

Planning Report

Including: Statement of Consistency

Response to LRD Opinion

LRD Planning Application for an amendment to the permitted Strategic Housing Development Ref 312170-21 At 'Marmalade Lane', Wyckham Avenue, Dundrum, Dublin 16.

October 2025

PREPARED BY MCG PLANNING
ON BEHALF OF 1 WYCKHAM LAND LIMITED

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Chapter 1 Introduction

On behalf of the applicant, 1 Wyckham Land Limited, this planning report accompanies an LRD application submitted to Dun Laoghaire Rathdown County Council under Section 32 of the Planning and Development (Amendment)(Large-scale Residential Development) Act 2021 for a proposed amendment to the to the permitted Strategic Housing Development Reg Ref ABP-312170-21. The amendment proposed will replace Block E in the south-west corner of the site (comprising a total of 68 no. units) with 8 no. semi-detached 3 storey houses at this site at “Marmalade Lane”, Wyckham Avenue, Dundrum, Dublin 16.

The application has been prepared by a multidisciplinary team on behalf of 1 Wyckham Land Limited as set out in the table below.

Company Name	Documents Prepared
McGill Planning	Planning Report including - Statement of Consistency - LRD Opinion Response
	EIAR Addendum
Client	Part V pack
Reddy Architecture & Urbanism	Design Statement
	Architectural Drawings
	Building Lifecycle Report
	Unit Schedule
	Summary Schedule
Digital Dimensions	Photomontages
NMP Landscape Architecture	Landscape Design Statement
	Landscape Drawings
DOBA Consulting Engineers	Engineering Drawings
	Infrastructure Design Report
	CEMP
	LRD Opinion Response
The Tree File	Arboricultural Report
	Tree Drawings
Fallon Design	Climate Action Energy Statement
Transport Insights	Transport Statement
Altemar Environmental Consultants	Appropriate Assessment
	Natura Impact Statement

Table 1 Design Team and Documents Prepared

Chapter 2 Development Description

On behalf of the applicant, 1 Wyckham Land Limited, 27 Merrion Square North, Dublin 2, this planning report accompanies a planning application submitted to Dun Laoghaire Rathdown County Council under Section 32 of the Planning and Development (Amendment)(Large-scale Residential Development) Act 2021. The proposed development is as follows:

1 Wyckham Land Limited intend to apply for Permission for a Large-Scale Residential Development (LRD) at this site, 'Marmalade Lane', Wyckham Avenue, Dundrum, Dublin 16. The application site includes lands formerly part of/owned by the Gort Muire Carmelite Centre and is located adjacent to Protected Structures (RPS No. 1453). The site is located to the north of Wesley Lawns, to the east of Gort Muire, to the west of Parkvale and Ballawley Park and to the south of St Tiernan's Community School.

The proposed development will amend permitted Strategic Housing Development (SHD) ACP Reg. Ref.: 312170-21.

The amendment proposed will replace Block E in the south-west corner of the site (comprising a total of 68 no. units) with 8 no. semi-detached 3 storey houses at this site at "Marmalade Lane", Wyckham Avenue, Dundrum, Dublin 16. All associated works to accommodate this change are proposed including additional car and cycle parking and public open space and associated ancillary works.

There is no change proposed to blocks A-D and all aspects of the permitted development Reg Ref ABP-312170-21 will be completed as permitted. A total of 471 no. units, 60 no. less than permitted, will be delivered as a result of this proposed development.

A Natura Impact Statement (NIS) have been prepared in respect of the proposed development. All application documentation and information is available to view online at the following website set up by the applicant:
[***https://www.marmaladelandamendmentlrd.ie/***](https://www.marmaladelandamendmentlrd.ie/)

This proposed houses are proposed to not have any Build to Rent conditions or stipulations. They are located in Dundrum/ Ballinteer area, on zoned lands. Marmalade Lane has permission to construction 531 no. apartments in 5 blocks A to E. Block E, the site where these unit are proposed to replace, have permission to construct an apartment block providing 68 no. houses and ranging in height from 3 to 5 storeys.

This site, is close to existing employment, community facilities, retail and public transport. As such, this is a high-quality development, in a highly sustainable location which accords with all of the National, Regional and Local Planning Policy.

The proposed development statistics are as follows:

Parameter	Houses in Block E
Site area	3,268.73
No. of units	8
Building height and storeys	10.318m, 3 Storeys
Single- and dual-aspect	8 dual aspect - 100%
Communal open space	0
Public open space	12,347sqm across the whole site + 1,108sqm
Car parking	On Curtilage 8
Cycle parking	32 no. residents parking, and 16 no. visitors cycle parking

When this is compared to the previous application, there is a reduction in the number of overall residential units by 60. This proposed new housing units will introduce a new unit type by providing new 4 bed housing, providing a greater mix of unit types across the site. There is an increase in the public open space across the site by c. 1,108sqm. It is also noted that the overall height is reduced from a maximum of 5 storeys for block E to 3 storeys for these houses.

The table below shows the change to the development in the metrics for the entire Marmalade Lane site, including blocks A-D, as a result of this proposal.

Development Proposal	Permitted SHD ACP-312170-21	Proposed
No. of residential units	531 no units in total: -28 no. Studios -297 no. 1 bed units -197 no. 2 bed units -9 no. 3 bed units	471 no units in total: -25 no. Studios -256 no. 1 bed units -173 no. 2 bed units -9 no. 3 bed units -8 no. 4 bed units
Public facilities	Creche (438.60 sqm) and cafe 96.70sqm , no change	
Residential facilities	Residential amenity space/ facilities c.1,488sqm, no change	
Site Area	Gross Site Area: 4.19 ha Net site area (minus public open space): 2.96 ha	
Residential Density	Gross: 126.62 uph Net: 179 uph	Gross: 112.4 uph Net: 159 uph
Plot ratio	C.1.08	No change
Site coverage	C.15%	No change
Building Height	Up to 10 storeys above undercroft and basement parking	
Aspect	55% Single aspect, 45% Dual aspect	
Open Space	Public: c.12,347 sqm Communal: c.6,977 sqm Building A = 979m ² (Ground Level) Building B = 3529m ² (Ground level) Building B = 323m ² (Roof Level) Building C = 1079m ² (Ground level) Building D = 558m ² (Ground level) Building E = 507m ² (Ground level)	Public: c.13,455.52sqm (c.12347.52sqm + 1,108sqm) Communal Open Space c.6,470 sqm Building A = 979m ² (Ground Level) Building B = 3529m ² (Ground level) Building B = 323m ² (Roof Level) Building C = 1079m ² (Ground level) Building D = 558m ² (Ground level) Building E = 0
As Carparking	171 no car parking spaces including: • Street level 16 • Undercroft/Basement 155	179 total • Street level 16 • Undercroft/Basement 155 • On Curtilage 8
Cycle parking	1,012 no. bicycle spaces including: 746 no long-term spaces & 266 no visitor cycle spaces	934 no. bicycle spaces including: 686 no long-term spaces & 248 no visitor cycle spaces
Motorcycle	26 no. motorcycle spaces	
Vehicular Access	From Wyckham Avenue	

Chapter 3 Site Location and Context

The subject site is located within the metropolitan area of Dublin City which is identified for significant residential growth over the next two decades.

The proposed development seeks to amend the permitted BTR Apartment Scheme to provide new housing in addition to the apartments permitted. This is an appropriate use due to the zoning of the site and its location in walking distance of a multitude of services, public transport options and amenities.

The proposed development seeks to amend the extant permission on the site under ABP-312170-21. As can be seen from the image below, work has commenced on site to implement this permitted development. Site establishment works were carried out including securing of perimeter hoardings, re-location of entrance gate to Gort Muire complex, Foul & surface water main drainage lines installed from Wyckham roundabout up to and throughout the site (under the supervision of Irish Water) and the excavation to formation levels of each block.

Works to date include commencement of permanent structural and civil items within building footprints. Foundations have commenced including being dug and poured in all blocks. Five tower cranes have been erected. The first-floor precast wall and floors have been installed on Block D and C. A significant portion of block B basement and podium has been formed and poured on site. Further works are occurring offsite including fabricating of prefabricated balconies and precast concrete wall and floor panels for blocks A,C, and D.



Figure 1 Image of wider site, with blocks A to D currently under construction



Figure 2 Image of wider site, with blocks A to D currently under construction

The site is located to the south and east of Gort Muire, Carmelite Order, Dundrum, Dublin 16 and is accessed off Wyckham Avenue, off Wyckham Way. St Tiernan's school is located to its immediate north. To the south and east of the site are mature, low density, two storey residential developments. The rear gardens of Parkvale and Wesley Lawns border this site. The lands fall from the southern boundary to the North East Corner with variations across the site of c. 10m.

It is c. 600m from the Ballinteer stores with its range of local shops and chemist. In addition to this neighbourhood centre, it is c.750m (10 minutes' walk) from the Dundrum Town Centre, with its wide range of shopping facilities, restaurants and services, 1.5km (15 minutes' walk) from SuperValu shopping centre, 1.4km from DLR Meadowbrook Leisure (14 minutes' walk) which has a gym, swimming pool, astro pitches.

The site is also within a 15 minute walk of Dundrum village centre which has a library, banks, and other services, which combined with the Dundrum town centre, results in a vibrant area which hosts many desirable residential and commercial amenities with multiple cafes, bars, restaurants, food retail and leisure facilities such as gyms. Beacon Hospital and the employment hub of Sandyford is just over 1km to the east.

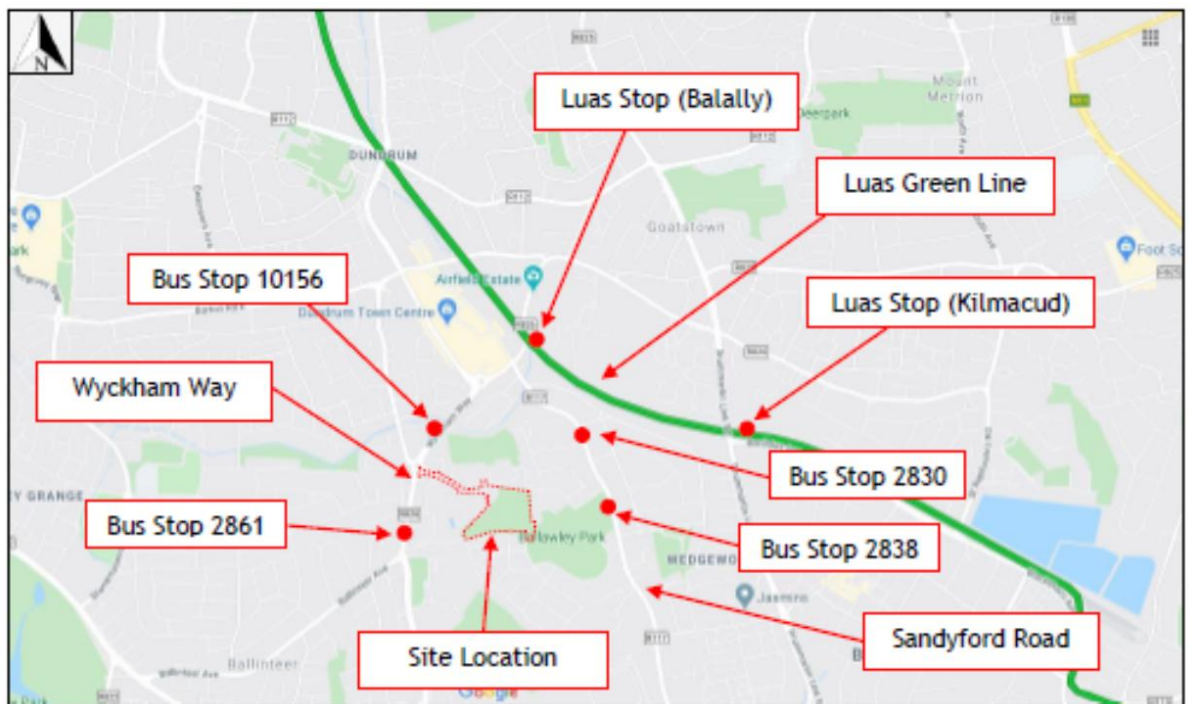


Figure 3: Site Location in proximity to public transport links

The site is well connected with public transport services. There are multiple bus routes within the vicinity as well as the being located c.750m from Ballaly Luas station and 1km from Kilmacud station on the Green Luas line.

