

PLANNING REPORT

FOR A

LARGE-SCALE RESIDENTIAL DEVELOPMENT AT TAYLORS LANE, BALLYBODEN, DUBLIN 16.

PREPARED BY



ON BEHALF OF

SHANNON HOMES DUBLIN UNLIMITED COMPANY

MARCH
2023

CONTENTS

| | |
|---|------------|
| SECTION 1 INTRODUCTION | 3 |
| SECTION 2 SUMMARY OF THE PROPOSED DEVELOPMENT..... | 4 |
| SECTION 3 SITE LOCATION AND CONTEXT | 9 |
| SECTION 4 PLANNING HISTORY | 16 |
| SECTION 5 PROPOSED DEVELOPMENT | 25 |
| SECTION 6 RATIONALE FOR DEVELOPMENT | 26 |
| SECTION 7 CONSULTATION..... | 48 |
| SECTION 8 STATEMENT OF CONSISTENCY | 61 |
| SECTION 9 CONCLUSIONS..... | 170 |

Proposed Development

The development will consist of the demolition of the existing former Institutional buildings and associated outbuildings (c.5,231 sq.m) and construction of a new residential development comprising 402 no. apartments (39 no. 1 beds, 302 no. 2 beds and 61 no. 3 beds) within 3 no. blocks ranging in height from 2 to 5 storeys over basement/ lower ground floor. All residential units will be provided with associated private balconies/ terraces to the north/ south/ east/ west elevations. The development will include the following:

- Block A up to 5 storeys over basement/ lower ground floor providing 118 no. units.
- Block B up to 5 storeys over basement providing 123 no. units.
- Block C up to 5 storeys over basement/ lower ground floor providing 161 no. units.

The development will also include a creche (c.656 sq.m) and 2 no. retail units (c.262 sq.m and c.97 sq.m) all located within Block A, along with c.322 sq.m of internal residential communal space located in Block C. The development will include the provision of a new public park in the north of the site along Taylor's Lane.

The development will include 290 no. car parking spaces and 1,054 no. cycle parking spaces provided at basement/surface level. The development will include for a revised vehicular access from Edmondstown Road and an emergency vehicular access from Taylor's Lane along with pedestrian/cyclist accesses to/from the site. The development will include for road improvement works along Edmondstown Road including the existing junction of Scholarstown Road/ Edmondstown Road.

The development will include for all associated site development works, open spaces, landscaping, SuDs features, boundary treatments, plant areas, waste management areas/bin stores, car/cycle parking areas (including EV parking), and services provision (including ESB substation/ kiosks).



Figure 1 Site Location

SECTION 1 INTRODUCTION

On behalf of the applicant, Shannon Homes Dublin Unlimited Company, this planning report accompanies a planning application submission to South Dublin County Council under Section 32B of the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021 for a proposed Large Scale Residential Development on a gross site of c. 3.8ha (net site area of 3.5ha) at Taylors Lane and Edmondstown Road, Ballyboden, Dublin 16 and including the former “Good Counsel” lands and former pitch and putt course in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The application has been prepared by a multidisciplinary team on behalf of Shannon Homes Dublin Unlimited Company as set out in the table below. This document should be read in conjunction with this accompanying detailed documentation.

| Company Name | Documents Prepared |
|---------------------------------------|--|
| McGill Planning Ltd | Planning Report including Statement of Consistency and Response to Opinion |
| | EIA Screening |
| | Social Infrastructure Audit |
| MCORM Architects | Architect’s Design Report |
| | Schedule of accommodation |
| | Building Life Cycle Report |
| | Architectural Drawings |
| | Housing Quality Assessment |
| Doyle O’Trothigh Landscape Architects | Landscape Design Development Report |
| | Landscape Drawings |
| | Landscape Maintenance and Management Report |
| | Landscape Visual Impact Assessment |
| DBFL Consulting Engineers | Site Specific Flood Risk Assessment |
| | Infrastructure Design Report |
| | Traffic and Transport Assessment |
| | Mobility Management Plan |
| | Parking Strategy |
| | Statement of Consistency with DMURS |
| | Infrastructural and Road Drawings |
| Altemar | Appropriate Assessment |
| | Natura Impact Statement |
| | Outline Construction and Environmental Management Plan |
| | Ecological Impact Statement |
| Independent Tree Surveys | Tree Survey Report |
| | Tree Drawings |
| McElligott Consulting Engineers | Lighting report and drawing |
| Digital Dimensions | Method statement and Photomontages |
| | Daylight and Sunlight Assessment |
| IAC | Archaeological Assessment |
| | Conservation Impact Assessment |

SECTION 2 SUMMARY OF THE PROPOSED DEVELOPMENT

The proposed development comprises a residential scheme of 402 no. units in three blocks ranging in height from 2-5 storeys over basement/ lower ground floor. The proposed development will also consist of a new public park, communal open spaces, retail units, a creche, car parking, cycle parking, bin stores and ESB substation/ kiosk(s) along with some upgrade works to Ballyboden Road. The proposal also includes the demolition of the existing former institutional buildings and out-buildings on site, all associated site development works, landscaping and boundary treatments. The key development statistics are set out in the table below:

| Development Proposal | Proposed LRD Development |
|--------------------------|---|
| No. of residential units | 402 no residential units as follows: <ul style="list-style-type: none"> - 39 no. 1 beds - 302 no. 2 beds - 61 no. 3 beds |
| Additional Facilities | Crèche (656 sqm) with spaces for 124 no children Retail Units <ul style="list-style-type: none"> • Retail 1: 262 sqm • Retail 2: 97 sqm Meeting/Communal rooms: 322sqm |
| Site Area | 3.8 hectares |
| Net Site Area | 3.5 hectares |
| Plot Ratio | 1.22 |
| Site Coverage | 35.4% |
| Residential Density | 114.9 units/ha |
| Building Height | 2 to 5 storeys over basement/ lower ground floor |
| Aspect | 53.5% dual aspect 46.5% single aspect |
| Public Open Space | 5,400 sq.m (15%) – public open space to the front 4,400sqm (13%) - woodland walk |
| Communal Open Space | 3,600 sqm (10%) |
| Car Parking | 290 no. car parking spaces <ul style="list-style-type: none"> • 265 no. basement spaces and • 25 no. surface spaces |
| Cycle Parking | 1054 no. cycle parking spaces <ul style="list-style-type: none"> • 832 no. long term spaces • 222 no. short term |

SECTION 3 SITE LOCATION AND CONTEXT

The subject site is on the former Good Counsel lands and former pitch and putt course at Taylor's Lane, Ballyboden in South Dublin County. It is zoned for residential use in the South Dublin County Development Plan. The western half of the site currently contains 3 storey former Augustinian Order buildings and chapel that are no longer in use along with some single storey buildings. It is worth noting that this is a substantial building, which is long and tall, the steeple measures c. 22.327m high and ridge height of the main building is c. 13.357m high. These buildings, which are of no architectural value, will be demolished as part of this application. The eastern half of the site consists of a former pitch and putt that is now overgrown.

The site fronts onto Taylor's Lane to the north and Edmondstown Road to the west. The lands immediately south of the site consist of the recently completed Ballyboden Primary Care centre. The eastern boundary has a treeline of dense cypress and there are some mature trees within the site which will be retained. The southern boundary consists of an old mill race drainage ditch which is now largely overgrown.

To the east and north of the site are predominantly of residential development with some retail and community uses. The residential development in the surrounding area consists primarily of 1-2 storey detached and semidetached houses. There is a small neighbourhood centre located directly opposite the site on Taylors Lane, and there are two local centres within 10/ 15 minutes' walk of the site in Whitechurch Shopping Centre and Rosemount Shopping Centre. The buildings fronting onto Taylor's Lane are generally set back from the road by front gardens, or grass verges. Taylor's Lane also has some large commercial sites including building merchants, petrol station and car sales. However, the overall impression of this road is of a largely car dominated space. Edmondstown Road is bounded to the west by trees surrounding the Owendoher River while to the east a more suburban character is developing due to the recent completion of the HSE Centre.

The subject site is located c. 7.5km south west of Dublin City Centre, c. 1km north west of Whitechurch Village, c. 2km south of Rathfarnham Shopping Centre, and c. 3km south west of Nutgrove Retail Park. Dundrum Town Centre is 5km and The Square, Tallaght is within 6km of the site. Sandyford Business Park is 6km from the site and City West Business Park is within 9km of the site. While Marley Park, Edmondstown and St Enda's Park are both within 20-minute walk of the site. As a result, there are significant amounts of excellent commercial, employment and recreational facilities existing in the area of the site.

The site is not located within a Conservation Area or an Architectural Conservation Area. The site is not designated for any nature conservation purposes and there are no habitats of conservation importance recorded within the site. There are no Natura 2000 sites located either within or directly adjacent to the lands at Taylor's Lane. There are also no protected views around this site.

Public Transport

The subject site is highly accessible and is served by five bus routes (15B, 15D, 61, 161 & 175) which connect the site with numerous locations including UCD, Rathmines, Rathgar, Ranelagh, Marley Park, City West, Dundrum, Dublin Airport and the City Centre. The bus stop directly north of the site is serviced by routes nos. 15D, 61, 161 and 175. The bus route 15B services another bus stop c. 150m further north of the site located on the R115, providing more frequent bus services. Currently the site is a c. 30 minute bus journey and c. 30 minute cycle to St Stephen's Green. The Bus Connects project will improve these existing bus services. It is also noted that the 175-bus route connects with the Red Line Luas at Tallaght and the Green Line Luas at Dundrum.

These routes provide excellent access to Grand Canal Dock, where there is a high concentration of

Information Technology companies; the Sandyford Business District which also has large scale employers and as well as a hospital, hotels and the Leopardstown Racecourse. In the opposite direction is Tallaght Technical University of Dublin as well as Tallaght Hospitals and Citywest Business Park. As a result, this site has ease of access by public transport or by bike to all of these wider employment, enterprise, commercial, health and education hubs of the Greater Dublin Area. These areas not only represent existing facilities but are also identified within their respective areas Development Plans as emerging growth areas ensuring access to future employment hubs.

| Route No. | Destination | Distance to Nearest Bus stop | Peak Frequency | Off-Peak Frequency |
|-------------------------|--|-------------------------------------|---|--------------------|
| Dublin Bus | | | | |
| 15B | Stocking Avenue to Ringsend road (Barrow street) | c.160m to Ballyboden rd. stop | 15 min | 20 min |
| 61 | Eden Quay to Whitechurch | Less than 100m to Taylors lane stop | 30 min | 45min – 1 hour |
| 15D | Whitechurch to Ringsend | c.160m to Ballyboden rd. stop | 08:05 to Ringsend 15:00, 16:45 to Whitechurch | |
| Go Ahead Ireland | | | | |
| 175 | Citywest - Tallaght - Ballyboden - Dundrum - UCD | Less than 100m to Taylors lane stop | 20 minutes | 20 minutes |
| 161 | Dundrum to Rockbrook | Less than 100m to Taylors lane stop | 1.5hours | 1.5hours |

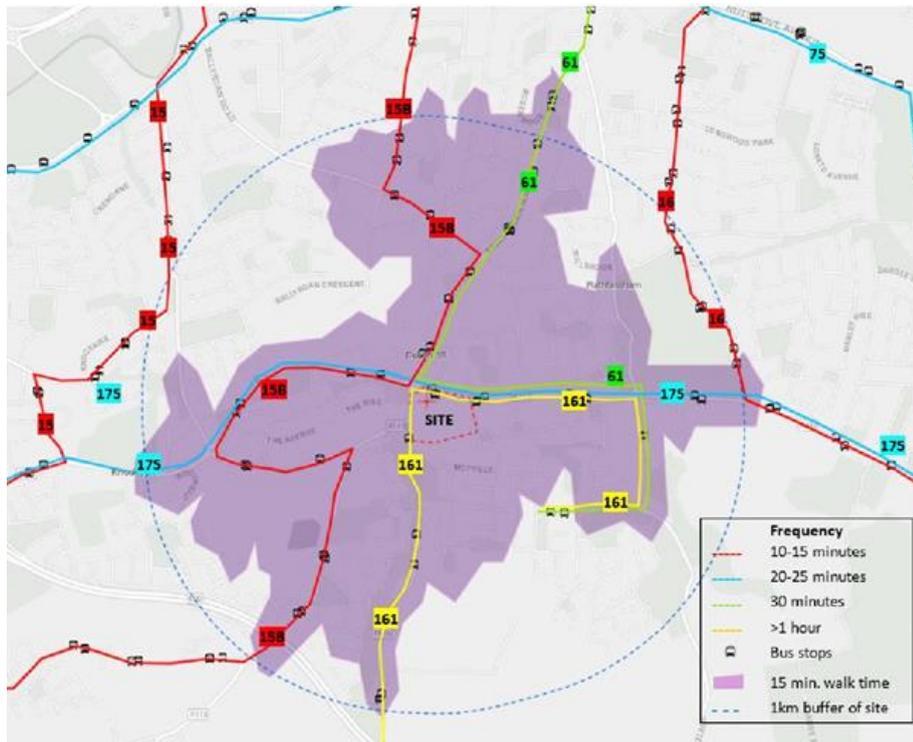


Figure 2 Existing Bus Routes Serving Subject Site

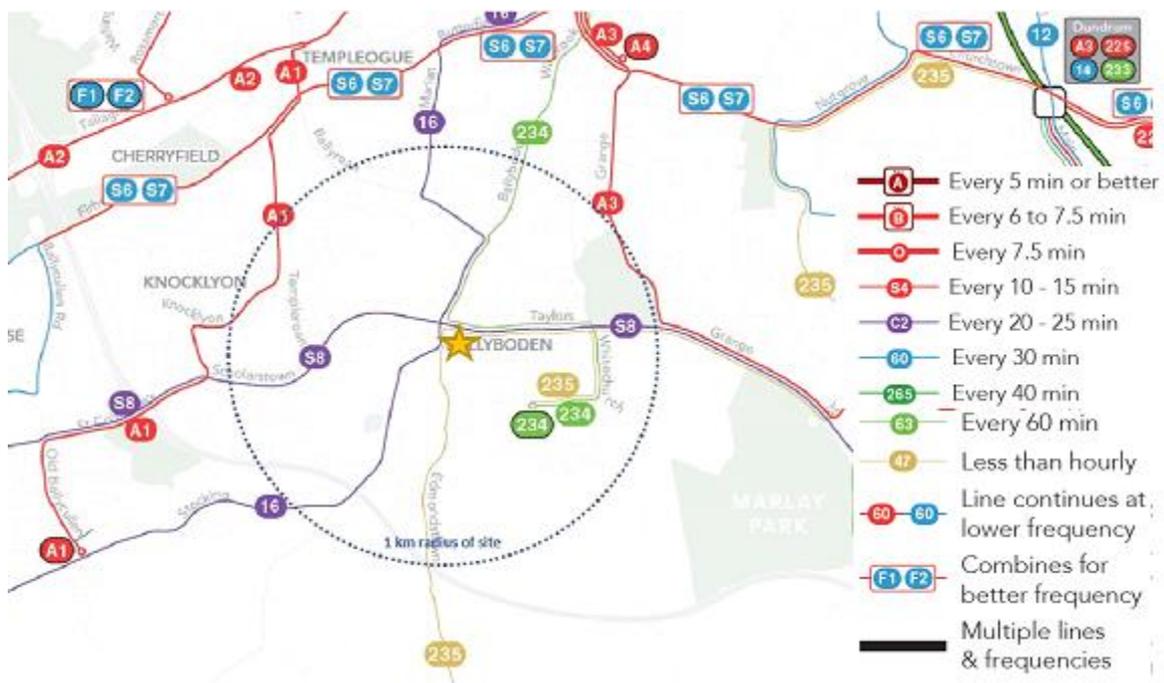


Figure 3 Proposed Bus Connects Bus Routes (Basemap sourced from busconnects.ie, Map 2: Proposed Bus Network)

The site has the benefit of existing segregated cycle routes along Taylors Lane and Ballyboden Way which connects the site in an east west direction. While there are cycle lanes along the Ballyboden Road and Edmondstown Road connecting the site in a north south direction. These routes connect into the wider cycle network including Dublin including the Dodder River Greenway which connects the site to the Dublin Docklands.



Figure 4 Existing Cycle Network. Source: DBFL Traffic and Transport Assessment

Education Facilities

There are 3 primary schools and 2 post-primary schools within 15-minute walk of the site. These are listed in the table below. There are further primary and post primary schools located in the wider area that may also serve the residents of the proposed development.

| Primary Schools | |
|----------------------|-------------------------------------|
| 1. | Ballyroan Boys National School |
| 2. | Scoil Naomh Padraig |
| 3. | Scoil Mhuire |
| Post-Primary Schools | |
| 1. | Coláiste Éanna (Christian Brothers) |
| 2. | Sancta Maria College |



Figure 5 Schools within the vicinity of the subject site

Retail and Community Services

There are five clusters of retail and community services within 1km of the subject. Three of these clusters are within a 10-minute walk of the subject site. These three clusters provide two petrol stations, a pharmacy, a local shop, a restaurant and a pub. Further facilities are provided in Whitechurch Shopping Centre and Rosemount Shopping Centre (identified by numbers 4 and 5 respectively on the map below), which are both within a 10/15 minute walk of the site. Both of these shopping centres are identified as *Local Centres* within the *South Dublin County Development Plan 2022 - 2028*. Whitechurch Library, a protected structure, is located to the east of the site along Taylors Lane. This building now hosts The WEB Project which is a socially inclusive community facility.

Eden Centre (number 6) is also identified as a *Local Centre* within the *South Dublin County Development Plan 2022 - 2028*. Although this centre is not within 1km of the subject site due to the street layout it is just a 15 minute walk from the subject site.

The Scholarstown Road SHD site (ABP 305878-19) is located just over 1km from the subject site and includes two retail units and two café/restaurant units. Once complete these will be within a 10- 15 minute walk of the subject site.

The permitted neighbourhood centre (SD19A/0345) at the lands south of Stocking Avenue is in operation. Currently operating from the neighbourhood centre is a Tesco store along with a 2 storey Safari childcare facility from desktop research.

As highlighted above, there are further larger retail and recreational facilities within 6km of the site including Nutgrove Shopping Centre, Rathfarnham Shopping Centre, The Square Tallaght and Dundrum Town Centre to name a few.

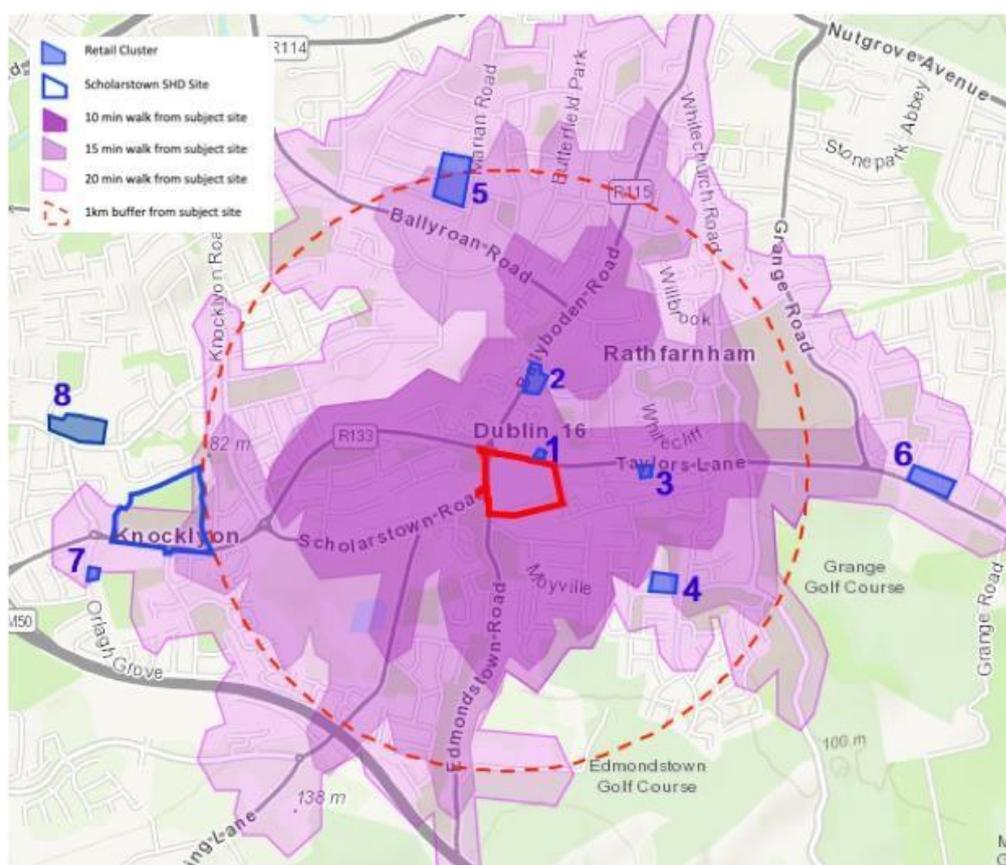


Figure 6 Locations of retail and community facilities within 1km of subject site.

Public Parks

The site is well provided by existing public parks within c. 15minute walk of the site including Edmondstown Park and St Enda's Park with Elkwood Playing Fields slightly further away. Marley Park is c. 20 minutes' walk away while the site is located in the foothills of the Dublin Mountains, with easy access to the range of forests, walks and hikes within a 20 minute drive of the site.

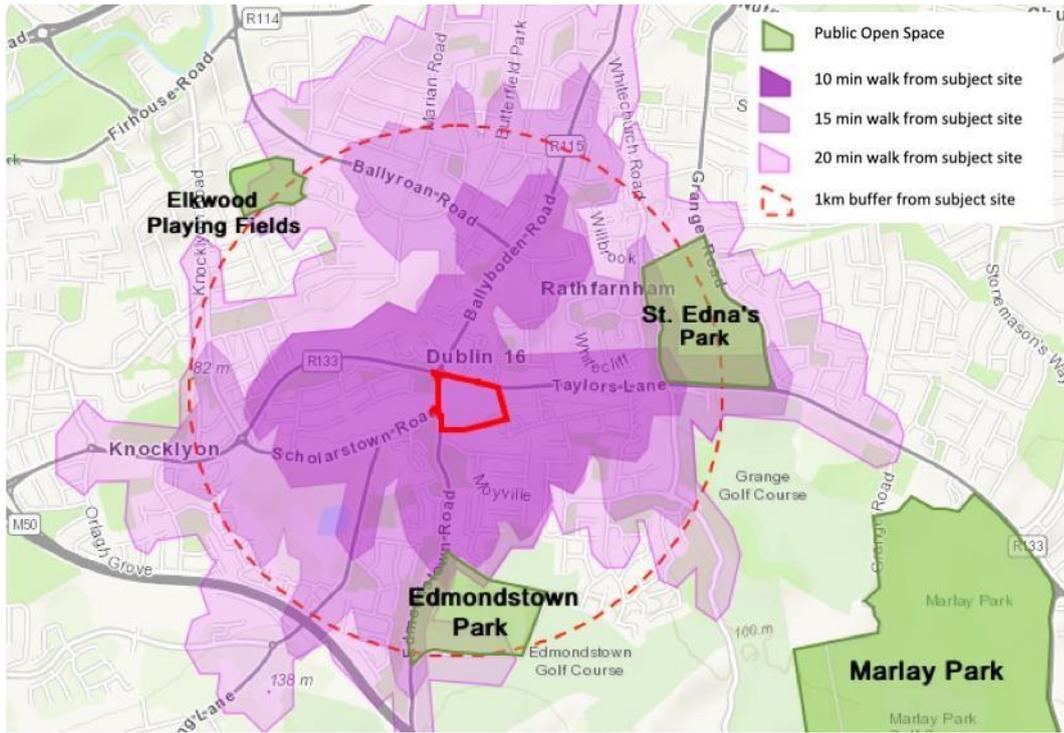


Figure 7 Public Open space within 15 minutes' walk of the site.

SECTION 4 PLANNING HISTORY

Subject Site

The site was subject to two previous planning applications in 2007 and an SHD application in 2020. The application details are as follows:

ABP Reg Ref: 307222-20

Location: The Good Counsel & ancillary buildings, Edmondstown Road, Ballyboden, Dublin 16.

Decision: Granted with conditions, 14/09/2020

Judicial Review: Quashed



Figure 8 Site layout plan



Figure 9 Context elevation along Taylors Lane



Figure 10 Context elevation along Edmondstown Road



Figure 11 Context elevation along the southern boundary of the site looking north

It is noted that South Dublin County Council recommended refusal on the basis of density, loss of biodiversity, height in general and height around the periphery. The specific reasons were as follows:

1. *Height and density*

- a. *The development would be a material contravention of the SDCC Development Plan 2016-2022 policy in relation to height and residential density. The proposed height of the development does not have regard to the existing character of the area, and there is inadequate transition of height at the site edges.*
- b. *Notwithstanding its location within the built-up area of Dublin, and proximity to certain bus routes, this development on former institutional lands would, by virtue of its scale and density, and the proposed provision of 371 no. car parking spaces in an outer suburban area, be unsustainable development the development would therefore contradict national and regional policy, and would not accord with the 'RES' land use zoning objective and the South Dublin County Council Development Plan 2016- 2022, and would therefore not accord with the proper planning and sustainable development of the area.*

2. *Residential Character*

- a. *The proposed design does not integrate with the established character of this residential area. There has been little effort to design a new residential development which reflects the surrounding area and the context of the site allowing a more visually accepting building type and overall finish. The mass and scale of the blocks are very bulky in their overall form, this along with the excessive height presents a highly visible and dominating development at this location. The development therefore looks out of scale and character with the adjoining buildings and streetscape. A revised design should be pursued and be supported by a design rationale and material schedule, demonstrating that the new development has had cognisance of such requirements. A new development at this location should provide a high-quality design which reflects the existing building stock and is sympathetic to the context of the site and adjoining village area and building form and character of the established areas.*

In its present form, the proposed development would not accord with the residential character of the area, would seriously detract from the residential amenity of the area.

3. *Ecology*

- a. *The development would result in an unacceptable loss of biodiversity on the site in the form of feeding grounds and travel routes for bats, and birds, on the site. The proposed mitigation measures would not make up for the loss of most of the trees on the site.*

Despite this recommendation for refusal by SDCC, planning permission was granted by An Bord Pleanála for a Strategic Housing Development which included the demolition of the existing buildings and the construction of 496 no. residential units, a creche and retail units in 3 urban blocks raising up to 7 storeys in height. This also included all ancillary works, including road improvements along Edmondstown Road and Scholarstown Road. While this was granted planning permission by ABP it was subsequently brought to Judicial Review where it was quashed.

However, despite the outcome of the Judicial Review, it is worthwhile considering the planning principles discussed by the Inspector in relation to this development. In granting permission the Inspector confirmed that “The proposal to provide residential units, creche and two retail units commercial development is acceptable in principle, having regard to the zoning objective.”

The inspector identifies that *“the site lies within the category of an ‘Intermediate Urban Location’, given its location within approximately 130m (at its closest point) to the bus stops on Ballyboden Way and Ballyboden Road, both of which are served by the 15b Bus Route, which is a reasonably frequent bus service.”* The report recognises the sites location close to high quality pedestrian and cycle infrastructure, shops, services and existing and proposed amenities.

The inspector argues that *“In relation to Institutional Lands, the Guidelines State that average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70 dph). In my view, a density in the range cited above, would not be in line with that envisaged for a site on a public transport corridor in close proximity to bus stops, and would not be in line with other relevant national and regional guidelines, including that set out in Design Standards for New Apartments Guidelines for Planning Authorities (2018). The proposal has, however, incorporated significant areas of open space, including a public park, with the opening character of the being retained to the north and south of the site.”*

From this the conclusion is reached that *“having regard to national and regional policy as relates to density, the density of 141.7 units/ ha is not excessive.”*

In regard to the proposed height, the inspector identifies that *“given the lack of immediate sensitivities and defined character adjacent to the site, and given the scale of the site, the site has the opportunity to create its own character. In this regard, the creation of defined street edge of 7 storeys along Edmondstown Road and the creation of new streets, open spaces including a new public park and ecological corridor within the development will make a positive contribution towards place-making, as required by the Building Height Guidelines. The retail units and crèche in Block A create an active frontage in close proximity to the main entrance of the site.”*

With regard to the loss of trees the inspector found that *“the loss of tree coverage is justified having regard to the need to ensure efficient use of the site. The proposal provides for the enhancement the watercourse to the south of the site and provides for an ecological corridor which will enhance the amenity of the area and will be of benefit for biodiversity.”*

The inspector went on to highlight that *“The development also provides for permeability through the site with pedestrian links to the north and west provided. The proposed development creates a*

distinctive development on the site and will form a positive addition and new landmark for the area. As a result, this will improve the legibility of the area. The proposal is also formed of a mix of 1 (36 no), 2 (391 no) and 3 (69 no) bed apartments and duplex units, including 15 no. own door units, that positively contributes towards the dwelling mix for the area, which at present is dominated by two-storey suburban dwellings.”

“Overall, I am content that the height and massing of the development will enhance the character of the area and I find that the proposed development satisfies the criteria described in section 3.2 and therefore SPPR 3 of the Building Height Guidelines”

The inspector also addressed the issue of Public Open Space. In the report they highlight that *“In relation to public open space, I note a third party submission has stated the proposal does not comply with Section 11.3.1 of the development plan, as related to institutional lands, and which requires a minimum of 20% of the site area as public open space. The Planning Authority has not raised this as a concern. However, I note the Ecological Corridor will be accessible to the public, and the provision of same, along with the public park, exceeds the 20% requirement.*

I consider that the quality of open space is high, with the public park, in particular, providing a welcome amenity to the area. The communal open space within the development is well overlooked by the residential units.

All private amenity spaces in the development comply with or exceed the minimum required floor areas for private amenity spaces.”

The inspector also identified that *“there would be no merit in retaining this building, or the other buildings on the site, which are of limited architectural value.”*

In conclusion the inspector found that *“The proposed residential, retail and café/restaurant and crèche uses acceptable in principle at this site with regard to the relevant ‘RES’ zoning objective under the South Dublin County Council Development Plan 2016-2022. The provision of a higher density residential development at this location is desirable having regard to its location within the Dublin Metropolitan Area, its proximity to public transport service and the existing high quality pedestrian and cycle infrastructure facilities. In addition, the site is located in an area with a wide range of social infrastructure facilities. The height, bulk and massing, detailed design and layout of the scheme are acceptable. I am also satisfied that the development would not have any significant adverse impacts on the amenities of the surrounding area. The future occupiers of the scheme will also benefit from a high standard of internal amenity and the proposal will contribute significantly to the public realm. The overall provision of car parking and cycle parking is considered acceptable. I am satisfied the future occupiers of the scheme will not be at risk from flooding, and the proposal will not increase the risk of flooding elsewhere.”*

Judicial Review

A Judicial Review of An Bord Pleanála’s decision was also carried out by Mr Justice Holland following an application to the High Court by Ballyboden Tidy Towns Group (Ref 2020/816JR).

