO. 634385. VAT NO. 354782314H. MANAGING DIRECTOR: TRACY ARMSTRONG WWW.ARMSTRONGFENTON.COM</p>



Appendix B

The following is a full schedule of the documentation, drawings & details enclosed as part of the application i.e. 2 no. hard copies of each & 3 no. soft copies of each.

Prepared by Armstrong Fenton Associates, Planning & Development Consultants:

Drawing / Document No.	Title	Scale
N/A	SHD Planning Application Form	A4 Document
N/A	Copy of Newspaper Notice as published in The Irish Daily Star on Monday 4 th July 2022	A3 Document
N/A	Copy of Site Notice dated for Monday 4 th July 2022	A3 Document
N/A	Planning Statement	A4 Report
N/A	Statement of Consistency	A4 Report
N/A	Material Contravention Statement	A4 Report
N/A	Statement of Response to An Bord Pleanála's Notification of Pre-Application Consultation Opinion	A4 Report
N/A	Statement of Compliance with Draft Dublin City Development Plan 2022-2028	A4 Report
N/A	Social & Community Infrastructure Assessment	A4 Report
N/A	Housing Quality Assessment	A3 Document
N/A	Outline Construction Management Plan	A4 Document
N/A	Building Life Cycle Report	A4 Report
N/A	Property Management Strategy Report	A4 Report
N/A	Universal Design Statement	A4 Document
N/A	Volume 1 - Environmental Impact Assessment Report Non-Technical Summary	A4 Report
N/A	Volume 2 - Environmental Impact Assessment Report	A4 Report
N/A	EIA Portal Confirmation Notice (ID 2022118)	A4 Document
N/A	Copy of Cover Letter to An Bord Pleanála	A4 Document
N/A	Copy of Cover Letter to Dublin City Council	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to Irish Water	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to Transport Infrastructure Ireland	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to the National Transport Authority	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to the Dublin City Childcare Committee	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to the Irish Aviation Authority	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to the Dublin Airport Operator	A4 Document
N/A	Copy of Prescribed Bodies Notification Letter Sent to Fingal County Council	A4 Document
N/A	Copy of Correspondence with Irish Water	A4 Document



N/A	Copy of Correspondence with Transport Infrastructure Ireland	A4 Document
N/A	Copy of Correspondence with the National Transport Authority	A4 Document
N/A	Copy of Correspondence with the Dublin City Childcare Committee	A4 Document
N/A	Copy of Correspondence with the Irish Aviation Authority	A4 Document
N/A	Copy of Correspondence with the Dublin Airport Operator	A4 Document
N/A	Copy of Correspondence with Fingal County Council	A4 Document

Prepared by Dwyer Nolan Developments Ltd.

Drawing / Document No.	Title	Scale
Document	Part V Proposals	A4 Document

Prepared by Dublin City Council

Drawing / Document No.	Title	Scale
Document	Letter of Consent	A4 Document

Prepared by Zoltorn Ltd.

Drawing / Document No.	Title	Scale
Document	Letter of Consent	A4 Document

Prepared by Davey & Smith Architects

Drawing / Document No.	Title	Scale
N/A	Architectural Design Statement	A3 Document
D1809.P01	Site Location Map	1:1000 @ A1
D1809.P02	Existing Site Layout & Existing Buildings	As Shown@A1
D1809.P03	Proposed Site Layout	1:500@A1
D1809.P04	Site Layout - Taking in Charge	1:500@A1
D1809.P05	Basement Level Plan.	1:200@A1
D1809.P06	Blocks A-G Ground Floor Plan	1:500@A1
D1809.P07	Blocks A-G First Floor Plan	1:200@A1
D1809.P08	Blocks A-G Second Floor Plan	1:200@A1
D1809.P09	Blocks A-G Third Floor Plan	1:200@A1
D1809.P10	Blocks A-G Fourth Floor Plan	1:200@A1
D1809.P11	Blocks A-G Fifth Floor Plan	1:200@A1



D1809.P12	Blocks A-G Sixth Floor Plan	1:200@A1
D1809.P13	Blocks A-G Seventh Floor Plan	1:200@A1
D1809.P14	Blocks A-G Eight Floor Plan	1:200@A1
D1809.P15	Blocks A-G Ninth Floor Plan	1:200@A1
D1809.P16	Blocks A-G Tenth Floor Plan	1:200@A1
D1809.P17	Blocks A-G Eleventh Floor Plan	1:200@A1
D1809.P18	Blocks A-G Twelfth Floor Plan	1:200@A1
D1809.P19	Blocks A-G Thirteenth Floor Plan	1:200@A1
D1809.P20	Blocks A-G Fourteenth Floor Plan	1:200@A1
D1809.P21	Block A/B East & West Elevation	1:200@A1
D1809.P22	Block C/D East & West Elevation	1:200@A1
D1809.P23	Block E/F East & West Elevation	1:200@A1
D1809.P24	Block G East & West Elevation	1:200@A1
D1809.P25	Blocks A-G South Elevation	1:200@A1
D1809.P26	Blocks A-G North Elevation	1:200@A1
D1809.P27	Blocks A-G Section K	1:200@A1
D1809.P28	Blocks A-G Section L & Contiguous South Elevation	1:200@A0
D1809.P29	Contiguous Elevations	1:200@A0
D1809.P30	Part V drawing	1:200@A1
D1809.P31	Site Layout - Phasing	1:500@A1

* ITM file included on soft copy enclosed with application for use by An Bord Pleanála