Within the wider area, and within a 20-minute cycle of the site there are also a wide range of existing employment opportunities which can be reached by either public transport, foot or bicycle these including Nutgrove Shopping Centre and Enterprise Park, Stillorgan Business Park, Sandyford Business Park, Central Park Leopardstown, South County Business Park and University College Dublin. These areas include many large employers such as the Beacon Hospital, Microsoft and the university. All of these provide a wider range of existing employment opportunities to the future occupants of this development, in addition to the opportunities within Dundrum itself.

The surrounding area is generally residential or educational. It is well located with respect to primary and secondary schools. Secondary education centres St. Tiernan's community school and Wesley college will have direct pedestrian connection to the site. Ballinteer Secondary school, and St. Benildus college are also present at an accessible distance of the site. 8 Primary schools fall within the 5-minute drive time catchment of the site.

The parent permission also provides a direct connection between the public open space and the existing open space within Ballawaley Park, enlarging and enhancing the existing open space. Finally, Marley Park is within 2.4km of the site providing an additional wide range of outdoor recreation facilities.

Chapter 4 Planning History

The subject site has been granted planning permission by An Bord Pleanála for a Build to Rent Strategic Housing Development twice (ABP Ref 308 157-20 and ABP Ref 312170-21) subject to conditions.

ABP: 312170-21

Final Decision: Grant

Decision Date: 8th April 2022

The proposed development was for 531 no. build to rent apartments, along with associated residential facilities, car and cycle parking, a creche and café. ABP decided to grant permission subject to 28 conditions.

It is this grant of planning permission which is currently under construction on site which this planning application seeks to amend. The subject application seeks to replace block E which has permission for a 3-5 storey apartment block containing 68 no. units with 4 sets of semi-detached three storey houses providing 8 new houses on site in total.

Chapter 5 Rationale for Development

The proposed development is an amendment to a permitted residential development, replacing a 3-5 storey, 68 no unit apartment block with 8 no. 4 bed three storey houses. The principle of residential development in this location is established and acceptable. Furthermore, to this the proposal includes the provision of a new public open space, which will be in addition to the permitted open space adjoining the existing Ballawley Park to the east.

The proposed amendment development has been designed to take into account the site constraints including, but not limited to, the changing in land levels, the existing land uses surrounding the site, the trees and vegetation, the location close to a protected structure and the relationship with the existing houses, particularly those located to the west of the site.

This proposed amendment will continue to deliver housing, but in addition to the mixed-use BRT apartments, the proposal will also include 3 storey family houses. This will provide a better mix and choice for the market on this site which is highly sustainable due to its proximity to excellent public transport, existing facilities and services, schools, retail and employment opportunities.

All other aspects of the development will remain as permitted including the connections into the existing area, the public park, new creche, café, and new links through the site. It is noted that blocks A -D are currently under construction as per the grant of planning permission.

The permitted scheme also enables new views and aspects of the protected structure, particularly the Water Tower to be opened up and this will remain unchanged, ensuring that the protected structures near the site have a more positive and attractive setting.

OVERALL LAYOUT

As set out in the Architectural Design Statement by Reddy Architecture, the new buildings will replace the L-shaped apartment block permitted with a single line of semi-detached houses. These will result in a reduced footprint as well as height, and enable the provision of increased public open space.

The new layout, which is only around area E, will provide new paths through the site, creating further permeability. Furthermore, the new typology will provide a new character area within the overall development, ensuring the creation of a clear sense of place, and which adds to the environment of which it is part.

All of the proposed houses will be dual aspect, with their own car parking space, private front and rear gardens and are sized to meet all the standards in both the Compact Settlement Guidelines and the County Development Plan. Furthermore, due to the orientation of the site all of the houses are predominantly east-west facing, resulting in passive solar energy gain with the development.

While these 8 houses will replace the 68 apartments, it is important to note that all the other apartment blocks are arranged around landscaped courtyards, each with an individual character with seating areas, and are not reliant on block E for communal open space.

The variety of landscaped spaces throughout the overall development offers a clear understanding of the area, creating legibility and a sense of place.

This development will remain a medium to high-density scheme with 159 units per hectare net, a reduction from 179uph net. This is considered appropriate due to the nature and layout of the development, and the predominantly car free development within a parkland setting. The flow of the

proposed development into the surrounding environment, reflecting the parkland to the southeast and blending with Ballawley Park, merging into the adjacent existing built development in the area seamlessly.

BUILDING HEIGHT, DESIGN, SCALE AND MASSING

The permitted building on site is for an L-shaped apartment block rising in height up to 5 storeys. This proposed amendment will replace this block with 4 semi-detached houses rising up to three storeys. This will result in a reduced scale of development, and due to the character of the semi-detached properties will result in a reduction in the overall mass of the development.

The 3 storey development will provide a transition between the existing houses to the west and the permitted apartments to the east, gradually stepping up the height of the development. This will enable a gradual change in the height, scale and massing of the buildings between the traditional housing to the permitted larger apartment blocks.

The contextual changes within the surrounding area are fully reflected and accommodated within the proposed design, creating an attractive transitional space between the urban density to the north and west and the low density suburban area to the south and east. As a result of this amendment, and reflecting the permitted block E, the buildings start at 3 storeys at the closest point to other residential development and steps up as it progresses through the site, away from existing residential development, minimising the impact it has on the surrounding existing houses.

The materials and finishes of the proposed amended houses are to a high architectural standard and have been considered with regard to the surrounding existing pattern of development and material palette in the locality.

As highlighted above, the buildings have been located to sensitively reflect the existing neighbouring properties, including historic buildings within the vicinity. The building footprints have been designed, to ensure that the built site coverage is minimised, while providing an acceptable form of housing. The new public open space provides additional positive views both from within the scheme and when viewed from outside the boundaries of the development site.

DAYLIGHT/SUNLIGHT/SHADOWING

As this is a replacement of a 5 storey apartment block with dual aspect, three storey housing the impact on the adjoining neighbours is reduced, ensuring an even lesser impact on the surrounding area.

In terms of daylight and sunlight within the houses themselves, they are all dual aspect, east-west facing with no obstructions to the front or rear of the properties. Therefore, they will achieve good daylight and sunlight internally and within their amenity space.

OVERLOOKING AND VISUAL AMENITY

The proposed amended development, due to their location and height, are at a significant distance away from existing residential development within the surrounding area. Their orientation ensures there is no direct overlooking between properties. As a result, the proposed development will not impact on the privacy of existing residential properties in the surrounding area.

Within the overall permitted scheme, due to the orientation of the blocks and the location of the windows, it ensures that there is no overlooking between the houses within area E and the apartments.

in block D. Therefore, this amendment as a result of the proposed houses location and orientation, there is no loss of privacy to the adjacent apartments.

ARCHITECTURAL HERITAGE

Whilst Gort Muire, to the north of the subject site, possesses specific architectural heritage significance, no corresponding structures having heritage characteristics are constructed on the subject site itself. The Gort Muire Centre has several protected structures including the Water Tower, Garden Walls and Farm Building Complex, House, Ornamental Ironwork, Conservatory and Water Tower (RPS Ref.1453). The development site, however, abounds sections of historic walled boundaries, which will require consideration in the proposed development.

It is noted that the protected fabric of Gort Muire is essentially shielded from the subject development site by a 1930 – 1960's buildings, constructed in alignment with the southern boundary shared with the site. This large-scale structure provides an inadvertent enclosure to the protected gardens, garden features and historic landscaping of the house, which are cited in the RPS as contributing to its character and worthy of specifically stated protection.

The approach to the proposed development, which is routed to the east of the water tower and south of the walled garden will have no physical impact on the built fabric.

It is noted that Molloy and Associates, Conservation Architects have stated in their assessment in the EIAR Addendum that

"The proposed amendment development has inherently evolved from consideration of impacts for its receiving environment. Following a careful review, it is held that due to the reduced scale and massing of the proposal compared with the permitted Block E, there will be no significant additional impacts at either construction or operational phases for the protected structure or its garden setting."

The proposal will not result in any material change to baseline architectural heritage findings or consequentially identified potential or significant impacts that require consideration of additional mitigation or monitoring measures.

The amendment is considered an improvement to the permitted condition, where a less intensive use at the shared boundary, now culminated by rear gardens, is proposed. The setting of the protected structure and its garden is likely to remain largely unchanged with the modestly arranged dwellings providing a gentler backdrop to the southeast than was permitted. Established screening provided by verdant, mature boundaries will further minimise interaction between the setting of the protected structure and the proposed development. On the whole, the subject amendment development will in time, merge harmoniously with Gort Muire in its evolved urbanised condition as a house and garden enshrouded by a protected sylvan setting, within a developed townscape."

VISUAL IMPACT ASSESSMENT

As can be seen from the submitted photomontages the proposed amendment will have similar or reduced impact on the area in terms of townscape assessment. This is due to the reduced height and reduced massing of the proposed houses.

It is considered that the magnitude of effect of this proposed amendment on the landscape/townscape character of the wider locality would not be significant. The enclosed photomontages by Digital Dimensions demonstrates the impact of the development from nearby public visual points. These views demonstrate that the impact is in keeping with the existing built development in the area, and the permitted scheme and it would have a modest, positive, and long-term effect.

CHILDCARE FACILITIES

The permitted creche will remain in situ. The proposed development will generate, due to the reduced number of units, a reduction in the overall demand for creche spaces, enabling additional spaces to be provided for the wider community. Therefore, the creche as permitted at the lower ground floor of Block A, which is sized to accommodate c.146 children, is sufficient to accommodate this amendment.

PARKING

Car parking serving the subject development is provided within the on-site car park located within the driveways of each of the houses. It will provide one car parking space per unit. This provision of 1:1 car parking space is in accordance with Development Plan policy. Cycle parking will also be within the curtilage of the houses, again this is provided in accordance with Development Plan policy.

There is no change to the permitted parking at basement/undercroft level below the apartments that are under construction. The ratio of car parking for the remainder of the scheme will increase slightly, from 0.32 parking spaces per apartment up to 0.37 parking spaces per apartment. This increases slightly the parking both for the houses and the apartments. This level of provision is considered appropriate due to the Census population information, the excellent public transport in the area and the significant drive from national policy to more sustainable modes of transport.

A further consideration is the high level of cycle parking provided within the development. 934 cycle parking spaces are provided which are in excess of the DLR Minimum requirements but are a true reflection of the Census 2022 data which demonstrates clearly that in this area people choose to use their bicycles or walk to work, or alternatively use public transport. The use of private car is chosen by less than a third of people. It is therefore considered appropriate to provide a higher level of cycle parking on this site to accommodate this modal shift to more sustainable transport.

Given the data on car usage versus public transport and other active mode of transport it is considered that the proposed car parking provision is appropriate to the site and is a reflection of the sites located proximate to excellent services, employment, education and community facilities, public transport and the census 2022 data for this area. This proposed parking provision, which is the inverse of the norm, will encourage the much needed modal shift to continue in this location.

PERMEABILITY

This site is a highly accessible site, which, as set out in the transport section above, can accommodate a reduced level of car parking in favour of increased levels of cycle parking and pedestrian mobility. This proposed development opens the site and creates new routes through the site increasing the permeability to and through the site. The landscaping plan enables ease of pedestrian movement through the site following logical routes, that accommodates the changing site levels, and enabling clear legibility within the site.

It is noted that this proposed development does not alter any of the permitted routes into the surrounding area. These will remain as permitted under the SHD permission. The design and layout of the development is such that it will provides attractive, supervised routes through the site providing a safe attractive alternative to the existing situation.

ARBORICULTURE

An Arboricultural assessment was carried out by The Tree File which highlights that the design of the development was strongly influenced by existing trees. The overall objectives as set within the permitted scheme are carried forward in this proposed amendment which enables the retention of the maximum number of good quality trees within this area.

As set out in the arboricultural report submitted with this application, this proposed amendment to the permitted development will not result in any additional tree loss or impact compared to the permitted development.