As set out in para 16 of the Judgement:

“the Applicant sought to quash the Impugned decision as invalid for the following reasons:

- *Grounds 3 & 4 – Bats & Otters The Board erred in failing to have any, or adequate, regard for the protection of bats and otters for the purposes of Annex IV of the Habitats Directive.*
- *Ground 5 – Material Contravention (Density) The Developer and the Board erred in concluding that the density of the proposed development was not a material contravention*

of the Development Plan.

- *Ground 7 – Justification of Building Heights The Board erred in its interpretation of section 3 of the Height Guidelines 2018 and/or failed to take into account a relevant consideration.*
- *Ground 8 – Traffic The Board acted irrationally or unreasonably and/or breached the Applicant’s rights to fair procedures and reasoned decision making in its assessment of traffic impacts from the proposed development on the greater Rathfarnham area.*

I will consider the pleadings further when considering each of the issues listed above.

Mr Justice Holland considered each of the items in detail. However, while the decision of ABP was ultimately quashed, it was not on the basis of all of the grounds raised.

The Judgement, in para 322, stated the following:

“For the reasons set out above, I will quash the Board’s impugned decision for, briefly put:

- *Failure to recognise material contravention of the Development Plan as to density and address it as such.*
- *Failure to take into account a relevant consideration as to the capacity of the public transport network and give adequate reasons for its decision on density in that context.*
- *Inadequacy of reasons on the traffic issue – specifically as to the disagreement between the traffic experts regarding methodology and the reliability of the results resulting from the application of that methodology.*

I reject all other grounds of challenge.”

It is noted that rather than the principle of the development that had been granted, it was more the procedure carried out by An Bord Pleanála in that particular instance that was considered inadequate and resulted in the ABP grant of permission being quashed.

The current proposed development before South Dublin County Council has had regard to the detailed assessment of the previous SHD proposal by all parties, the previous grant of permission from ABP, and the concerns raised by SDCC and third parties at the time.

The current proposal, which is now to be assessed under the LRD provisions, and the policies and objectives of the current 2022-2028 County Development Plan, has incorporated a number of significant changes in particular a reduction in building height, density, and car parking.

It is considered that these serve to further reduce the impact of the development, in particular in relation to visual impact and the transport/ traffic impact.

A comprehensive Public Transport Capacity Assessment has also been prepared by DBFL Consulting Engineers (as part of the Traffic & Transport Assessment) to demonstrate that the capacity of the public transport network is appropriate to facilitate the predicted demand generated by the development.

Furthermore, it is noted that the current proposal does not materially contravene the current County Development Plan and therefore a Material Contravention Justification is not required.

The supporting documents submitted with the LRD application address all substantive issues including density, height and traffic and transport, and ecology. In addition to this, all items raised in the SDCC Opinion following the pre-application LRD Consultation meeting have also been addressed in full.

SDCC Reg Ref: SD16A/0121

Location: The Good Counsel & ancillary buildings, Edmondstown Road, Ballyboden, Dublin 16.

Decision: Refused, 11/11/2016

Permission was sought for the demolition of the existing Good Council buildings (recently vacated by the Health Service Executive, formerly an Augustinian Seminary and Chapel) and associated outbuildings including the boiler house/ flue and single storey workshop along the Edmondstown Road and adjacent garages and greenhouse. All service connections shall be capped off and recorded for the future development of the site. A set of record drawings, photographs and report on the history of the site and buildings shall be lodged with the Irish Architectural Archive, these documents are also included with this application.

This application was refused for the following reasons:

- Not possible to widen the junction on Edmondstown Road/ Scholarstown Road without the loss of a number of structures including the Community Centre;
- The proposed pathway along Edmondstown Road is substandard.

Adjacent Sites

SDCC Reg Ref: SD20A/0059

Location: Taylor's Lane, Ballyboden, Dublin 16 (Lands directly southeast of subject site)

Decision: Granted, 23/07/2020

Alteration and additions (increasing the overall floor area from 2042.3 sq.m to 2480sq.m) to the existing Order of St. Augustine buildings. Single storey bedroom wing extension (275sq.m) to the northwest of the existing building; two storey bay extension (11.4sq.m) to existing north elevation at new Oratory; new entrance steps, ramp, planters and canopy to existing entrance; single storey extension (17.2sq.m) to rear (south elevation) of existing building to form lobby and prayer room; extension (47.4sq.m) to rear (south) elevation to include extension of existing kitchen/dining area at ground floor; extension (86.6sq.m) of existing first floor administration area providing 4 cellular offices and tea station; new canopy over rear service yard between existing main building and existing detached external store; general internal alterations to existing ground and first floor living, dining, bedroom and administration areas; alterations to existing external store to provide staff changing and laundry/utility facilities; new external patio seating area to rear (south) elevation of existing building; 20 car parking spaces including residents, staff, visitor and 1 disabled accessible space; all associated hard and soft landscaping and site development works.

These works appear to have commenced and are ongoing on the site.

SDCC Reg Ref: SD13A/0222

Location: Grounds adjoining St. Augustine's Priory, Edmondstown Road, Dublin 16.

Decision: Granted, 27/06/2014

ABP Appeal: PL06S.243622

Decision: Granted, 31/12/2014

Permission was sought for the erection of a new Primary Care Centre of 3,841sq.m. of 1-4 storeys; construction of new vehicle/bicycle entranceway in Edmondstown Road to replace the existing entrance; a new pedestrian entranceway on Edmondstown Road and two new pedestrian entranceways on Moyville; extensive new site landscaping works to include new boundary treatment, pedestrian and cycle paths and planting and parking for 81 cars, 2 ambulances and 26 bicycles; site

signage to be erected at Edmondstown Road entrance.

This application was granted subject to conditions. On the 10/06/19 SDCC granted an extension of duration (SD13A/0222/EP) for a further 5 no. years.

These works have now been completed and the Primary Care Centre is now operational.

SDCC Reg Ref: SD20A/0320 (Amendment of SD13A/0222)

Location: Grounds adjoining St. Augustine's Priory, Edmondstown Road, Dublin 16.

Decision: Granted, 05/02/21

Amend planning permission Ref. SD13A/0222 for the provision of internal and external alterations to the main Primary Care Centre building resulting in an increase of floor area by 121sq. (GIA) and alterations to the wider layout including access and boundary treatment.

As above.

Similar Developments in the Area

SDCC Reg Ref: SD15A/0017

Location: Scholarstown Road, Rathfarnham, Dublin 16

Decision: Granted, 20/03/2015

ABP Appeal: PL06S.244732

Decision: Granted, 12/9/2015

SDCC granted a 10 year permission for a residential development consisting of 317 dwelling units (247 No. houses and 70 No. apartments) and 223 sq. m. crèche including two vehicular accesses from Scholarstown Road and one vehicular access from Stocking Lane, all associated site and infrastructural works including foul and surface water drainage, 599 No. car parking spaces (534 No. surface and 65 No. underground), landscaping and public open space, boundary walls and fences, roads, cycle paths and footpaths. The development consists of 247 No. houses (detached, semi-detached, terraced and end-terrace two and three storey units) and 70 No. apartments (Block A, B and C) all on a site of approx. 9.77 hectares located south of Scholarstown Road, west of Stocking Lane, north of Ballyboden Waterworks and east of Woodfield Ballyboden.

This development was granted permission by South Dublin County Council and also, following an appeal, by An Bord Pleanála. The Inspector in their Report highlighted that due to its direct access to *'a frequent bus route, with a service every 10 minutes in the peak hour and is located within the Metropolitan Area of the GDA, as defined by the Regional Planning Guidelines, and with the urban footprint of the city and suburbs, its development for residential use is consistent with the above principles of planning policy.'*

The site the subject of this application shares the 15b bus route referred to in the inspector's decision above and also has the benefit of a further 6 bus routes all within walking distance of the site.

ABP Ref: 305878-19

Website: <https://www.scholarstownplanning.ie/>

Decision: Granted, 09/03/2020

An Bord Pleanála granted planning permission for a strategic housing development comprising 590 no. residential units and has a density of 110 units/ha. It also includes 459 no. car parking spaces, which equates to 0.78 car parking spaces per residential unit located at Scholarstown Road, c. 1km

west of the subject site.

The Inspector for this application considered the density to acceptable and stated *Even though a residential density of 110 dwelling units per hectare may appear in stark contrast to the excessively low-density character of the area, I am satisfied that this is the correct and most sustainable use of such land.*

The report also identified that *“Increasing residential density at appropriate locations is national policy and articulated in section 28 guidelines such as the ‘Urban Development and Building Heights, Guidelines for Planning Authorities’ 2018 and ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018. Such increases in density are to ensure the efficient use of zoned and serviced land, which of course, this site is. In addition, Knocklyon is identified in the County Plan as a consolidation area within the Dublin Gateway, an area where there are a range of urban services such as transport, retail, medical and community facilities. ... Increased residential density in suburban locations such as Knocklyon ensure the efficient and increased use of existing and planned services such as shops, commercial, social infrastructure such as schools, libraries and medical facilities. All of these services, whether commercial or social, rely on a critical mass of population to remain viable. In the immediate environs of the site are schools, shops and medical facilities. There are also parks and open spaces, sporting facilities and clubs. All of which will benefit from a higher density development that is a comfortable walkable or cyclable distance away. Even though a residential density of 110 dwellings may appear stark contrast to the excessively low density character of the area, I am satisfied that this is the correct and most sustainable use of such land.”*

In the Inspectors report they identify that *“The proposed development is located at a well-served suburban location close to a variety of amenities and facilities. Current public transport options are limited to low and high frequency bus services without defined bus corridors but this may change in the future as BusConnects is developed. At present however, there are good cycle and pedestrian facilities in the area and the proposed development will add significant improvements to the public realm in this respect. It is inevitable that traffic in all forms will increase as more housing comes on stream. However, I am satisfied that most of the ingredients are in place to encourage existing and future residents to increase modal shift away from car use to more sustainable modes of transport and this can be achieved by the implementation of the mobility management plan and car parking strategy submitted by the applicant.”*

The applicant has arranged the site to ensure that the existing residential amenities enjoyed by neighbouring residences are not negatively impacted upon. This is achieved by the selection of the margins of the site to locate the three storey duplex apartments. The taller and bulkier six storey apartment blocks are massed at the centre of the site and along Scholarstown Road. In addition, the three storey duplex units maintain a minimum of 25 metres from opposing upper floor windows, this is acceptable and I am satisfied that privacy is not an issue. In terms of overshadowing, the applicant has prepared a comprehensive Daylight, Sunlight and Overshadowing Study, that inevitably shows that overshadowing will impact the rear gardens of most properties at some times of the year. This impact is however, temporal and marginal in its impact and will not impact on the habitable rooms of homes to any significant degree. Indeed, there will be no impact from the six storey apartment blocks because they are located at the centre of the site and the only perceptible impact will result from the three storey duplex units. It is interesting to note that most conventional three and four bedroom houses under construction in the area today are typically three storey in height. So I see no reason to restrict the height of the three storey duplex units proposed as they are a sufficient distance from existing houses and of a height that is domestic in scale and innocuous in their impact.

When discussing the alteration to the open character of the road and the introduction of new buildings

in this location the inspector found that *the proposed development will remove the existing open character of the Scholarstown Road and this is a positive thing. This void will be replaced with a new urban streetscape, some new commercial development and a significant pedestrian/cycle route to Dargle Park and beyond. Whilst this change in character is dramatic it is not entirely unexpected given the land use zoning for the site and section 28 guidelines on residential density and building height. I am satisfied that the proposed southern elevations to the Scholarstown Road are of interest and are sufficiently broken up so as not to present an impenetrable street wall. The applicant has proposed a 'front door' to the site along Scholarstown Road that is very different from the low rise, low density suburban development so common in the area.*

In relation to building height the Inspector discussed the rationale for the Urban Development and Building Heights Guidelines for Planning Authorities and the need to assess a development against these criteria, for this site, only a kilometer away from the site the subject of the application the report highlighted the following:

Observers have commented on the prevailing suburban nature of the area and how the development is completely at odds with this character and contrary to development plan objectives and guidelines on height. To this end the applicant has prepared a statement concerning a material contravention of the development plan concerning height and quotes from the Urban Development and Building Heights Guidelines for Planning Authorities, 2018, as the reason for increasing height here. The Building Height guidelines recognise that development plans have historically drawn blanket height caps and this has led to unsustainable densities of development, SPPR 1 seeks to correct this. Section 3.0 of the guidelines sets out how a planning authority should react to development proposals and SPPR 3 is relevant in this case. Specifically, the Board may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

At the scale of the relevant city/town, a low frequency orbital bus route (175) passes along the Scholarstown Road to the front of the site. The higher frequency number 15 (and 15B) bus route from Ballycullen Road to Clongriffin via the city centre passes to the west of the site. This route passes along the Scholarstown Road with stops approximately 150 metres away near the Orlagh roundabout or 250 metres away via Dargle Park to Knocklyon Road. There are no other public transport modes in the area that are convenient to the site, however, I note that the 175 bus route connects with the Red Line Luas at Tallaght and the Green Line Luas at Dundrum. The area is not identified as a sensitive landscape or conservation area. Other than Ros Mor House and its lodge cottage, there are no other sensitive built environment receptors. As it is Ros Mor House is well screened by mature vegetation and will remain so in the current proposal. In addition, a significant landscaped open space area provides a buffer to the protected structure and the lodge house will be sited between the five storey wing of block C2 and a three storey duplex unit. The proposal will make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve increased densities but with sufficient variety in scale and form to respond to adjoining developments and create visual interest in the streetscape.

At the scale of district/ neighbourhood/ street the development will make a positive contribution to the suburban neighbourhood and streetscape by creating a new and active street frontage. The development will integrate well with the existing environment and provide good pedestrian connectivity across the site. In addition, the development will contribute to the mix of uses, building and dwelling typologies available in the neighbourhood by the introduction of one and two bedroom apartments, together with 3 bed units and some commercial development. At the scale of the site/building, the applicant has prepared a wide variety of drawings and studies to demonstrate and maximise access to natural daylight, ventilation, views and minimise overshadowing and loss of light. I am satisfied that the optimal design approach has been achieved.

Specifically, the choice of brick as the predominant building finish is suitably robust and attractive at this location. The new and improved public realm is responsive to the needs of pedestrians and cyclists, that it is hoped will avail of this route to and from locally available services. I am satisfied that the proposed development will bring a more urban character to the area that will in turn improve the quality of Scholarstown Road as an urban street rather than a vehicle dominated road.

When considering the amenity of the future occupants the inspector addresses some concerns of the local planning authority that some of the units may be close together resulting in overlooking and loss of privacy. The inspector's report puts forward the following argument.

It is a fact that the gables of apartment blocks are as close as 5 meters in terms of blocks B1 and B2, but greater distances are achieved up to 10 and 15 metres in respect of other blocks. I support the creation of an urban environment and a characteristic of urban living is slightly closer separation distances between habitable room windows. I agree with the planning authority's reservations up to a point, however, not in all cases. In my view the worst cases are to be found between blocks B2 and B3, B2 and B1 and C1 and C2. It is only these gable end units that should have secondary bedroom windows fitted with obscure glazing. Ground floor privacy barriers to the rear amenity spaces associated with duplex units A1 to A4 is a sensible recommendation made by the planning authority and I agree.

In the conclusion of this decision the inspector states that *"I consider the principle of residential development to be acceptable on this site. I am of the opinion that this is a zoned, serviceable site within an established urban area where a wide range of services and facilities exist. I have no information before me to believe that the proposal, if permitted would put undue strain on services and facilities in the area. In my opinion, the proposal will provide a high quality development, with an appropriate mix of apartment units and an acceptable density of development. I am satisfied that the proposal will not impact on the visual or residential amenities of the area, to such an extent as to warrant a refusal of permission."*

The site the subject of this application is within 10 minutes walk of this site and has access to similar existing facilities including excellent public transport, schools, shops and community facilities. As a result the approach for increased density and height, along with creating a more attractive urban edge in this area also applies to this site. The proposal, the subject of this application also provides significant benefits to the locality through the provision of additional shops, a creche and a new public park and walk around the site which is available for existing residents in the area to use.

SECTION 5 PROPOSED DEVELOPMENT

The proposal is for a strategic housing development on this site of 3.8ha consisting of the:

The development will consist of the demolition of the existing former Institutional buildings and associated outbuildings (c.5,231 sq.m) and construction of a new residential development comprising 402 no. apartments (39 no. 1 beds, 302 no. 2 beds and 61 no. 3 beds) within 3 no. blocks ranging in height from 2 to 5 storeys over basement/ lower ground floor. All residential units will be provided with associated private balconies/ terraces to the north/ south/ east/ west elevations. The development will include the following:

- Block A up to 5 storeys over basement/ lower ground floor providing 118 no. units.
- Block B up to 5 storeys over basement providing 123 no. units.
- Block C up to 5 storeys over basement/ lower ground floor providing 161 no. units.

The development will also include a creche (c.656 sq.m) and 2 no. retail units (c.262 sq.m and c.97 sq.m) all located within Block A, along with c.322 sq.m of internal residential communal space located in Block C. The development will include the provision of a new public park in the north of the site along Taylor's Lane.

The development will include 290 no. car parking spaces and 1,054 no. cycle parking spaces provided at basement/surface level. The development will include for a revised vehicular access from Edmondstown Road and an emergency vehicular access from Taylor's Lane along with pedestrian/cyclist accesses to/from the site. The development will include for road improvement works along Edmondstown Road including the existing junction of Scholarstown Road/ Edmondstown Road.

The development will include for all associated site development works, open spaces, landscaping, SuDs features, boundary treatments, plant areas, waste management areas/bin stores, car/cycle parking areas (including EV parking), and services provision (including ESB substation/ kiosks).

The breakdown of 402 no. residential units will be as follows:

| Unit Type | Number of Units | Percentage |
|-----------------|-----------------|-------------|
| 1 bed apartment | 39 | 10% |
| 2 bed apartment | 302 | 75% |
| 3 bed apartment | 61 | 15% |
| Total | 402 | 100% |

The proposed development also provides for communal rooms, concierge, public plazas and public parks. This will create an attractive place for future residents of this development.

SECTION 6 RATIONALE FOR DEVELOPMENT

| Development Proposal | Permitted by ABP Statistics | Proposed LRD Statistics |
|--------------------------|---|--|
| No. of residential units | 496 no. residential units as follows: <ul style="list-style-type: none"> - 36 no. 1 beds (7%) - 391 no. 2 beds (79%) - 69 no. 3 beds (14%) | 402 no residential units as follows: <ul style="list-style-type: none"> - 39 no. 1 beds (10%) - 302 no. 2 beds (75%) - 61 no. 3 beds (15%) |
| Additional Facilities | Crèche (655 sqm) providing spaces for 124 no children Retail Units <ul style="list-style-type: none"> • Retail 1: 262 sqm • Retail 2: 97 sqm Meeting/Communal rooms: 278sqm | Crèche (656 sqm) with spaces for 124 no children Retail Units <ul style="list-style-type: none"> • Retail 1: 262 sqm • Retail 2: 97 sqm Meeting/Communal rooms: 322sqm |
| Site Area | 3.8 hectares | 3.8 hectares |
| Net Site Area | 3.5 hectares | 3.5 hectares |
| Plot Ratio | 1.53 | 1.22 |
| Site Coverage | 32% | 35.4% |
| Residential Density | 141.7 units/ha | 114.9 units/ha |
| Building Height | 2 to 7 storeys | 2 to 5 storeys over basement/ lower ground floor |
| Aspect | 50.2 % dual aspect 49.8% single aspect | 53.5% dual aspect 46.5% single aspect |
| Public Open Space | 9,800 sqm (28%) 5,400 sq.m – public open space to the front 4,400sqm - woodland walk | 9,800sqm (28%) 5,400 sq.m – public open space to the front 4,400sqm - woodland walk |
| Communal Open Space | 3675 sqm (11%) | 3,600 sqm (10%) |
| Car Parking | 372 no. car parking spaces <ul style="list-style-type: none"> • 347 no. basement spaces (residential ratio of 0.75) and • 25 no. surface spaces | 290 no. car parking spaces <ul style="list-style-type: none"> • 265 no. basement spaces and • 25 no. surface spaces |
| Cycle Parking | 1144 no. cycle parking spaces <ul style="list-style-type: none"> • 992 no. basement spaces and • 152 no. surface spaces | 1054 no. cycle parking spaces <ul style="list-style-type: none"> • 832 no. long term spaces • 222 no. short term |

Principle of development

This site, which measures c. 3.8ha gross (3.5ha net), is zoned Objective RES “to protect and/or improve residential amenity” in the South Dublin County Development Plan 2022 – 2028. Within this zoning new residential development is acceptable in principle on this site.

The principle of development is established through the grant of permission by An Bord Pleanála for 496 no. units on this site along with retail, parking, open space, and all associated works and ranging in height up to 7 storeys.

It is also noted that both South Dublin County Council and An Bord Pleanála agreed that this is an appropriate site for residential development, in line with the zoning of the site in the Development

Plan. This is demonstrated by both the Inspectors report and subsequent grant of permission from ABP and also by the Chief Executives Report on the SHD application which stated: *“The proposed development, being predominantly residential scheme, is permissible in principle. Ancillary retail, creche and community facilities, and a public park, are all permissible under the zoning.”*

Furthermore, it is noted that this zoning, RES - *“to protect and/ or improve residential amenity”* has been retained in the recently adopted Development Plan 2022-2028. The LRD Opinion issued from SDCC has further confirmed that *“Residential development is permitted in principle under this zoning objective”*. The Opinion goes on to state that *“The uses proposed are listed as follows in the zoning matrix:*

- Residential – Permitted in Principle
- Childcare Facilities – Open for Consideration
- Shop-Neighbourhood – Open for Consideration”

It is worth noting that this site has been zoned for residential development since 2004 and has yet to be delivered due to the significant constraints on the site which are discussed below.



Figure 12 Development plan maps 2004 - 2010 and 2010-2016



Figure 13 Land use zoning 2016 - 2022 and 2022-2028

As a result, this proposed revised application is being submitted which provides for a similar layout but with reduced building height and overall mass, unit numbers, density and car parking in line with comments by SDCC. Further to ecological surveys have been carried out and the landscaping strategy ensures the replacement of the trees on site with native and more appropriate species to this area to enhance the biodiversity of this site. These measures address SDCC’s previous reasons for refusal are appropriately. This is confirmed by the LRD Opinion Conclusion and Recommendation which states that *“it is the conclusion of the Planning Authority that the submitted particulars alone and in their present form constitute a reasonable basis for making an LRD planning application subject to further consideration and amendment as set out in the foregoing report.”*

This is also in line with National and Regional Planning Policy given the proposed development site is located within the metropolitan area of Dublin city, within the existing built-up area of Ballyboden and in close proximity to existing facilities, services and public transport. Given the good, high quality existing facilities in the area, this is an appropriate location for a high-density residential development. The increased density and residential mix will increase demand for public transport and existing services and facilities in the area making public transport routes and services more viable and enabling their growth.

In line with the NPF and RSES policies this site, with its ready access to a range of bus routes, cycle routes, schools, public open spaces, existing community facilities and retail is considered to be a highly sustainable site which is appropriate for higher density residential development. The redevelopment of this site will achieve national and regional objectives of consolidation and compact growth.

Guiding principles for the site layout

The overall layout is the same as that permitted by ABP under ABP Reg Ref 307222-20. This is due to the site characteristics/constraints which have informed the chosen design and layout. Furthermore, the approach was found to be appropriate to the area. However, the development has been amended to take into account the concerns raised by South Dublin County Council regarding the height and density. This has resulted in the development being reduced from 7 storeys to 5 storeys

over lower ground floor/ base.

The number of units has also been reduced by nearly 20% from 496 no. units to 402 no. units, thereby reducing the density from 141.7 uph to 114.9uph. These alterations result in the bulk, scale and massing of the buildings being reduced, while the layout maintains an appropriate street frontage and good urban design. These are demonstrated by the submitted photomontages as well as the architect's pack.

The reduced scale is closer in height to the surrounding. However, it is worth noting that the streetscene in this area has a variation of building types, heights and positions in relation to Taylors Lane, and there is no single, unified streetscene within the area. Also, given the size of the site, it has the opportunity to create a unique character of its own.

THE DESIGN PROCESS

The constraints on the site include an existing regionally strategic Irish Water main supply running along the northern portion of the site parallel to Taylors Lane, a small area identified as being within flood zone area B in the north west corner of the site, the existing mature category A trees within the site, and a small ditch to the south. The apartment blocks have been carefully located with these constraints in mind to ensure the best and most appropriate form of development occurs on the site. As a result, the blocks have been located away from the boundaries to the north, east and south into more central location on the site, creating a single central vehicular street within the development. Pedestrian and cycle routes are located throughout the development, including an attractive public walking route along the east and south of the site and a new public park to the north. The location of the public park also reflects the former institutional character and historic relationship with residential areas to the north, however, the current proposal now seeks to open up the former open space as a new public park for the community.

A key driver of design was to ensure a sense of security and overlooking of these spaces by ensuring all the new apartment blocks address the new public open space. It is considered that the retention of some of the existing trees, the creation of a new public park and the new routes to the east and along the ditch to the south, with additional native tree planting will help to integrate the proposed development into the area, will create an ecological corridor and will ensure the existing open character within the site is retained. These open spaces are interconnected by a variety of paths, and smaller public open spaces which are car free creating an attractive, peaceful area to be in.

Site Constraints

The proposed layout has been informed by the subject site's location and existing landforms.

As highlighted above there are a number of constraints and opportunities with this site, which have informed the design and layout of the proposed development.

- The underground watermain cuts through the northern part of the site limiting the development possibilities along Taylor's Lane forcing all building further south into the site.
- The retention of numerous trees on site, particularly the Category A trees to the north of the site, limit the possible layouts for the proposed development.
- The existing ditch along the southern boundary is currently in poor condition but presents an opportunity for improvement through the landscaping plan and the creation of an attractive feature within the site.
- The existing trees along the eastern boundary provide a natural boundary between the development site and the existing houses to the east and are an attractive feature within the

site.

- The existing junction between Scholarstown Road and Edmondstown Road provides a possibility for a new vehicular entrance into the subject site.

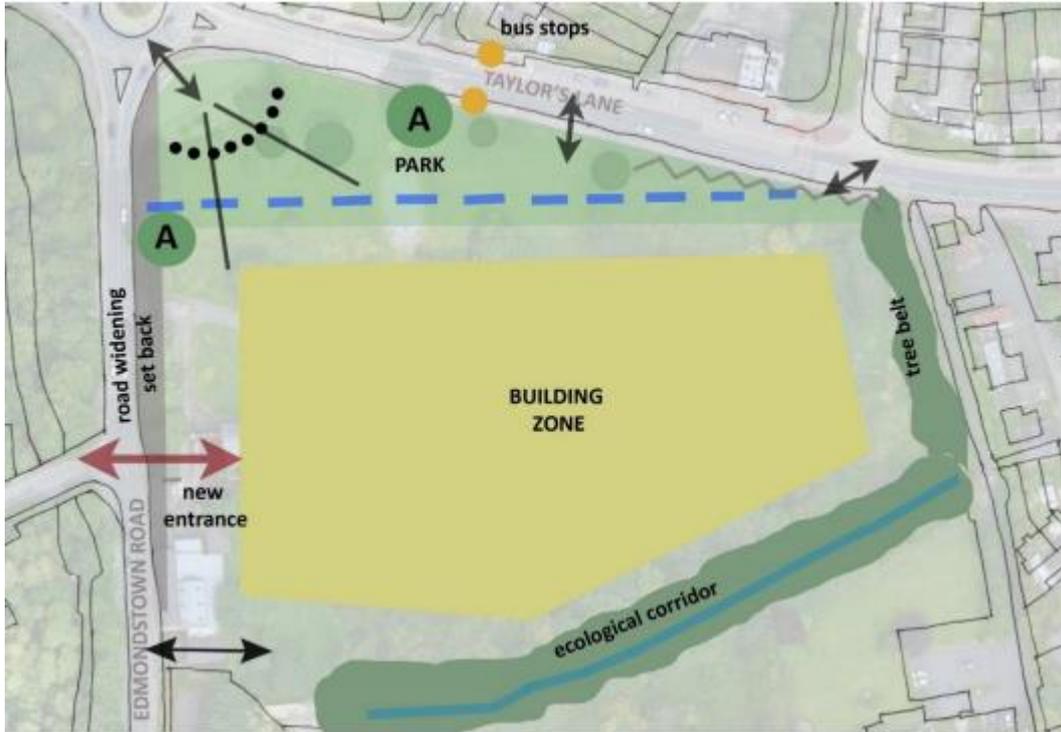


Figure 14 Site's Opportunities and Constraints. Source: MCORM Architects Design Report

Alternative Layouts Considered

A range of site strategies/ options were considered for the site. However, none of them were considered appropriate for the site.

The first option considered a medium density housing development with a range of house types including ranging in height from 2 to 4 storeys in height and delivering a density of development of c. 60 per hectare. However, this layout was considered inappropriate due to the road dominance in the proposal along with the surface car parking. Furthermore, it does not make best use of available land in this highly sustainable site which is easily accessible by public transport, foot and cycle and is therefore contrary to national and regional policy.