Prepared by DBFL Consulting Engineers

Drawing / Document No.	Title	Scale
200060-X-X-X-XXX-RP-DBFL-CE-0002-0	Site Specific Flood Risk Assessment	A4 Report
200060-X-Z-X-XXX-RP-DBFL-CE-0001	Engineering Services Report	A4 Report
200060-X-Z-X-XXX-RP-DBFL-CE-0003	Construction Environmental Management Plan (CEMP)	A4 Report
200060-X-Z-X-XXX-RP-DBFL-CE-0004	Traffic & Transport Assessment	A4 Report
200060-X-Z-X-XXX-RP-DBFL-CE-0005	Mobility Management Plan	A4 Report
200060-Itr-002	DMURS Statement of Consistency	A4 Report
200060-X-10-Z-F01-RP-DBFL-SE-0001-0	Foundation Appraisal	A4 Report
200060-X-10-Z-B01-DR-DBFL-SE-0001-0	Basement Plan	As Shown@A1
200060-X-10-Z-B01-DR-DBFL-SE-1001-0	Ground Floor Plan	As Shown@A1



200060-X-X-Z-L00-DR-DBFL-SE-1000-0	Keyplan and Site Boundary	As Shown@A1
200060-X-92-X-DTM-DR-DBFL-CE-1101-0	Foul Layout Plan	1:250@A1
200060-X-92-X-DTM-DR-DBFL-CE-3101-0	Foul Water Longsections	As Shown@A1
200060-X-04-X-DTM-DR-DBFL-CE-1301-0	Road Layout Plan	1:250@A1
200060-X-04-X-XXX-DR-DBFL-CE-5007-0	Road Standard Details Sheet 1 of 1	As Shown@A1
200060-X-91-X-DTM-DR-DBFL-CE-1001-0	Surface Water Layout	1:250@A1
200060-X-91-X-DTM-DR-DBFL-CE-3001-0	Surface Water Longsections	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5001-0	Surface Water Details Sheet 1 of 6	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5002-0	Surface Water Details Sheet 2 of 6	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5003-0	Surface Water Details Sheet 3 of 6	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5004-0	Surface Water Details Sheet 4 of 6	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5005-0	Surface Water Details Sheet 5 of 6	As Shown@A1
200060-X-91-X-XXX-DR-DBFL-CE-5006-0	Surface Water Details Sheet 6 of 6	As Shown@A1
200060-X-90-X-DTM-DR-DBFL-CE-1401-0	NTA's CBC Corridor No. 2, Swords - City CENTRE	1:500@A1
200060-X-93-X-DTM-DR-DBFL-CE-1201-0	Proposed Watermain Layout	1:250@A1
EN-6000-000-001	Mixed Use Development – Site Access Management	NTS

Prepared by Dermot Foley Landscape Architects

Drawing / Document No.	Title	Scale
Dw.02	Design Rationale – Landscape Architecture	A4 Document
Dw.01-DR-201	Landscape Plan	1:250@A1
Dw.01-DR-202	Roof Terrace Plan	1:250@A1
Dw.01-DR-203	Boundary Treatments	1:1000/1:50@A1
Dw.01-DR-240	Landscape Sections	1:100@A1
Dw.01-DR-250	Typical Landscape Details	1:20@A1



Prepared by The Tree File Consulting Arborists

Drawing / Document No.	Title	Scale
N/A	Arboricultural Report	A4 Report
N/A	Santry Tree Constraint Plan	1:500@A1
N/A	Santry Tree Impacts Plan	1:500@A1
N/A	Santry Tree Protection Plan	1:500@A1

Prepared by Sabre Electrical Services Ltd.

Drawing / Document No.	Title	Scale
SES 07021 Rev B	Outdoor Lighting Report	A4 Document
SES07021	Public Lighting Layout	1:500@ A1

Prepared by Chris Shackleton Consulting

Drawing / Document No.	Title	Scale
N/A	Santry Avenue SHD, Chadwicks Builders Merchants Site - Daylight & Shadow Assessment	A3 Document

Prepared by 3D Design Bureau

Drawing / Document No.	Title	Scale
N/A	Mixed Use Residential Development at Chadwicks Builders Merchants Site, Swords Road, Santry – Verified Views	A3 Document

Prepared by Bruton Consulting Engineers

Drawing / Document No.	Title	Scale
200060 DBFL Swords Road Santry	Stage 1 Road Safety Audit	A4 Document

Prepared by AWN Consulting

Drawing / Document No.	Title	Scale
MA/21/12197SR01	Hydrogeological Impact Assessment	A4 Report
CB/21/121997WMR01	Resource & Waste Management Plan	A4 Report
CB/21/121997WMR02	Operational Waste Management Plan	A4 Report

Prepared by Enviroguide Consulting

Drawing / Document No.	Title	Scale
N/A	Appropriate Assessment Screening Report	A4 Report

Prepared by B-Fluid Dynamics

Drawing / Document No.	Title	Scale
N/A	Wind Microclimate Modelling	A4 Report

Prepared by ASH Ecology & Environmental

Drawing / Document No.	Title	Scale
N/A	Bat Survey Report	A4 Report

Prepared by Archaeology Plan Heritage Solutions

Drawing / Document No.	Title	Scale
AP21-08	Archaeological Assessment	A4 Report

Prepared by Dermot Nolan Conservation Architect

Drawing / Document No.	Title	Scale
N/A	Architectural Heritage Impact Assessment	A4 Document