Furthermore, the proposed new tree planting within the landscape plans and design reports will provide a new generation of trees which have the potential to develop and add to the existing tree cover on the site. A tree protection plan is also included within the development.

Chapter 6 Statement of Response to S32B Pre-Planning Meeting and DCC LRD Opinion

An LRD Meeting, planning authority reference PAC/LRD2/006/25 (Amendments to SHD), was held on the 26th August 2025 via Microsoft Teams. Following this LRD Meeting under section 32 of the Act, the council were required to provide an Opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

The Planning Authority issued its Opinion on the 25th September 2025. This confirmed that the *“Planning Authority is of the opinion that the documentation submitted constitute a reasonable basis for an application for Large-scale Residential Development.”*

The Opinion also stated that: *“Pursuant Section 32D of the Planning and Development Act 2000 (as amended), the Planning Authority is of the Opinion the documents submitted do constitute a reasonable basis on which to make the application – however comments and concerns are noted in respect of the following areas, and the following and specific information should be addressed in any application for development. The applicant is requested to provide:*

Item raised	Application Response
Architectural Approach and Visual Impact:	
<i>Justification in relation to the development strategy for the site, in particular the architectural approach and the quality of the design. The evidence shall have regard to inter alia, national policy including the National Planning Framework, Sustainable Residential Development and Compact Settlements and Sustainable Urban Housing: Design Standards for New Apartments 2025 and local planning policy, the sites context and locational attributes. The evidence should refer to any approved baseline heights under the foregoing approved SHD outlined by An Bord Pleanála ABP-312170-21.</i>	Please see the Architectural Design Statement submitted with this application. This confirms that the amendment is a considered and sensitive architectural response to the site’s context and surrounding residential character. As this is not a proposed apartment scheme, and is rather a housing proposal in place of the permitted apartments in block E, the Design Standards for New Apartments do not apply. The proposal however is fully compliant with the Compact Settlement Guidelines. This is set out in the compliance section in the Planning Report. Both the Planning Report and the Architectural Design Statement discuss the permitted 3-5 storey building on this site and how the replacement of this building with 3 storey semi-detached properties is in keeping with the character of the surrounding area. The amendment proposed provides an appropriate transition between the existing lower density residential houses within the surrounding area and the permitted higher density apartments within the development under construction.
<i>The Stage 3 application should continue to demonstrate a sensitive architectural response to the site's context, particularly in relation to scale, massing, and visual impact. Detailed</i>	The architectural response set out in the Architects Design Statement demonstrates how the proposed development is sensitive to the surrounding area in terms of scale and massing,

<i>boundary treatment plans should be provided to ensure clarity around privacy, integration, and landscaping. Visual impact assessments, including photomontages from key public viewpoints, would help reinforce the appropriateness of the design and its relationship with surrounding development. The design rationale should also clearly explain how the layout contributes to placemaking, connectivity, and the overall character of the scheme. As national guidance evolves—particularly with the anticipated Design Manual accompanying the 2024 Guidelines—future proposals should reflect best practice in urban design, accessibility, and sustainability. Additionally, incorporating energy efficiency and climate resilience measures would further strengthen alignment with contemporary planning policy and enhance the longterm quality of the development.</i>	providing a transition to the higher density development. This is reinforced by the Verified Views by Digital Dimensions and submitted with the application. A Visual Impact Assessment is also within the EIAR Addendum. As with the parent permission this proposal amends, the new 8 units will provide new public open space and pathways increasing connectivity to the area and into the wider scheme. The new unit type will provide further legibility to the permitted scheme. The proposal will not alter any of the existing boundaries of the site. Post and Panel Timber Fences are proposed around the neighbours rear gardens. as indicated in the NMP Landscape plans the site is designed to ensure accessibility across the area. The houses are designed to be energy efficient as set out in the Fallon Engineering Report. This proposed amendment to the permitted development is considered to enhance the longterm quality of the overall permitted development currently under construction.
Density:	
<i>The revised Marmalade Lane proposal results in a lower residential density compared to the original SHD permission. The original scheme provided 531 units at a net density of 179 UPH. In contrast, the revised proposal delivers 471 units, reducing the net density to 159 UPH. The Stage 3 application should include justification in relation to the proposed density, ownership/tenure, and dwelling size/ mix quantum, and demonstrate if the proposed provision is the optimum solution for the site and location having regard to the location of the site and the provisions of the Guidelines for Planning Authorities: ‘Sustainable Residential Development and Compact Settlements 2024’ and the ‘Sustainable Urban Housing: Design Standards for New Apartments 2025’ and the Dun Laoghaire Rathdown County Development Plan 2022-2028, in particular Policy Objectives PHP18 and PHP20.</i>	PHP18 seeks to increase the supply of housing and promotes compact urban growth, including development at higher densities, while balancing the need to protect existing residential amenities. PHP20 aims to protect residential amenity where they are adjacent to higher density and greater height infill development. The Apartment Guidelines 2025 no longer deals with density and this is only addressed within the Compact Settlement Guidelines. This site, as discussed in the Statement of Consistency below, would be classified as a City and Urban Neighbourhood due to its proximity to the Luas and good bus services. It is therefore appropriate for development in the density range of 50uph to 250uph. The proposed development, which would result in a reduction in the density of the development

	of the overall site to 159uph, will remain within the appropriate range set by the Compact Settlement Guidelines. 3 storey houses in this location will provide an appropriate transition from the surrounding two storey housing in the wider area up to the 10 storey apartment block in the permitted development. It will also provide a new unit type that will be available to the wider market and not just the rental market. It will provide further choice with the area and is considered to be an appropriate solution and type of development for this area.
Unit Mix:	
<i>Evidence to demonstrate that the unit mix proposed is in accordance with Policy Objective PHP 27 and Table 12.1 of the Dun Laoghaire Rathdown County Development Plan 2022-2028. The LRD Stage 3 Application should provide information on how the Unit Mix will comply with the requirements of the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, 2025; and the Dun Laoghaire Rathdown County Development Plan 2022-2028.</i>	Policy PHP27 Housing Mix encourages the establishment of sustainable residential communities by ensuring a wide variety of housing and apartment types, sizes and tenures are provided throughout the County. Table 12.1 advises that for apartment developments that up to 80% of a development can be studio, one and two bed and seeks a minimum of 20% 3+ bedroom units.
<i>The Planning Authority acknowledges the proposed amendment to replace the previously permitted apartment block with eight semi-detached houses. While no specific concerns were raised during the meeting regarding the change in unit mix or typology, it is noted that the revised proposal introduces a new housing type—four bedroom family homes—which contributes positively to the overall housing mix on the site. <u>This diversification is welcomed in principle, as it aligns with the objectives of the County Development Plan to support a variety of unit types and tenures that reflect evolving household needs.</u></i>	SPPR1 of the Apartment Guidelines 2025 states that “A) with the exception of social housing development, social/ affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.
<i>However, the Planning Authority recommends that any future Stage 3 application should clearly demonstrate how the revised unit mix supports the creation of a sustainable and inclusive residential community. This should include a rationale for the typology change, its impact on density, and how it complements the existing and permitted development. The applicant is also encouraged to provide further detail on how the proposed houses integrate with the wider</i>	B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain mix of bedrooms within the development, except in the circumstances set out above.”

<i>scheme in terms of design, layout, and access to amenities, and to ensure that the development continues to meet the standards set out in national and local planning policy.</i>	The proposal will amend the permitted scheme, which only delivered apartments, and will replace block E with houses. Block E as permitted ranges in height from 3-5 storeys and which comprises a mix of 3no. studios, 41no. one beds and 24 no. 2 beds. The amended development will deliver 8 no. 4 bedroom houses. This will introduce a new typology into the overall scheme which has permission for studios, 1, 2 and 3 bed apartments and no four bed units or houses. As set out in the Opinion, this introduction of 4 bed family homes within the overall development will contribute positively to the housing mix and provides diversification within the permitted scheme. This is fully in accordance with both the County Development Plan and the Apartment Guidelines 2025. It is noted that the proposal will now provide a wider variety of choice in housing types as a result of this amended proposal. The revised unit mix will now deliver: 471 no units in total: -25 no. Studios -256 no. 1 bed units -173 no. 2 bed units -9 no. 3 bed units -8 no. 4 bed units The proposed provision of residential units as amended will now deliver both houses and apartments. It shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends within Dublin. This will enable the delivery of a sustainable, mixed new residential communities and shall ensure the delivery of an appropriate mix including a proportion of larger units on this site. It is therefore fully compliant with the County Development Plan.
Open space and landscaping:	
<i>Evidence (including a Color-coded map showing percentiles of compliance) to demonstrate that</i>	As set out in the Landscape Rationale by NMP it confirms that “As per drg no. LA-7000 of the

<i>the proposed development is in accordance with the standards for Public, Communal and Private open space set out by the relevant provisions under the Guidelines for Planning Authorities documents: Design Standards for New Apartments 2025 and Sustainable Residential Development and Compact Settlements.</i> <i>The LRD Stage 3 Application should also demonstrate how it accords with the Open Space provisions of the Dun Laoghaire Rathdown County Development Plan 2022-2028.</i> <i>Particular efforts should be demonstrated in the application that the existing mature trees are retained. The LRD stage 3 application documents should include a full suite of Arboricultural Documentation including Landscape Plans; Arboricultural assessments and a tree survey.</i>	<i>submitted drawing pack and section number LA-8000 Open Space Strategy, the proposed development demonstrates compliance with required open space %'s, areas and is tabulated and colour coded accordingly. The proposals are in line with best practice guidance as outline in the county development plan and Design Standards for New Apartments, Sustainable Residential and Compact Settlements."</i> <i>It also confirms that "As per drg no LA-1000, LA-1010 AND LA-7000 of the submitted drawing pack and section number 01 to 04 as per drg no LA-8000 the provision of public, communal and private amenity space, within which play, seating, exercise, walking trail gathering spaces have been provided. The plant palette reflects a richness of native species with some exotics to enhance the developments bio-diverse credentials. The drawing set demonstrates through cross section, plan and detail the consideration of interfaces within the site and on its boundaries and the quality to which the applicant is committed to delivering as well as the retention of existing trees and care not to alter the conditions of those on its boundaries. Additionally, the provision of nature based solutions for storm water have been allocated and care not to alter the conditions of those on its boundaries. Additionally, the provision of nature based solutions for storm water have been allocated"</i>. <i>Finally, The Tree File have provided an updated Tree Constraints Plan, Tree Impacts Plan, and Tree Protection Plan along with an Arboricultural Report. These confirm that this proposed amendment will not impact on the tree as permitted and will enable additional public open space, and associated landscaping to be provided as a result of this amendment application.</i>
<i>The Planning Authority welcomes the submission of the updated arboricultural report and acknowledges the increase in public open space as a positive enhancement to the overall scheme. The approach to communal open space, with each block maintaining its own provision, is considered appropriate. Clarification was provided during the meeting that grey-patched areas on the plans represent seating zones,</i>	<i>This is noted and further details have been provided which demonstrate how the proposed new public open space will be integrated into the wider area.</i>

<i>which will remain under private management. The Authority also noted potential limitations for tree planting in rear gardens due to existing canopy cover from neighbouring trees and advises that future applications should consider this in planting strategies. Overall, the landscaping and open space proposals are satisfactory, and future submissions should continue to demonstrate how these areas will be effectively managed and integrated into the wider development.</i>	
Transportation:	
<i>From the Planning Authority's perspective, the applicant is advised that the proposed car parking provision should be clearly contextualised within the Compact Settlement Guidelines. The increase of eight spaces is noted and remains below the maximum standard of one space per unit.</i> <i>The relocation of Sheffield cycle stands closer to the park is recommended, and it is acknowledged that each house will provide its own in-curtilage cycle parking.</i> <i>The Authority emphasises the importance of retaining pedestrian and cycle linkages to Greenmount Lane and Wesley Lawns, and requests that these connections be delivered and fully accessible prior to occupation.</i> <i>Additionally, the carriageway should be tightened to prevent overspill parking, and future submissions should clearly identify refuse truck turning areas and bin storage locations.</i>	Please see the Transport Insights Transport Statement submitted with this application. This report confirms that the application is in accordance with Compact Settlement Guidelines and that the additional eight spaces for the houses is appropriate for this amendment development. Despite the additional spaces, and in line with national and local guidance, the development as a whole, and for this amendment alone, remain below the maximum standard of one space per unit. As can be seen in the Landscape Plan submitted with this application Sheffield cycle stands have been provided close to the park. We wish to confirm that bicycle parking for residents will be provided within the curtilage of the houses. The proposal will not alter the permitted pedestrian and cycle links to Greenmount Lane and Wesley Lawns. These will be delivered in line with the granted permission Ref ACP 312170-21. The carriageway has been reduced in size in accordance with this request to prevent overspill parking. Appropriate turning areas have been provided for refuse trucks. Bins will be stored within the curtilage of each property.
<i>Having regard to the proposed parking provisioning, it is recommended that the applicant provide a report with robust evidence, having particular regard to the criterion in Section 12.4.5.2 Application of Standards (i) Assessment Criteria for deviation from Car Parking Standards and Chapter 3 Climate Change of the Dun Laoghaire Rathdown County Development Plan 2022-2028. The report should also cover the proposed bicycle parking provisioning and accord with the 'Standards for</i>	Please see the Transport Insights Transport Statement submitted with this application. This report confirms that the proposed amendment application is in accordance with Development Plan standards.