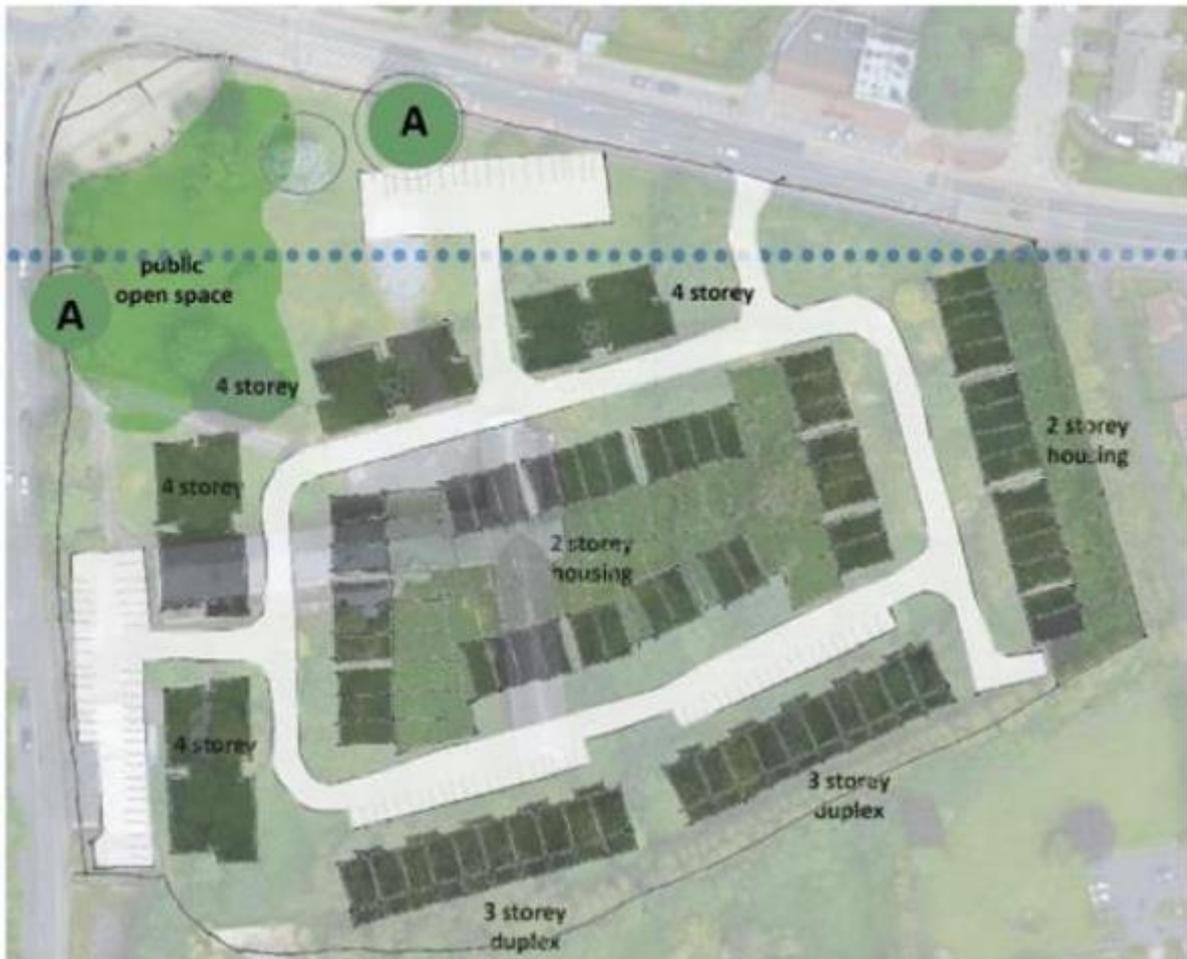


Figure 15 MCORM Option A

The second option was for a higher a higher density and provided for a mix of 4 and 5 storey apartment blocks with a mix of basement and surface car parking along with a centralised road running through the scheme. While the increased density was considered appropriate it did result in the removal of Category A trees from the site, it also resulted in built development on both sides of the underground mains. Overall, the development was considered to be overly car dominated scheme despite the limited car parking provision and the public open space was more piecemeal.

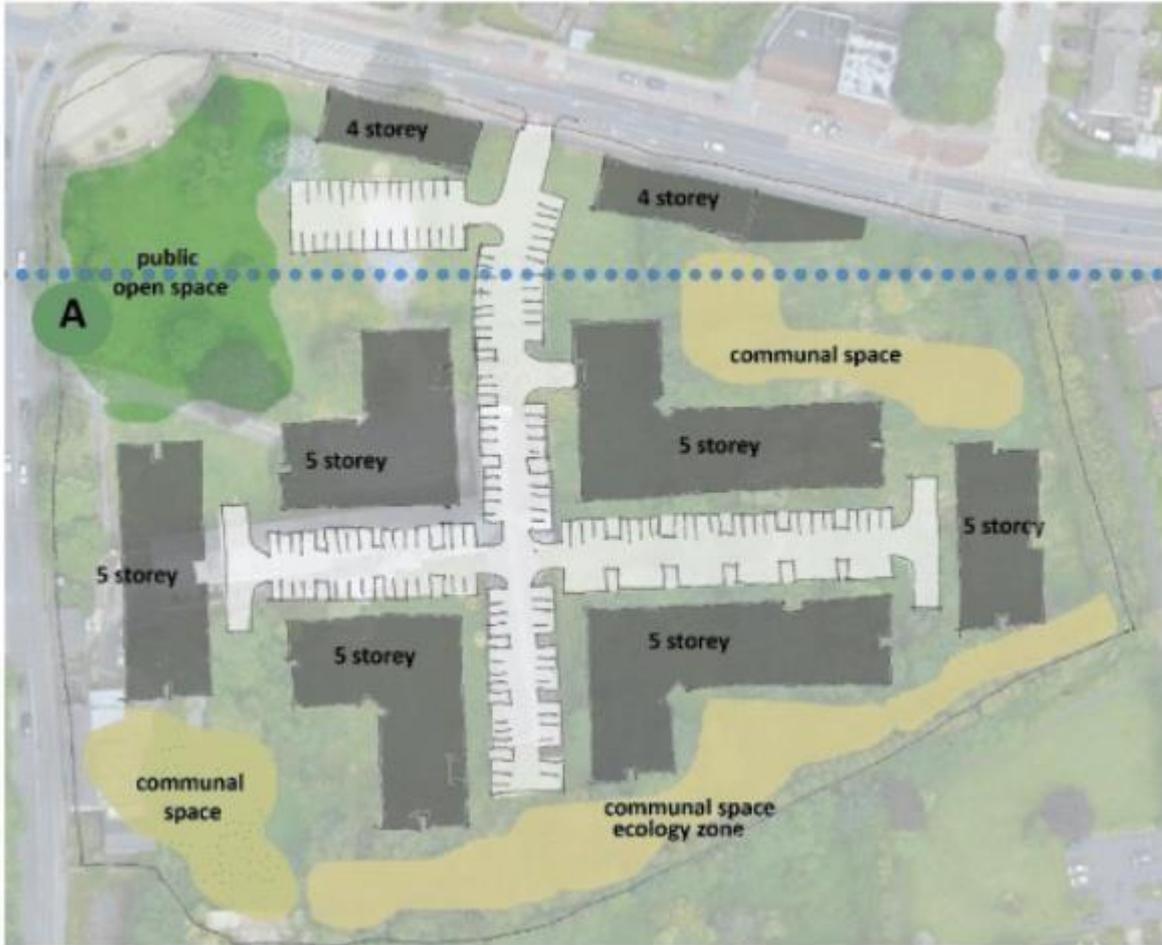


Figure 16 MCORM Option B

Option C also proposed a predominantly 4-5 storey apartment development with an entrance off Edmondstown Road, and with a centralised public open space in the centre of the development. However, again it had some parking underground and some on the surface resulting in the public open space being surrounded on all sides by roads. It also resulted in the redirection of the underground pipe to run more centrally through the site, however, this would have resulted in significant problems with regard to the basement car parking and the taking in charge of this pipe.

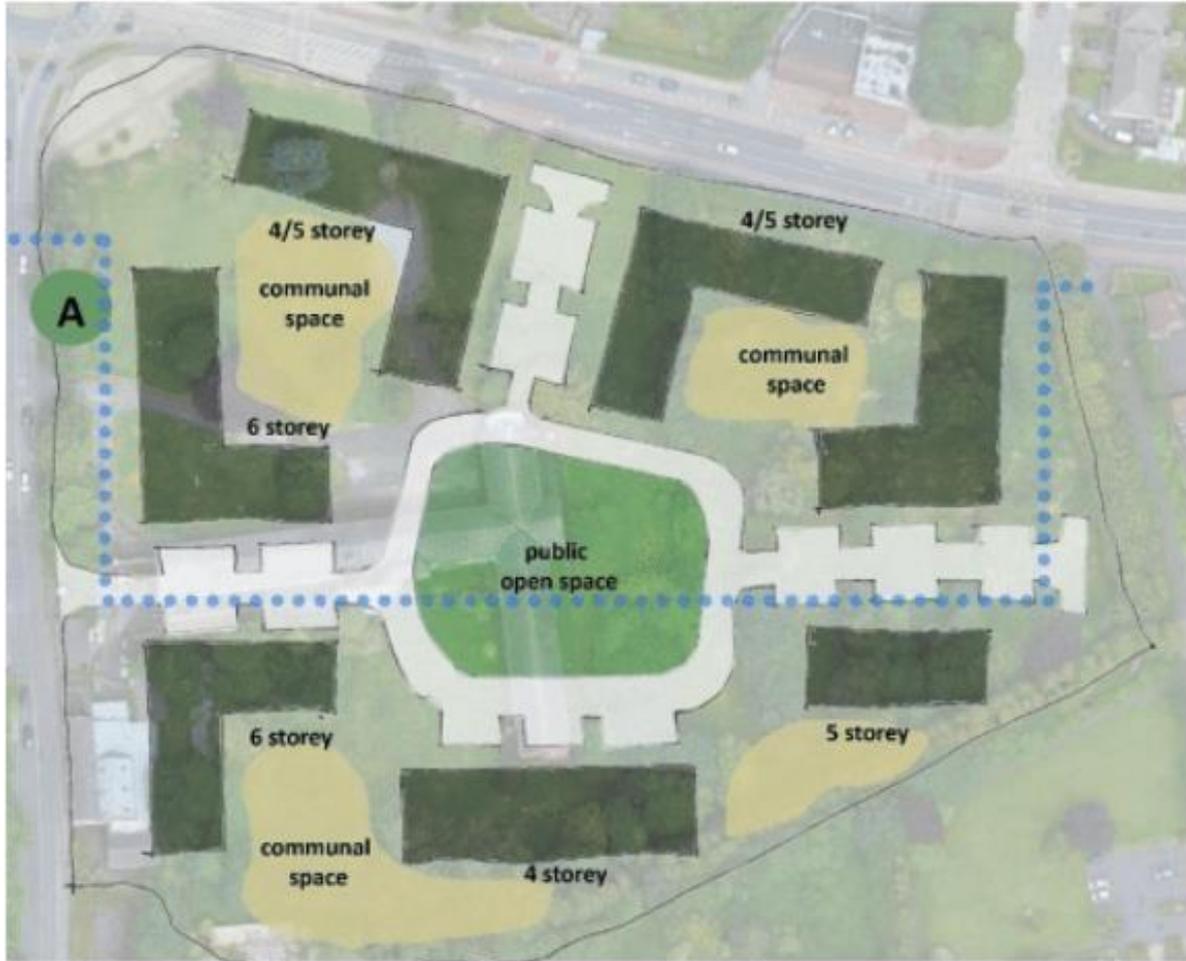


Figure 17 MCORM Option C

Option D further increased the density of the development to 550 units, which is higher than the current proposal the subject of this application. The proposal also continued with the option of an entrance off Edmondstown Road which had been considered appropriate. However, the proposal retained the redirection of the watermain which had issues with regard to taking in charge. A positive of this development was the majority of the car parking was located in the basement with limited roads network and parking at surface level. While this proposal was considered the most successful in terms of storey height the relocation of the underground pipe resulted in a development that was not viable.

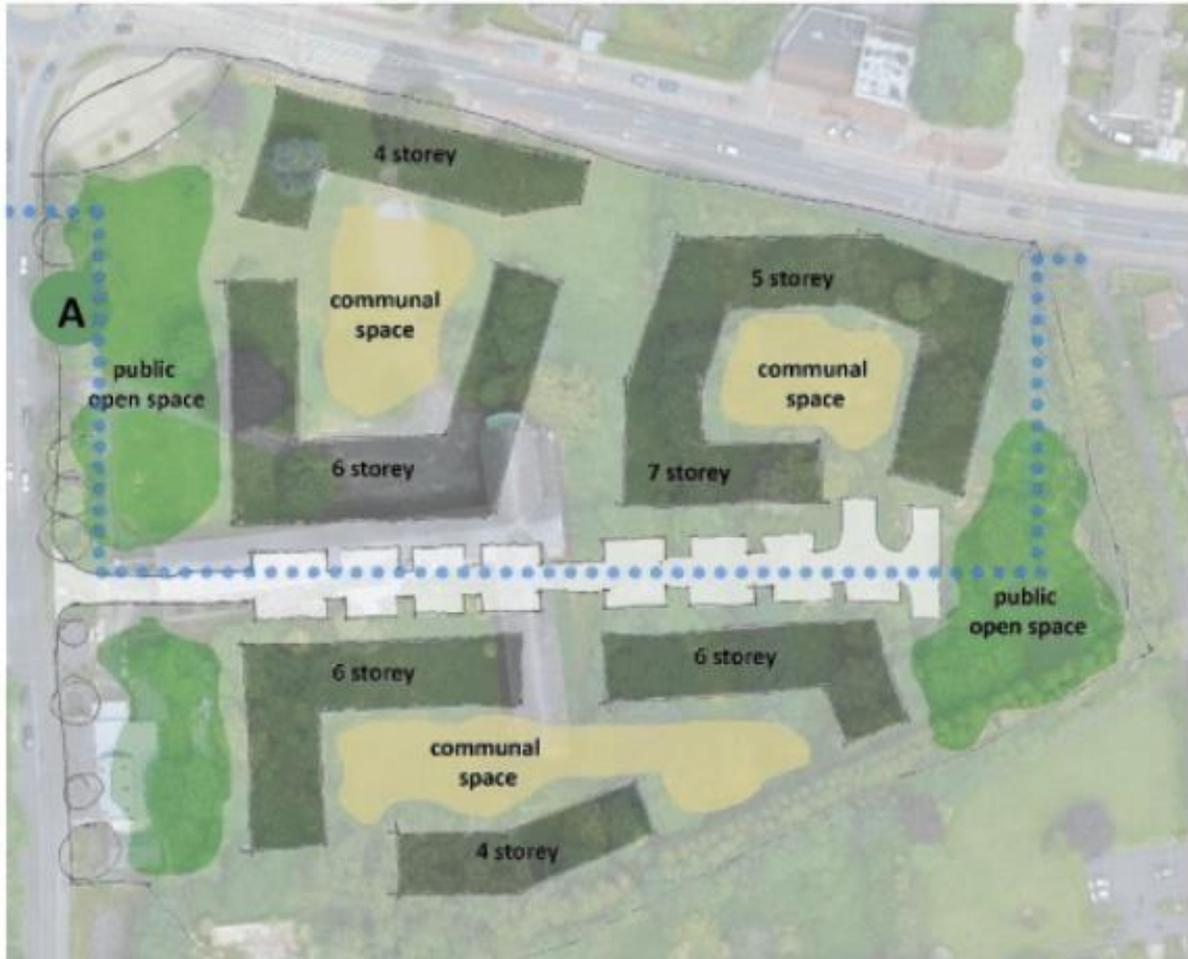


Figure 18 MCORM Option D

Having considered all of the options it was considered that there were certain key elements which had to be achieved in order to develop this site which includes:

- The existing underground pipe cannot be relocated (confirmed by IW)
- The majority of car parking needs to be located underground.
- The most appropriate vehicular access is off Edmondstown Road not Taylor's Lane
- Increased heights and density were appropriate to this location and were more successful than lower densities in this location.
- The small ditch was a feature which could be enhanced within any future scheme.
- Given the constraints of the pipe to the northern end of the site, the most appropriate use for this area of the site was a public park for the wider community.
- To provide sufficient and appropriate surveillance of the area and the surrounding network it was appropriate to increase the height to provide a sense of presence and enclosure to the area.

The proposed development is considered to meet all of these key layout criteria for the site.

Proposed Design

The proposed development still comprises 3 no. urban blocks – Block A, Block B and Block C in the same location and footprint. This layout has been approved by An Bord Pleanála. To address the concerns regarding character, height and density raised by SDCC the height has been reduced but the overall layout has been maintained.



Figure 19 Proposed Design

Block A consists of two L-shaped sections which create an overall rectangular shape. These two L-shaped sections frame the communal open space providing sufficient overlooking and passive surveillance to create a safe environment for residents. The northern edge of this apartment block fronts onto the public park which will provide active and passive surveillance on this public open space. There are front doors into the duplex apartments at lower ground floor level and also access for the creche to the play area. The western edge of this block contains the retail units and the crèche on the ground floor and lower ground floor level. These units will provide active frontage along the western edge of the development, which will help to create a sense of place and provide further passive surveillance. The southern block overlooks the Central Street, while the east overlooks the public path linking the new public path to the ecological corridor.

Block B consists of 3 no. five storey buildings placed in a north-south orientation separated by 2 no. two storey duplex buildings. The communal open space for this block is provided in two separate spaces, separated by the middle 5 storey building. The two storey duplexes are located at the southern end of these communal open spaces, providing passive surveillance and active front doors to the ecological corridor along the south of the site, closing off the communal open space, and also, due to their lower height ensuring these courtyards get good levels of sunlight and daylight.

Block C consists of a single irregular polygon shaped building with a central courtyard. The building frames an internal courtyard which serves as the communal open space for the building. The communal open space is overlooked by the apartments and provides a variety of spaces. The northern edge provides an urban edge along this section of the public park. Due to the shape of the site, the northern edge of this block is closer to Taylor's Lane than the northern sections of Block A. This block, therefore, provides an increased level of enclosure and frontage to Taylor's Lane.

The passive surveillance provided by the three apartment blocks will provide a sense of safety and security throughout the public and communal open spaces. This will help to provide a high quality residential development and a strong sense of place.

The Central Street provides the vehicular access to each of the basement car parks. A turning point has been provided at the eastern end of this central street. The Central Street and the turning area have been carefully landscaped to ensure that pedestrian and cyclists are provided with clear and safe routes through the development and to ensure that the street does not dominate as a road through the scheme.

Building height

The height of all the buildings have been reduced for the development. It is now of a similar height to the existing building on site. In addition, the reduction in height compared to the ABP SHD permitted development also reduces down the density and number of units proposed within the development.

The existing building, while a 3-storey building, actually measures c. 13.357m at ridge height which is the equivalent of a 4 storey building and c. 22.327m at the steeple (equivalent to c. 7 storey building). The proposed buildings are up to 16.325m at their highest point when viewed from the back or south of the site. This is less than 3m taller than the ridge height of the existing building, or the equivalent of a single storey. It is also c. 6m smaller than the steeple of the existing building.



Figure 20 Comparison between existing and proposed finished floor levels and scale/building height.

Block A has been reduced in height from 7 storeys along Taylors Lane and Edmondstown Road to 5 storeys in height. This retains a strong urban edge to these frontages while reducing the number of units proposed and the overall impact on the development. Block A retains the careful gradation in heights reflecting the varying heights around the site. This can be seen in the approach to the Edmondstown Road frontage.



Figure 21 Proposed Block A frontage along Taylors Lane



Figure 22 Permitted Block A frontage along Taylors Lane



Figure 23 Block A as proposed versus block A as permitted along Edmonstown Road

Block B has also been reduced in height to provide three 5 storey buildings along with two 2 storey buildings, rather than 7 storeys. The retention of 5 storey buildings, stepping down to the two storey buildings is to ensure that there is still a sense of enclosure along the southern boundary, as well as overlooking and security of this new proposed woodland walkway.



Figure 24 New proposed elevation for Block B



Figure 25 Permitted elevation by ABP for Block B

Finally block C has also been reduced in height to 5 storeys to retain the presence and good urban design features of the previous permission, while reducing the overall number of units within the development.



Figure 26 Proposed Block C frontage along Taylors Lane



Figure 27 Permitted Block C frontage along Taylors Lane by ABP



Figure 28 Proposed block C frontage when viewed from within the site.



Figure 29 ABP Permitted block C frontage when viewed from inside the site.

It is our opinion that the proposed building heights have been appropriately considered as part of the subject development, the grant of permission by An Bord Pleanála and the subsequent Judicial Review which quashed the decision. The proposed new height range up to 5 storeys in height. These have been sited to ensure an appropriate sense of enclosure within the development, while also still providing a strong urban edge to the surrounding roads and the proposed park and have been located to ensure that all communal open spaces and public open spaces achieve a high level of amenity. Given the context of the site, at a roundabout junction fronting onto two main roads, the large size of the site, and the fact that there are no immediate neighbours immediately adjoining the location of the buildings, the proposed height is considered appropriate.

The Building Height Guidelines in addition to the National Planning Framework encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl. On this basis it is considered appropriate to increase the height of development in this location in order to achieve a suitable sustainable density for this strategic site. Furthermore, it is considered that the high-quality design and layout of the development enhances the appearance of the area and creates an attractive feature in this area. It is considered that any reduction below 5 storeys in height would not achieve any credible urban design goals or create a sense of identity for the development.

Density

The proposed development provides 402 no. residential units on a net site area of 3.5 hectares. This equates to a density of 114.9 units per hectare. This is in line with both national, regional and local plan policy.

The South Dublin County Development Plan 2022-2028 states in policy H6 Objective 4 *“To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/ or high capacity public transport*

nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.

This site, due to its location next to both Taylors Lane and Edmondstown Road and within an urban area with good walking and cycling facilities, nearby community services and amenities and good public transport, is appropriate for higher density development. The site is also sufficiently large, and set sufficiently away from any neighbouring properties to be able to establish its own density, style and height.

Dwelling Mix

The proposed unit mix will provide suitable accommodation for a mix of households, improving the existing housing stock in the area, which is predominantly one and two storey detached, semi-detached and terraced larger family houses. The units will cater for individuals, couples, people looking to downsize and young families enabling greater flexibility and choice in the area for those looking to live here.

Submitted with this application is a Housing Demand and Composition Assessment Report of the surrounding area by KPMG. This report has found that:

“The proposed development is consistent with the requirements of national, regional and local policy objectives. It represents an efficient use of a constrained brownfield site through densification (i.e., limiting urban sprawl) and will help ensure that future housing type needs are adequately addressed.

Since the area’s demographic and housing profile is over-saturated by large underoccupied two-story-homes, the proposed scheme will help rebalance the area’s current housing variety in the following ways:

- *The proposed unit mix provides starter-home options to single people, couples and small families in this highly accessible, commuter area.*
- *The proposed unit mix provides options to an older demographic who may consider ‘down-sizing’ within their local area.*

County and local planning application pipeline, sales and rental data indicates that:

- *there is a strong demand for one- and two-bedroom units in the area, with these units currently accounting for 86.6% of the active application pipeline.*
- *there will be a future shortfall in one- and two-bed units in the area (even considering the current granted applications).*
- *The large majority of one- and two-bed units within the local Electoral Division catchment are dominated by a single Build-to-Rent (58.6%). This BTR will add a more transient dimension to the otherwise settled community which could potentially be ‘rebalanced’ and offset by the Taylors Lane scheme once the units are on the open market.*

Pending further research, other initial findings from the study include the following:

- *As per the SDCC Housing Delivery Action Plan 2022-2026, 1 the developers 10% Part V contribution of 40 units will help the council to meet its wider social and affordable housing targets.*
- *The Taylors Lane area is a highly accessible area, being served by 16 bus stops and 5 routes within a 10-minute walking time catchment.*
- *Pending the forthcoming results of the 2022 Census, KPMG Future Analytics notes that there are limitations with the 2016 Census data which has informed the council’s housing demand projections. This is in addition to the planning application pipeline data which suggests that there*

is currently an adequate supply of smaller units.

To ensure that the development provides the right supply to the market, KPMG Future Analytics recommends that the Planning Authority consider removing the 30% prescribed requirement per scheme. The council could instead consider applying the requirement to a general county level target. This will ultimately help ensure that unit mix requirements are appropriate to the local context."

Residential Development Standards

The subject development has been designed to accord with residential development standards as prescribed in the South Dublin County Development Plan 2022-2028 and the Apartment Guidelines, 2022. MCORM Architects have prepared a Housing Quality Assessments which provides a detailed assessment of the size of the units, aggregate floor areas of living and bedroom spaces, storage areas and open space for examples. This demonstrated that the proposed development meets the standards in all cases and exceeds the standards in many cases. Therefore, the subject development is acceptable in relation to the standards outlined in the South Dublin County Development Plan 2022-2028 and the Apartment Guidelines, 2022.

Amenity

In terms of the existing neighbours' amenity, the site has the benefit of roads located to the north and west which separate them from any neighbours in these directions. To the east there is an existing treelined boundary which is being enhanced, while to the south there is a ditch with a Primary Care Centre beyond. These factors, combined with the constraints on the site, have resulted in the buildings being located more centrally within the site. Due to the distances involved to the surrounding neighbours and the screening to the east of the site it ensures that none of the existing neighbours will be impacted by the development in terms of overlooking or loss of privacy.

Within the development the layout and design of all the buildings within each block to ensure that there each new apartment enjoys appropriate levels of privacy and are not unduly overlooked. Furthermore, all of the apartments and amenity areas, as set out in the Daylight and Sunlight report have the appropriate access to sunlight and daylight to meet the BRE Standards.

Daylight and sunlight

A Daylight and Sunlight Assessment has been prepared by Digital Dimensions. In terms of impact on adjacent neighbours the report has identified that the *"There will be minimal reduction to the available daylight and sunlight levels to the adjacent dwellings. The results find that any impact on the adjacent residential structures would be minimal and imperceptible. All areas assessed continue to meet or exceed the recommendations of the BRE guidelines (2022).*

Assessment of the quality of the proposed development.

The results find that any impact on the adjacent residential structures would be minimal and imperceptible. There will be a minimal reduction in the available sunlight to the adjacent private adjacent amenity spaces. All areas assessed continue to meet or exceed the recommendations of the BRE guidelines."

In terms of the quality within the proposed development *"When assessed without the presence of trees 99.7% of the Living, Dining, Kitchen and Bedroom spaces achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1. When the assessment is undertaken with the presence of the existing trees 99.1% of the Living, Dining, Kitchen and Bedroom spaces achieve the minimum rooms specific values to be achieved in dwellings. Overall, the results indicate that the rooms will achieve high levels of daylight and they will be bright and pleasant dwellings.*

The Target and Minimum levels set out in EN17037:2018 are not specific to dwellings; they do not

take into account room use or make allowance for rooms that have a lesser requirement for daylight. The results for this assessment indicate a high level of compliance for Minimum level of 96.6% and Target level of 89.2% of rooms achieving the minimum target for each metric when assessed without trees. When this assessment is undertaken with the existing trees, the compliance values are a minimum level of 95% and a target level of 86.9%.

This scheme is well designed for sunlight, with 84.3% of units meeting the minimum recommended 1.5 direct sunlight hours, which meets the recommendations of the BRE guidelines (2022).

The public and communal amenity spaces are well oriented for sunlight and all spaces exceeds 2 hours sunlight over 50% the area as per the recommendations of the BRE guidelines (2022)."

The report concludes at 1.3 that "The results find that any impact on the adjacent residential structures would be minimal and imperceptible. There would be good quality of daylight and sunlight in the proposed apartments and the amenity areas would have sufficient sunlight to be bright and pleasant spaces."

Archaeology and conservation

IAC Archaeology carried out an Architectural Heritage Assessment of the buildings on site as well as an Archaeological Assessment including Test Trenching on the site.

The Architectural Heritage Assessment that there no protected structures on or adjacent to the site, nor is the site in or near an architectural conservation area. None of the buildings on the site or adjacent to it are included in the National Inventory of Architectural Heritage. The historical background shows that there was a house on the application site since the early nineteenth century, though this was demolished later in the century and a new house built on another part of the site. Both of these houses were known as Catherine's Park or St Catherine's Park. In the 1950s the property was acquired by the Augustinian Order and new buildings were erected for use as a college. The nineteenth-century house known as St Catherine's Park was incorporated within the new buildings. In more recent years the property was leased to the Health Service Executive, but it has now closed down and has been vacant for about five years and many of its windows and openings have been boarded up.

The building survey shows that while the external appearance suggests that the entire range of buildings dates from the 1950s, closer examination reveals that the nineteenth-century house is identifiable. Some features from that time include a small number of cornices, the staircase, window and door architraves and some doors. Other features are no longer present, such as the chimney pieces, most of the shutters, some doors and some decorative door surrounds. Some of the furnishings of the chapel have also been removed, including the alter, a number of subsidiary altars and some timber cabinets. There was a previous application for planning permission for the demolition of the buildings and while this was refused the reason for refusal did not include any reference to architectural heritage. The Architectural Conservation Officer at that time declared that the building was not considered to warrant retention, though some features could be salvaged. Since then, the buildings have further deteriorated and key elements have been removed, such as the chimneypieces, the door surrounds from the former entrance hall, most of the shutters, the altars and the vestment cabinets. In the light of the above, there would be no purpose in retaining the former nineteenth-century house at St Catherine's or any of the other buildings on the site.

It has also been noted that the proposed development would have no adverse impact on the character or setting of Whitechurch Library, which is the only protected structure in the vicinity of the application site.

The Archaeological Assessment has identified that there are no recorded monuments within 500m of

the proposed development area. The site is shown on early historic mapping as primarily agricultural land. Two possible mill races have also been identified on the site from the 1820s onwards. In the 18th and 19th centuries, the wider environs of the site were dominated by demesne landscapes, with the first edition Ordnance Survey map of 1838 showing the proposed development area as forming part of a small demesne called Catherine's Park.

Archaeological testing was carried out over the course of two days from 3rd March 2020 using a mechanical excavator fitted with a flat grading bucket. The trenches were positioned to investigate the archaeological potential of the site. No features of archaeological significance were identified during the course of testing and it is clear that the site has been subject to a level of disturbance.

However, it remains possible that ground disturbances associated with the proposed development may have an adverse impact on isolated archaeological features that may exist outside of the excavated test trenches. It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record. Any further mitigation will require approval from the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.

Open space

There are a variety of open spaces provided within the proposed development including public, communal, and private open spaces. Over 28% of the site is public open space. There is c. 5,400sqm of public open space in the form of the park fronting onto Taylors Lane and a further 4,400sqm of public open space in the form of a woodland walkway to the south and east of the development, providing a total of 9,800sqm of new public open space to this area. This calculation does not include the routes between Block A and C and between Block B and C.

In terms of communal open space there is a further c. 3,675sqm space throughout the development. If the communal open space (3,675sqm), all the routes between blocks (1,200sqm), the park (5,400sqm) and the woodland walk (4,400sqm) are taken into account there is over 14,675sqm of open space which is over 40% of the site.