<i>Cycle Parking and associated Cycling Facilities for New Developments', DLRCC 2018 and the Dun Laoghaire Rathdown County Development Plan 2022-2028.</i>	
Drainage:	
<i>The Planning Authority requested clarity on how the proposed amendment would integrate with the permitted drainage scheme, particularly regarding outflow and positively drained areas. In response, the applicant submitted updated documentation confirming seamless integration and an increase in positively drained areas due to expanded public open space.</i> <i>An updated Site-Specific Flood Risk Assessment (SFRA) was also provided, confirming no flood risk on-site or off-site. The Authority was satisfied that flood flow paths remain unobstructed and unaffected by the proposed changes. Any future stage LRD 3 application should include evidence to demonstrate that the proposed drainage infrastructure for the proposed development and the Site-Specific Flood Risk Assessment (SSFRA) is carried out in accordance with the requirements of the Dun Laoghaire Rathdown County Development Plan 2022-2028. Please refer to Appendix A Drainage Planning Report for detail on what is required to be submitted</i>	<i>Please see the Applicant's Response to LRD Opinion by DOBA. This confirms that "The permitted wastewater drainage system granted under ABP-312170-21 remains unchanged save for the amendments related to the wastewater network located to the south-west of the subject site associated with the proposed 8 units replacing Block E as illustrated in Figure 2 below. The proposed wastewater infrastructure associated with the amended development will connect to the wastewater currently being constructed in accordance with Uisce Eireann Connection Agreement CDS2400627001. Overall, the peak wastewater discharge for the whole development will be reduced to 13.25 l/s from the permitted discharge of 14.93 l/s. The reduction in wastewater discharge arises from replacing Block E with the proposed 8-unit amendment.</i> <i>The permitted water supply system granted under ABP-312170-21 remains unchanged save for the amendments related to the water supply network located to the south-west of the subject site associated with the proposed 8 units replacing Block E as illustrated in Figure 3 below. The proposed water supply infrastructure associated with the amended development will connect to the water infrastructure currently being constructed in accordance with Uisce Eireann Connection Agreement CDS2400627001. Overall, the peak water demand for the whole development will be reduced to 13.56 l/s from the permitted peak rate of 15.56 l/s. The reduction in water supply rates arises from replacing Block E to the proposed 8 unit amendment.</i> <i>The Applicant has submitted a Pre-Connection Enquiry (CDS25005360) to Uisce Eireann for the proposed amended 8 units. Uisce Eireann have confirmed via a Confirmation of Feasibility (CoF) that connections to the existing wastewater network are feasible without infrastructure upgrades. The Applicant further notes that Uisce Eireann issued a Statement of Design</i>

	Acceptance that can be reviewed in Appendix A.”. It also confirms that “The results of the amended planning application simulation indicate that the storage as provided in the granted application of 250.9m3 is sufficient. There is therefore no additional storage provision required for the proposed amended planning application.” Finally, it confirms that “The site has been assessed in accordance with the “The Planning System and Flood Risk Management” Guidelines. As part of the sequential test, the OPW flood hazard maps have been consulted, as have the Catchment Flood Risk Assessment Maps produced by the OPW. In all cases it was found that the development is at low risk of flooding and the development is deemed appropriate within the proposed site location.”
Water/Wastewater capacity:	
From the Planning Authority’s perspective, the applicant is advised that any future application should continue to demonstrate how the proposed development integrates with existing water and wastewater services. This should include confirmation from relevant service providers, such as Irish Water, that adequate capacity exists to accommodate the revised scheme, and that no adverse impacts on service provision will arise.	Please see the Applicant’s Response to LRD Opinion by DOBA. This confirms that “The permitted wastewater drainage system granted under ABP-312170-21 remains unchanged save for the amendments related to the wastewater network located to the south-west of the subject site associated with the proposed 8 units replacing Block E ... The proposed wastewater infrastructure associated with the amended development will connect to the wastewater currently being constructed in accordance with Uisce Eireann Connection Agreement CDS2400627001.”

The Opinion goes on to request that “The Applicant is advised that the following specific information, as provided by Article 16A(7) of the Planning and Development Regulations, 2001-2022, should also be submitted with any LRD application for permission for the proposed development:”

Information Requested	Applicant Response
A report should be submitted that specifically addresses the proposed materials and finishes for the amended scheme, with particular reference to the houses now proposed. This should include detailed information on finishes, landscaped areas, pathways, entrances, and boundary treatments. Given that the application relates to a minor amendment to an extant permission currently under construction, the report should demonstrate how the revised elements will integrate with the permitted	Please see the Architects Design Statement which details the materials and finishes within the proposed development. NMP Landscape drawings and rational also provide detailed information on finishes, landscaped areas, pathways, entrances and boundary treatments. Both the contextual/ contiguous elevation drawings provide by Reddy Architecture and the

<i>development. Emphasis should be placed on ensuring high-quality and sustainable finishes that contribute to a distinctive character for the overall scheme. The documentation should also address the long-term management and maintenance of the proposed development.</i>	verified views submitted with this application clearly demonstrate how the development will integrate with the permitted scheme. A Building Life Cycle Report is included with this application. It is worth noting that the areas of public open space will be managed by a management company, along with the wider site currently under construction. Each house will be the responsibility of individual home owners.
<i>A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, that would assist in understanding the relationship between the proposed development and its context.</i>	Please see the Architects Pack by Reddy Architecture and Urbanism which includes floor plans, elevations and contiguous sections. In addition, please see the Verified Views by Digital Dimensions which demonstrate the relationship between the proposed new houses in place of block E and the wider context. It also provides details of the permitted block E so that a direct comparison between the permitted and proposed can be understood. Finally, Digital Dimensions also include new CGI's within their report so that an understanding of how they units will look once completed is also provided.
<i>A Building Lifecycle Report.</i>	Please see the Building Lifecycle Report by Reddy Architecture and Urbanism.
<i>A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.</i>	Please see the Transport Statement by Transport Insights.
<i>A quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.</i>	Please see the NMP Landscape Architects drawing pack and rationale. As per drg no. LA-7000 of the submitted drawing pack and section number LA-8000 Open Space Strategy, the proposed development demonstrates compliance with required open space %'s, areas and is tabulated and colour coded accordingly. The proposals are in line with best practice guidance as outline in the county development plan and Design Standards for New Apartments, Sustainable Residential and Compact Settlements. It is noted that no Communal Open Space is required for these houses. The COS for the apartment blocks A-D remains unchanged and delivers c.6,460sqm of open space which is

	significantly in excess of the 3,291sqm required for these blocks. The Public Open Space will increase as a result of this proposal 13,311.00sqm of open space, which equates to c. 31.7% of the site. This is an increase in area as a result of this proposed development amending block E from apartments to houses.
<i>Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site, discharge rates equal to greenfield sites, integration of appropriate phased works.</i>	Please see the Infrastructure Report and the Response to LRD Opinion by DOBA along with the Landscape Rationale by NMP which indicate all attenuation and SuDS features within this proposed amendment application area. It confirms that the discharge rates are appropriate to the site.
<i>Submission of a Taking in Charge Map.</i>	No area is proposed to be taken in charge as a result of this amendment. It will be all managed by a private management company. As a result there is no map or in plan indicating areas to be taken in charge.
<i>Submission of a Construction Management Plan.</i>	A Construction and Environmental Management Plan by DOBA is submitted with this application.
<i>A letter from Irish Water confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no more than 6 months before the date of lodgement of the LRD application.</i>	The Applicant has submitted a Pre-Connection Enquiry (CDS25005360) and received a Confirmation of Feasibility (CoF) on 29 July 2025. We would further note that Uisce Eireann issued a Statement of Design Acceptance on the 2nd of October 2025. Please refer to Appendix A of LRD Applicant's Response to LRD Opinion by DOBA for ease of reference.
<i>A report detailing how the proposed development accords with the objectives and policies set out in Chapter 3 of the County Development Plan, Climate Action, in achieving a sustainable planning outcome to include any proposals they may have for e.g. passive housing, renewable energy, solar and wind energy infrastructure, district heating etc</i>	Please see the Climate Action and Energy Statement by Fallon Design M+E Engineering submitted with this application. This confirms that <i>"The proposed development will be constructed in accordance with Part L 2022 of the Building regulations and all residential units shall be certified A rated BER's to a Nearly Zero Energy Building standards. This development's fabric first design strategy will result in lower climate impact from a reduced overall heating requirement and energy consumption."</i>

S247 Meeting comments

A meeting was held between the Design Team and Dun Laoghaire Rathdown County Council on the 627th March 2025. The following items were discussed and the response by the design team is set out below.

DLR CoCo comment	Applicant response
Transportation	

Car parking provision • impact on the overall ratios. There is an increase in car parking by 8 additional car parking spaces. • Car parking needs to be set out in the context of the Compact Settlement Guidelines, with a max space is 1 space per unit.	The proposal ensures that each houses has its own carparking space within the curtilage of the development. As a result, while the number of cars available for the apartments will remain unchanged from the permitted scheme, the ratio of car parking for the remaining apartments will increase from c. 0.32 per unit to 0.37, thereby increasing the car parking ratio across the site. This is less than the maximum of 1 per space residential unit, and is a slight increase over the permitted scheme.
Bicycle parking • Sheffield stands should move closer the park • houses all provide own cycle parking	There are Sheffield stands proposed close to the park. All houses have in curtilage parking.
General comments • Future pedestrian and bicycle Linkage through the development to Greenmount Lane & Wesley Lawns should be retained and will require these are delivered and useable prior to occupation. • Tighten up the carriageway to the front of the houses, and prevent overspill parking • Refuse truck turning areas need to be accommodated, location of bins need to be identified.	There is no proposed change to the permitted pedestrian and cycle linkages around the site. The carriageway has been reduced in size and the public open space has increased. A turning head has been provided which can accommodate refuse truck turning.
Drainage	
• Demonstration how the permitted and proposed will interact between the two in detail, and detail any changes proposed • Some of the conditions on the permitted scheme relate to the outflow and positively drained areas • A SFRA will be required • Flood flow path areas should not be obstructed and not impacted by	Please see the pack from DOBA Consulting engineers. This demonstrates how the proposed amendment will merge seamlessly with the permitted scheme. Due to the increase in public open space there is an increase in positively drained areas. A SFRA update is provided in the DOBA Consulting Engineers report which confirms that this site is not in a flood risk area and nor will it increase flood risk outside of the site. The flood flow path has not been obstructed or impacted.
Planning	
• Scale and massing in this location addresses the concerns previously raised by DLR • No risk of overshadowing/ overbearing/ overlooking	Noted re scale, massing and impact on adjoining neighbours. The development statistics are set out above.

• Tabulate the changes independently and as part of the wider scheme • How the boundary treatment will be implemented should be set out in any forthcoming application. The opening up of the pinch point is welcomed	The boundary treatment will be to retain the permitted boundary treatments in this location.
Landscaping/ open space provision	
• Arborist report required • No real concerns or major issues • public open space provision is increased • communal open space provision – each block washed its own face	The Tree File has provided updated tree survey and arborist report submitted with this application. Noted that there are no significant concerns in this regard, and that the increase in public open space is welcomed. Each communal area for the remaining blocks is appropriate in size as demonstrated above.

Chapter 7 Statement of Consistency

Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities, 2024

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Sustainable Residential Development and Compact Settlement Guidelines will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this LRD planning application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Urban Neighbourhood.

*The ‘City – Urban Neighbourhoods’ category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that **residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.***

Section 3.4 provides further advice on *Refining Density* and includes a two-step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies that *while densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are ‘open for consideration’ at accessible suburban and urban extension locations to the maximum set out in Section 3.3.*

Table 3.8 (below) sets out definitions for terms used to define accessibility to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Figure 31- Table 3.8 - Accessibility

Policy and Objective	Response
3.1 and Table 3.1 It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.	This site is within 1,000m of the Luas Balally stop and the site is therefore classified close to a High Capacity Public Transport Node or Interchange within a City – Urban Neighbourhood. The density appropriate to this site is identified as being in the range of 50uph to 250uph. Therefore, the proposed density of 159 uph net is considered appropriate to this accessible, urban location.
4.1 It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.	Transport Insights have confirmed in their report that the site layout for the amended block E is appropriate to this location. It is noted that the wider site, as permitted, is also in accordance with DMURS.
4.2 It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.	Please see the assessment in the table directly below this which confirms the development is in accordance with Section 4.4
5.1 It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in	The site is located within the administrative area of Dun Laoghaire Rathdown County Council. The site is zoned objective A and also has an institutional objective for this site as set out in the DLR County Development Plan 2022-2028. The proposed amendment application will increase the provision of public open space to the south of the site adjoining the permitted

exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations. In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas. In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site	new area of public open space. The proposed amended development will deliver Public:c.13,455.52sqm (c.12347.52sqm + 1,108sqm) Communal Open Space c.6,470 sqm There is therefore ample provision of Open space throughout the development in line with this policy and the County Development Plan. Full details of the site's public open space and amenity strategies are detailed in the enclosed Landscape Masterplan prepared by NMP.
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Section 4.4 Key Indicators of Quality Design and Placemaking Assessment

Key Indicators	Evaluation of consistency
Sustainable and Efficient Movement In order to meet the targets, set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public	This permitted development provides new cycle and pedestrian routes within the development which will not change as a result of this amendment. The local area has many cycle lanes and designated paths for the use of cyclists along with the proposed developments

transport. Local authorities should plan for the development of well-connected neighbourhoods and a distribution of activities to ensure that day-to-day services and amenities are accessible within walking distance of homes and workplaces. In addition to sustainable travel objectives, this will ensure that settlements are vibrant, and when applied alongside the principles of Universal Design, will allow vulnerable users to move about and access services with ease. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.2 also refers): (a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate. (b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible. (c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists. (d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments. The Design Manual for Urban Roads and Streets (DMURS) sets out statutory guidance and standards in relation to the design of individual streets and the use of traffic management and	plans to provide additional cycle infrastructure. It is a site that is well located close to existing public transport and facilities along the Wyckham Bypass/ Ballinteer Road/ Sandyford Road along with Balally Luas all within 1km from the site. This proposed development, as already permitted, creates an attractive, highly permeable urban environment which provides new links through the development connecting to the wider area. The permitted development has ease of access to existing services and the proposed amendment will not alter this. The provision of a high ratio of cycle parking will encourage a modal shift to active travel. Use of Cars is minimised within the development as permitted. They are restricted to the access roads only and do not have access to the public open space areas creating a largely car free development. The revised proposal will only increase the level of parking by 8 no. additional cars within the development. The ratio of car parking will rise to 0.37 to each apartment (permitted scheme is 0.32), but will continue to encourage a modal shift and reducing reliance on car parking. The permitted design and layout, which remains unchanged is designed in accordance with DMURS.
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placemaking measures to manage traffic and promote safer and more vibrant streets (Section 2.3 refers). The application of DMURS in all new developments will be key to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements. Local Authorities should also consider preparing active travel plans or sustainable mobility plans that focus on improving ease of movement in established areas to important destinations such as schools, parks, shops and public transport. This can be of particular benefit where a new transport service or new destination such as a school is proposed	
Mix and Distribution of Uses These Guidelines promote a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of mixed use neighbourhoods. Ensuring that there is a good mix and distribution of activities around a hierarchy of centres has many benefits in terms of reducing the need to travel and creating active and vibrant places. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.3 also refers): (a) In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development. (b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop	The permitted development provides a mix of uses including creche and cafe and is also in proximity to a range of land uses, reducing the need to travel and creating a sustainable neighbourhood. This site, as permitted, will provide a large new public park within the development. This proposal will increase the public open space further, enhancing the permitted development. This permitted development, and as proposed to be amended, will provide a new community facilities in the form of parks and creches within the development. This site is ideally located next to multiple bus routes as well as the Luas. It is also adjacent to existing schools and amenities as well as the Dundrum Town Centre. This site will deliver a sustainable community through the introduction of a new population along with the permitted facilities that are under construction such as residential amenity facilities, communal space, public open space, and creche. The proposed amendment will introduce a larger 4 bed family unit type to complement the permitted apartment development which

living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved through the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres. (c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout. (d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access). (e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport. (f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	includes studio, 1, 2 and 3 bed apartments. This will provide more choice and variety to the permitted scheme along within the wider area.
Green and Blue Infrastructure Green and Blue Infrastructure (GBI) is a strategically planned network of natural and seminatural areas designed and managed to	Noted. Please see the DOBE Infrastructure Design Report. This will remain mostly as permitted with only minor amendments to the development.

deliver a wide range of ecosystem services, while also enhancing biodiversity. Ecosystem services include water purification, enhancing air quality, space for recreation and climate mitigation and adaption. In settlements, GBI includes features such as rivers and canals, coastline and coastal habitats, green spaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans. Development plans should include (or be informed by) a Green and Blue Infrastructure Strategy and include objectives for the conservation, restoration and enhancement of natural assets and GBI networks. These objectives can be refined further in local statutory plans and guidance documents in response to local circumstances.

The following key principles should be applied in the preparation of local plans and in the preparation and consideration of individual planning applications, (Figure 4.4 also refers):

(a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts.

(b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below.

(c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised. Planning authorities should adopt a nature based approach to urban

drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. (d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.	
Public Open Space All statutory development plans should include a strategy for the provision of an integrated hierarchy of public open spaces and corridors across the plan area to meet the needs of the planned population. The availability of accessible and high quality public open spaces within all settlements that are part of a wider GBI network will be important in creating sustainable settlements. This should include a hierarchy of multifunctional public open spaces and corridors that are accessible and provide for the recreational needs of the planned population, while also creating space for nature and ecosystem services. The public open space strategy in the development plan should include objectives relating to the provision of: (a) Regional, district and local level public parks and greenways. These are generally publicly owned and managed parks e.g. by a local authority or public body such as the OPW or Waterways Ireland. (b) Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development. The objectives of the development plan public open space strategy should be informed by the objectives of the RSEs and any regional GBI strategy. The form, size and distribution of new public open spaces should be plan led and take account of open space provision within the area and broader nature conservation and environmental considerations. While there is no set standard of open space provision per settlement in Ireland, it is	The Public Open Space will remain as permitted, with additional public open space provided to the front of the 8 houses, increasing the overall area of public open space. The new public open space will also provide new pedestrian and cycle routes to the wider area. The layout and design of the permitted open space integrates with the existing area, connecting into Balalley Park. It enhances the existing features on the site, while providing additional planting to create more attractive and diverse area to promote the biodiversity of the area. The permitted, and proposed amendment, will result in the delivery of a new public park within this area. The proposed public open space is in full compliance with the requirements of the Development Plan.

recommended that opportunities to enhance the overall quantum of public open space and to restore and enhance nature and biodiversity within settlements is harnessed where opportunities arise, for example, through regeneration or urban enhancement projects and in new development areas. The level of provision should take account of the needs of the planned population, protected zones, landscape character and statutory obligations to protect certain habitats and biodiversity. Ideally, all residents within a settlement will have access to a multi-functional public open space within walking distance of their home. Public open spaces should be designed to cater for a range of active and passive recreational needs (including play, physical activity, active travel, cultural uses and community gardens and allotments, as appropriate to the context) and to conserve and restore nature and biodiversity. It will be necessary to balance improved access to natural assets with the need to protect the environment as increased levels of tourism, sports and leisure can impact negatively on nature and biodiversity. In addition, the provision of public open spaces should not result in any direct or indirect adverse effects on the integrity of European Sites. Chapter 5 includes minimum requirements for the provision of open space in new residential developments, based on the net site area	
Responsive Built Form Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces. This is a key element in ensuring the creation of attractive and well-designed settlements. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.5 also refers): (a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points. (b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in	Noted. The proposed development, will provide a 4 pairs of 3 storey semi detached houses in place of a 3-5 storey L-Shaped apartment block. This proposed amendment will provide a transition from the surrounding area to the permitted larger apartment blocks which rise up to 10 storeys over basement. The layout of the proposed new units, and the permitted buildings provides clear legibility to the development. Blocks A-D of the permitted development, will not be altered as a result of this amendment. The new buildings in place of block E will open up the site providing further connections into the permitted scheme. This will then in turn

particular should respond positively to and enhance the established pattern of development (including streets and spaces). (c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible. (d) Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages. (e) New development should embrace good modern architecture and urban design that is innovative and varied and respects and enhances local distinctiveness and heritage. (f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable	connect into the wider area via the permitted pedestrian and vehicular routes through the sit currently under construction. The proposal will provide an attractive new set of houses in the southwestern corner of this development. The scheme, as proposed to be amended and the permitted development under construction are considered an exemplar development showcasing contemporary architecture. A varied, high quality palette is proposed for the development which creates a distinctive attractive development within the area.
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<i>SPPR 1 – Separation Distances</i>	Evaluation of consistency
<i>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</i> <i>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</i>	The proposed development complies with this policy. The proposed blocks and housing units have separation distances greater than 16 metres between opposing windows. Please refer to the Site Layout Plan prepared by Reddy Architecture & Urbanism for further details.
<i>SPPR 2 – Private Open Spaces for Houses</i>	Evaluation of consistency
<i>It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:</i> <i>1 bed house: 20 sq.m</i> <i>2 bed house: 30 sq.m</i> <i>3 bed house: 40 sq.m</i> <i>4 bed + house: 50 sq.m</i> <i>A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is</i>	The proposed houses all comply with the minimum private open space standards as set out in the HQA. Please refer to the Housing Quality Assessment prepared by Reddy Architecture & Urbanism for further details.

<i>provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.</i>	
SPPR 3 – Car Parking	Evaluation of consistency
It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.	This site is considered an accessible location in a city centre/ urban neighbourhood. The proposals is for one parking space per house. The overall parking site wide is .037 spaces per unit. Therefore this proposal is fully compliant with this application.
SPPR 4 – Cycle Parking and Storage	Evaluation of consistency
<i>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:</i> <i>(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future</i>	The proposal provides 32 cycle parking spaces, 4 per house, and 4 visitor parking spaces. this is in accordance with this policy. The storage areas are safe, secure and overlooked. This is fully compliant with the policy.

<i>enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.</i> <i>(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.</i>	
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Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

The Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025, support compact and sustainable urban growth by aligning apartment development with updated national planning policies and housing strategies. They reflect the National Planning Framework and Housing for All and incorporate the Sustainable Residential Development and Compact Settlement Guidelines 2024.

It is noted that this proposed amendment application is for the replacement of Block E apartments with 8 no. houses. Therefore, these guidelines do not apply to the area the subject of this application. However, it is further noted that the LRD Opinion raises queries in relation to the Apartment Guidelines 2025, so in the interest of thorough consideration of the wider scheme, blocks A-D have been considered in the light of these guidelines. However, the proposed amendment is not seeking to alter blocks A-D of the permitted development.