Private open space is provided for each residential unit as terraces for the ground floor units and as balconies for the units on all other floors. These areas of private open space are in line with the Apartment Guidelines requirements.

Communal open spaces are provided for each of the apartment blocks in excess of the Apartment Guideline requirements and have good daylight and sunlight while providing for a range of passive and active areas.

- The communal open space for Block A measures 1,110sqm and is framed by the two L-shaped buildings which make up the block. Access to the communal open space is provided from the south-west corner and from the cores in each block.
- Block B's communal open space measures 1,100sqm and is provided in two separate spaces to the north of the two storey duplex buildings, and between the 3 parallel buildings. The boundary between these communal and public open spaces is cleverly defined with the use of the slightly sloping topography and soft landscaping. In addition, the building line of the apartment blocks marks the boundary clearly.
- The communal open space for Block C measures 1,400sqm is fully enclosed by the buildings within the Block and as such is clearly defined as separate from the surrounding public open spaces.

Green spaces, native planting, pathways and seating areas are all provided within each of these communal open spaces. These communal open spaces are clearly defined as separate to private and public open spaces by using soft and hard landscaping. The varying site levels are also used to define the communal open spaces, as with the communal open space in Block A.

The public open spaces include the public park, the Central Street, and the walkway along the southern and eastern boundary. These public open spaces will be characterised by pathways, informal play areas, seating areas, existing mature trees and proposed native tree planting.

The proposed buildings are set back from Taylors Lane to allow the Category A trees on site to be retained and protected the underground pipe network. This set back has allowed the creation of a large public park with existing established attractive trees along Taylors Lane which will serve both the proposed development and the local area. This park creates a connection between the proposed apartment buildings and integrating the proposed development with the surrounding area. This public park contains a variety of spaces to allow a variety of users and age to enjoy the space. Pathways weave through this park connecting it with the proposed apartment buildings and the public footpath along Taylors Lane following expected desire lines through the site. A dedicated outdoor play area is provided for the creche to the north of Block A adjacent to the park. This area will be appropriately screened from the public park to ensure the children's safety.

The Central Street provides the vehicular access to the three basement car parks, but it has been carefully landscaped and designed to ensure pedestrians are prioritised.

The existing drainage ditch along the southern boundary will be enhanced through native woodland planting. This will enhance the biodiversity in the area. An amenity walkway will be provided along the southern and eastern boundaries to allow residents to enjoy this native woodland planting. This walkway will provide an alternative route from pedestrians walking or running between Taylors Lane and Edmondstown Road.

This view is reinforced by the findings of the LVIA by Doyle O' Trothaigh Landscape Architects which states that many of the views are either imperceptible long term visual impact (views 1, 2, 3, 5, 6, and 7), or a moderate long term neutral visual impact (views 4, 8, 9 and 11). While view 10 is found to have a moderate long term positive visual impact.

Childcare facilities

A large creche, c. 656 sqm with 124 childcare spaces, is proposed with this application. The proposed development consists of 402 units comprising 32 no. 1 beds, 302 no 2 beds and 61 no. 3 beds. Applying the 2001 Guidelines standard, a demand for 107 childcare spaces may be generated. These guidelines have been updated by the 2022 Apartment guidelines, which allows for the exclusion of one bed units, then the development would generate a private childcare demand of c.97 spaces. As a result, the size of this creche is sufficiently large to accommodate all the children which may be generated within this development and also the surrounding area. This creche is appropriately designed and is located within Block A, close to the entrance and the retail units. Along with classrooms it also has associated office, staff room, kitchen and sanitary facilities.

Transport and road improvements

A Mobility Management Plan, a Parking Strategy, a DMURS compliance statement, and a Traffic and Transport Assessment have been prepared by DBFL Consulting Engineers and submitted with this application.

As highlighted above, there are several bus routes which run past this site, all of which can be accessed within a 5-minute walk or less of the site. The 15b Dublin Bus is within 500m of the subject site and provides a high frequency route. The bus services in the area will be improved by the Bus Connects project, improving an already good service to the area in the future. It is also noted that the 175 bus route connects with the Red Line Luas at Tallaght and the Green Line Luas at Dundrum. As a result, this site, in transport terms, is considered to be a highly sustainable site which is appropriate for higher density and reduced need for private car parking.

As reflection of the concerns raised by SDCC LRD Opinion, the number of car parking spaces has been further reduced to 290 no. car parking spaces (from 320 in the LRD Pre-application Opinion documents and 372 no. car parking spaces in the SHD application). This includes 265 no. at basement level and 25 no. on surface which equates to an overall ratio of 0.70 spaces per unit, however, as 25 of these are for the commercial and creche uses, there is 0.68 spaces per apartment.

The number of cycle parking spaces proposed is for 1,054 no. cycle parking spaces. This includes 826 no. long term residential parking space and 203 no. visitor spaces, equating to a ratio of 2.55 for residential including the visitor spaces or 2.05 for long term residential. The remainder of the cycle spaces are for the retail and creche units and are provided in line with policy.

The placement of the majority of these car parking spaces at basement level along with only one road within the development ensures the development is not dominated by cars and gives priority to pedestrians throughout the development. The reduced level of

car parking spaces and access, along with the high levels of cycle parking spaces (1,054) will encourage a modal shift to more sustainable modes of transport. This level of car parking is considered appropriate given its proximity to a wide range of bus routes, its accessibility to good quality, segregated cycle tracks and the existing community facilities in the area.

The proposed level of car parking, bicycle parking and motorbike parking is considered to be in line with the Sustainable Urban Housing Design Standards for New Apartments. It also reflects the grant of permission and inspectors report on the previously SHD development on this site.

The proposed development site currently has vehicular entry points on Edmondstown Road, to the west of the subject site. These points are being removed and a new vehicular entry point is being created. This development also proposes road improvements to Edmondstown Road to improve the network as well as improving the access to the site. The proposed access to the site for all users will be via Edmondstown Road to the west of the proposed development site, to the south of the existing site entrance which will be closed up. The subject development proposals include the upgrading of the existing Scholarstown Road/ Edmondstown Road signalised junction to increase capacity at the junction. The site access will be incorporated into these works, creating a four-arm signalised crossroads junction.

Pedestrian and cycle links to Taylors Lane has been proposed. One of these access points also serves as an alternative access and egress for residents and emergency services should the primary site access be blocked due to an accident.

Trees

A Tree Survey was carried out by Independent Tree Surveys for the application. Of the individual trees it identified a total of 95 trees and 23 tree groups. They identified two category A trees, 16 category B trees, 57 category C and 20 category U. 22 of the tree groups were classed as category C when assessed collectively, although some groups contain stems of lesser value. There is one group of category U. The report goes on to state that:

“Overall, the site is characterised by a having a large number of trees, with the vast majority of them being of comparatively low value/quality as individual trees. That said, the site does include some better-quality individual trees that are quite prominent from the public highways, especially in the north-western parts of the site.

All of the Ash trees on the site are showing signs of Ash Dieback disease (ADB); unfortunately, these trees are likely to decline in health and condition, and most will die within a few years. The Wych Elm trees growing on the site have all been affected by Dutch Elm disease, with trees 923.1 and 926 now standing dead.”

The report comments that *“There are a large number of trees on the property, however, the relative quality of the trees is comparatively low, on account of the species, condition and management history. The tree survey schedule recorded 81% of the individual trees as being of low value (category C) or unsuited for long-term retention (category U). All 23 tree groups were either category C or U.*

A significant proportion of the trees are of non-native species and include exotic tree species that support low levels of wildlife, both in the trees and ground flora (Leyland Cypress, Lawson Cypress for example). The Cypress tree group G21 includes a large number of closely planted individual trees that are visually prominent on the site and

make up a significant proportion of the proposed tree loss from the site, however, this group is of very low arboricultural and conservation value because of its dense canopy, low habitat potential and high water demand and its removal and replacement with more suitable species should be viewed as a positive rather than a negative land use change.

Many trees have grown up in close proximity to each other as part of deliberate planting for the pitch and putt course, these trees were managed by a cutting regime that has left many disfigured and with growth habits that would render them unable to develop as individuals if left isolated by the removal of neighbouring trees.

The age class and size of many of the trees has contributed to their categorisation as low value, with smaller, younger trees often being of inherently lower amenity, conservation and landscape value than older and larger specimen trees.

A significant number of trees have been affected by disease, storm damage, decay and previous site activity. Diseases include Bleeding Canker in Horse Chestnut, Ash Dieback disease in the Ash trees, and Dutch Elm disease amongst the Wych Elm. Storms have impacted the Cedar, London Plane and Poplar trees in particular. Many trees appear to have been damaged by previous site activity, with the Cherry trees in the northwest badly impacted."

In terms of mitigation the arborist report states that "The proposed development will require the removal of much of the existing tree cover and vegetation and will have a significant initial impact on the existing landscape amenity of the site; however, the comprehensive new planting scheme will provide substantial numbers of new trees to replace those lost as well as incorporating the better-quality trees being retained within the new layout. The full effects of the mitigation provided by the new landscape plan will take some years to fully manifest itself, and the effects will be incremental rather than instant. In the longer term the new planting will contribute significant landscape amenity, along with increasing conservation and arboricultural value that will continue to accrue into the future."

Drainage infrastructure

An Infrastructure Design Report, prepared by DBFL Consulting Engineers and submitted with this application sets the proposed surface water drainage, proposed foul drainage and proposed water supply and distribution. This report outlines in full the strategy, however in brief, the surface water runoff from the building roofs and courtyards will drain via SUDS features to a slung system at basement level and ultimately pass through the attenuation features. These will restrict the outflow from the development to greenfield rates before being discharged via a single outfall to the Owendoher River at the north western corner of the subject site.

The proposed foul drainage has been designed to drain via one outfall to the Irish Water combined sewer in Edmondstown Road. The foul drainage network can be found on DBFL drawing pack. For the water main and supply, as part of the development proposals the existing water main on site will be removed and a new connection to the existing 6" diameter watermain in Edmondstown Road will be made (refer to DBFL Drawings pack). This will feed a cold-water storage tank located at basement level. The water main layout and details including valves, hydrants, metering etc. will be in accordance with Irish Water's Code of Practice and Standard Details for water infrastructure. Existing fire hydrants are located along the site frontage in Edmondstown Road. These will be maintained to cater for any fire at the proposed development. Additional

hydrants will be provided in the proposed development. Hydrants shall comply with the requirements of BS 750:2012 and shall be installed in accordance with Irish Water's Code of Practice and Standard Details.

This report also identifies that the majority of the site is located within Flood Zone C with only a small section of the north eastern corner of the subject site located in Flood Zone B. As a result, all of the development has been located within Flood Zone C. This is set out in full in the Site Specific Flood Risk Assessment Report by DBFL.

Compliance with Part V

The applicant has engaged in discussions with South Dublin County Council in respect of Part V provision. The units, along with the indicative costs, have been provided with this application.

The applicant has allocated 41 no. units for Part V and are identified on the enclosed Part V pack. The initial suggestion is to have these Part V units spread across the three apartment blocks, but these details will be agreed with the local authority in the event of a grant of permission. The costings of the Part V units are attached in the Part V planning pack.

Ecology

Altamar Ecologists have carried out Ecological Impact Assessment (EclA) and a Natura Impact Statement as part of this LRD application. The Ecological Impact Assessment found that there were no badger setts present on site. Furthermore, an otter presence was not noted on the Owendoher River to the west of the site. It also noted that there were no otter holts found on site.

It also found that there was no flora of conservation importance or invasive species noted on the site either during the 2022 or 2023 site surveys. The majority of the site is overgrown grassland with large areas of dense bramble scrub. This report recommended mitigation measures to be in the form of *"pre-construction inspection for terrestrial mammals of conservation importance and control of silt and pollution from the site."* For flora it was recommended that a pre-construction inspection for invasive species is carried out

A number of bat surveys have been carried out on site in 2013, 2018, and 2022. Three species of bats were noted on site in 2022. However, no bat roosts were noted in the buildings or trees. Again, with regard to mitigation it was recommended that a pre-construction/ demolition inspection of buildings and trees is carried out and during the operation of the development there is control of light spill.

In terms of Aquatic Biodiversity this report identifies the links to the Owendoher River and has identified that *"Out of an abundance of caution, it is considered that there is the potential for silt and contaminated runoff to enter this waterbody and transport pollutants to the Owendoher River."* As a result, in terms of mitigation the report recommends that *"Robust mitigation is needed in the form of control of silt, petrochemicals and dust entering the watercourse during construction."*

A series of wintering bird surveys were carried out in 2022 and 2023. This identified a total of 37 no. bird species on site during 10 different surveys. This report identifies that the construction will result in a loss of foraging and nesting habitat for breeding birds. The mitigation measures proposed are that *“the form of control site clearance outside bird nesting season and the provision of compensatory foraging and nesting habitat.”*

The EclA outlines in terms of potential impacts that *“Once developed, the site would be seen as a stable ecological environment. Planting of native species will be important to re-establish nesting and foraging habitats lost. Proximate bat species will be sensitive to light spill. Appropriate measures should be taken to prevent light spill, contaminated surface water run-off and dust entering into adjacent riparian habitats, and in particular the Owendoher River needs to be protected due to the potential for downstream impacts on the watercourse. The new drainage networks will have to comply with SUDS requirements and standard petrochemical interception will be in place.”*

The report sets out under the section titled - *“Adverse effects likely to occur from the project (post mitigation)”* the following:

“Standard construction and operational mitigation measures are proposed. These would ensure that water entering the Owendoher River is clean and uncontaminated, bats are protected and that mitigation in relation to bird nesting and foraging will be in place. However, early implementation of ecological supervision, prior initial mobilisation and enabling works is seen as an important element to the project, particularly in relation to the implementation of surface water runoff mitigation, bat mitigation and the protection of riparian habitats.

With the successful implementation of standard mitigation measures to limit surface water impacts on the watercourses, biodiversity mitigation/supervision, no significant impacts are foreseen from the construction or operation of the proposed project on terrestrial or aquatic ecology. Residual impacts of the proposed project will be localised to the immediate vicinity of the proposed works. It would be expected that bat foraging may be reduced within the site, but this would be deemed not to be significant.

The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on terrestrial biodiversity, aquatic biodiversity and bats through the application of the standard construction and operational phase controls as outlined above. In particular, mitigation measures to ensure compliance with Water Pollution Acts and prevent silt, dust and pollution entering the Owenadoher River will satisfactorily address the potential impacts on downstream biodiversity. No significant adverse impacts on the conservation objectives of European sites are likely in the absence of mitigation measures outlined above.

It is essential that these measures outlined are complied with, to ensure that the proposed development does not have “downstream” environmental impacts and significant impacts on biodiversity on site.”

The report concludes that: *“The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the ecology of the proposed development will*

result in a long term minor adverse not significant residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategies.”

A Natura Impact Statement has been completed by Altemar Marine and Environmental Consultants. This is following an Appropriate Assessment for the proposed project. The Appropriate Assessment concluded that *“Acting on a strictly precautionary basis, an NIS is required in respect of the effects of the project on the South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, and North Bull Island SPA because it cannot be excluded on the basis of best objective scientific information following screening, in the absence of control or mitigation measures that the plan or project, individually and/or in combination with other plans or projects, will have a significant effect on the named European Site/s.”*

As a result, an NIS has been completed. This states in its introduction that *“A NIS or Stage 2 Appropriate Assessment is not required for the effects of the project on all other listed Natura sites above because it can be excluded on the basis of the best objective scientific information following screening that the plan or project, individually and/or in combination with other plans or projects, will have a significant effect on the European Site/s.”*

This Natura Impact Statement examines whether the project, either alone, or in combination with other plans and projects, in the view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European sites.”

The NIS under *“Adverse Effects on the conservation objectives of European sites likely to occur from the project (post mitigation)”* has found the following:

“A robust series of mitigation measures will be carried out. These would ensure that surface water runoff from the proposed works site is clean, uncontaminated and that dust from the works would not significantly impact on the Owendoher River. It should be noted that the early implementation of ecological supervision on site will be at the initial mobilisation and enabling works. This is seen as an important element to the project, particularly in relation to the implementation of surface water runoff mitigation strategies.

With the successful implementation of the mitigation measures to limit surface water impacts on the Owendoher River, including mitigation/supervision, no significant impacts are foreseen from the construction works of the proposed project. Residual impacts of the proposed project will be localised to the immediate vicinity of the proposed works and would not impact on the integrity of downstream Natura 2000 sites.

The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, and North Bull Island SPA, through the application of the standard construction and operational phase controls as outlined above. In particular, the mitigation measures will ensure compliance with Water Pollution Acts, and prevent silt, dust and pollution entering the Owendoher River

will satisfactorily address the potential effects on downstream biodiversity and Natura 2000 sites within Dublin Bay. Adverse effects on the integrity of Natura 2000 sites having regard to their conservation objectives can be objectively ruled out following the implementation of the mitigation measures outlined above.

It is essential that these measures outlined are complied with, to ensure that the proposed development does not have “downstream” environmental impacts. These measures are to protect the surface water, which is the primary vector of impacts from the site, and to ensure that any European Sites are not impacted during construction and operation. Ecological supervision will be on site during the works.

Conclusion

Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development will not result in direct or indirect effects which would have the potential to adversely affect the qualifying interests/special conservation interests of the European sites screened in for NIS with regard to the range, population densities or conservation status of the habitats and species for which these sites are designated (i.e., conservation objectives). All other European Sites were screened out at AA Screening Stage. The proposed project will not will adversely affect the integrity of European sites.

On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.

The proposed project will not will adversely affect the integrity of European sites.”

EIA Screening

It is noted that an EIAR was submitted with the previous Strategic Housing Development (SHD) proposed on this site and which was granted by An Bord Pleanála in September 2020 (Ref. ABP-307222-20) but was subsequently quashed by the High Court following a Judicial Review.

The number of residential units proposed in that SHD application was 496 no., analogous to the 500 unit threshold under (10)(b)(i) of Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended). At the time, it was therefore determined that a full Environmental Impact Assessment Report (EIAR) was necessary.

The current proposal is a reduced scale and quantum of residential development. The number of residential units proposed has been reduced by just under 20%. The number of units, at 402, is significant under the minimum 500 unit threshold (10)(b)(i) of Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended).

Given the reduced quantum and scale of development proposed, it has been determined, as part of this screening report, and with full regard to the various reports prepared with this application (in relation to landscape/visual, traffic/transport, water services, ecology, cultural heritage, etc.) that a full EIAR is not required.

It is further noted that the draft proposal submitted at LRD Stage 2 was also accompanied by an EIAR Screening Report which also concluded that a full EIAR was not required. As part of the LRD

Opinion, it is noted that SDCC acknowledged the EIAR Screening Report and its conclusions and noted the following - *“The applicant has provided an EIA Screening Report, and this should be submitted with the final application to enable the development to be screened for Environmental Impact Assessment.”*

SECTION 7 CONSULTATION

S247 PRE-APPLICATION CONSULTATION

A pre-application S247 meeting reg ref LRDP002/22 was held via Microsoft Teams on the 4th March 2022. The proposal was for the demolition of the existing buildings and the construction of 446 residential units, and a density of 127uph with a similar parking ratio. Block C was reduced in height.

SDCC Attendees included: Eoin Burke, Senior Planner; Colm Maguire, Executive Planner; Stephen Willoughby, Senior Executive Planner – Forward Planning; John Hegarty, Senior Engineer – Roads; Oisín Egan, Executive Parks Superintendent; Ronan Toft, Assistant Engineer – Water Services.

Applicant Attendees included: Trevor Sadler – MCG Planning Director (Agent); Frank Fahy – Shannon Homes (Applicant); Stephen Manning – MCROM Architects Managing Director; Shane Walsh – MCORM Architects Director; David Ledwith – MCORM Architects Senior Architect; Dan Reilly – DBFL Consulting Engineers Director; Nick Fenner - DBFL Consulting Engineers Senior Engineer

Council identified that:

- Public Transport capacity and frequency puts a ceiling on sustainable density on the site. Density is a material contravention of the County Development Plan 2016; and it is unlikely that SDCC can support a material contravention of its own plan.
- Any application to SDCC will be assessed by the Roads Department by way of a technical appraisal of the traffic impact, and if any third parties submit a competing document, this will similarly be assessed by SDCC Roads Department

Applicants' response

The density of the development has been reduced as a result of the reduction in the building height on site. The density proposed is now 114.9uph reduced from 141.7uph. This is a significant reduction, and while it is higher than the surrounding area, it is considered appropriate given its location and proximity to public transport, amenities, cycle lanes and social infrastructure. DBFL are doing a full review of the Traffic and Transport in the area. It is worth noting that the quantum of car parking has also been reduced proportional to the reduction in density.

It is noted the council's approach to other third party responses and it is agreed that this is an appropriate and rationale approach to address any observations on the future application.

Council identified that:

- Ecology requires updated baseline surveys and mitigation proposals and a cross reference arboricultural assessment and ecological assessments.

Applicants' response

Altamar Marine and Environmental Consultancy have been appointed as ecologists for this development. The details of the findings are set out above.

Council identified that:

- Drainage, SUDS and outfalls need to be detailed.

Applicants' response

DBFL have included an infrastructure report and drawings setting out the proposal in terms of drainage. This is in line with the County Development Plan 2022-2028 and Irish Water requirements.

Council identified that:

- On all other issues, be advised that SDCC is unlikely to support a material contravention, and can be expected to repeat any objections raised at stage 3 of the SHD process where those objections have not been
 - o (a) adequately addressed by the applicant,
 - o (b) nullified by way of changes to the scheme, or
 - o (c) changed by way of new County Development Plan.
- We will also have regard to the Inspector's report for the previous SHD Stage 3, but as of yet we haven't done a detailed assessment of that report. It may benefit the applicant to address our objections in their own report and put together a case based on new technical assessments, alterations to the scheme, or lastly comments from ABP that they feel are relevant.

Applicants' response

It is noted that the recommendation for refusal by South Dublin County Council was on three grounds:

- Height and density,
- existing residential character and,
- loss of biodiversity

It is noted that the South Dublin County Council Development Plan 2022 – 2028 has now been adopted which welcomes increased density and height at its core, in line with national policy.

It is also considered that through the reduction in the height of the buildings the issue of building height and density has been addressed. This site is a prominent site on a key junction in South Dublin. As such it is important that a high quality streetscene is provided at this junction to provide legibility to the area. Given the size of the site, and the enforced set back due to the IW network to the north of the site, 5 storeys buildings are required to provide a presence on this road. It will also enable all of the new proposed public open spaces to be surveilled appropriately giving security to the area. A further reduction in the height would have a detrimental effect on the streetscene in this location.



Figure 31 Aerial view of Taylor's Lane and Edmonstown Road



Figure 32 Properties to the immediate north of the site fronting Taylor's Lane



Figure 33 Shops to the north of the site fronting Taylors Lane



Figure 34 Properties to the east of the site, on the same side of the road, fronting Taylors Lane



Figure 35 Properties to the north east of the site fronting Taylors Lane

With regard to the existing character of the area, as can be seen from the images above, there is no single house/ building or uniformity of building line along Taylors Lane, and there are no buildings immediately adjacent to Edmondstown Road. The buildings in this location that do front onto Taylors Lane range in height from single to two storey and detached to terrace. As such there is no unique character or particularly sensitivities in this location that must be protected in this location. The site is 3.5 hectares in size. It is considered that this is a site of sufficient size that it can create its own character. It is also considered that these 5 storey buildings will enhance the character and public realm of the area by creating a strong urban edge, ensuring a sense of place and legibility is provided to the area. It is considered to make a positive contribution and provide visual interest making this key junction a place for the first time, as it is currently ignored and just a roundabout.

Finally, as set out in the main body of the report, Altemar Marine and Environmental Consultants have been appointed as ecologists for this development. They have reviewed the site a fresh including a full suite of flora and fauna survey assessments completed. To date the findings have been in line with those of Faith Wilson. This is confirmed in the reports and the NIS submitted with the application.

RESPONSE TO LRD OPINION FROM SOUTH DUBLIN COUNTY COUNCIL

An LRD Meeting was held on the 11th of November 2022 via Microsoft Teams as per section 32C of the Planning and Development Act 2000 as amended.

Taking into account the discussion held at the S32C LRD Meeting, and the particulars received for the purpose of that meeting, an LRD Opinion was issued to the applicant under S32D of the Act. This is dated the 28th November 2022.

In the Opinion issued by South Dublin County Council it was the conclusion of the Planning Authority that the submitted particulars **constitute a reasonable basis for making an LRD application subject to further consideration and amendment.**

In the event that the applicant proceeds to submit a planning application, the LRD application should include:

| SDCC Information Request | Statement of Response |
|---|---|
| A statement of response to the issues in the LRD Opinion | This section of the Planning Report addresses issues raised within the LRD Opinion. A Statement of Response has been prepared for each issue raised. |
| A statement that in the applicant's opinion, the proposal is consistent with the relevant objectives of the development plan. | Section 8 of this Planning Report contains a Statement of Consistency demonstrates consistency with the relevant objectives and policies of the Development Plan. |

The detailed assessment within the LRD Opinion *highlights areas in which the particulars submitted under S32B of the Act are lacking or those issues which remain to be reconsidered or addressed by the applicant in any documents submitted in a future planning application. These items are summarised as follows:*

| SDCC Information Request | Statement of Response |
|---|--|
| Justification and mitigation for the significant loss of trees at the site to cater for the development | <p>Please refer to Section 2.0 of the Landscape Design Report prepared by Doyle & O' Troithigh Landscape Architects and Section 10 of the Tree Survey Report prepared by Independent Tree Surveys. Both reports note that the scale of tree removal required to facilitate the proposed development is justified on the basis of the relatively low quality of the existing tree cover and also by the way in which the trees are distributed on site. This result in many of the trees on site being of relatively low value and are unsuited for long term retention. Overall 75 out of 90 individual trees (>80%) are low value.</p> <p>The Tree Survey Report also states that <i>"The trees being proposed for removal include several Ash and Elm trees that are already dead or showing signs of decline as a result of Ash dieback and Dutch Elm disease. It is very likely that these trees would have to be removed at some point within the next few years as they die off due to the disease"</i>.</p> <p>It goes on to state that <i>"A significant proportion of the trees are of non-native species and include exotic tree species that support low levels of wildlife, both in the trees and ground flora (Leyland Cypress, Lawson Cypress for example). The</i></p> |

| | |
|---|---|
| | <p><i>Cypress tree group G21 includes a large number of closely planted individual trees that are visually prominent on the site and make up a significant proportion of the proposed tree loss from the site, however, this group is of very low arboricultural and conservation value because of its dense canopy, low habitat potential and high water demand and its removal and replacement with more suitable species should be viewed as a positive rather than a negative land use change.”</i></p> <p>The tree report recognizes that <i>“Doyle & O’Troithigh Landscape Architecture have prepared a highly detailed landscape plan for the site which includes extensive new tree planting in the form of hedges, native woodland areas, and specimen tree planting. The tree planting is supported by associated shrub planting, green roof areas and numerous measures designed to enhance the species diversity and ecological potential of the site.</i></p> <p><i>The proposed development will require the removal of much of the existing tree cover and vegetation and will have a significant initial impact on the existing landscape amenity of the site; however, the comprehensive new planting scheme will provide substantial numbers of new trees to replace those lost as well as incorporating the better-quality trees being retained within the new layout. The full effects of the mitigation provided by the new landscape plan will take some years to fully manifest itself, and the effects will be incremental rather than instant. In the longer term the new planting will contribute significant landscape amenity, along with increasing conservation and arboricultural value that will continue to accrue into the future.”</i></p> |
| <p>Justification of the height and density of the development, with reference to Appendix 10 of the Development Plan, and other relevant policies and objectives of local and national plans.</p> | <p>The design teams’ approach to building height and density is intrinsically linked to the overall design rationale for this significant opportunity site in particular, urban design, daylight and sunlight, amenity, and visual impact.</p> <p>The Architect’s Design Report prepared by MCORM Architect’s provides further justification. The report details how the design approach incorporates guidance from the <i>Development Management Criteria in the Urban Development and Building Height Guidelines for Planning Authorities</i>. The proposed height is also assessed in detail against Appendix 10 of the Development Plan below under the Statement of Consistency in this report.</p> <p>MCORM Architects along with other consultants on the design team have created a proposal which consists of appropriate building heights that delivers the quality of residential amenity envisaged in the Development Plan and National Guidance. Generous separation distances within the courtyards and defined streetscapes will protect</p> |

residential amenity and allow for a sense of enclosure and definition of routes in and around the scheme.

As set out above, the proposed site is considered of sufficient size that it can create its own character. The site also already has substantial building on site with a ridge height of over 13m and a steeple height of over 22m. The existing building is substantially taller than the existing surrounding suburban context.

The proposed buildings will be, at most, c. 3m taller than the ridge heights of the existing buildings on site, however, it will be smaller by c.6m than the existing steeple.

The layout of the site has been designed to create an attractive urban edge and ensure overlooking is provided to all of the new open spaces. It also aims to provide an attractive urban edge to Taylors Lane and onto Edmondstown Road providing additional legibility and character.

It is also worth highlighting that there is no unified character to the area in architectural terms. All of the buildings along Taylors Lane are of different heights and have different setbacks to the road. The introduction of a new style and building height along this road will further enhance the character of this road.

With increased heights the density also generally increases. As a result, to achieve an attractive urban layout and make the best use of zoned residential land, which is currently an under-utilized site, it is appropriate to increase the height. This in turn has resulted in an increase in the density. However, given its proximity to a range of bus services, existing community and social infrastructure it is considered that the provision of additional housing of the quantum and mix proposed on this site is considered entirely appropriate.