These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2023, and introduce updated design parameters for apartment mix, space standards, amenity provision, and redevelopment of existing buildings. Policies contained within these Guidelines now only include matters relating to:

- *Apartment mix;*
- *Internal space standards for different types of apartments;*
- *Dual aspect ratios;*
- *Floor to ceiling heights;*
- *Apartment to stair/lift core ratios;*
- *Storage spaces; and*
- *Amenity spaces including balconies/patios.*

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to.

SPPR 1	Evaluation of consistency
(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no	The permitted development, which relates to blocks A-D, will provide 463 no apartments with an extant permitted mix as follows: -25 no. Studios -256 no. 1 bed units -173 no. 2 bed units -9 no. 3 bed units

restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms. (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.	This will remain unchanged as a result of this proposed amendment to block E. The permitted mix in blocks A-D is fully compliant with SPPR1.
SPPR 2	Evaluation of consistency
The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed those set out below: Studio Apartment (1 person): 32 sq.m 1-Bedroom Apartment (2 persons): 45 sq.m 2-Bedroom Apartment (3 persons): 63 sq.m 2-Bedroom Apartment (4 persons): 73 sq.m 3-Bedroom Apartment (4 persons): 76 sq.m 3-Bedroom Apartment (5 persons): 90 sq.m These floor area parameters shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.	Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size, therefore in line with SPPR 2.
SPPR 3	Evaluation of consistency
Minimum Number of Dual Aspect Apartments in Apartment Schemes In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement. (ii) For building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25 hectares, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above. This is subject to the achievement of overall high design quality in other aspects.	Dual Aspect is 49% in the development, the current proposal exceeds these standards as set out in the Housing Quality Assessment.

SPPR 4	Evaluation of consistency
Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality.	Ground Floor apartments floor to ceiling height will be a minimum of 2.7m
SPPR 5	Evaluation of consistency
There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.	The development is compliant with SPPR 5.
SPPR 6	Evaluation of consistency
The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	Noted. It remains compliant with SPPR6.

EVALUATION OF CONSISTENCY

The permitted development of blocks A-D remain unchanged. These units remain in compliance with the Apartment Guidelines 2025.

LOCAL PLANNING POLICY

Dún Laoghaire-Rathdown County Development Plan, 2022-2028

The site is located within the administrative area of Dun Laoghaire Rathdown County Council and is therefore subject to the land use policies and objectives of the County Development Plan 2022-2028. The County Development Plan 2022-2028 came into effect on the 21st of April 2022.

Zoning

The subject site is predominantly zoned Objective A *“To provide residential development and improve residential amenity while protecting the existing residential amenities.”* The eastern portion of the subject site is zoned Objective F with the objective to *“To preserve and provide for open space with ancillary active recreational amenities.”*

Zoning Objective A allows for Childcare Services, Open Space and Residential uses to be permitted in principle on this land use zoning. Please refer to the following table which outlines uses which are *‘permitted in principle’* and *‘open for consideration’* within Zoning Objective A lands.

Permitted in Principle
Assisted Living Accommodation, Community Facility ^a , Childcare Service^a , Doctor/Dentist etc. ^a , Education ^a , Health Centre/ Healthcare Facility ^a , Open Space , Public Services, Residential , Residential Institution, Travellers Accommodation.
Open for Consideration
Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark ^b , Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light,

Part Off-License, Office Based Industry^c, Offices less than 200sq.m^c, Offices in excess of 200 sq.m.^d, Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery.

a: Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'.

b: Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.

c: less than 200sq.m.

d: Only applies to A zoned lands subject to Specific Local Objective 122.



Evaluation of Consistency

The proposed development will provide an amendment to a permitted strategic housing development on this land zoned for residential development. The proposal is to replace 68 apartment with 8 no. houses on residentially zoned lands. Therefore, the proposal is considered in accordance with the land use zoning on the site.

Policy/Objective

Evaluation of Consistency

Core Strategy	
Policy Objective CS11 – Compact Growth It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES)	The proposed development will provide a higher density residential development within the Dun Laoghaire Rathdown County Council boundary, on appropriately zoned land. This development will also contribute to the compact growth of Dundrum, as it located in an existing residential area.
Neighbourhood – People, Homes, and Place	
Overarching Policy Objective PHP1 That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to: • Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. • Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment. • - Embed the concept of neighbourhood and community into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation, and employment opportunities.	The proposed development will increase the housing stock within the county. It aligns with national, regional and county policy, including Chapter 2 and Appendix 2 of the development plan to provide for more residential units in the country. The proposed development includes public open space that will serve future residents and the surrounding community. The proposed development will also support existing community facilities located in the Dundrum area.
Policy Objective PHP2: Sustainable Neighbourhood Infrastructure It is a Policy Objective to: - Protect and improve existing sustainable neighbourhood infrastructure as appropriate. - Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES. - Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.	The amended development as proposed a sustainable community that integrates into the existing residential neighbourhood and provides for the housing needs of a broad range of lifestyle stages. It will provide residential design that inherently prioritises sustainable modes of transport and a residential layout that ensures high levels of amenity, security and convenience with open spaces and services provided on site or in proximity.
Policy Objective PHP3: Planning for Sustainable Communities It is a Policy Objective to:	

- Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide' and any amendment thereof. - Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2). - Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/ redevelopment areas and existing residential neighbourhoods. - Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.	
Section 4.3 Homes 4.3.1 Delivering and Improving Homes The provision of new homes will be encouraged in suitable locations across the County that support sustainable development (consistent with NPO 33 of the NPF). In this regard, housing growth in DLR will occur in either of the following: - Existing built up areas, promoting compact urban growth through the development in the form of infill development of brownfield sites. - Creation of new residential communities (refer Core Strategy Map, Figure 2.9, Chapter 2) Housing delivery should have regard to the capacity of all required enabling infrastructure including physical infrastructure such as transport, water and drainage, and social infrastructure. Housing delivery should not simply be a matter of providing new residential units, rather it should result in the provision of new and/or enhanced communities and neighbourhoods with high quality design and the creation of attractive places to live being the focus of every development. Detail with regard to design is set out in Section 4.4 'Place'. In addition to the delivery of new homes within the County, many residents may wish to improve or adapt	The proposed development will provide sustainable residential development in a suitable location. The subject site is within an established residential area and will promote to the compact growth of the area. The proposal will positively contribute to the local community through its incorporation of quality design, public open space. A sense of place is to be achieved within the development as great consideration has been given to the public realm. All of the proposed houses are made to be easily accessible by individuals with disabilities without the need for modifications or adaptations. This scheme incorporates accessibility in design and layout to accommodate the changing needs of the inhabitants.

their existing homes to suit the needs of their changing circumstances.	
Policy Objective PHP20: Protection of Existing Residential Amenity. It is a Policy Objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.	The proposed development is set back from the existing residential units surrounding the site which will ensure the residential amenity of these existing dwelling is not unduly impacted.
Policy Objective PHP25 – ‘Housing for All – A new Housing Plan for Ireland, 2022’ It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in ‘Housing for All – A new Housing Plan for Ireland, 2021’	The proposed residential units are designed to be easily accessible by individuals with disabilities without the need for modifications or adaptations. This scheme incorporates accessibility in design and layout throughout to accommodate the changing needs of the inhabitants.
Policy Objective PHP26 – Implementation of the Housing Strategy It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 - 2028.	The amended proposal will 463 apartments and 8 4-bed house units. This housing mix will increase the quantum of smaller housing units available in the area, which reflects the emerging household size in the area.
Policy Objective PHP27: Housing Mix It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.	
Policy Objective PHP35: Healthy Placemaking It is a Policy Objective to: - Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. - Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013). - Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.	The proposed amendment to block E, changing apartments to houses, will provide additional public open space and routes through the permitted development. The new houses will provide a new typology on the site, increasing the character within the wider area. This will contribute to the placemaking of the area by creating an attractive, legible development along Marmalade Lane that is finished with high quality materials. The development encourages an active lifestyle with outdoor spaces and play areas inclusive of all. Walking and cycling are promoted as part of this development with bike storage provided for both residents and visitors.
Policy Objective PHP36: Inclusive Design & Universal Access	

It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.	The proposed residential units and blocks are made to be easily accessible by individuals with disabilities without the need for modifications or adaptations. This scheme incorporates accessibility and inclusivity in design and layout to accommodate the changing needs of the inhabitants.
Policy Objective PHP37: Public Realm Design It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.	The public realm is designed to ensure equal accessibility for persons of various ages and physical abilities.
Policy Objective PHP42: Building Design & Height It is a Policy Objective to: Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).	The architectural design is modern and visually interesting. The proposed amendment replaces a 5 storey structure with 3 storey semi detached housing. This will result in additional variety of the character and building height within the context of the permitted development. The three storey housing will provide an appropriate transition from the existing housing in the wider area to the taller permitted apartments in blocks A-D. The proposed height and design of this amendment is appropriate to the wider area and the permitted development.
Transport and Mobility	
Policy Objective T11: Walking and Cycling It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm permeability improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)	Pedestrians and cyclists have been prioritised in this scheme, with facilities for both incorporated into its design. The proposed development encourages use of sustainable modes of transport with its permeability.
Policy Objective T12: Footways and Pedestrian Routes It is a Policy Objective to maintain and expand the footway and pedestrian route network to provide for accessible, safe pedestrian routes within the County in accordance with best accessibility practice. (Consistent with NPO 27 and 64 of the NPF and RPO 5.3 of the RSES)	The development proposals will provide additional routes within the site. The proposal will not alter any of the permitted routes into the wider area.

Policy Objective T19: Carparking Standards It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.	Car parking serving the subject development is provided within the on-site car park located within the driveways of each of the houses. It will provide one car parking space per unit. This provision of 1:1 car parking space is in accordance with Development Plan policy.
Policy Objective T31: Accessibility It is a Policy Objective to support suitable access for people with disabilities, including improvements to transport, streets and public spaces. Accessibility primarily concerns people with reduced mobility, persons with disabilities, older persons and children. (Consistent with RPO 9.1 and 9.10 of the RSES)	The proposed amendment has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
Open Space, Parks, and Recreation	
Policy Objective OSR4: Public Open Space Standards It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2020).	The proposed development has allocated c.29.44% of the gross site area and (41.7% of net site area) for Public Open Space, which is greater than that required under Section 12.8.3.1 of the Development Plan. The public open space has been designed to maximise functionality.
Heritage and Conservation	
Policy Objective HER7: Record of Protected Structures It is a Policy Objective to include those structures that are considered in the opinion of the Planning Authority to be of special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest in the Record of Protected Structures.	There are no protected structures on the subject lands however the proposed development is located immediately beside sites of architectural heritage value, which are Protected Structures. Gort Muire (RPS No. 1453) is a historic house, built in 1870, and referred to as 'Gortmore' on historic maps. Gort Muire Gate Lodge and Gates are also Protected Structures (RPS No 1446), but these are separated from the site by Wyckham Way (R826).
Development Management	
12.1.1.2 Design Statements A Design Statement which is an outline of the proposal's context and aims, and how it responds to Development Plan objectives and surroundings, should be submitted for all applications of 1000+sq.m. commercial development or applications of 30+ residential units (refer also to Policy Objective PHP44 and Section 12.3.1 below).	Please refer to Architectural Design Statement prepared by Reddy Architecture + Urbanism.
12.1.1.3 Landscape Plans Planning applications for 1000+sq.m. commercial development, 10+ residential units, or smaller	Please refer to Landscape Design Statement and associated drawing prepared by NMP landscape architects.

developments (as deemed appropriate by the Planning Department), should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority).	
12.1.2 Impacts on the Environment All Planning applications undergo EIAR screening or preliminary assessment	An EIAR Addendum has been provided and is submitted with this application.
12.3.1 Quality Design It is a Policy Objective to promote high quality design and layout in all new development. Whilst this Section refers more specifically to design relative to residential development, the principles detailed can be applied to any form of development. A core aim of land-use planning is to ensure that new residential developments offer a high quality living environment for residents, both in terms of the standard of individual dwelling units and in terms of the overall layout and appearance of streets and outdoor spaces. In considering applications for new developments the Planning Authority will refer to Government guidelines that offer specific guidance in relation to design, including those listed in Appendix 12.	The proposed development will be of high-quality design and will provide a high standard of living for future residents.
12.3.1.1 Design Criteria The objective of DLR County Council is to achieve high standards of design and layout to create liveable neighbourhoods. The following criteria will be taken into account when assessing applications: - Land use zoning and specific objectives contained in this Plan and any Strategic Development Zone / Local Area Plan / Urban Framework Plan / non-statutory planning guidance adopted by the Council. - Compliance with other policy requirements contained within the Plan. - Consistency with any/all relevant National and Regional policy objectives. - Synergies with adjoining complementary uses and land use zoning objectives. - Density - Higher densities should be provided in appropriate locations. Site configuration, open space requirements and the characteristics of the area will have an impact on the density levels achievable. - Quality of the proposed layout and elevations, the quality of the residential environment will be of primary significance in determining the acceptability of planning applications. Layouts, elevations, and plan form must be designed to emphasise a 'sense of place' and community, utilising existing site	The proposed amendment is predominantly located on suitably zoned lands of Objective A - <i>'To provide residential development and improve residential amenity while protecting the existing residential amenities'</i>. The proposed amendment will provide for additional 4 bed units within the overall permitted development resulting in a unit mix of the development includes 25 no. studios, 256 no. 1-beds, 173 no. 2-beds, 9 no. 3-beds, and 8 no. 4-bed houses. This is inline with the objective of the Development Plan to provide an appropriate mix of smaller and larger properties within each development. The proposed scheme has been assessed against national, regional, county and local policy. The proposed density of development is deemed acceptable, and similar to the permitted scheme, and will achieve the aims of delivering optimal quantum of residential units at this appropriate location.

features, tree coverage and an appropriate landscape structure. - Levels of privacy and amenity, the relationship of buildings to one another, including consideration of overlooking, sunlight/daylight standards and the appropriate use of screening devices. - Quality of linkage and walking and cycling permeability – to adjacent neighbourhoods and facilities and the nature of the public realm/streets and spaces. Walking and cycling permeability shall be maximised at every opportunity. - Accessibility and traffic safety - proximity to centres and to public transport corridors, existing and proposed. - Quantitative standards - set out in this Chapter and/or referenced in Government guidelines. - Safety and positive edges to the public realm - opportunities for crime should be minimised by ensuring that public open spaces are passively overlooked by housing and appropriate boundary treatments applied. - Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public or communal open space. - Quality of the pre-existing environmental sound environment. - Context - having regard to the setting of the site, the surrounding character, streetscape, and the impact of any proposed development on the development potential of adjoining sites. - Variety of house types and unit size. - Variety in layout through providing different lengths and types of residential roads, mixes of ‘cul-de-sac’, loop roads, set-back road sections, loose grid layouts and similar. - Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged. - Roofscape, plant and green roofs.	Private amenity space is provided for each apartment and house in line with standards.
12.3.3 Quantitative Standards for All Residential Development Applications for residential schemes shall comply with all relevant requirements set out in PHP20: Protection of Existing Residential Amenity (see Section 4.3.1.3).	This proposed development accords with these requirements as set out below.

12.3.3.1 Residential Size and Mix

In order to demonstrate compliance with Policy Objective PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County. Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Council Housing Department.

The proposed provision of residential units (both houses and apartments) shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/ or within the County. New residential communities (as set out in the Core Strategy and Figure 2.9 of the Core Strategy Map) shall ensure an appropriate mix including a proportion of larger units. Applications received in both new residential communities and within the residual built up area shall include:

- Details of existing and permitted unit types within a 10-minute walk of the proposed development.
- A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.
- A site and/or floor plans that clearly identify proposed units that:
 - o Are designed and located having regard to the needs of older people and/or persons with a disability.
 - o Are designed having regard to the concept of lifetime adaptable and/or multi-generational homes.
- A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.
- No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types.

Table 12.1 sets out the mix requirements for apartment developments. Duplexes are considered to be apartments for the purposes of mix.

This is a proposed amendment to a wider development. It will replace 68 no. apartments with 8 no. 4 bed houses, therefore providing a 100% larger houses within this site.

However, the proposed amendment unit mix of the wider development will result in a mix of 25 no. studios, 256 no. 1-beds, 173 no. 2-beds, 9 no. 3-beds, and 8 no. 4-bed houses.

This will, in accordance with the table below, result in an improvement and an increase in the number of 3 and 4 beds across the site, bringing this permitted development more in line with the overall development of the wider site.

Extract from Table 12.1 below:

Area	Threshold	Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

12.3.3.2 Residential Density

In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document:

- 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009).
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).

As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4).

The proposed density of development aims to deliver the optimal quantum of residential units on site in response to type of site, location, and accessibility to public transport without compromising on the quality of the proposed development.

The proposed development will provide 471 no. new apartment and house units within Dundrum at a net density of 159 uph. This is slightly less than the permitted density of 179uph. However, given the context of the site and the permitted development, the low density housing to the south and west of the site, this revised slightly lower density is considered appropriate to the location.

12.3.4.1 Road and Footpath Requirements

The requirements set down in the Council's 'Taking in Charge Policy Document', and 'The Design Manual for

The proposed roads and paths are designed in line with DMURS.

Urban Roads and Streets', (DMURS), 2019, will generally apply. Where an innovative layout is accepted by the Planning Authority variations to these requirements may be accepted. In allowing any deviation in the general requirements, the primary considerations will be the safety and convenience of pedestrians, cyclists and access for emergency vehicles. Continuous footpaths shall be provided at junctions, and vehicular entrances, to facilitate people with ease of movement. At any such junctions where continuous footpaths are neither feasible nor appropriate, dished kerbs with tactile paving shall be provided to facilitate people with ease of movement.	The proposed development is not proposed to be Taken in Charge.
12.3.4.4 Phased Development No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development. In addition, when considering proposals for development within the curtilage of Protected Structures a proposed phasing agreement should be provided (refer to Section 12.11.2.3). A phasing schedule for any such development shall be submitted with a planning application.	The proposed development will be carried out in one phase.
12.3.4.5 Management Companies and Taking in Charge In residential developments, which are not proposed to be Taken in Charge by the Council, evidence will be required that private Management Companies are to be set up by time of completion of the estate, and of which membership shall be compulsory for all purchasers of property. If a development (or part thereof) is to be Taken in Charge by the Council the applicant shall agree, which areas are to be Taken in Charge, and this shall be clearly indicated on a site layout plan. All areas not to be Taken in Charge by the Council, shall also be clearly indicated on a site layout plan, and shall be maintained and the responsibility of a properly constituted Private Management Company. These details shall be submitted with the planning application.	Noted, a Management Company will be set up on completion of the development.

All roads, footpaths, sewers, drains, lighting columns, mini-pillars, watermain, services and open spaces within the privately managed areas, irrespective of the management and maintenance regime to be put in place for these areas, shall be satisfactorily completed to the standard for development works as set out in the Council's 'Development Works Guidance Document'. In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document 'Taking in Charge of Residential Developments Circular Letter PD 1/08', and 'Circular Letter PL 5/2014', the Departments 'National Taking in Charge Initiative Report', 2018, and the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.	
12.3.4.7 Refuse Storage and Services Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. (See also Appendix 6).	Bin Storage will be held within the curtilage of the house
12.4.5 Car Parking Standards Car parking standards provide a guide on the number of required off-street parking spaces for new developments. The principal objective of the application of car parking standards is to ensure that, in assessing development proposals, appropriate consideration is given to the accommodation of vehicles attracted to the site within the context of Smarter Travel, the Government policy aimed at promoting modal shift to more sustainable forms of transport. The Council's car parking standards have also been informed by the National Planning Framework. The National Planning Framework requires a stronger focus by Planning Authorities on consolidating growth within existing built up areas, strengthening our urban centres and improving public transport, permeability and accessibility. The standards have also been informed by the 'Sustainable Urban Housing: Design Standards for	The proposal includes for 1 car parking space per unit. This is in accordance with the Development Plan. It is noted, that the permitted car parking will remain unchanged across the site despite the reduced number of residential units. Therefore, there will be a slight increase in the parking ratio per apartment across the site as a whole. This change is minimal and is considered appropriate in the context of the permitted development.

New Apartments – Guidelines for Planning Authorities’ (2020) including SPPR 8. It is in the context of the above policy requirements, changing commuting patterns and investment in walking, cycling and public transport infrastructure that the Council’s car parking standards have been developed. In particular, the standards take into account the increasing availability of options for travel other than by car and the need to encourage non car modes by limiting car parking supply, especially at employment and retail destinations and at educational facilities, while at the same time prioritising high standards for cycle parking and requiring appropriate ancillary facilities for cyclists and pedestrians at destination points.	
12.4.5.3 Car Parking –General For both residential and non-residential car parking, 4% of car parking provision shall be suitable for use by disabled persons. In certain circumstances the Planning Authority may consider that a higher disabled parking content may be required depending on the nature of development. All disabled parking should be clearly marked and suitably sign posted for convenient access. A minimum of 4% of car parking spaces provided shall be reserved for parent and child parking for commercial, retail, health, childcare, hotels, medical and leisure uses, but a higher number may be required depending on the nature and location of the development.	The proposal includes for 8 in curtilage car parking spaces. all of these spaces are sufficiently wide to be used as accessible car parking spaces. There is no change to the wider provision across the site of 14 no. accessible car parking spaces which are permitted on site. This is in accordance with the policy. We note the council reserve the right to request further provision of disabled persons parking spaces. This could be dealt with by way of condition.
12.4.6 Cycle Parking Cycle parking should accord with the Council published – ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018) or any subsequent review of these standards. These are minimum cycle parking standards.	Cycle parking proposed within this development has regard to ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018) and minimum cycle parking standards. The proposed cycle parking provision is in excess of the minimum requirements.
12.4.6.2 Cycle Parking Assessment Criteria In general, new residential developments of 5 units or more or non-residential of 400 sq. m. or over will be assessed in accordance with the following criteria: - Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of outsized formats (cargo bikes etc)? - Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?	The proposed development includes for the provision of long and short stay bicycle parking facilities for residential units. There are 32 cycle parking spaces proposed, or 4 for each houses, along with a further 4 cycle parking spaces for visitors. It is noted that the cycle parking will reduced overall across the site in

- Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required? - Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed? - Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas? Where cycle parking cannot be conveniently provided within the development, a financial contribution of €500 per cycle parking stand will be required to provide alternative on-street cycle parking provision in the vicinity of the development. Consideration should be given to requiring the provision of cycle parking-related directional signage, in particular for storage and commercial parking facilities. Bike lockers, showers and changing rooms should be available at final destination storage facilities (private). For short-term cycle parking (e.g. for customers or visitors), cycle parking is required at ground level. This should be located within 25 metres of the destination in an area of good passive surveillance. Weather protected covered facilities should be considered where appropriate. Consideration should be given to using green roofs in the design of standalone cycle parking shelters. Appropriate cycle parking signage may also be required to direct cyclists to the end destination. For long-term cycle parking (e.g. for more than 3 hours for residents, staff, students), secure covered cycle parking is a requirement. This should be conveniently located within 50 metres of the destination and located near building access points where possible. In all cases it is a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations. All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4 metres to facilitate access by cyclists.	numerical terms, however the ratio of cycle parking will remain as permitted for the overall scheme. All of the parking is accessible and sheltered in line with the development plan requirements.
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Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments.	
12.4.7 Motorcycle Parking It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.	The proposed development will allow for motorcycle parking within the front garden of the proposed houses. This is in line with Section 12.4.7 of the Development Plan.
12.4.8.4 ACAs/Protected Structures Boundary features such as walls, railings and gardens contribute to character and setting of Protected Structures and those areas which have been identified as ACAs and cACAs. Poorly designed off-street parking which involves the removal of boundary walls, gate piers, railings and gates can have an effect on the setting and appreciation of the building, groups of buildings and the wider streetscape and will not generally be permitted. In areas characterised predominately by pedestrian entrances, new or widened vehicular entrances will be resisted. Where existing rear site vehicular access exists or can be easily provided, off-street parking to the front will generally not be permitted. All proposals for off-street parking will be considered on a case-by-case basis and should: - Minimise loss of original boundary treatment. - Retain a significant amount of soft landscaping and planting to reduce the visual impact of the parked car. The vehicular entrance and hard-standing area should not dominate a property's forecourt or result in the loss of traditional finishes such as granite setts and flags. - Provide surface treatments of a high quality using traditional materials compatible with the surrounding context. Bituminous and concrete surfacing are not acceptable. - Where favourable site conditions exist minimum intervention, integration and reuse of materials will be the key considerations All other criteria for car parking within Section 12.4.8 shall also apply to parking within ACAs/ Protected Structures.	The proposed development is not located within an ACA. There are no protected structures within the subject lands. It is located adjacent to a protected structure. These have been considered within the design and development of the proposal. The scheme is considered to enhance the setting of these protected structures. This includes the removal of car parking adjacent to any protected structures.