Finally it is worth noting that in the assessment of the previous SHD, in relation to density the ABP Inspector noted that *“Increasing residential density at appropriate locations is national policy and articulated in section 28 guidelines such as the ‘Urban Development and Building Height, Guidelines for Planning Authorities’ 2018 and ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018. Such increases in density are to ensure the efficient use of zoned and serviced land.*

In particular, Project Ireland 2040: National Planning Framework (NPF) seeks to deliver on compact urban growth. Of relevance, objectives 27, 33 and 35 of the NPF seek to

| | |
|---|---|
| | <p><i>prioritise the provision of new homes at locations that can support sustainable development and seeks to increase densities in settlements, through a range of measures.</i></p> <p><i>This site lies within the Dublin Metropolitan Area Strategic Plan (MASP) as defined in the Regional Spatial & Economic Strategy (RSES) 2013-2031 for the Eastern & Midland Region. A key objective of the RSES is to achieve compact growth targets of 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs. Within Dublin City and Suburbs, the RSES support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area and ensure that the development of future development areas is co-ordinated with the delivery of key water and public transport infrastructure.”</i></p> <p>The inspectors report goes on to highlight the benefits of the site including the number of bus services serving the site, the existence of high quality pedestrian and cycle infrastructure, the proximity of the site to shops and services, and the existing and proposed amenities in the area, including the existing open spaces and the proposed public park, provided as part of this development. As a result of these factors <i>“having regard to national and regional policy as relates to density, the density of 141.7 unit/ha is not excessive”</i>.</p> <p>It is noted that this revised proposal has a lower density of 114uph.</p> |
| <p>Revisions to the design of Block C to improve daylight and sunlight achieved in both the central open space area, and lower-level units of concern. The applicant should aim to achieve 100% compliance with room specific targets</p> | <p>Please see MCORM Design Statement and associated drawing pack.</p> <p>The design team has revised the design of Block C by introducing a full height break in the southwest corner of Block C. This results in increased sunlight to communal open space and improve daylight.</p> <p>Other revisions include the increased separation distance of Blocks A & C and the rearrangements of balconies along the east facing elevations to create more direct daylighting to living rooms.</p> <p>Please refer to Daylight and Sunlight Report prepared by Digital Dimensions for a breakdown of rooms assessed. This report has found that <i>“In excess of 99% of rooms to the units now achieve the minimum target values when assessed with and without the effects of existing trees. The number of main living spaces to Block C when assessed with existing trees not achieving the minimum target levels was reduced from 17 to 7. All the rooms below the target level benefited from an increase in daylight levels with the average ratio of 143%</i></p> |

| | |
|--|---|
| | <p><i>and a minimum ratio of improvement of 120%. All rooms to Block C achieve the minimum target levels when assessed without trees.</i></p> <p><i>The percentage of the area achieving 2 hours sunlight to the courtyard amenity space in Block C has an increased from 58% to 67.4% with the reduction in height of the building to the south”.</i></p> <p>It is also worth noting that the BRE guidelines (2022) state at the outset that <i>“It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location.”</i> This is in line with the approach advised in the Apartment Guidelines 2022 and the Building Height Guidelines 2018.</p> <p>The Digital Dimensions report goes on to advise that <i>“That the recommendations of the BRE guidelines (2022) are not suitable for rigid application to all developments in all contexts is of particular importance in the context of national and local policies for the consolidation and densification of urban areas.”</i></p> <p>However, the achievement of 99% of all units achieving appropriate lighting is a significant achievement on this development which will deliver 402 no. apartments.</p> |
| <p>The redesign of units B111, B112, B113, B114, B114 and B116 which are considered to be terraced houses and not duplex units. These units must comply with all relevant space standards, both internally and externally.</p> | <p>As shown within the MCORM Documentation, these units have now been omitted and redesigned as two duplex blocks each consisting of 2 No. single storey apartments at ground floor level with 2 No. two storey apartments above.</p> <p>All units achieve the minimum spaces standards both internally and externally and in accordance with Sustainable Urban Housing: Design Standards for New Apartments.</p> |
| <p>Justify the unit mix with regard to Policy H1 Objective 12 and the requirement for 30% 3-bedroom units</p> | <p>The proposal has increased the total number of 3 bed units from 46 no. to 61 no. which is now 15% of the total mix. This was achieved by some reworking of the internal layouts and a small uplift in the total number of units from 398 no. at stage 2 to 402 no. for this application.</p> <p>This proportion of 3 beds is considered appropriate for this area given the existing high proportion of 3 and 4 bed homes in the immediate local area. Please refer to the Housing Demand and Composition Assessment Report prepared by KPMG Future Analytics. This key report findings are as follows:</p> <p><i>“Local, Regional and National Policy: the National Planning Framework, the RSES and the CDP recognise and highlight the need to address the ongoing housing issues through suitable housing policy. This includes accommodating an additional 490k-540k additional population in the “Eastern</i></p> |

and Midland Region (NPO 1b) by 2040. According to the CDP the over-65 age cohort will increase by 51% between 2016-2031.

Meeting the housing requirements of the countries aging population whilst limiting urban sprawl (through densification) is, therefore, a core priority in both documents. This proposed scheme represents a highly efficient use of an otherwise constrained yet highly accessible brownfield site.

Local profile and Variety: within both the 10-minute and 15-minute walking time catchments of the Taylors Lane site, there is an over-saturation of a single housing type. Older, larger family homes largely occupied by 'empty nesters' (19.1% of households) means that there is a lack of variety in the area. This includes younger people who may be looking for smaller starter homes from which they can commute to and from work. It also includes older members of the community who may wish to 'down-size' and resettle in the locality. Currently, there is an acute shortage of appropriate one- and two-bed units in the area, like those contained in the proposed Taylors Lane scheme. Based on adjustments to the Census 2016 figures (and subject to local development over the interim period), the proportion of apartments in the area would change from 5.6% to 18.5% if the scheme were to be developed.

Planning Pipeline: compared to the CDP projections, the local planning pipeline indicates that there is a much stronger demand for 1- and 2-bedroom units (accounting for 86.6% of units in the active application pipeline).

Scholarstown BTR SHD: of the 3 larger granted SHD developments in the 10- minute and 15-minute walking time catchments, one development (Scholarstown SHD in the 15-minute catchment) makes up a large proportion of the one- and two-bed units in the application pipeline. The 590 unit development accounts for most of the 1- and 2-bed units in the pipeline for the area (58.6%).

The near-exclusively Built-to-Rent development raises other issues. Firstly, the near-exclusively BTR element works against the council's objective of developing settled, vibrant communities since it attracts more transient rental tenants. Secondly, excluding these BTR (for sale) units from the analysis means that there is an even larger proportion of 3 beds in both the pipeline and in the locality.

*This report goes on to recommend:
Following a detailed analysis of available data, it is KPMG Future Analytics view that the unit-mix requirements of the Council's Development Plan and Apartment Guidelines are*

| | |
|---|---|
| | <p><i>incompatible with the current and future market demand. Therefore, we believe that the council should re-consider and deviate from these requirements. This is considering the aging demographic and lack of available smaller housing options in the walking time catchment, as well as the transient influence of the BTR development on the local community character.</i></p> <p><i>For the above reason, our analysis of the 10-minute and 15-minute walking time catchment indicate that the wider area needs a ‘rebalance’. Therefore, the key recommendations in this document are as following:</i></p> <ul style="list-style-type: none"> <i>– the council consider the positive contribution which the Taylors Lane scheme will make to meeting the council’s housing delivery targets as well for offsetting the more ‘transient’ nature of the BTR development’s target market.</i> <i>– the council consider adopting a more flexible approach to its tenure mix requirements, to change the 30% minimum 3-bed unit rate from a per-scheme basis to a general county level target.</i> <i>– the council consider the temporal accuracy of the application pipeline results</i> <i>– in particular, the lag that is likely to exist between the application pipeline and sales figures.</i> <i>– likewise, that the council questions the accuracy of the Census 2016 data upon which it is basing many of its important housing supply decision. Until superseded by 2022 Census data, it is the view of KPMG Future Analytics that the Census 2016 data is restrictive for decision-making purposes.”</i> |
| <p>Demonstrate compliance with green infrastructure policies contained within the Development Plan</p> | <p>Please refer to section 3.2 of the Landscape Design Report which addresses specific green infrastructure policies set out in the Development Plan. These include Policy GI1 Objective 4 and section 4.2.2 ‘Sustainable Water Management’.</p> <p>We also refer you to drawing no. LPR-01-PP (‘Landscape Policy Review and Green Infrastructure’) which illustrate the assessment of the infrastructure policies contained within the Development Plan and compliance with the same.</p> <p>Overall, the landscape scheme as put forward throughout this application incorporates green infrastructure as an integral part of the design.</p> |
| <p>Detailed plans for the existing landscaped area at the northwest entrance and how its use can be maintained for the existing community</p> | <p>Refer to Landscape design Report, Section 3.1 (‘The North – Northern Public Open Space) which describes in detail how this space has been revised and reviewed in terms of providing a more open and welcoming space with increased amenity value.</p> <p>This is also demonstrated in the following detailed drawings for detailed proposals as necessary: LP01-PP, LP-02-PP along with associated landscape details (LD-01-PP to LD-13-PP as necessary), boundary proposals (contained within drawing</p> |

| | |
|---|---|
| | no. BP-01-PP, BD-01- PP and BD-02-PP), Play Rationale drawings (PG-01-PP and PPG-02-PP), landscape sections (LS-01-PP) and supporting planting plans (PP-01-PP to PP-04-PP inclusive) |
| Provide detailed drawings and calculations for SuDS, providing additional SuDS where possible including green roofs, as well as revised surface water attenuation and catchment area calculations | <p>The design team coordinated accordingly to ensure the SuDS approach is collective and holistic in nature. DBFL Consulting Engineers along with Doyle & O' Troithigh Landscape Architects have coordinated to develop landscape proposals which offers multifunctional spaces whilst providing for 'ecology and sustainable water management' as required under G14 Objective 3.</p> <p>Please refer to documentation by both DBFL Consulting Engineers along with Doyle & O' Troithigh Landscape Architects for further details.</p> <p>Appendix F of the DBFL Infrastructure Design Report sets out detailed response in relation to the SuDS systems. Green roofs have been proposed across all three apartment blocks, details of which can be found in Section 5 of the Infrastructure Design Report. DBFL drawing 190068-X-91-Z00-XXX-DRDBFL-CE-1401 shows the extent of coverage of the proposed green roofs. Application documents have been revised across all disciplines to ensure the inclusion of green roofs in the scheme is coordinated and apparent. For further justification and explanation of the use of attenuation & SuDS features, please refer to F Section 1.3 (Appendix F) of this response.</p> |
| Consider the proposal in relation to traffic and transport, based on more relevant Irish Trics data, and with regard to planned cycle infrastructure upgrades | <p>Section 1.5 of the Traffic and Transport Assessment by DBFL addresses all of the comments raised in the Opinion and by the Roads Division. While TRICS calculations were used DBFL have confirmed that <i>"Data supplied for inclusion in TRICS undergoes a procedure of validation testing, and there is no evidence from this procedure suggesting that data from Ireland bears any significant fundamental differences to that from the other countries included. Consequently, we consider that TRICS will provide a reasonable indication of traffic generation from the proposed development."</i></p> <p>This report also highlights that <i>Consultation has been undertaken with SDCC Active Travel Department, in terms of the Tallaght to Knocklyon Active Travel scheme. The Option Assessment/Preliminary Design for the Taylor's Lane Roundabout and Edmondstown Road is currently being undertaken. According to SDCC, a preferred design is not currently available.</i></p> |

Specified Information required in addition to Article 23 of the Planning and Development Regulations (as per Article 16A(7))

The below list advises on particulars required in addition to those particulars provided for the purposes of the LRD Meeting, or particular issues which may need to be addressed as part of those particulars.

| SDCC Information Request | Statement of Response |
|---|---|
| <p>1. Statement addressing each issue identified in the previous Judicial Review decision relating to SHD ABP-307222-20</p> | <p>Judicial Review</p> <p>A Judicial Review of An Bord Pleanála’s decision was also carried out by Mr Justice Holland following an application to the High Court by Ballyboden Tidy Towns Group (Ref 2020/816JR).</p> <p>As set out in para 16 of the Judgement: <i>“the Applicant sought to quash the Impugned decision as invalid for the following reasons:</i></p> <p><i>Grounds 3 & 4 – Bats & Otters. The Board erred in failing to have any, or adequate, regard for the protection of bats and otters for the purposes of Annex IV of the Habitats Directive.</i></p> <p><i>Ground 5 – Material Contravention (Density) The Developer and the Board erred in concluding that the density of the proposed development was not a material contravention of the Development Plan.</i></p> <p><i>Ground 7 – Justification of Building Heights The Board erred in its interpretation of section 3 of the Height Guidelines 2018 and/or failed to take into account a relevant consideration.</i></p> <p><i>Ground 8 – Traffic: The Board acted irrationally or unreasonably and/or breached the Applicant’s rights to fair procedures and reasoned decision making in its assessment of traffic impacts from the proposed development on the greater Rathfarnham area.”</i></p> <p>Mr Justice Holland considered each of the items in detail. However, while the decision of ABP was ultimately quashed, it was <u>not</u> in relation to all grounds raised.</p> <p>The Judgement, in para 322, stated the following:</p> <p><i>“For the reasons set out above, I will quash the Board’s impugned decision for, briefly put:</i></p> <ul style="list-style-type: none"> - <i>Failure to recognise material contravention of the Development Plan as to density and address it as such.</i> - <i>Failure to take into account a relevant consideration as to the capacity of the public transport network and give</i> |

adequate reasons for its decision on density in that context.

- *Inadequacy of reasons on the traffic issue – specifically as to the disagreement between the traffic experts regarding methodology and the reliability of the results resulting from the application of that methodology.*

I reject all other grounds of challenge.”

It is noted that rather than the principle of the development that had been granted, it was more the procedure carried out by An Bord Pleanála in that particular instance that was considered inadequate and resulted in the ABP grant of permission being quashed.

The current proposed development before South Dublin County Council has had regard to the detailed assessment of the previous SHD proposal by all parties, the previous grant of permission from ABP, and the concerns raised by SDCC and third parties at the time.

The current proposal, which is now to be assessed under the LRD provisions, and the policies and objectives of the current 2022-2028 County Development Plan, has incorporated a number of significant changes in particular a reduction in building height, density, and car parking.

It is considered that these serve to further reduce the impact of the development, in particular in relation to visual impact and the transport/ traffic impact.

A comprehensive Public Transport Capacity Assessment has also been prepared by DBFL Consulting Engineers (as part of the Traffic & Transport Assessment) to demonstrate that the capacity of the public transport network is appropriate to facilitate the predicted demand generated by the development.

Furthermore it is noted that the current proposal does not materially contravene the current County Development Plan and therefore a Material Contravention Justification is not required.

The supporting documents submitted with the LRD application address the issues of ecology, density,

| | |
|---|---|
| | height and traffic and transport. In addition to this, all items raised in the SDCC Opinion following the pre-application LRD Consultation meeting have also been addressed in full. |
| 2. Housing Quality Assessment | MCORM Architects have prepared a detailed Housing Quality Assessment as well as detailed scaled plans of all the apartments. This demonstrates compliance with all of the Apartment Guideline and SDCC standards for apartment developments. |
| 3. Schedule of Accommodation a. To include adequate information in relation to the calculation of Development Contributions. b. Section in Planning Report to demonstrate compliance with, or robust justification for not complying with, Policy H1 Objective 12. | <p>MCORM Architects have prepared a Schedule of Accommodation as part of this planning application.</p> <p>MCROM Architect's documentation provides adequate information to allow for the calculation of Development Contributions.</p> <p>In relation to Policy H1 Objective 12, please refer to the Housing Demand and Composition Assessment Report prepared by KPMG Future Analytics. This report reviews the high proportion of 3 and 4 bed homes in the immediate local area. The proposal has increased the total number of 3 bed units from 46 no. to 61 no., which is now 15% of the total mix. This was achieved by some reworking of the internal layouts and a small uplift in the total number of units from 398 no. to 402 no.</p> <p>The report considers that this proposed 3-bed mix is appropriate with regard to Policy H1 Obj 12 in this instance given the existing context. This is also addressed in the section on the statement of compliance below.</p> |
| 4. Architect's Design Statement a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan) b. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide | <p>Section 4 of the Architect's Design Report prepared by MCORM Architect's includes details on how the scheme has incorporated 'The Plan Approach' throughout the design process.</p> <p>The design report also addresses each of the specified requirements as set out in the Development Plan such as context, healthy placemaking, connected neighbourhoods, thriving economy, inclusive and accessible, public realm, built form and mix, design and materials.</p> |
| 5. Revised Sunlight and Daylight Analysis based on any changes to the scheme resulting from this Opinion | <p>Please refer to Daylight and Sunlight Report prepared by Digital Dimensions. This has been modelled on the drawings submitted as part of this application. The findings of this report are that:</p> <p><i>"The results find that any impact on the adjacent</i></p> |

| | |
|---|--|
| | <i>residential structures would be minimal and imperceivable. There would be good quality of daylight and sunlight in the proposed apartments and the amenity areas would have sufficient sunlight to be bright and pleasant spaces.”</i> |
| 6. Green Infrastructure Plan | Please refer to drawings (LPR-01-PP) prepared by Doyle & O’ Troithigh Landscape Architects. Section 3.2 of the Landscape Design Report outlines landscape policy review and green infrastructure. |
| 7. Green Space Factor Calculations | Section 3.3 of the Landscape Design Report illustrates Green Space Factor calculations through a worksheet as well as a map. Drawing no. LPR-02-PP provides further details on the breakdown of the GSF calculations. Overall the GSF 0.5 score requirement has been achieved in line with policy. |
| 8. Street Tree Planting Plan | Please refer to planting plans PP-01-PP to PP-04-PP inclusive as submitted for further detail. |
| 9. Landscape Plan, to include: a. details of hard and soft landscaping. b. details on levels and gradients. c. details on street trees. d. pedestrian connections to other sites. e. Play Rationale and Layout Plan f. Detail on boundary treatments | Please refer to the Landscape Pack prepared by Doyle & O’ Troithigh Landscape Architects as part of this planning application. |
| 10. Ecological Impact Assessment | Altemar Limited has prepared an Ecological Impact Assessment as part of this planning application. <i>The report concludes that: “The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the ecology of the proposed development will result in a long term minor adverse not significant residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategies.”</i> |
| 11. Traffic and Transport Assessment a. Applicant to use a revised baseline for Trics using the expected opening date of the proposed development. b. Provide Trics data based more on local Irish estate information. c. Additional information on bus services and capacity d. Detailed junction analysis of Junction 2 (roundabout | Detailed responses are submitted in DBFL Consultation under section 1.5 to address each of these items. |

| | |
|---|--|
| Taylors Lane – Edmondstown Road | |
| <p>12. Taking in Charge drawing and proposals</p> <p>a. To include details of any areas proposed to be taken by an Owner’s Management Company</p> | <p>A Management Company will be formed for the development in line with the MUDs Act. At this stage it is envisaged that the scheme will be entirely managed by a management company.</p> <p>The management company will maintain the landscaping and park areas within the scheme.</p> <p>The South Dublin County Council lands will remain in the charge of the local authority.</p> |
| <p>13. Stage 1 Road Safety Audit</p> | <p>A Stage 1 Road Safety Audit has been undertaken and is submitted as part of this planning application.</p> |
| <p>14. Layout Plan to show</p> <p>a. Reduced car parking provision</p> <p>b. A fully operational 4-arm junction at the proposed development access at the Edmondstown, Scholarstown</p> <p>c. Integration of proposals with SDCC cycle improvements</p> <p>d. EV Points</p> <p>e. Refuse Collection Points</p> <p>f. Swept Path Analysis demonstrating that fire tenders and large refuse vehicles can access/egress the site.</p> | <p>The layout has a reduced parking figure from 320 spaces in the LRD opinion request to 290no. spaces as per the advice in the opinion.</p> <p>A fully operational 4-arm junction is proposed at the development access. Drawings of the junction can be found in DBFL Drawing 190068-X-04-Z00-XXX-DR-DBFL-CE-1203. The proposed junction includes provision of new pedestrian and cycling facilities, which will tie in with any existing facilities. Further details of the subject development including the proposed junction can be found in Section 4 of the TTA.</p> <p>As shown in DBFL drawings the proposal will integrate with the SDCC cycle proposals.</p> <p>There are both EV Points and Refuse Collection Points indicated on the site layout plan.</p> <p>DBFL Drawings no 190068-X-04-Z00-XXX-DR-DBFL-CE-1204 Vehicle Tracking provides analysis for larger vehicles on the site.</p> |
| <p>15. SUDs Strategy, to include:</p> <p>a. SUDs Design details</p> <p>b. Revised report showing surface water attenuation calculations for proposed development.</p> <p>c. Increase surface water attenuation or explain in more detail how surface water attenuation was calculated.</p> <p>d. If underground tanks present, why these cannot be excluded from the design.</p> <p>e. Revised attenuation capacity as per the advice of the Water Services report.</p> <p>f. SUDs Layout identifying the different types of SUDs features.</p> | <p>Please refer to section 8 ‘Stage 2 LRD – Statement of Response’ of the Infrastructure Design Report prepared by DBFL Consulting Engineers.</p> |

| | |
|---|---|
| <p>g. To demonstrate adherence to SDCC SUDs guidance. h. Drawing showing cross sectional views of all SuDS features</p> | |
| <p>16. Confirmation of Feasibility from Irish Water</p> | <p>Please refer to Appendix E of the Infrastructure Design Report prepared by DBFL Consulting Engineers.</p> |
| <p>17. Appropriate Assessment Screening Report</p> | <p>The proposed scheme has been screened for Appropriate Assessment by Bryan Deegan, Altemar Environmental Consultants. As a result of this assessment a Natura Impact Statement (NIS) has been completed. This concludes that:</p> <p><i>“Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development will not result in direct or indirect effects which would have the potential to adversely affect the qualifying interests/special conservation interests of the European sites screened in for NIS with regard to the range, population densities or conservation status of the habitats and species for which these sites are designated (i.e., conservation objectives). All other European Sites were screened out at AA Screening Stage. The proposed project will not will adversely affect the integrity of European sites.</i></p> <p><i>On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.</i></p> <p><i>The proposed project will not will adversely affect the integrity of European sites.”</i></p> |
| <p>18. Building Lifecycle Report</p> | <p>Please refer to the Building Life Cycle Report prepared by McCrossan O’ Rourke Manning Architects as part of this planning application.</p> |
| <p>19. Social Infrastructure Audit</p> | <p>McGill Planning Limited has prepared a Social Infrastructure Audit detailing facilities and services within a 1km buffer distance of the subject site.</p> <p>The assessment also refers to the expected generated population of the proposed development when mature. The scheme incorporates a childcare facility and 2 no. retail spaces within block A to alleviate pressures and demands from the expected generated population. This provision ensures the proposed development</p> |

| | |
|--|--|
| | caters for the needs of the future population as well as residents within the surrounding area. |
| 20. Part V Proposals | The design team proposes 41 no. Part V units spread evenly across the three blocks that could be offered to meet the Part V obligations as set out in the enclosed pack. In the event of a planning permission grant the developer shall liaise with the local authority's housing department to agree the details and the preferred location for these units. |
| 21. Confirmation of all landownership(s) and necessary consent(s) to proceed to planning | A Letter of Consent was received from the Land Use, Planning and Transportation Department within South Dublin County Council. Please refer to this letter submitted with this planning application. |
| Prior to Commencement <ol style="list-style-type: none"> 1. Public Lighting proposals 2. Mobility Management Plan <ol style="list-style-type: none"> a. Revised mode share calculations and car parking provision in light of the cycle infrastructure improvements and bus connects services at this location. 3. Construction Traffic Management Plan 4. Construction and Demolition Waste Management Plan 5. Landscape Maintenance and Management Scheme 6. Agree location of hedgehog passes and bird/bat boxes | <p>McElligotts have provided a Public Lighting plan and Report.</p> <p>An updated Mobility Management Plan by DBFL is submitted as part of this planning application to accurately reflect the targeted modal shift from private car journeys to sustainable modes of transport. This plan includes for reducing car journeys, and increasing the modal split of walking, cycling, and using public transport.</p> <p>A Construction Traffic Management Plan will be agreed with SDCC prior to commencement of the development.</p> <p>Traynor Environmental have completed a Resource and Waste Management Plan which addresses the construction and demolition for this site and is the same a Construction and Demolition Waste Management Plan.</p> <p>Doyle O'Trothaigh have completed a Landscape Maintenance and Management Scheme which is submitted with the application.</p> <p>The siting of the hedgehog passes and bird boxes can be agreed with SDCC prior to commencement of development.</p> |

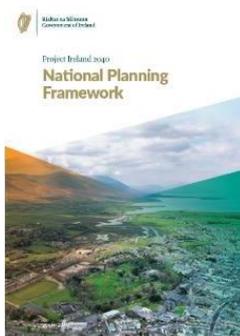
SECTION 8 STATEMENT OF CONSISTENCY

National & Regional Planning Policy

The key national and regional policies and guidelines relevant to the proposed development are as follows:

- Project Ireland 2040 Our Plan - National Planning Framework (2018);
- Rebuilding Ireland – Action Plan for Housing and Homelessness 2016
- Guidelines for Planning Authorities on Urban Development and Building Heights (2018);
- Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Quality Housing for Sustainable Communities (2007);
- Design Manual for Urban Roads and Streets (2019);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- The Planning System and Flood Risk Management (2009);
- Climate Action Plan 2019

Ireland 2040 Our Plan - National Planning Framework (2018)



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of the country and to cater for the extra one million people that are anticipated to be living in Ireland. The Eastern and Midland Region (including Dublin) will, by 2040, be a region of around 2.85 million people, at least half a million more than today. The NPF includes National Strategic Outcomes and National Policy Objectives to guide development and policy making at regional and local levels, providing an overall framework for the entire country.

The NPF Strategy includes the following aims:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.
- Target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built up areas.
- Balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.

This major new policy emphasis on renewing and developing existing settlements aims to prevent the continual expansion and sprawl of our cities. This aim for compact growth notes that achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority. As a result of this new policy approach, and as set out in section 4.5, there is a recognition that infill, and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. As a result, to enable infill and brownfield development a flexible approach to planning policies and standards needs to be ***"focusing on design led and performance-based outcomes, rather***

thanspecifyingabsoluterequirementsinallcases...planningstandardsshouldbeflexiblyappliedin response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.” In particular, Section 4.5 highlights that “general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.” It highlights that there “should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five”.

The NPF projects that 550,000 additional homes will be required by 2040 to meet future demand. These new homes should be located in *places that can support sustainable development* and in *cities and larger towns where large-scale housing exists*. To achieve this housing target, *we will need to build inwards and upwards*, and apartments will need to become a *more prevalent form of housing*. The NPF also states that that “*to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas*”.

Key National Policy Objectives (NPOs) which relate to this proposal are set out below:

| <i>National Policy Objective</i> | <i>Evaluation of Consistency</i> |
|---|---|
| National Policy Objective 4 Ensure the creation of attractive, liveable, well-designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being. | The proposed development will create a high-quality, attractive and liveable place for residents. In accordance with NPO 4, the proposed development will be of high quality providing a liveable place for future residents and will integrate into the existing urban environment in the area and will provide an attractive urban frontage along Taylors Lane and Edmondstown Road. The hierarchy of open spaces throughout the development will help to create an attractive place for residents and visitors. The proposed apartment mix will add to the existing housing stock providing more housing options in the area. |
| National Policy Objective 11 In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth. | The proposed development is located within the established residential area of Ballyboden, Rathfarnham and Edmondstown. It is in a highly sustainable location with easy connections to Dublin City Centre, Sandyford Business Park, City West via multiple bus routes. It is also within cycling distance of these areas (the site is only a 25 minute cycle from St. Stephen’s Green). The proposed development will increase the residential density of the area which is appropriate for this strategic location. |
| National Policy Objective 27 Ensure the integration of safe and convenient alternative to the car into the design of our communities by prioritising walking and cycling | The development has been designed to minimise the presence of the car. Although 290 no. car parking spaces are provided within the development, the majority of these are provided |

| | |
|--|---|
| <p>accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</p> | <p>at basement level ensuring that pedestrians and cyclists are given priority throughout the development and that the development is not dominated by cars.</p> <p>The provision of only one vehicular access and a single vehicular street in the development will prevent cars from driving through the scheme to avoid the Ballyboden Road/Taylor's Lane roundabout while also prioritising pedestrians and cyclist.</p> <p>This design has helped to create a safe pedestrian friendly environment with numerous pedestrian and cycle routes through the scheme. This will make walking and cycling attractive with good links into the wider area with its range of existing facilities and very good public transport.</p> |
| <p>National Policy Objective 32 To target the delivery of 550,000 additional households to 2040</p> | <p>The proposed development will provide 402 no. residential units helping to achieve this objective.</p> |
| <p>National Policy Objective 33 Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</p> | <p>It is considered that 114.9uph is an appropriate density for the subject site.</p> <p>The site is located within the established residential area of Ballyboden, which consists of generally low-density development which is inappropriate for this highly accessible site. This development will increase the overall density of the area.</p> <p>The site is well served by very good public transport and cycling infrastructure. It has access to a wider range of existing facilities in the area including schools, shops, parks and community facilities. The proposed development will support the existing public transport and facilities in the area and will enable the improvement of services more viable by creating additional population to support this.</p> <p>Given the existing excellent facilities in the area the proposed development is considered to be of a scale appropriate to its highly sustainable location.</p> |
| <p>National Policy Objective 35 Increase residential density in settlements, through a range of measures including</p> | <p>The proposed development will provide residential units at a density of 114.9uph.</p> |

| | |
|--|---|
| <p>reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</p> | <p>The subject site consists of former institutional buildings and a former pitch and putt course. Both of these are no longer in use and the site is vacant. The site is identified as a development site within the South Dublin County Council 2022-2028 Development Plan and this proposed development will bring this under-utilised site back into use.</p> |
| <p><i>National Policy Objective 60</i> Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.</p> | <p>The proposed public park to the north of the site, the communal open spaces throughout the development and the proposed native woodland planting along the southern boundary will make a positive contribution to the natural heritage and green network in the area.</p> |
| <p><i>National Policy Objective 62</i> Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.</p> | |

Evaluation of Consistency

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 will provide high density residential accommodation by the redevelopment of a vacant and under-utilised site within the existing built up area of Ballyboden. This will contribute to achieving the aim NPF aim of 40% of new housing to be developed in the existing ‘footprint’ of built up areas and help to achieve compact growth. It is on a highly accessible site with excellent links to the existing facilities and services within the area, cycle routes, footpaths and bus routes. The design and layout of the site also provides additional facilities to the existing community including a new public park and attractive walking routes, new retail units and a creche as well as better links through the site into the wider area.

Overall, it is considered that the proposed development supports the objectives and goals of the NPF.

Rebuilding Ireland – Action Plan for Housing and Homelessness 2016



Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

The Action Plan puts locating houses in the right place at the centre as stated in page 24: “locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and

amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision”.

Evaluation of Consistency

The proposed development is consistent with Pillar 3 to build more houses in the right places. The proposed development provides for 402 no. new residential units in a highly accessible location with excellent existing facilities. This will add to the housing stock and mix of Dublin and cater to the increasing demand.

Guidelines for Planning Authorities on Urban Development and Building Heights (2018)

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR’s) of the guidelines in carrying out their function. SPPR’s, as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plan and strategic development zone planning schemes.

The Guidelines emphasise the policies of the NPF to **increase levels of residential development in urban centres and increase building heights and overall density** by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála.

The Guidelines place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. *“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, **development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors**”*. It goes on to highlight that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”*.

| Development Management Criteria | Evaluation of Consistency |
|--|--|
| At the Scale of the Town | |
| Site is well served by public transport with high capacity, frequent service and good links to other modes of transport. | <p>There are a number of Dublin Bus and Go Ahead Ireland bus services operating in the vicinity of the site.</p> <p>Within 500m of the site are the Dublin Bus routes 15b, 15d, 16 and 61, 161 and 175. These services vary in frequency, with many of them arriving every 10-15minutes throughout the day. This is considered to be an excellent bus service.</p> <p>There is also good cycle infrastructure in the area which is further to be in provide in line with SDCC Active Travel Plans.</p> |

| | |
|--|--|
| <p>Successfully integrates into/enhances the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.</p> | <p>The proposed development will make use of a large vacant site that is zoned for residential development in a well-established suburban location that is well provided for in terms of social infrastructure.</p> <p>The existing building on site is a large 3 storey building which is taller than the other buildings in the immediately surrounding areas. The open up of this site will present a new opportunity for the community.</p> <p>The subject site is unique with its suburban context given its former institutional use. It is wholly appropriate for redevelopment to higher density residential use within a parkland setting. It will create a new focal point for the area with a new public park along Taylors Lane and a woodland walk to the south and east of the site. The proposed layout also provides multiple pedestrian connections through the development</p> |
| <p>Make a positive contribution to place-making</p> | |
| <p>At the Scale of the Neighbourhood</p> | |
| <p>Responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p> | <p>The proposed development responds to the natural environment by providing a new large public park along Taylor’s Lane and maintaining the two category A trees on site.</p> <p>A series of open spaces and streets are created within the scheme. The existing drainage ditch (former mill race) along the southern boundary will be enhanced with native woodland planting.</p> <p>The apartment blocks will add to the area’s housing typology, which will be a positive contribution to the area. The 5 storey buildings are set back from Taylors Lane and will provide an urban frontage to the proposed public park, Taylors Lane and Edmondstown Road and will provide an attractive feature in this area particularly in relation to the approach to the roundabout.</p> |

| | |
|---|---|
| <p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p> | <p>The proposed apartment blocks are provided at a variety of heights and finishes making for a visually interesting residential development. The balconies and terraces for each unit also help to avoid long interrupted walls of building.</p> |
| <p>Enhances the urban design context for public spaces and key thoroughfares while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).</p> | <p>The proposed development will provide a new public park that is overlooked by the proposed apartment blocks. Overall, this will enhance the public realm in the area. A pathway along the southern boundary will provide an attractive amenity walkway for pedestrians. The proposed pathways through the public park along Taylors Lane follow the expected desire lines of pedestrians through the space.</p> |
| <p>Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p> | <p>The Central Street will be overlooked by the Block A and the northern units of Block B. Block A also has two retail units and a creche providing activity in this area. As a result, this street will have the benefit of both active and passive surveillance along the street, creating a safe route through the site.</p> <p>The new public park will act as a focal point in the area and will help the development integrate with the surrounding area.</p> <p>The multiple pedestrian access into the site, from both Taylors Lane and Edmondstown Road will ensure the development integrates with the surrounding area in a cohesive manner.</p> |
| <p>Positively contributes to the mix of uses and/or building typologies available in the neighbourhood</p> | <p>The scheme contributes to an overall sustainable mix of residential types in the area by introducing a significant apartment development into an established suburban area predominantly comprising low density suburban estates.</p> |
| <p>At the scale of site/building</p> | |
| <p>Form, massing and height should be modulated to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light</p> | <p>The form, massing and height have been designed to optimise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p> |
| <p>Regard should be taken of quantitative performance approaches to daylight provision</p> | <p>A Daylight and Sunlight Assessment was carried out by Digital Dimensions to ensure daylight is optimised throughout the site. This report demonstrates that the development meets the BRE standards.</p> |
| <p>Specific Assessments</p> | |

| | |
|---|--|
| Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. | The height and orientation of the proposed blocks along with the space between the blocks ensures the development will not have negative local microclimate impacts. |
| In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision. | Altamar are carrying out a full review of the flora and fauna on the site. This is building on from the assessments carried out by Faith Wilson. To date the findings are in line with the ecological assessments to date. |
| An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. | |
| An assessment that the proposal maintains safe air navigation. | |
| An urban design statement including, as appropriate, impact on the historic built environment | |
| Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate. | |

Evaluation of Consistency

As can be seen from the above analysis, this proposed site, despite its location in a relatively low-density residential area of South Dublin, is an ideal location for increased heights and densities.

The proposed development is located on a development site in the Development Plan, within the Ballyboden area and the proposed range of heights is considered appropriate for this prominent corner site. The proposed heights respond to the overall natural and built environment, the proposed layout including the public park along Taylors Lane, and will make a positive contribution to the site's context creating an attractive urban edge to this location and removing the existing character of this junction as a car dominated location.

Digital Dimensions carried out a Sunlight and Daylight Assessment of the proposed development. It found that the development would result in no noticeable loss of light to the surrounding properties. In relation to daylight within the proposed apartments, it found that the development design was optimised to maximise available daylight in line with the recommendations of the BRE Guidelines and that the apartments. The assessment also analysed the open spaces and concluded that all the amenity spaces within the development have good quality sunlight throughout the year.

It is respectfully submitted that the proposed development has regard to the planning policy framework as set out in the Building Height Guidelines and National Planning Framework. The provision of residential development at this location is supported by the height guidelines which encourages increased density and building heights. This site is appropriate for an increase in height when examined at a city/ town scale; at a district/ neighbourhood/ street scale and at a site/ building scale.

Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022)

The Apartment Guidelines 2022 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

The guidelines note that *apartments are most appropriately located within urban areas* and that the scale and extent of apartment development should *increase in relation to proximity to core urban centres and other factors*. The guidelines outline three types of locations:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided within the guidelines.

The site is within walking distance of two local centres, Whitechurch Shopping Centre and Rosemount Shopping Centres, along with its location opposite a small neighbourhood centre and an access to a wider range of retail, recreation and community services within 1km of the area. It is also within the range of good Dublin Bus services the site and is an **“Intermediate Urban Location”** which includes ‘*sites within easy walking distance (i.e. up to 5 minutes or 400-500m of reasonably frequent (min 15 minute peak hour frequency) urban bus services.*’

The Guidelines state that such locations are appropriate for higher density development which can wholly comprises apartments. In this instance the unique nature, character and extent of the site can facilitate large scale residential development.

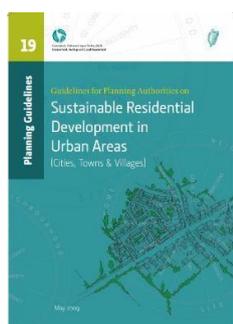
| <i>Guidance</i> | <i>Evaluation of Consistency</i> |
|--|---|
| SPPR1 notes that apartments may include up to 50% one bedroom or studio type units and that there shall be no minimum requirement for 3 or more bed units. | The proposed development provides 8% one-bedroom units and 12% three bedroom units. |
| SPPR2 relates to building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha. | N/A |
| SPPR3 sets out the minimum floor areas for apartment units | The Schedule of Accommodation prepared by MCORM Architects illustrates in tabular format how each apartment meets or exceeds the relevant standards in respect to apartment size. |
| SPPR4 requires more than 50% dual aspect apartments in intermediate locations | 53.5% of the apartments are dual aspect. |
| SPPR5 requires all ground floor apartments to have 2.7m floor to ceiling heights. | All the ground floor apartments achieve the minimum requirement of 2.7m floor to ceiling heights in line with SPPR5. |
| SPPR6 limits the number of units per core to 12 units. | The proposal is also in line with SPPR6 regarding the number of units per core. |

| | |
|--|---|
| SPPR7 relates to build to co-living and shared accommodation. | N/A |
| The apartment guidelines states that all apartments should include private and communal open space. | All apartments include access to private and communal open space to standard. A total of 3600sq.m of communal open space is provided to serve the 402 no. apartments. |
| Section 4.16 identifies that cycling “provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.” | Cyclists, along with pedestrians, will be given priority over cars throughout this development. Cars can only access the central route to the basement parking, with limited surface parking (only 25 spaces). As a result this development will be predominantly car free at surface level. Bike stores are provided for the residents at basement level and will be easily accessible from each apartment block. Additional bicycle parking is provided at surface levels and for the crèche, retail units and visitors. |
| Section 4.23 notes that for intermediate urban locations planning authorities must consider a reduced overall car parking standard. | The proposed 265 no. residential car parking spaces results in 0.68 parking spaces per unit. These are all provided at basement level. A further 25 no. spaces are provided on surface for the crèche, retail units and visitors. |
| Appropriate density | The proposed density of 114.9units/ha is a density appropriate to this location due to the proximity (c. 1km) to a high-frequency bus service (15). |
| Appropriate location | The proposed residential development is located in a strategic location within the metropolitan area of Dublin and in close proximity to a frequent bus service that connects the site with Whitechurch, Ringsend and Eden Quay. |

Evaluation of Consistency

The proposed development provides high density residential accommodation in an appropriate location while also achieving all the standards set out in the guidelines. It is therefore considered that the proposed development is in accordance with the above Guidelines.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)



The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas.

Each of these aims have been expanded upon and critically below. The conclusion finds that the proposed development, in terms of layout, design, mix and accessibility ensures a highly sustainable, accessible development that will provide an attractive location to live and visit. This is consistent with national guidelines.

| <i>Guidance</i> | <i>Evaluation of Consistency</i> |
|---|--|
| Prioritise walking, cycling and public transport, and minimise the need to use cars; | Pedestrians and cyclists are given priority throughout the scheme, which will help to minimise the need to use cars. Car parking (at a rate of 0.68 spaces per unit) is primarily included in terms of car storage, wherein residents will have access to a car at weekends for out of city trips, comparison retail shopping etc. There are only 25 surface parking spaces within the development, and only one central road into the development. The remaining 265 car parking are located within basements. Routes through the site, and around the site, in the form of public parks have been developed in order to enable access throughout the site. There are 1054 no. cycle parking spaces, with two spaces for each apartment within a secure locker in the basement. All of these measures, along with those set out in the TTA/MMP will ensure that the development supports and prioritises walking, cycling and the use of public transport. |
| Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience; | The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets down in the national guidelines and South Dublin County Council Development Plan 2022 |
| Provide a good range of community and support facilities, where and when they are needed and that are easily accessible; | <p>An assessment of the retail and community facilities in the area was carried out as part of the EIAR. This assessment determined that, although there are some facilities within the area, further facilities should be provided with the proposed development.</p> <p>Therefore, in addition to the crèche, the proposal includes two retail units, which will provide for the future residents of the development and the local area. The crèche and retail units are located on the western side of Block A and will provide active frontage along Edmondstown Road.</p> <p>The existing neighbourhood centre north of the site along Taylors Lane will cater for the north and eastern side of the development while the proposed units in Block A will cater for the western and southern side.</p> <p>The proposal also includes over 3,600sqm of communal open space and a further 5,400sqm of public open space which includes a treeline route along the drainage ditch to the south and a public park to the north.</p> |

| | |
|--|--|
| <p>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</p> | <p>The layout of development has been designed to utilise the existing landscape and surrounding building context. The proposal includes features that will contribute to creating a new sense of place for the site enhancing the features of the corner site. Public and communal open space proposed within the scheme will cover a substantial portion of the site (over 28% public open space). These large areas of open space both around the periphery of the site and between the buildings, along with the high quality landscaping proposed will provide an attractive space.</p> |
| <p>Are easy to access for all and to find one's way around;</p> | <p>There will be three pedestrian access points from Taylor's Lane. A fourth pedestrian access will be provided at the Taylors Lane/Ballyboden Road roundabout. These provide access to the proposed public park and into the main street in the centre of the scheme.</p> <p>There will be two pedestrian access points from Edmondstown Road, one through the vehicular access and the second in the south-west corner.</p> <p>Pedestrian pathways weave through the development's open spaces and along the drainage ditch (former mill race) to the south of the site that will be enhanced with native planting.</p> <p>A single vehicular access point is provided from Edmondstown Road to the west which will provide vehicular access to the proposed development. The proposed Central Street leading from this access point will provide a small number of visitor parking spaces and drop off points. The street also provides vehicular access to the three basement car parks</p> <p>The layout and landscaping has been carefully designed to ensure that the proposed layout is legible and logical.</p> |
| <p>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</p> | <p>The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations.</p> |
| <p>Provide a mix of land uses to minimise transport demand;</p> | <p>The proposed development provides a public park, residential units, a creche and two retail units. The development is also located close to existing social infrastructure in the area including schools, shops and other services.</p> |
| <p>Promote social integration and provide accommodation for a diverse range of household types and age groups;</p> | <p>The mix of 1 bed, 2 bed and 3 bed units provided in the development will significantly improve the mix of housing typologies in the area and provide for a diverse range of household types.</p> |
| <p>Enhance and protect the green infrastructure and</p> | <p>The proposed development seeks to preserve the existing mature trees and enhance drainage ditch from the</p> |

| | |
|--|---|
| biodiversity; and | former mill race with new native planting. |
| Enhance and protect the built and natural heritage. | The proposal will significantly enhance this disused site and incorporate significant landscape works, which will enhance the biodiversity and green links within the site. |
| Ensure there is sufficient capacity in the local schools and childcare facilities. | <p>In relation to schools we note the following located in the immediate area:</p> <ol style="list-style-type: none"> 1. Ballyroan Boys National School 2. Scoil Naomh Pádraig 3. Scoil Mhuire 4. Coláiste Éanna 5. Sacta Maria College <p>There are 12 no. childcare facilities located within 1km of the subject site.</p> <ol style="list-style-type: none"> 1. Sadie Matthews/ Moyville Montessori 2. Ballyboden Family Centre – Scoil Mhuire Pre-School 3. The Lodge Montessori School 4. Giddy-Ups Preschool 5. Young Days Montessori 6. Crescent Hill Pre-School Ltd. 7. Kinds Inc Rathfarnham 8. Usher Montessori Pre-School 9. Kids Play Montessori School 10. Chestnut Montessori 11. Ballyboden’s Childcare Centre 12. Cocoon Childcare Rathfarnham <p>A school and childcare demand assessment was completed as part of Chapter 4 of the EIAR submitted with this application.</p> |

Evaluation of Consistency

The proposed development, in terms of layout, design, mix and accessibility ensures a highly sustainable, accessible development that will provide an attractive location to live and visit.

In accordance with the 2009 Guidelines with respect to former institutional lands, the current development retains significant open space – 28% of the site area – which is in excess of the 20% recommended, and which will ensure that the development retains an open character and will open up these spaces to the public for the first time.

Overall, this proposed development is consistent with these national guidelines.

Urban Design Manual (2009)

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12 point criteria. The proposal complies with the following design criteria:

| | |
|--|--|
| 1. Context – How does the development respond to its surroundings? | |
| | <i>Evaluation of Consistency</i> |
| <i>The development seems to have evolved naturally as part of its surroundings.</i> | <p>The development is a bespoke apartment development within a parkland setting which reflects elements of the former institutional use and the existing natural environment on the site. This design has been influenced significantly by the trees along the east and southern boundary and the drainage ditch along the southern boundary.</p> <p>The site is a large vacant site, which was used for institutional uses and a pitch and putt course. The treelined boundary to the east and south separates the site from the residential development further afield. While Taylors Lane and Edmondstown Road act as a divide from the surrounding area. As a result, due to its size, existing boundary conditions and distance to neighbouring properties, enables the site to develop its own character.</p> <p>The set back from Taylors Lane allows the open space to be maintained along Taylors Lane and allows the creation of a large public open space within the development.</p> |
| <i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i> | <p>The area is a mixed use area with a mix of commercial and residential activities along Taylors Lane itself, which does not have a particular character or building line. While along Edmondstown Road there is large areas of public open space and a mixture of detached one off buildings, both residential and commercial. In the wider area development is predominantly low density residential housing characterised 2 storey semi-detached and terraced houses.</p> <p>The proposed development will increase the overall housing density of the wider area. However, given the boundary treatments of the site and the mixed nature of the surrounding area the design and layout has been influenced by the existing natural characteristics on the site.</p> <p>The site is separated from surrounding residential development by the existing roads to the north and west and by the boundary treatments and ditch to the south. The site is of a size and scale that it can accommodate the proposed higher density development while also providing some 28% of the site as open space. The buildings heights will provide a sense of enclosure on the internal streets and pathways</p> |

| | |
|---|--|
| | <p>while also providing passive surveillance. It will also provide an urban edge and presence along Taylors Lane.</p> <p>The proposed open spaces, public park, and native woodland planting will make a positive contribution to the amenities and ecology in the area.</p> |
| <i>Form, architecture and landscaping have been informed by the development's place and time.</i> | The proposed density of 114.9 units/ha is an appropriate density for this location within the suburbs of Dublin and within a short walking distance of regular bus services. |
| <i>The development positively contributes to the character and identity of the neighbourhood.</i> | <p>The proposed development will provide high density apartment blocks within a mixed use sub-urban area, while also maintaining the natural character of the area and the site by providing large areas of public open space. It will create a new public park that will be a welcome amenity for the neighbourhood and contribute to the neighbourhood's character and identity.</p> <p>The proposed development will provide a new use for this under- utilised site.</p> |
| <i>Appropriate responses are made to the nature of specific boundary conditions.</i> | <p>The existing drainage ditch along the southern boundary will become a revived ecological feature of the development with proposed native woodland planting and a pedestrian walkway alongside the water feature.</p> <p>Along Taylor's Lane the mature trees (which are considered the best specimens on the site) are retained within a new public park.</p> |

| 2. Connections – How well connected is the new development? | |
|---|---|
| | <i>Evaluation of Consistency</i> |
| <i>There are attractive routes in and out for pedestrians and cyclists.</i> | <p>The three pedestrian access points into the site from Taylor’s Lane provide access through the proposed public park. These pathways through the park will be attractive and safe routes for pedestrians and cyclists.</p> <p>The pedestrian access in the southwest corner provides direct access to the woodland walkway along the southern and eastern boundary. This will be an attractive pedestrian route into the scheme.</p> <p>There will also be pedestrian and cycle access into the site from Edmondstown Road via the vehicular access point.</p> |
| <i>The development is located in or close to a mixed-use centre.</i> | <p>Across the road from the subject site is a small mixed-use centre consisting of a local shop, pharmacy and a beauty salon. Whitechurch shopping centre and Rosemount shopping centre are located within 1km of the subject. Both of these shopping centres provide a variety of services and facilities.</p> <p>In addition, the proposal includes two retail units and a creche which will provide further facilities for the residents.</p> <p>Nutgrove and Rathfarnham Shopping Centres are also within 2km of the site which provide a further range of shops, restaurants and amenities. Dundrum Town Centre is 5km and The Square, Tallaght is within 6km of the site, which would take approximately 10 minutes to drive to both.</p> |
| <i>The development’s layout makes it easy for a bus to serve the scheme.</i> | The proposed development is located directly adjacent a number of existing bus routes. Provision of a bus route through the scheme is not required. |
| <i>The layout links to existing movement routes and the places people will want to get to</i> | The layout provides pedestrian permeability through the site with multiple access points at strategic locations providing connections to existing movement routes and bus stops. It not only provides connectivity for the site but improves the connectivity within the wider area as this site is currently inaccessible to the wider public. |
| <i>Appropriate density, dependent on location, helps support efficient public transport.</i> | The density of 114.9 units/ha is considered appropriate for the site and will support existing and future bus routes that service the area. |

| 3. Inclusivity – How easily can people use and access the development? | |
|---|--|
| <i>Evaluation of Consistency</i> | |
| <i>New homes meet the aspirations of a range of people and households.</i> | The mix of 1 bed, 2 bed and 3 bed units provides a variety of home sizes to cater for a range of people and household sizes. The provision of smaller units reflects the decreasing household sizes and will facilitate a wide range of homeowners including individuals, couples, empty nesters and families. |
| <i>Design and layout enable easy access by all.</i> | The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations. |
| <i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i> | The scheme will provide a variety of open spaces that including public, communal, and private amenity spaces for a range of different ages including children, adults and the elderly. There is c. 28% public open space and a further 10% communal open space provided within the development. The open areas will include provisions for active recreation, natural woodland areas, as well as more intimate and formal landscaped spaces. All of the open spaces are overlooked by the residential units offering great passive surveillance. |
| <i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i> | Public open spaces will be clearly defined throughout the scheme with the use of soft landscaping to define the boundaries. |
| <i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i> | The new buildings have been site to enable the flow and legibility within the site and for people to move through the site with ease. The buildings have been located in order to provide a new public park along Taylors Lane, a woodland walk and ecological corridor and a clear connection between these and the commercial uses. This ensures a positive contribution to both the proposed scheme and the wider area. |

| 4. Variety – How does the development promote a good mix of activities? | |
|---|--|
| <i>Evaluation of Consistency</i> | |
| <i>Activities generated by the development contribute to the quality of life in its locality.</i> | The proposal will contribute to the housing mix of the area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development. The additional retail and creche within the development will also provide additional commercial facilities for existing residents. While the public park and walks will provide an additional attractive amenity space for the wider area. |

| | |
|--|---|
| <i>Uses that attract the most people are in the most accessible places</i> | A variety of open spaces are provided throughout the scheme including a new public park and a woodland walk and ecological corridor. These areas include a range of spaces for all age groups including open spaces with child's play areas, flexible lawns, kickabout areas and seating areas. All of these spaces will be easily accessible and well overlooked. |
| <i>Neighbouring uses and activities are compatible with each other.</i> | <p>This residential development will add to the existing housing stock in the area, providing more housing choices and supporting existing business and facilities.</p> <p>The proposed creche will increase the childcare capacity in the area ensuring that there are sufficient childcare spaces to serve the local area.</p> <p>The proposed retail units will provide additional services for the developments future residents.</p> <p>These mix of uses in the area will complement and support each other creating a high quality neighbourhood.</p> |
| <i>Housing types and tenure add to the choice available in the area.</i> | The proposed scheme will add to the residential mix of the neighbourhood and further improve the availability of a range of unit types to various types of households. Please refer to the accommodation schedule for more information. |
| <i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i> | <p>The proposal includes the provision of two retail units. These two units will provide further services and facilities to serve the residents of the area.</p> <p>The proposed retail units are provided on the western side of Block A which will be easily accessible for the developments residents and the wider area.</p> <p>In addition to the two retail units the proposal also includes a childcare facility to support the expected increase in childcare demand generated by the development.</p> <p>These proposed facilities will support and complement the existing facilities and services in the area.</p> |

| | |
|--|---|
| 5. Efficiency – How does the development make appropriate use of resources, including land? | |
| | <i>Evaluation of Consistency</i> |
| <i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i> | The proposed density of 114.9 units/ha is a higher residential density than the surrounding area. This is an appropriate for its location as it is considered to be an Intermediate Urban Location with excellent proximity to a frequent bus services and within a short walking distance to a neighbourhood centre. |
| <i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate</i> | The existing ditch (former mill race) along the southern boundary of the site will be enhanced with native woodland planting to improve local biodiversity. An amenity walkway will be provided alongside this southern boundary and the native planting. |

| | |
|--|---|
| <p><i>sustainable urban drainage systems</i></p> | <p>The public park to the north of the site will provide a new public amenity space while also maintaining and improving existing habitats.</p> <p>The communal open spaces will provide outdoor amenity spaces for the residents of each block.</p> |
| <p><i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i></p> | <p>Digital Dimensions have carried out an assessment of the development. It has identified that there would be no noticeable loss of light to the surrounding existing properties. It also identified that the proposed residential units within the development would meet the recommendations of the BRE Guidelines</p> |
| <p><i>The scheme brings a redundant building or derelict site back into productive use.</i></p> | <p>The site is currently a vacant site which is underutilised. The existing seminary building and outbuildings are not readily adaptable and have little architectural value. As a result, these buildings are proposed to be demolished.</p> <p>The demolition of these buildings will allow for the redevelopment of this under-utilised site and provide housing stock at an appropriate density in this urban location which has very good public transport facilities. This is a more sustainable and productive use of this land.</p> |
| <p><i>Appropriate recycling facilities are provided.</i></p> | <p>Communal recycling facilities are provided in the bin stores.</p> |

| 6. Distinctiveness – How do the proposals create a sense of place? | |
|--|---|
| <i>Evaluation of Consistency</i> | |
| <i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i> | <p>The proposed development will include a new central street and large public park which will act as focal points within the development and will create a unique character and setting for future residents.</p> <p>The enhanced drainage ditch will also become a focal point for the development as an amenity walkway.</p> |
| <i>The scheme is a positive addition to the identity of the locality.</i> | <p>The site is currently vacant underutilised site which is inaccessible to the wider area. The proposal will provide an appropriate scale and quantum of residential development on a key site in the area. By providing additional public open spaces and links through the site it will improve the connectivity and permeability of the area as well as providing attractive areas of public open space.</p> <p>The proposed modern, high quality design of the apartment blocks will provide an attractive feature within this area.</p> |
| <i>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout</i> | <p>The existing features on the site have had a key influence in the layout of the site and the design of the buildings. The ditch (former millrace) along the southern boundary will be ecologically enhanced, the existing tree line along the eastern boundary will be retained and the Category A trees located in the northern portion of the site will be retained with the apartment blocks providing an urban frontage alongside the park.</p> |
| <i>The proposal successfully exploits views into and out of the site.</i> | <p>The provision of a new street framed by the three apartment blocks will draw people into and through the site. The gaps and breaks within each block will ensure that there are multiple views into and out of the site.</p> |
| <i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i> | <p>The main public open space will draw people into the development where the main street will be the main urban focus of the development to and from which most residents will travel.</p> |

| 7. Layout – How does the proposal create people friendly streets and spaces? | |
|--|--|
| <i>Evaluation of Consistency</i> | |
| <i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i> | Pedestrian permeability is a key design outcome for the scheme. All cycle and pedestrian paths have been designed to follow anticipated desire lines. Buildings are used to frame these routes and to ensure that they are well surveilled and provide safe, attractive routes around and through the development. Please refer the Architect's Design Report prepared by MCORM Architects for further information. |
| <i>The layout focuses activity on the streets by creating frontages with front doors directly serving the street.</i> | The development has been designed to provide accessibility and activity to all of the main routes through the development. Along the northern boundary block A has own door duplex units fronting onto the park. All of the open spaces have balconies and terraces overlooking these spaces as well as active doorways into the apartment blocks. This provides both active and passive surveillance and activity in these locations. |
| <i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</i> | The main vehicular street will provide to basement car parking. There is limited surface car parking within this development. The main street will be a low speed environment where pedestrian can cross readily and safely at any point. Elsewhere the routes and open spaces are car free and will provide the optimum in safe travel for pedestrians and cyclists. |
| <i>Traffic speeds are controlled by design and layout rather than by speed humps.</i> | As set out in the Traffic and Transport Assessment the scheme has been designed in line with DMURS and ensures that the development is not dominated by cars but instead is a well landscaped pleasant environment to be in. |
| <i>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</i> | The open space strategy for the scheme creates multiple open space areas of varying uses and sizes. This can be seen in the landscaping masterplan. |

| 8. Public Realm – How safe, secure and enjoyable are the public areas? | |
|--|---|
| | <i>Evaluation of Consistency</i> |
| <i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i> | All open and landscaped spaces are overlooked and surveyed by the residential units surrounding them. This will provide a sense of safety within the open spaces and ensure that the spaces are attractive to be in and look at. |
| <i>The public realm is considered as a usable integrated element in the design of the development.</i> | The existing natural features, their integration and the development of the public realm has been the primary driver for the layout and design of the development. It has been designed to not only provide high quality space within the development but also to form part of the wider network of usable public spaces in the area. The design of the public park has been carefully considered to provide a variety of open spaces for different users. Pathways for pedestrians and cyclists weave through the scheme and help to integrate the public space with the apartment blocks. |
| <i>Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i> | The children’s play area is located within the public park and will be overlooked by apartment block A, which will provide passive surveillance. |
| <i>There is a clear definition between public, semi-private, and private space.</i> | Care has been taken to ensure that there are clearly defined public, private and communal open spaces. Soft and hard landscaping and the use of slopes and steps will provide a clear definition between public, communal and private space. |
| <i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i> | The Central Street, which provides vehicular access to the basements, visitor parking and set down spaces, is landscaped to integrate the street into the public realm. All other pathways throughout the site are pedestrian and cycle routes. |

| 9. Adaptability – How will the buildings cope with change? | |
|--|---|
| | <i>Evaluation of Consistency</i> |
| <i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i> | The apartment buildings have a lift built into it so the apartments can be adapted for all times of life. |
| <i>The homes are energy-efficient and equipped for challenges anticipated from a changing climate</i> | Yes, design practices and proposed materials will militate against the effects of climate change. |
| <i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i> | N/A |
| <i>The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.</i> | The apartments can be altered internally. |

| | |
|---|-----|
| <i>Space in the roof or garage can be easily converted into living accommodation.</i> | N/A |
|---|-----|

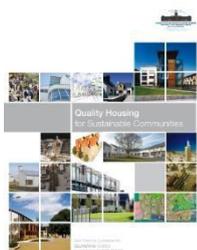
| 10. Privacy and Amenity – How does the scheme provide a decent standard of amenity? | |
|---|--|
| <i>Evaluation of Consistency</i> | |
| <i>Each home has access to an area of useable private outdoor space.</i> | Yes, each home has access to useable private outdoor space. Useable private outdoor space is provided as either terraces or balconies. The terraces will be clearly separated from communal and public open space. |
| <i>The design maximises the number of homes enjoying dual aspect.</i> | The development maximises the number of dual aspect homes, and none of the single aspect units are north facing. |
| <i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i> | All units will be designed to prevent sound transmission in accordance with building regulations. |
| <i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i> | Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue. |
| <i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</i> | All units are designed in accordance with national design standards on storage areas. |

| 11. Parking – How will the parking be secure and attractive? | |
|--|--|
| <i>Evaluation of Consistency</i> | |
| <i>Appropriate car parking is on-street or within easy reach of the home's front door.</i> | The three basement car parks will be directly accessible to future residents. The surface car parking is overlooked and is for people using the commercial facilities and visitors to the site. |
| <i>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</i> | The surface car parking spaces overlooked by the southern section of Block A and the units on the northern sides of Block B. |
| <i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i> | Car parking for residents is provided communally at basement level. Limited car parking spaces are provided on surface to serve the creche, retail units and visitors. Bicycle parking for residents is provided at basement level with an individual storage space provided for each unit. Each storage locker can store two bicycles. Further bicycle storage is provided communally at surface level for the retail units, visitors and the creche. |
| <i>Materials used for parking areas are of similar quality to the rest of The development.</i> | Yes, the highest quality materials will be used throughout the scheme. |
| <i>Adequate secure facilities are provided for bicycle storage.</i> | 832 no. long term spaces in the basements will be provided for the residents. These long term spaces will be provided in individual lockers for each residential unit, and each locker can store 2 no. bicycles. A further 222 no. spaces will be provided for the retail units, crèche and visitors. |

| 12. Detailed Design – How well thought through is the building and landscape design? | |
|---|---|
| <i>Evaluation of Consistency</i> | |
| <i>The materials and external design make a positive contribution to the locality.</i> | The proposed development uses a controlled palette of high-quality materials that are detailed within architecture drawings and in the Architect's Design Report. |
| <i>The landscape design facilitates the use of the public spaces from the outset.</i> | A network of different types of open spaces are provided within the scheme that will provide a range of opportunities for future users. |
| <i>Design of the buildings and public space will facilitate easy and regular maintenance.</i> | This can be achieved and will be provided by the estate management company. Further details are provided in the Building Lifecycle Report prepared by MCORM Architects. |
| <i>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</i> | The car parking spaces along the proposed central street have been carefully considered and located to integrate into the public realm design and ensure that the presence of cars is minimised within the development. |
| <i>Care has been taken over the siting of flues, vents and bin stores.</i> | Flues, vents and bin stores will be strategically located within the development to minimise their visual impact. |

Evaluation of Consistency
It is considered, based on the above, that the proposed development will create a highly sustainable new residential neighbourhood that is in line with the criteria of the Urban Design Manual.