12.4.11 Electrically Operated Vehicles To encourage the use of Electric Vehicles (EV), in line with Council, National Policy and Standards, developments shall provide at minimum EV Charging points and infrastructure as follows: - Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided. - New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs. - Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. - Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Publicly accessible charge point parking space(s) should be clearly marked as being designated for EV charging. Appropriate signage indicating the presence of a Charge Point or Points should also be erected. All Charge Points fitted in publicly accessible areas should be capable of communicating usage data with the National Charge Point Management System and use the latest version of the Open Charge Point Protocol (OCCP). They should also support a user identification system such as Radio Frequency Identification (RFID). Publicly accessible EV Charging locations should also allow for ad-hoc payment methods for users. EV Charging enabling works for disabled and other reserved parking spaces should also be included in the development where these exist.	In accordance with the DLRCC 2022-2028 Development plan Section 12.4.11 all houses have parking on curtilage. Each house can provide its own Electric Vehicle charging on curtilage. No proposed change to the permitted EV Charing across the wider site is proposed.
12.8 Open Space and Recreation	See below.
12.8.1 Landscape Design Rationale Planning applications for both residential (10+ units or as required by the Planning Authority) and commercial (1,000 sq.m. or as required by the Planning Authority), including leisure and recreational facilities, should	A Landscape Design Statement has been prepared by NMP Landscape Architecture and submitted as part of this application.

submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority), for the consideration of the Parks and Landscape Services Department. Smaller schemes may also require a Landscape Plan to be submitted. All such requirements should be ascertained at pre-planning stage. The design rationale shall set out and specifically indicate how the overall approach is ecologically resilient and provides varied landscapes that reflect the character of the area. The landscape design rationale should also address the following: - Ecosystems services and carbon capture approach. - Urban Greening. - Biodiversity including pollinator friendly approach. - Sustainable Drainage Systems. - Maintenance without the use of chemical. - Nature Based Play. Such proposals shall include a scaled Landscape Plan(s) including: - Cross-sections, where applicable, indicating the layout and hard and soft treatments of all boundaries, features, external areas, and green spaces. - Specifications for materials, workmanship, and maintenance, together with proposed design details. - Hard landscape details are to include, where applicable, any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features. - Soft landscape details are to include, detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation, and spacings. - A Landscape Plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and a defects liability clause. - Regard should also be had to Policy Objective OSR13: Play Facilities and Nature Based Play	The landscape design rationale sets out how the landscape design incorporates the ecological needs of the site, enables the retention of existing vegetation, nature based play and accommodates SUDS measures throughout. The proposed planting specification can be maintained without the use of chemicals. The landscape plans include all of the required drawings and sections setting out the approach to the landscaping of the development. This plan also demonstrates how this additional area of public open space integrates with the permitted public open space across the development.				
12.8.3 Open Space Quantity for Residential Development	See below.				
12.8.3.1 Public Open Space <table border="1"> <thead> <tr> <th data-bbox="209 1839 544 1877">Location</th><th data-bbox="544 1839 874 1877">Min Public Open Space</th></tr> </thead> <tbody> <tr> <td data-bbox="209 1877 544 1984">Institutional and Redevelopment of SNI use</td><td data-bbox="544 1877 874 1984">25% (of site area)</td></tr> </tbody> </table>	Location	Min Public Open Space	Institutional and Redevelopment of SNI use	25% (of site area)	The permitted development delivered c. 27.8%. The proposed development will provide an additional c. 1,108sqm which is an increase in the overall public open space across the development and is c. 30% of the area E development site.
Location	Min Public Open Space				
Institutional and Redevelopment of SNI use	25% (of site area)				

All residential schemes must provide a minimum provision of public open space in accordance with the table above, which has regard to the content of the Section 28 Guidelines 'Sustainable Residential Development in Urban Areas' (2009).

To qualify as public open space the area must be designed and located to be publicly accessible and useable by all in the County; generally free from attenuation measures; and capable of being taken in charge (i.e. must accord with the Council policy on taking in charge of open spaces).

It is acknowledged that in certain instances it may not be possible to provide the above standards of public open space. High density urban schemes and/or smaller urban infill schemes for example may provide adequate communal open space but no actual public open space. In these instances where the required percentage of public open space is not provided the Council will seek a development contribution under Section 48 of the Planning and Development Act 2000, as amended. The contribution in lieu to be paid for any shortfall in the quantum of public open space to be provided will be used for the provision of improved community and civic infrastructure and/or parks and open spaces, in the vicinity of the proposed development for use of the intended occupiers of same. On overall sites of less than 0.25 ha, the Council may also consider levying a contribution in lieu of public open space.

Public Open Space may be taken-in-charge, by the Local Authority, or may be privately managed.

Therefore it is fully compliant with this policy.

The public open space has been designed to maximise functionality. The public open space delivers, play areas and formal areas of tree planting.

12.8.3.3 Private Open Space

(i) Private Open Space for Houses:

All houses (terraced, semi-detached, detached) shall provide an area of good quality usable private open space behind the front building as follows:

Table 12.10 Private Open Space

House type	Private Open Space requirement (minimum)
1-2 bedroom	48 sq. m. *
3 bedroom	60 sq. m.
4 bedroom (or more)	75 sq. m.

* May be acceptable in cases where it can be demonstrated that good quality usable open space can be provided on site.

Any provision of open space to the side of dwellings will only be considered as part of the overall private open

All of the private rear gardens provided as in accordance with the Compact Settlement Guidelines. These are appropriate for this development and in line with National Planning policy.

space calculation where it is useable, good quality space. Narrow strips of open space to the side of dwellings shall not be included within any of the above calculations. In instances where an innovative design response is provided on site, particularly for infill and corner side garden sites, a relaxation in the quantum of private open space may be considered, however this is on a case-by-case basis. The provision of open space to the front and side of the site to serve the proposed dwelling may also be considered acceptable, subject to design, residential amenity, etc.	
12.8.5 Public Open Space – Quality Open space is fundamental in contributing to a high quality of life for those living, working and visiting the County. It provides a basis for active and passive recreation, creates urban focus, fosters community spirit, and helps mitigate the impacts of climate change. It can also improve the public realm and urban image, provides for inclusivity, adds to the liveability, sense of identity and define the quality of the area. For this reason, public open space should be accessible, inclusive, secure, and usable. In accordance with the ‘Guidelines on Sustainable Residential Development in Urban Areas’, public open space on greenfield sites in the County’s new development areas should be in the form of useful open spaces and where appropriate larger neighbourhood parks to serve the wider community. Where public open space is to be provided on foot of a planning permission, the space in question should be well designed, and located to sympathetically complement the layout of the development. Public open spaces should be overlooked and designed to ensure that potential for antisocial behaviour is minimised through passive surveillance. The open space should be visible from, and accessible to, the maximum number of dwellings/units within the proposed scheme. Inaccessible, hidden or otherwise backland open space, and narrow linear strips of open space will not be acceptable. For public open space proposed roof gardens will not be acceptable. Fragmented open spaces within a development layout, which result specifically from the necessity to protect existing site features (for example a stand of mature trees) may not be included in the	The proposed new area of public open space adjoins the permitted open space, which in turn links into the existing public Ballawley Park, creating a network of public open spaces. The proposed additional open space is of high quality, is overlooked and will provide attractive additional open space within the development. As set out in the NMP documentation, it is a continuation of the permitted development, and will provide attractive open spaces within the area.

calculation of open space requirements, as they are necessary to ensure the protection of existing amenities. Age friendly measures should also be incorporated into the design of public open space, such as the provision of suitable benches at appropriate intervals.	
12.8.5.1 Design The layout of public open space and its associated facilities/ infrastructure as delivered by the residential development – particularly in larger areas of open space - should be designed to meet a range of user needs, including both active and the passive recreation to maximise accessibility and should strive to incorporate universal design. Users of public open space in the County should feel safe with adequate supervision, passive surveillance, boundary treatment and public lighting all contributing to an overall sense of security. Public Open Space should be expansive and suitably proportioned. Accordingly, blocks and buildings should overlook the public realm. Narrow tracts and corridors of open space, which are difficult to manage, will generally not be acceptable. Public open spaces, within new development should be capable of providing opportunities for play e.g. playgrounds, small pitches, etc. Playgrounds on public open space should be carefully sited within residential areas to ensure they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residences. In higher density residential schemes (in excess of 100 units per hectare), the quality of the open space becomes of paramount importance.	
12.8.5.2 Accessibility, Permeability, Security and Privacy Permeability and accessibility will be encouraged as part of an integrated approach to the provision of linked open spaces. Where pedestrian and cycleway opportunities are presented, substantial links between developments will be encouraged.	The proposed development includes new routes through the site. These are overlooked by the proposed amended houses as well as the permitted development.
12.8.7 Private Amenity Space – Quality Standards	See below.
12.8.7.1 Separation Distances A minimum standard of 22 metres separation between directly opposing rear first floor windows should usually be observed, for new developments. This normally results in a minimum rear garden depth of 11 metres.	Please refer to documents and drawings prepared by Reddy Architecture + Urbanism. The layout of the buildings with only gable end windows to the northern elevation, and which are secondary windows ensures there is no

However, where sufficient alternative private open space (e.g. to the side) is available, the required separation distance for new developments may be reduced, subject to the maintenance of privacy and protection of adjoining residential amenities. In all instances, private open space should not be unduly overshadowed and where there is the potential for the proposed development to overshadow or overlook existing/future development adjoining the site, minimum separation distances to boundaries should be increased. In an exceptionally well-designed scheme providing an otherwise very high-quality living environment and that is in close proximity to existing public open spaces, the above standards may be relaxed. Any relaxing of standards will be assessed on a case by-case basis and should not be seen as setting a precedent for future development.	overlooking between these amended units and the permitted apartments. Furthermore, there is in excess of 11m between all windows to the front and rear of the proposed houses. Given the distance to the primary windows and adjacent buildings, along with the orientation and layout of the site, ensures that all units, whether permitted or proposed as part of this amendment, will achieve good daylight and sunlight as a result of this amendment.
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Chapter 8 Conclusions

The proposed amendment to the permitted development will provide an increased mix of unit types and more public open space to this already permitted high-quality residential development on this residential zoned site. This proposed development will meet the changing need of the population which require accommodation in a recognised housing crisis and meets an increasingly diverse range of housing needs.

The provision of houses in addition to the apartments at this accessible and well-serviced location will result in an attractive development and will provide improvements to the development in the form of:

- Increased unit mix by providing semi-detached houses in this location.
- Increase in attractive public open space adjoining the existing permitted development and the existing area in the form of Ballawley Park which will continue to provide connections to the wider area and the resultant increase in public open space.
- Provide an attractive building type adjacent to the historic buildings within Gort Muire.
- the creation of additional three storey houses on a highly sustainable site, making the best use of this scarce resource (zoned land).

This is achieved while also taking advantage of its excellent location in sustainability terms (great access to public transport, community facilities, shopping facilities, employment and leisure facilities) ensuring that an appropriate density of development, in an appropriate scale and form is realised.

The proposed development will provide an appropriate form of high-quality residential development on residential zoned site within the context of the Dun Laoghaire Rathdown Development Plan.

The statement of consistency submitted with the application submission demonstrates that the proposed development complies with relevant national, and local planning policies and guidelines and that it will provide for an effective and efficient use of this serviced site located proximate to Dundrum Town Centre, close to a wide range of existing local services and excellent public transport and employment zones such as Sandyford.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area. We look forward to a positive decision for this planning application.