Quality Housing for Sustainable Communities (2007)



The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

- promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;
- encourage best use of building land and optimal of services and infrastructure in the provision of new housing;
- point the way to cost effective options for housing design that go beyond minimum codes and standards;
- promote higher standards of environmental performance and durability in housing construction;
- seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and
- provide homes and communities that may be easily managed and maintained.

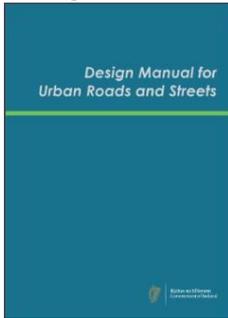
The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development

| | <i>EVALUATION OF CONSISTENCY</i> |
|--|--|
| <p><u>Socially & Environmentally Appropriate</u> <i>"The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</i></p> | <p>The scheme will provide a mix of apartment units which will cater to the needs of a wide range of family sizes and types than previously catered for in the Ballyboden area which are predominantly low density larger homes.</p> <p>The proposal is for an apartment development with retail and creche facilities within a parkland setting and includes significant and usable open spaces distributed throughout the scheme and will provide a variety of recreational opportunities for all age types.</p> |
| <p><u>Architecturally Appropriate</u> <i>"The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage."</i></p> | <p>The design and layout of the scheme creates a liveable and visually attractive residential environment which responds to the constraints within the site and the wider area.</p> <p>The design and layout are considered appropriate for this large former institutional site and the development of apartments allows significant open spaces to be provided including a large public open space which can be used by the existing community within the area. It is a legible scheme, which is highly permeable. The high-quality architecture and landscaping create an attractive development to be in and pass through.</p> |

| | |
|---|--|
| <p><u>Accessible & Adaptable</u> <i>“There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”</i></p> | <p>The design approach routes, entrances and accommodation within the proposed units incorporate the provisions of Building Regulations Part M access and use 2010.</p> |
| <p><u>Safe, Secure & Healthy</u> <i>“The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.”</i></p> | <p>The landscaping of the development has been one of the key drivers in the layout and design of the development. The protection of existing class A trees and the enhancement of the ditch to the south along with the parkland to the north create an attractive variety of spaces and routes for residents and visitors to use.</p> <p>Pedestrian and cyclist movement through the scheme is prioritised. There is only one vehicular access and route in the site which leads to basement car parking. The restricted access to cars along with the limited surface car parking, places pedestrians and cyclists at the heart of the development enabling people to move within and enjoy the new park and walking routes with ease and safety.</p> |
| <p><u>Affordable</u> <i>“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”</i></p> | <p>The scheme will employ high quality materials and landscaping throughout, ensuring that it has longevity in terms of appearance and ease of maintenance.</p> |
| <p><u>Durable</u> <i>“The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.”</i></p> | <p>The scheme proposes to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</p> |
| <p><u>Resource Efficient</u> <i>“Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management</i></p> | <p>The existing site constraints have been designed in to create key attractive features of the development. The layout is designed to ensure maximum daylight and sunlight and ensure solar gain.</p> <p>The scheme accords with the sustainable development principles. The site is located within a well-established suburban community with existing very good public transport and social infrastructure in the vicinity.</p> <p>The redevelopment of these former institutional lands for an apartment development is considered</p> |

| | |
|---|--|
| <i>of the dwellings should be minimised.”</i> | the optimum re-use of this highly accessible and well serviced site. |
|---|--|

Design Manual for Urban Roads and Streets (2019)



The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 and an updated version was released in May 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

It is considered that the proposed design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing sense of place. The implementation of a low parking regime and predominantly basement parking promotes a modal shift to alternative forms of transport while also creating a high quality public open space network in the development. This scheme prioritises pedestrians and cyclists through the development with a number of car free routes throughout. Permeability for cyclists and pedestrians is therefore prioritised.

| Design Manual for Urban Roads and Streets | |
|---|--|
| Design Principle 1 | Connected Networks |
| <i>“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”</i> | <p>The proposed layout and design ensure a permeable and legible development for all users.</p> <p>Vehicular access provided from Edmondstown Road and is limited to the central street and the basement car parks. All other pathways through the site are pedestrian and cyclist only, providing residents a variety of safe routes to get to public transport and local services.</p> <p>The apartment blocks have been designed and sited to optimise pedestrian permeability through the scheme. The breaks in the apartment blocks provide pedestrian routes that follow desire lines through the scheme, which will help to ensure that walking is an attractive mode of transport.</p> |
| Design Principle 2 | Multi-Functional Streets |

| | |
|--|--|
| <p><i>“The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.”</i></p> | <p>The apartment blocks overlook all the pedestrian routes and public areas throughout the scheme creating a self-regulating environment with a strong sense of safety and security.</p> <p>The pedestrian pathways through the public park connect the apartment blocks with the surrounding public realm and the surrounding neighbourhood.</p> <p>The proposed new street between Blocks A and B, that provides vehicular access to the basement car parks, has been designed as a low speed, shared streetscape in which pedestrians and cyclists can travel across safely. The turning space at the end of this street has been carefully designed to ensure there are clear legible routes for pedestrians and cyclists.</p> |
| <p>Design Principle 3</p> | <p>Pedestrian Priority</p> |
| <p><i>“The quality of the street is measured by the quality of the pedestrian environment.”</i></p> | <p>Pedestrians are prioritised throughout the scheme with the provision of multiple routes through the scheme and by limiting the vehicular routes.</p> <p>Maintaining this pedestrian priority was a key factor in the design of this scheme, with an early decision to place the car parking at basement level and as a result minimising the visual presence of cars in the scheme.</p> |
| <p>Design Principle 4</p> | <p>Multi-Disciplinary Approach</p> |
| <p><i>“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”</i></p> | <p>The proposed design results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers and landscape architects.</p> |
| <p><i>Evaluation of Consistency</i></p> <p>The proposed design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing sense of place. The implementation of a low parking regime and predominantly basement parking promotes a modal shift to alternative forms of transport while also creating a high quality public open space network in the development. This scheme prioritises pedestrians and cyclists through the development with a number of car free streets throughout. Permeability for cyclists and pedestrians is therefore prioritised.</p> | |

Guidelines for Planning Authorities on Childcare Facilities (2001)

These guidelines state that developments should facilitate the provision of childcare facilities with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Childcare Facilities
Guidelines for Planning Authorities

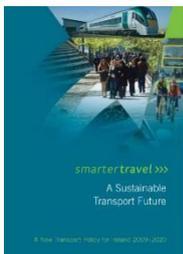
The 2001 Guidelines have since been updated by Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2018 which states the following:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”*

Evaluation of Consistency

The proposed development consists of 402 units comprising 39 no. 1 beds, 302 no 2 beds and 61 no. 3 beds. Applying the 2001 Guidelines standard would result in a demand of 107 childcare spaces. This was subsequently updated by the 2022 Apartment guidelines, by excluding the one bed units, then the development would generate a private childcare demand of c.97 spaces. A creche providing spaces for 124 no. Children is proposed as part of the development which

Smarter Travel – A New Transport Policy for Ireland (2009-2020)



The Irish Government published *Smarter Travel - A New Transport Policy for Ireland* in 2009 in acknowledgment that the transport trends throughout the country are unsustainable. This national policy document was designed to demonstrate how unsustainable transport and travel patterns can be reversed.

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.

Evaluation of Consistency

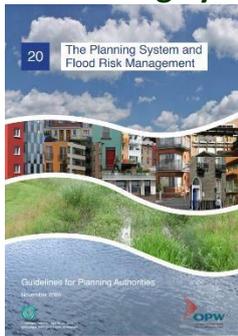
The proposed development is in line with this overall vision for better integration between land-use and transport. The proposed residential development for a higher density development located within a short distance of a number of neighbourhood centres, including a small neighbourhood centre opposite the site on Taylor's Lane and within a five-minute walk south of a neighbourhood centre on Ballyboden Road. The subject site is well serviced by public transport with a high frequency bus route (the 15b) serving the bus stop c. 150m north of the site along Ballyboden Road. A further two bus stops adjacent to the site are served by routes 15d and 61.

In addition, the entire development has been designed to provide pedestrian permeability to make walking a more attractive and viable form of transport. The presence of cars in the scheme has been kept to a minimum by providing only one street with vehicular access in the entire development and by placing the car parking almost entirely at basement level. The car parking ratio is also 0.68 spaces per residential unit. This will encourage people to leave their cars behind and chose other, more sustainable, forms of transport.

The site is also readily accessible by public transport and cycling from a range of employment hubs including Sandyford Business Park, Citywest, and Dublin City Centre. As such, this apartment development in this highly sustainable location is wholly in line with the compact city aims of this and other national planning guidance.

The site is also proposing minor road improvement works to the Edmondstown Road including the junction at Edmondstown Road and Scholarstown Road. These improvements will enable sustainable travel within this area.

The Planning System and Flood Risk Management (2009)



These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals

Evaluation of Consistency

DBFL Consulting Engineers have carried out a Site Specific Flood Risk Assessment for the subject site from this the layout of the development has ensured that all buildings are wholly contained within Flood Zone C, which is an appropriate location for residential development. The north western corner of the site is within Flood Zone B due to the possibility of flooding from the Owendoher to the west of the site. However, there is no built development proposed within this section of the site and therefore the proposed development will not be at risk of flooding.

Climate Action Plan 2019



The Department of Communications, Climate Action and Environment published the Climate Action Plan 2019, which aims to *make Ireland a leader in responding to climate disruption*. This Action Plan acknowledges the impact of climate change and that *the window of opportunity to act is fast closing* and that *decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge*.

The Action Plan includes the following objectives:

- Increase reliance on renewables from 30% to 70% adding 12GW of renewable energy capacity
- Increase attention to Energy and Carbon ratings in all aspects of managing property assets.
- Make growth less transport intensive through better planning, remote and home-working and modal shift to public transport.
- A target of 55% renewable power and at least 500,000 electric vehicles on the road by 2030.
- Reduced travel distances and greater proximity to employment and services, which will enable a greater proportion of journeys by bike or on foot (zero emissions)
- Greater urban density, which when combined with the point above, will ensure more viable public transport (less emissions per person than by individual vehicle)
- Greater sustainable mode share, which will enable cities and towns to densify, as development will not be dependent on road capacity nor car parking requirements, and less land will be required for the latter
- Closer proximity of multi-storey and terraced buildings, which will require less energy and make renewables-based systems of energy distribution such as district heating, or area-wide technology upgrades, more feasible

The Action Plan notes that the built environment accounted for 12.7% of Ireland's greenhouse gas emissions in 2017 and it is therefore important that we improve the energy efficiency of our buildings. Ireland's dispersed settlement pattern and low population density are identified as challenges specific to Ireland that need to be addressed reduce transport emissions. Actions to address spatial planning and urban form of development are required to aid the transition to a low carbon and climate resilient

society.

Evaluation of Consistency

The proposed high density residential development will provide housing within the existing built-up area of Ballyboden and help to counter urban sprawl into greenfield areas outside the city. The future population of this development will help to support bus services and existing facilities in the area and make providing further bus services and facilities to the area more viable. This in turn will help to reduce greenhouse gas emissions from transport and help Ireland to achieve our climate change goals. The development has been designed to include existing trees where possible and includes native planting as part of the landscaping plan. The planting will add to the biodiversity in the area and will help with the decarbonisation of the environment.

Car parking at basement level is provided within this development with some surface parking, as an acknowledgement of the fact that the movement away from car ownership will not happen overnight. There are many different factors that are involved in reducing greenhouse gas emissions and combating climate change, providing high density housing developments is just one factor. This basement car parking ensures that, as people move away from car dependence, the proposed development will not become an empty car park with excessively wide roads. There are also pedestrian and cycle links through the development as well as the provision of 1054 cycle parking spaces, and each apartment has its own secure locker for these bicycles. This will encourage and enable the movement to a more sustainable mode of transport.

REGIONAL POLICY

Regional Spatial and Economic Strategy (2019- 2031)



Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly (EMRA).

The Regional Spatial and Economic Strategy was adopted on the 28th June 2019 and is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond which is a new concept in Irish Planning tying spatial planning to economic factors. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change.

The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The central need identified by the RSES is ‘to be people focused as quality of life encapsulates strong economic output and stability, good environmental performance and good standard of living for all.’

The RSES outline Guiding Principles for Integration of Land Use and Transport in the region. They include the following:

- For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.
- Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.
- Support the ‘10 minute’ settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
- Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.
- Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency.

RSES Settlement Strategy supports, and as set out in Regional Policy Objective 4, the consolidation and redevelopment of infill, and brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs. The aim is to have *“50% of all new homes to be provided in the existing built up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031.”*

RPO 4.3 supports development of brown field sites as follows:

‘Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.’

Section 5.3 sets the Guiding Principles for the growth of the Dublin Metropolitan Area. Some of these principles include:

- **Compact sustainable growth** - Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.
- **Integrated transport and land use** – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including Bus Connects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.
- **Accelerate housing delivery**– Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.
- Co-ordination and active land management - enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and **land management policies that focus on the development of underutilised, brownfield, vacant and public lands.**

RPO 5.4 states the future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the Section 28 national guidelines.

RPO 5.5 promotes a “clear sequential approach” to the future development of Dublin Metropolitan Area, with a primary focus on the consolidation of the city and existing suburbs, and the development of Key Metropolitan Towns.

Elsewhere the RSES also promote development within the metropolitan area of Dublin that achieve integration of land use and transport planning (Section 8.1), compact growth (as an alternative to urban sprawl)(Section 8.2), and apartment developments that help achieve a wider demographic profile for an area (particularly mature suburban locations).

Evaluation of Consistency

The proposed development will provide a high density residential scheme on a key development site, bringing a greater quantum and variety of housing into the established suburban settlement of Ballyboden that is characterised by low density, own door housing. The proposed development will provide a high-density residential scheme on a key development site, bringing a greater quantum and variety of housing into the established suburban settlement of Ballyboden that is characterised by low density, own door housing. The redevelopment of this site is in line with compact growth and the aim of providing at least 50% within the city and suburbs on infill/brownfield sites.

The site is within a short walking distance of a number of Dublin Bus routes and local centres. The site is only a 25-minute cycle from St. Stephen's Green. This proximity to services, facilities and public transport creates a sustainable location that is ideal for significant residential development.

The public realm has been designed around pedestrian priority and permeability, with many pedestrian routes through the proposed development. Vehicular access into and around the proposed development is limited to help maintain this pedestrian priority, helping to ensure that walking is an attractive mode of transport and to reduce car dependence within the scheme.

Transport Strategy for the Greater Dublin Area (2016-2035)



The Transport Strategy for the Greater Dublin Area promotes the consolidation of the Metropolitan Dublin area allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built-up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.

The strategy's primary policy notes that *Ireland is required to radically reduce dependence on carbon-emitting fuels in the transport sector and that the strategy must promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.*

Section 7 states that *"the implementation of the Strategy will facilitate a more efficient use of land within the GDA. By focussing public transport investment, and investment in the cycling and pedestrian network, into the city centre, major suburban centres and hinterland growth towns, the Strategy will complement national, regional and local planning policy by promoting and enabling the consolidation of development into higher order centres... In terms of the provision of housing, the Strategy will directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest."*

Evaluation of Consistency

The proposed development is located within Corridor E – N81 Settlements – South Tallaght – Rathfarnham – to Dublin City Centre. The Transport Strategy notes that this corridor is ‘*made up of generally suburban residential development and is not defined on the basis of a major transport route, road or public transport service.*’ Within the metropolitan area of this corridor, in which the subject site is located, a BRT (to Tallaght via Rathfarnham and Terenure) and a core radial bus corridor (between Rathfarnham, Rathmines and the City Centre) have been suggested by the Transport Strategy as the public transport solution for the corridor.

The proposed development is located within the E1 Inner Metropolitan Segment. The car mode share in this segment is 68%, the public transport mode share is between 9% and 13% and the walking mode share is between 15% and 19%. It is envisaged, with the proposed improvements through BusConnects in this area, this distribution will further change to a higher percentage of public transport use and an associated reduction in car traffic.

The proposed development will support these public transport improvements by increasing the residential density in the area. In addition, these proposed improvements will benefit the future residents of the proposed development and help to encourage a modal shift to more sustainable modes of transport.

LOCAL POLICY

South Dublin County Council Development Plan 2022-2028

The subject site is within the administrative boundary of South Dublin County Council and as such is covered by the South Dublin County Council Development Plan 2022-2028.

Core & Settlement Strategy

The Core Strategy of the County Development Plan seeks to consolidate the existing urban footprint of the Dublin City and Suburbs. The Ballyboden area is identified at the edge of the Tallaght “Dublin City and Suburbs” area which is defined as follows:

“International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.”

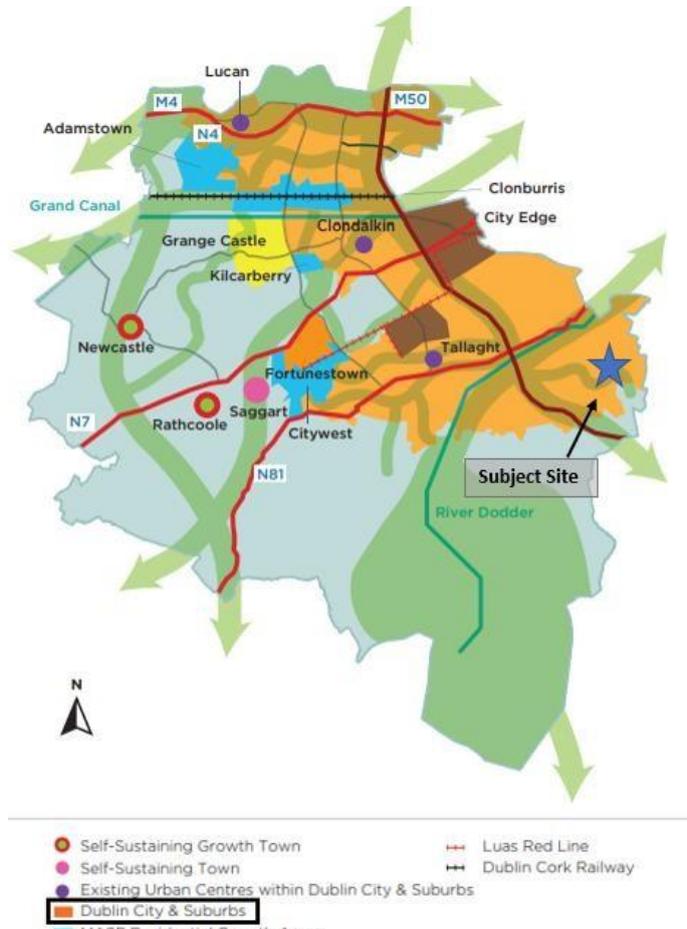


Figure 1: Extract from the Development Plan

Zoning

The subject lands are principally zoned “RES: To protect and / or improve residential amenity”. Residential is permitted in Principle. Childcare facilities and Shop (Neighbourhood) are Open for Consideration. The proposed development is therefore in accordance with the zoning as set out in Table 12.2.



Core Strategy and Settlement Strategy

The following polices/objectives are noted of relevance to the current proposal:

| Policy/ Objectives | Statement of Consistency |
|---|---|
| <p>Policy CS1: Strategic Development Areas Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.</p> | <p>The Ballyboden area is identified as being within the Dublin City & Suburbs in the County Development Plan. The proposal will contribute to the continued development of this outer suburban area.</p> |
| <p>Policy CS3: Monitoring Population and Housing Growth Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.</p> | <p>The subject site is zoned for residential development within the Development Plan.</p> <p>The subject site is highly accessible and is served by bus routes – 15B, 16, 61, 15D, 175, 161.</p> |
| <p>Policy CS6: Settlement Strategy - Strategic Planning Principles Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.</p> | <p>The site also benefits from a high level of local amenities and services including employment centres, retail, education and healthcare facilities.</p> |
| <p>Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.</p> | |

Natural, Cultural and Built Heritage

| Policy/ Objectives | Statement of Consistency |
|---|---|
| <p>Policy NCBH1: Overarching Protect, conserve and enhance the County’s natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.</p> | <p>The site has been assessed holistically from the outset at the concept masterplan stage in terms of the existing site features.</p> |
| <p>NCBH1 Objective 1: To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development</p> | <p>The existing trees, drainage ditch (former Mill Race) to the south, surrounding lands, archaeological and ecological aspects have all been considered. This process has been important in determining a landscape masterplan which is respectful of the key aspects of the of the landscape fabric.</p> <p>A unique aspect to the scheme is the ‘Circuitous Amenity Trail’ which consists of a well-connected path network circulating the entire development. This element incorporates shared cycle footpaths inviting</p> |

| | |
|---|---|
| | <p>residents and the wider community to enjoy a leisurely walk/jog/cycle throughout the development. As a result of this feature the design team has incorporated an ecological ‘enhancement’ zone which will include indigenous herbaceous and woodland planting and the naturalised drainage ditch.</p> |
| <p>NCBH1 Objective 2: To support the objectives and actions of the County Heritage Plan and the County Biodiversity Action Plan in the promotion and protection of natural, built and cultural heritage, and to take full cognisance of the County’s Landscape Character Assessment and the County Geological Audit in the sustainable management of development</p> | <p>Where possible the scheme has adopted a collaborative approach to the protection and reinforcement of key green infrastructure elements existing on site.</p> <p>In order to enhance biodiversity the design team has implemented the ‘Miyawaki Planting’ method and ‘Carbon Sequestration’ process throughout the landscaping on site. These methods and processes ensure native species are planted to provide density and diversity throughout the scheme.</p> |
| <p>Policy NCBH2: Biodiversity Protect, conserve, and enhance the County’s biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</p> | |
| <p>NCBH2 Objective 2: To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation.</p> | <p>The Natura Impact Statement submitted with this planning application identifies ‘Special Areas of Conservation’ and ‘Special Protection Areas’ within 15km of the site.</p> <p>The Statement prepared by Altemar Limited concludes that <i>“The proposed project will not will adversely affect the integrity of European sites.”</i> Please refer to this statement for a list of mitigation measures which must be adhered to during construction and operation of the proposed development.</p> |
| <p>NCBH2 Objective 3: To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as ‘stepping stones’ for the purposes of green infrastructure and Article 10 of the Habitats Directive.</p> | |
| <p>NCBH2 Objective 4: To protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the river</p> | <p>The NIS submitted with this application outlines <i>“potential negative impacts within the Zone of Influence (Zoi) including the Owendoher River, River Dodder, and downstream European sites”</i>.</p> <p>The NIS ensures that a robust series of mitigation measures will be carried out to ensure that surface water runoff from the proposed works on site are clean, uncontaminated and that dust from works on the site will not significantly impact on nearby rivers.</p> |
| <p>Policy NCBH3: Natura 2000 Sites Conserve and protect Natura 2000 sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura</p> | <p>The Natura Impact Statement prepared by Altemar Limited concludes that <i>“The proposed project will not will adversely affect the integrity of European sites.”</i></p> |

| | |
|---|---|
| <p>2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</p> | |
| <p>Policy NCBH4: Proposed Natural Heritage Areas Protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats and species.</p> | <p>As stated previously where possible all existing features have been maintained or mitigated against their loss with appropriate planting.</p> |
| <p>NCBH4 Objective 1: To ensure that any proposal for development within or adjacent to a proposed Natural Heritage Area (pNHA) is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the pNHA particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats</p> | <p>Altamar Limited have prepared an Ecological Impact Assessment (EclA) submitted as part of this planning application.</p> <p>There are no designated Natural Heritage Areas (NHA) within a 15km radius. However, the nearest Proposed NHA (Dodder Valley pNHA) is located 2.2 km from the site. The nearest RAMSAR site (Sandymount Strand/Tolka Estuary) is located 7.1 km from the proposed development site.</p> |
| <p>NCBH4 Objective 2: To restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional.</p> | <p>The EclA concludes that <i>"The overall impact on the ecology of the proposed development will result in a long term minor adverse not significant residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategies."</i></p> |
| <p>Policy NCBH14: Landscapes Preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development</p> | <p>A Landscape & Visual Impact Assessment is submitted as part of this planning application.</p> <p>The assessment determines the short term and long term visual impacts of the development from various viewpoints. 11 viewpoints were chosen, all of which have been assessed within the assessment by Doyle & O' Troithigh Landscape Architecture.</p> |
| <p>NCBH14 Objective 1: To protect and enhance the unique landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2021).</p> | <p>The assessment outlines a series of measures that will ensure a long term positive impact in terms of the landscape character, zoning and context. Please refer to Doyle & O' Troithigh Landscape Architecture documentation for further information.</p> |
| <p>NCBH14 Objective 4: To require a Landscape / Visual Impact Assessment to accompany all planning applications for significant proposals, located within or adjacent to sensitive landscapes and to provide mitigation measures to address any likely negative impacts.</p> | |

Housing Policies

The following polices/objectives are noted of relevance to the current proposal:

| Policy/ Objectives | Statement of Consistency |
|---|---|
| <p>Policy H1: Housing Strategy and Interim Housing Need and Demand Assessment Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review.</p> | <p>The proposed development is in line with the South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028.</p> |
| <p>H1 Objective 1: To ensure adequate and appropriate land is zoned to facilitate and implement the aims of the Core Strategy, to deliver affordable sustainable development, and to meet forecast future housing need in the County over the life of the Plan as identified by the Housing Strategy and Interim HNDA.</p> | <p>The subject site is zoned RES under the county development plan.</p> |
| <p>H1 Objective 2: To require that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended).</p> | <p>The applicant has allocated 41 no. units for Part V on-site which are identified on the enclosed Part V pack.</p> |
| <p>H1 Objective 3: To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.</p> | <p>The proposed development will provide a mix of housing types suitable for a variety of people. The application comprises a sustainable mix apartments/duplex, ranging from 1-bed to 3-bedroom apartments.</p> <p>Please refer to the Housing Demand and Composition Assessment Report by KMPG which provides clarity on the mix of unit types and tenures chosen for this development.</p> |

| | |
|---|--|
| <p>H1 Objective 4: To recognise the urgent need for the increased provision of social and affordable housing to ensure that all residents in South Dublin County have access to a home. Such provision shall be made through working with approved housing bodies and co-operatives to provide for social and genuinely affordable housing accommodation to meet housing needs. This shall be carried out through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, cost rental leasing, and housing supports including RAS and HAP or any other mechanism promoted under Government Housing Policy, with priority given to new builds and renovations whenever available</p> | <p>The scheme overall aims to provide a significant mix of tenures. A formal Part V agreement will be made with SDCC Housing post-planning.</p> |
| <p>H1 Objective 5: To ensure the selection of land or housing units to purchase or lease by the Council, including Part V, promotes the development of sustainable and mixed income communities.</p> | <p>Part V details are submitted with this application</p> |
| <p>H1 Objective 6: To provide social and affordable housing over the Plan period to meet forecast future housing need as identified in the Housing Strategy and interim HNDA.</p> | <p>The proposal includes a mixture of apartment types to meet the identified needs in the HNDA.</p> |
| <p>H1 Objective 7: To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries suited to their strategic regional role, subject to good design and development management standards being met</p> | <p>The subject site is located within the Dublin City and Suburbs as identified on the County Development Plan's Core Strategy Map. As such, this apartment proposal which will deliver 402 no. units at an appropriate density of 114.9uph will enable the increase in population is met.</p> |

| | |
|---|---|
| <p>H1 Objective 8: To promote the re-use of and reactivation of vacant units within our Urban Areas and pursue as soon as possible, through the application of the vacant site levy in accordance with the Urban Regeneration and Housing Act 2015, and through the implementation of the South Dublin Vacant Homes Strategy and Action Plan 2018-2021. The Council shall review and update this programme as deemed necessary and shall pursue the Compulsory Purchase of long-term vacant sites and units, where feasible.</p> | <p>The proposed development will provide new residential development on this vacant site, bringing it back into appropriate residential use.</p> |
| <p>H1 Objective 9: To implement the policies, objectives and unit target set out under the South Dublin Traveller Accommodation Programme (TAP) 2019-2024 and review the programme as required.</p> | <p>N/A</p> |
| <p>H1 Objective 10: To work with Central Government and relevant State Agencies in responding to requirements to support those in need of refuge and long-term housing, as well as ensuring the consistent application of the 'Policy and Procedural Guidance for Housing Authorities in Relation to Assisting Victims of Domestic Violence with Emergency and Long-term Accommodation Needs' or any alternative policy or legislation that is enacted over the lifetime of this Development Plan.</p> | <p>N/A</p> |
| <p>H1 Objective 11: To examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021.</p> | <p>N/A</p> |
| <p>H1 Objective 12: Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:</p> <ul style="list-style-type: none"> - there are unique site constraints that would prevent such provision; or - that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or the scheme is a social and / or affordable housing scheme. <p>Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).</p> | <p>Please refer to the Housing Demand and Composition Assessment Report prepared by KPMG Future Analytics. This report outlines the high proportion of 3 and 4 bed homes in the immediate local area. It also identifies the need in the area for smaller unit sizes to accommodate the population demand in this area. It is also worth noting that the proposal has increased the total number of 3 bed units from 46 no. to 61 no., which is now 15% of the total mix. This was achieved by some reworking of the internal layouts and a small uplift in the total number of units from 398 no. to 402 no.</p> |

| | |
|--|--|
| <p>H1 Objective 13: To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</p> | <p>The proposed development is a mixed tenure proposal which includes a PART V proposal.</p> |
| <p>H1 Objective 14: To facilitate, as far as possible, the development of homes for owner-occupiers over institutional investors.</p> | <p>This is noted.</p> |
| <p>H1 Objective 15: To ensure that a balanced mix of tenure is provided for in the areas zoned for Regeneration in the Tallaght LAP lands and the City Edge area. Such a mix shall take account of the existing or permitted tenure within a ten-minute walking distance of any proposed development and applicants for planning permission shall demonstrate, to the satisfaction of the Planning Authority, that there is no saturation of a single tenure within the defined area.</p> | <p>N/A</p> |
| <p>H1 Objective 16: To support the provision of homeless accommodation and / or support services which is inclusive and treats all persons with dignity and respect in a balanced way located throughout the County and not concentrated in any particular areas and to incorporate consultation with other homeless support services in supporting this service.</p> | <p>N/A</p> |
| <p>H1 Objective 17: To review the South Dublin County Council Housing Strategy 2022-2028 as part of the mandatory Two-year Development Plan Review.</p> | <p>N/A</p> |
| <p>H1 Objective 18: To ensure that where Local Authority public lands zoned Res / Res N or future zoned Res / Res N local authority lands are used to develop housing, that it is used exclusively for the delivery of social, affordable cost rental and affordable purchase homes.</p> | <p>N/A</p> |

| | |
|---|---|
| <p>Policy H2: Supply of Housing Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.</p> | <p>The proposed development will provide residential units on a currently vacant site. The existing structures on site are not suitable for residential units and will be demolished to enable the development of new apartments on this site.</p> |
| <p>H2 Objective 1: To maximise the use of existing housing stock, prioritising Council voids, facilitating and promoting upgrade / retrofit of existing stock reducing energy demand and addressing Climate Change in line with the Energy, Efficiency and Retrofitting Programme 2021-2030 (or any superseding document)</p> | |
| <p>H2 Objective 2: To ensure that sufficient zoned land, integrating land use and transport and which can be serviced is available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing lands based on the Settlement Strategy outlined in Chapter 2: Core Strategy and Settlement Strategy.</p> | <p>The proposed residential scheme is on zoned land and is in line with the zonings set out in the Development Plan.</p> |
| <p>H2 Objective 3: To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County, working towards an even spread of such schemes across all LEAs, whilst ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates, subject to the protection of residential amenity.</p> | <p>The proposed development does not represent a typical infill site and development given the significant extent of the landholding and unique setting and character compared to the adjoining suburban areas. It is considered a brownfield site within an urban area. This site, as such, will contribute to the community facilities in the area through the provision of a new public park, two retail units and a creche. It will open up an existing private site to the wider community for the first time, providing an attractive place to relax and enjoy.</p> |
| <p>H2 Objective 4: To promote lifetime housing standards in new homes built in the County in accordance with best practice.</p> | <p>The proposed housing has incorporated lifetime housing standards to ensure homes are more easily adaptable for lifetime.</p> |
| <p>H2 Objective 5: To ensure the provisions of the Planning and Development Act 2000, as amended are utilised in the control and authorisation of short-term lettings and to prevent an over-concentration of such a use to facilitate the supply of housing.</p> | <p>N/A</p> |
| <p>H2 Objective 6: To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</p> | <p>A Part V proposal is submitted with this planning application and can be the subject of subsequent agreement on receipt of planning permission.</p> |

| | |
|--|--|
| <p>H2 Objective 7: To promote integration of all tenure types within communities by shifting the areas of focus for the provision of Social Housing to areas of population decline to break down barriers and stigmas that unfortunately exist and promote the re-population of declining communities instead of continuing to develop infill and larger projects in areas of population increase and population pressure, like Tallaght and Clondalkin, where green space is becoming more sparse by the year as a result.</p> | <p>The proposed development provides for a variety of tenure types within the development.</p> <p>The site layout and design has been designed to ensure full integration of all members of society. Another key principle has been the provision of high-quality open space which is accessible to all.</p> |
|--|--|

| | |
|--|--|
| <p>Policy H3: Housing for All Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed-use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.</p> | <p>The proposed development will provide for apartments within the existing building up area. This will introduce a new type of development within a largely low density residential area. It will provide a new housing choice within this area. All of the units are designed in line with Part M and the Apartment Guidelines</p> |
| <p>H3 Objective 1: To support housing that is designed for older persons and persons with disabilities and / or mental health issues in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</p> | <p>All of the apartment types are designed as suitable for older people, people with disabilities and/or mental health issues. The proposed housing development is in close proximity to existing services and amenities including pedestrian paths, local shops, parks and public transport.</p> |
| <p>H3 Objective 2: To support housing options for older people and persons with disabilities and/or mental health issues – consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.</p> | <p>All of the apartment types are designed as suitable for older people, people with disabilities and/or mental health issues.</p> |
| <p>H3 Objective 3: To provide for the subdivision of large houses or an amalgamation of smaller houses within established areas for the purpose of providing independent, semi-independent or long-term care accommodation. Such development should be subject to the car parking standards and the standards on dwelling subdivision as set out under Chapter 12: Implementation and Monitoring. A Traffic Impact Statement will be required in the case of major traffic generating developments or where it is considered that there would be a significant impact on the County’s road network.</p> | <p>N/A</p> |
| <p>H3 Objective 4: To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate, and the amenities of the area are preserved.</p> | <p>N/A</p> |
| <p>H3 Objective 5: To actively encourage and directly support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing and adaptation of existing properties as a matter of urgency.</p> | <p>All units are large enough to accommodate internal adaptation.</p> |
| <p>H3 Objective 6: To promote ‘aging in place’ and opportunities for right sizing within communities and require an evidence base for proposed new nursing homes in areas which</p> | <p>All of the apartment types are designed as suitable for older people.</p> |

| | |
|--|--|
| appear to be well served by them. | |
| H3 Objective 7: To ensure that those with specific housing needs, such as older persons, persons with disabilities, homeless persons, Travellers and people leaving Direct Provision, are accommodated in a manner appropriate to their specific needs and in a timely fashion. | The application is designed in accordance with government policy, particularly the S28 Ministerial Guidelines as assessed above. Therefore, the scheme caters for various needs in order to develop and support a sustainable community for all residents. |
| H3 Objective 8: To support and facilitate the implementation of the South Dublin Age Friendly Strategy 2020 – 2024, the National Age Friendly Programme, and Housing Options for Our Ageing Population 2019 and having regard to Age Friendly Ireland’s guidelines for planning authorities (2021). | All of the apartment types are designed as suitable for older people. |

| | |
|--|--|
| Policy H7: Residential Design and Layout Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development. | The layout, footprint of buildings and all amenity and landscaping proposed development has been designed in compliance with the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009. |
| H7 Objective 1: To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), or as may be updated and Chapter 12: Implementation and Monitoring. | This is achieved in the current proposal. Refer to the Architectural Design Statement prepared by MCORM for further details. |
| H7 Objective 2: To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities. | The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations. |

| | |
|--|---|
| <p>H7 Objective 3: To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling, having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</p> | <p>The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points from Edmondstown Road and Taylors Lane adjoining existing residential developments to the west, north and south.</p> <p>The routes are also overlooked by adjoining residential developments and a safe environment will be created.</p> |
| <p>H7 Objective 4: To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013, updated 2019).</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines as assessed above and the DMURS statement prepared by DBFL Consulting Engineers.</p> |

| | |
|---|--|
| <p>Policy H8: Public Open Space Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.</p> | <p>The proposed development includes a new public parks as well as a woodland walk.</p> |
| <p>H8 Objective 1: To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Open Space and Chapter 12: Implementation and Monitoring.</p> | <p>The public open space provision within the development site is 5400 sqm, with an additional 4400 sqm of Woodland Walkway.</p> |
| <p>H8 Objective 2: To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.</p> | <p>The proposed development includes a new park as well as a series of residential pocket parks distributed throughout the development. A clear distinction of open space is provided for.</p> |
| <p>H8 Objective 3: To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.</p> | <p>The proposed development is capable of providing above open space standards on site and will provide a new public park.</p> |

| | |
|---|--|
| <p>Policy H9: Private and Semi-Private Open Space Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.</p> | <p>All apartments and duplexes all have private balconies/terraces.</p> |
| <p>H9 Objective 1: To ensure that all private open spaces for houses and apartments / duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out in Chapter 12: Implementation and Monitoring.</p> | <p>All apartment balconies/terraces either meet or exceed the minimum standards outlined in Section 28 Apartment Guidelines and chapter 12. The design, location and orientation of the balconies/terraces also ensures high qualitative standards are achieved.</p> |
| <p>H9 Objective 2: To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.</p> | <p>Each of the apartment blocks has direct access to a dedicated communal open space area that exceeds the minimum size standards.</p> |

| | |
|--|---|
| <p>Policy H10: Internal Residential Accommodation Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.</p> | <p>This is achieved within the unit typologies proposed. Refer to the Architectural Design Statement prepared by MCORM for further details.</p> |
| <p>H10 Objective 1: To promote the provision of high-quality houses and apartments / duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 12: Implementation and Monitoring.</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines and chapter 12.</p> |
| <p>H10 Objective 2: To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity.</p> | <p>The design approach routes, entrances and accommodation within the proposed units incorporate the provisions of Building Regulations Part M access and use 2010.</p> |
| <p>H10 Objective 3: To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.</p> | <p>The proposed units all meeting or exceed the standards as proposed under the county development plan and can all be adapted to accommodate an at home office.</p> |

| | |
|--|--|
| <p>Policy H11: Privacy and Security Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</p> | <p>Privacy and security for all unit types is achieved within the designs proposed. A clear definition between public, semi-private and private open spaces is achieved.</p> |
| <p>H11 Objective 1: To ensure there is a clear definition and delineation between private, semiprivate (communal) and the public open spaces that serve residential development.</p> | <p>A clear definition between public, semi-private and private open spaces is achieved.</p> |
| <p>H11 Objective 2: To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.</p> | <p>All residential streets will be fronted by residential development which will provide ample surveillance.</p> |
| <p>H11 Objective 3: To ensure that private open spaces, where it consists of gardens, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</p> | <p>This is achieved within the proposed development. Refer to architectural and landscape drawings and reports for further details.</p> |
| <p>H11 Objective 4: To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity</p> | <p>Generous separation distances are provided within the blocks. The courtyard in Block A is 25m x 52m approximately, the courtyards in Block B are open ended with 26m approximately between the finger blocks and the courtyard in Block C is 38m x 51m approximately.</p> |

| | |
|---|---|
| <p>Policy H12: Steep or Varying Topography Sites Ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.</p> | <p>The proposed design and layout have been fully informed by the topography of the site. The site slopes up to the rear (south). Because of this Blocks A and C are set into the slope of the site creating a step in section. The design of the scheme is further elaborated in the Architectural Design Statement prepared by MCORM.</p> |
| <p>H12 Objective 1: To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).</p> | <p>The proposed design and layout have been fully informed by the topography of the site. The site slopes up to the rear (south). Because of this Blocks A and C are set into the slope of the site creating a step in section. The steps in floor level help to define boundaries and communal open space areas. The design of the scheme is further elaborated in the Architectural Design Statement prepared by MCORM.</p> |

| | |
|--|---|
| <p>H12 Objective 2: To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography.</p> | <p>Blocks A and C are set into the slope of the site creating a step in section to integrate with the topography of the site.</p> |
|--|---|

| | |
|--|---|
| <p>Policy H13: Residential Consolidation Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County</p> | <p>The proposed development represents a sustainable intensification of residential development at this location proximate to public bus transport yet located at the edge of the built-up area of South Dublin adjacent the foothills of the Dublin Mountains.</p> |
| <p>H13 Objective 1: To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.</p> | <p>The proposed development supports the creation of a more consolidated urban form in a suitable location with links to public transport and accessibility to a range of amenities.</p> |
| <p>H13 Objective 2: To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring</p> | <p>The site is a brownfield site currently occupied by 3 storey former Augustinian Order buildings and chapel that are no longer in use along with some single storey buildings which will be demolished as part of this application. The site is zoned for residential use under the County Development Plan and will contribute to the consolidation of residential development within an established residential area.</p> |

| | |
|--|--|
| <p>H13 Objective 3: To favourably consider proposals for the development of corner or wide garden sites within the curtilage of existing houses in established residential areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring</p> | <p>N/A</p> |
| <p>H13 Objective 4: To promote and encourage 'Living-Over-The-Shop' residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.</p> | <p>N/A</p> |
| <p>H13 Objective 5: To ensure that new development in established areas does not unduly impact on the amenities or character of an area.</p> | <p>The proposed development represents a sustainable intensification of residential development at this location proximate to public bus transport and amenities.</p> |
| <p>H13 Objective 6: To support the subdivision of houses in suburban areas that are characterised by exceptionally large houses on relatively extensive sites where population levels are generally falling and which are well served by public transport, subject to the protection of existing residential amenity.</p> | <p>N/A</p> |
| <p>H13 Objective 7: To support and facilitate the replacement of existing dwellings with one or more replacement dwellings, subject to the protection of existing residential amenities and the preservation of the established character (including historic character and visual setting) of the area (see Policy NCBH 22: Features of Interest and Chapter 12: Implementation and Monitoring).</p> | <p>As the site is zoned for residential use under the County Development Plan, the proposed development will contribute to the consolidation of residential development within an established residential area. The site is currently occupied by 3 storey former Augustinian Order buildings and chapel that are no longer in use along with some single storey buildings which will be demolished as part of this application.</p> |

| | |
|--|-----|
| <p>Policy H14: Residential Extensions Residential Extensions Support the extension of existing dwellings subject to the protection of residential and visual amenities.</p> | N/A |
| <p>H14 Objective 1: To favourably consider proposals to extend existing dwellings subject to the protection of residential and visual amenities and compliance with the standards set out in Chapter 13 Implementation and Monitoring and the guidance set out in the South Dublin County Council House Extension Design Guide, 2010 (or any superseding guidelines).</p> | N/A |
| <p>H14 Objective 2: To review and update the South Dublin County Council House Extension Design Guide, 2010 during the lifetime of this Development Plan, to include a review of design options for mid terrace type extensions with a view to facilitating these extensions in Local Authority housing where appropriate.</p> | N/A |

| | |
|--|-----|
| <p>Policy H14: Residential Extensions Residential Extensions Support the extension of existing dwellings subject to the protection of residential and visual amenities.</p> | N/A |
| <p>H14 Objective 1: To favourably consider proposals to extend existing dwellings subject to the protection of residential and visual amenities and compliance with the standards set out in Chapter 13 Implementation and Monitoring and the guidance set out in the South Dublin County Council House Extension Design Guide, 2010 (or any superseding guidelines).</p> | N/A |

| | |
|--|-----|
| H14 Objective 2: To review and update the South Dublin County Council House Extension Design Guide, 2010 during the lifetime of this Development Plan, to include a review of design options for mid terrace type extensions with a view to facilitating these extensions in Local Authority housing where appropriate. | N/A |
|--|-----|

Community Infrastructure and Open Space

| Policy/Objectives | Statement of Consistency |
|--|--|
| Policy COS1: Social Inclusion and Community Development Promote social inclusion and community development and encourage active participation and social integration of minority and marginalised groups, consistent with RPO 9.1 and RPO 9.2 of the RSES. | This development aims to provides a mix of housing both in terms of apartment sizes and tenures. The establishment of natural amenities throughout the scheme enhances this vision of social integration further by creating areas for socialising for residents and visitors to interact with their surrounding environment. |
| COS1 Objective 1: To provide appropriate and accessible community facilities to meet the needs of all citizens of the County, comprising of a fast-growing young population and including an ageing population, consistent with NPOs 28 and 30 of the NPF. | The proposed development will provide a new public park, woodland walk, 2 retail units, a creche and a community room. These facilities will serve the needs of the residents and the wider community for a range of people of all ages. |
| COS1 Objective 3: To support and facilitate the implementation of local plans and programmes (and any superseding documents) with a social inclusion and community development focus including: - Social Inclusion and Community Activation Programme (2018-2022); -South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County; -The South Dublin County Traveller Accommodation Programme (2019- 2024); -South Dublin Disability Accommodation Strategy. -South Dublin Age Friendly Strategy (2020-2024); A Strategy for a Healthy South Dublin (2019-2022); -South Dublin County Sports Partnership Strategic Plan (2017-2022). | ‘Building for Everyone. A Universal Design Approach’ is a design manual which the design team has been informed by. The design teams’ vision is to ensure that residents and visitors of the scheme can get out and about in their local area and avail of the amenities available in their local community. DMURS and Part M of the Building regulations have been addressed throughout the design. |
| COS1 Objective 4: To support the improvement, maintenance, upgrade and refurbishment of existing community-based facilities and changing rooms within the County to meet current and future needs. | N/A |

| Policy/Objectives | Statement of Consistency |
|--|---|
| <p>Policy COS1: Social Inclusion and Community Development Promote social inclusion and community development and encourage active participation and social integration of minority and marginalised groups, consistent with RPO 9.1 and RPO 9.2 of the RSES.</p> | <p>This development aims to provides a mix of housing both in terms of apartment sizes and tenures. The establishment of natural amenities throughout the scheme enhances this vision of social integration further by creating areas for socialising for residents and visitors to interact with their surrounding environment.</p> |
| <p>COS1 Objective 1: To provide appropriate and accessible community facilities to meet the needs of all citizens of the County, comprising of a fast-growing young population and including an ageing population, consistent with NPOs 28 and 30 of the NPF.</p> | <p>The proposed development will provide a new public park, woodland walk, 2 retail units, a creche and a community room. These facilities will serve the needs of the residents and the wider community for a range of people of all ages.</p> |
| <p>COS1 Objective 3: To support and facilitate the implementation of local plans and programmes (and any superseding documents) with a social inclusion and community development focus including:</p> <ul style="list-style-type: none"> - Social Inclusion and Community Activation Programme (2018-2022); -South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County; -The South Dublin County Traveller Accommodation Programme (2019- 2024); -South Dublin Disability Accommodation Strategy. -South Dublin Age Friendly Strategy (2020-2024); A Strategy for a Healthy South Dublin (2019-2022); -South Dublin County Sports Partnership Strategic Plan (2017-2022). | <p>‘Building for Everyone. A Universal Design Approach’ is a design manual which the design team has been informed by.</p> <p>The design teams’ vision is to ensure that residents and visitors of the scheme can get out and about in their local area and avail of the amenities available in their local community.</p> <p>DMURS and Part M of the Building regulations have been addressed throughout the design.</p> |
| <p>COS1 Objective 4: To support the improvement, maintenance, upgrade and refurbishment of existing community-based facilities and changing rooms within the County to meet current and future needs.</p> | <p>N/A</p> |
| <p>Policy COS2: Social/Community Infrastructure Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, consistent with RPO 9.14 of the RSES. (See also Chapter 5: Quality Design and Healthy Placemaking)</p> | <p>The proposed development provides a variety of facilities on site including a creche, public open space, retail units, community facilities all of which are accessible to the residents and the wider community.</p> |

| | |
|---|---|
| <p>COS2 Objective 1: To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for a period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.</p> | <p>The proposed development includes a community room in Block C of the development. This will cater for the proposed community.</p> |
| <p>COS2 Objective 2: To continue to work closely with the Health Service Executive, Department of Education and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.</p> | <p>The proposed development includes a 656sq.m creche which will be appropriately sized to facilitate the predicted childcare demand of the proposed development.</p> <p>The proposed development will provide Community facilities located at the ground floor level in Block C fronting onto a plaza in that area.</p> <p>The proposed development includes new public open space as well as a series of communal pockets of open space distributed throughout the development. A well-defined hierarchy of open space is provided for.</p> |
| <p>COS2 Objective 3: To protect and enhance existing community facilities, and to support the development and expansion of new and existing facilities and services, in proximity to the populations they serve, where their need is identified.</p> | <p>The proposed development of 402 residential units will provide an increased local demand on existing community facilities. As a result, the provision of a community facilities, childcare facility and creation of new public open space will facilitate and serve the population of this development and the wider area.</p> |
| <p>COS2 Objective 4: To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community hubs without negatively restricting the range of services provided in any one centre.</p> | <p>Community facilities are located in the Block C and a creche is proposed in block A along with retail units which will provide community facilities within the development.</p> |
| <p>COS2 Objective 5: To promote accessible and inclusive social infrastructure for a range of users by adopting a universal design approach where feasible and to provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives, consistent with RPO 9.12 and RPO 9.13 of the RSES and having regard to Building for Everyone: A Universal</p> | <p>Particular emphasis has been placed in detailed design stage on how walkable the scheme is for people of all abilities and ages.</p> |

| | |
|--|--|
| <p>Design Approach – Planning and Policy’ (2012)</p> | |
| <p>COS2 Objective 6: To ensure that social, community, cultural and recreational facilities are provided in a manner which reduces climate impact by supporting and promoting the following measures:</p> <ul style="list-style-type: none"> -Provision of facilities within walkable distances of communities and on public transport routes; -Promotion of walking and cycling and use of public transport via permeability and mobility management measures; -Co-location, clustering and sharing of community facilities to increase efficient use and reduce trips; -Location, siting and design to promote climate mitigation and adaptation for example, taking advantage of solar gain; -Sourcing power from renewables such as wind and solar energy; -Use of alternative energy technologies such as heat pumps; -Energy-proofing of community buildings; -Additional tree planting and adapting management regimes in parks and public open spaces to allow more wild areas in order to increase opportunities for carbon sequestration. | <p>The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations. Refer to the Architectural Design Statement prepared by MCORM Architects for further details.</p> <p>In terms of accessibility, a well-designed and safe footpath network will circulate the development, link open spaces and invite residents and the wider community for leisure Walks, cycling and jogging.</p> <p>The interconnectivity of the scheme will ensure access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme.</p> <p>The new public park will support additional tree planting and encourage more wild areas.</p> |

| | |
|---|---|
| <p>Policy COS3: Community Centres Ensure that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities.</p> | <p>There are a number of community centres already in the wider area, however the provision of a community facilities within Block C of the development creates a new focal point for the area which will be highly accessible both to future residents and existing residents in the local area through the variety of connections proposed.</p> |
| <p>COS3 Objective 1: To investigate, where new provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.</p> | <p>Block C provides community facilities consisting of a concierge, a meeting room and general purpose rooms. This will offer residential interaction and social activity for the residents and members of the wider community.</p> |
| <p>COS3 Objective 2: To ensure the provision of new community centres in new and existing development areas or where provision is the responsibility of the developer, the Council will ensure the developer provides, in proximity to the population they serve and in accordance with the standard of one centre per 8,000 population with a size of approximately 1,200-1,800 sq m, or dependent on specific local demographic or other needs, smaller centres at a more local level, generally between 350-650 sq m in size at the discretion of the Council, or as may be updated by any future community centre strategy carried out by the Council.</p> | <p>There are a number of community centres already in the wider area, however the provision of a community facilities within Block C of the development creates a new focal point for the area which will be highly accessible both to future residents and existing residents in the local area through the variety of connections proposed.</p> |
| <p>COS3 Objective 3: To provide discretion to the Council to require residential or mixed used developments in new development areas to provide a pro rata contribution towards the provision of a community centre, in accordance with the standards set out in COS3 Objective 2 and in line with the Development Contribution Scheme.</p> | <p>The proposed development includes for a creche which will be used by the wider community. This space could also operate as a dual use in the evening time should the council so wish and condition accordingly.</p> <p>It is also noted that there is a residential internal amenity area proposed in block C. again, if it was deemed appropriate this could be open to be made available for the wider community.</p> <p>The review of Social & Community Infrastructure in the area suggests there may not be a distinct need for an additional community centre in the area.</p> |
| <p>COS3 Objective 4: To ensure that community buildings are multi-functional and adaptable, can be used by all age cohorts (intergenerational), providing for indoor and supporting outdoor use, for example, café</p> | <p>Community facilities are located at the ground floor level of block C and fronting onto a plaza in that area and paths linked to the retail units and furthermore the creche provided by this development.</p> |

| | |
|--|--|
| seating areas, and are accessible to as many different users as possible including our teens and young people. | |
| COS3 Objective 6: To support and facilitate the provision of community resource centres | This scheme provides a community facilities which provides a range of resources to future residents as well as existing residents in surround development. |

| | |
|---|---|
| Policy COS4: Sports Facilities and Centres Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable. | Ballyboden St Endas GAA Club is approximately 350m from the north-western corner of the site. There are also several gyms, hockey clubs and other facilities within the wider area including Marley Park and Three Rock. |
| COS4 Objective 2: To promote public health policies including the Healthy Ireland Framework and National Physical Activity Plan consistent with NPO 26 of the NPF and RPO 9.16 of the RSES. | The proposed development encourages a modal shift from car-based travel to sustainable transport modes which in return promotes a healthy lifestyle. |
| COS4 Objective 4: To support and encourage the co-location and sharing of community and sporting facilities within the County where feasible. (See also Policy COS8 Objective 8). | The proposed community facilities and public parks will be located in a central location so that adjoining communities can benefit. |
| COS4 Objective 5: To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated. | Within the public park located in the north of the site, existing trees in that location are maintained and the ground plane is moulded to provide dedicated play areas. Informal play zones, giving opportunity for natural play, have also been incorporated into the layout design. |
| COS4 Objective 6: To facilitate the provision of appropriately scaled children’s play facilities and teen space facilities at suitable locations across the County within existing and new residential development | The play areas are located in areas overlooked and passively supervised by the adjacent residential development and the footpath network. |
| Policy COS5: Parks and Public Open Space – Overarching Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County. | The open space recreational network of the proposed development is designed for optimal access for all and to be inclusive of those who may not be able to afford access to gyms or classes. The path network includes for strong pedestrian and cycle link provision for active and sustainable movement for commuter and recreational use. Walking and Jogging is promoted throughout the site with appropriate rest stops. |
| COS5 Objective 1: To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard | The public park, considered a key part of the overall scheme, is located in the north of the site and will create a significant new open space amenity along Taylor’s Lane on these lands that |

| | |
|---|---|
| <p>of 2.4ha per 1,000 population.</p> | <p>were previously private and not open to the public. The proposed public park can increase the residential amenity for the existing local population.</p> <p>Other features of open space include a woodland walkway which would provide an ecological corridor on the southern boundary and allow high levels of connectivity through the site.</p> <p>This site provides c. 28% of the site area as public open space.</p> <p>The public open space provision within the development site includes 5400 sqm and an additional 4400 sqm of Woodland Walkway, a total of 9800 sqm.</p> <p>In addition to this the site also provides for 3,600sqm of communal open space or 10% of the site. In total there is c. 38% of the site provided as open space which is considered to be a significant portion on this site, and in excess of the requirements by the Apartment Guidelines or the SDCC Development Plan policies.</p> <p>This area also has a wealth of large public open spaces within the immediate vicinity of the site, as such the 2.4ha per 1,000 population across this area is considered to be achieved between Marley Park, St Enda's Park and Edmonstown Park to name a few large parks in the immediate area. This proposed new public park will further contribute to this provision.</p> <p>However, should the council think there is a shortfall an in lieu contribution can be required by way of condition.</p> |
| <p>COS5 Objective 4: To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2 (<i>which requires a minimum of 20% of the site area</i>). The Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities</p> | |

| | |
|---|---|
| <p>meeting the open space 'accessibility from homes' standards for each public open space type set out in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha per 1,000 population, subject to the Regional Park meeting the open space 'accessibility from homes' standard set out in Table 8.1.</p> | |
| <p>COS5 Objective 5: To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2 (<i>which requires a minimum of 20% of the site area</i>). The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, such contribution being held solely for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion to accept a financial contribution in lieu of the remaining open space requirement to allow provision or upgrade of Regional Parks, subject to the Regional Park meeting the open space 'accessibility from homes' standard specified in Table 8.1. Where the Council accepts financial contributions in lieu of open space, the total contribution shall be calculated on the basis of the costs set out in the applicable Development Contribution Scheme, in addition to the development costs of the open space.</p> | <p>In line with the calculations stated in COS5 Objective 6, the proposed occupancy of the development is c.725 persons (341 units x 1.5 persons and 61 units x 3.5 persons. This site provides c. 28% public open space.</p> <p>The public open space provision within the development site includes 5400 sqm and an additional 4400 sqm of Woodland Walkway, a total of 9800 sqm.</p> |
| <p>COS5 Objective 6: To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</p> | <p>As above</p> |
| <p>COS5 Objective 8: To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-</p> | <p>The open space recreational network is designed for optimal access for all and to be inclusive for all.</p> |

| | |
|---|---|
| <p>long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers:</p> <ul style="list-style-type: none"> -provision of an appropriate mix of hard and soft surfaced areas; - enhancement of biodiversity and existing trees and hedgerows; -incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate; -provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating. | <p>It has been designed to include active and passive spaces as well as incorporating the enhancement of biodiversity and water courses within the development.</p> <p>The open space network within the development will accommodate a range of recreational activities across different age groups.</p> |
| <p>COS5 Objective 9: To ensure that parks and public open space are appropriately located within the County and within development sites, to facilitate and support its multifunctional role</p> | |
| <p>COS5 Objective 10: To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.</p> | <p>A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation. Green roofs are proposed for areas which will be overlooked and an extensive landscaping plan incorporating hard and soft surfaces is proposed.</p> <p>The public park includes plans of maintaining existing trees in that location and a moulded ground plane to provide play areas and sustainable drainage features.</p> |
| <p>COS5 Objective 11: To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021- 2025), the Council’s Biodiversity Action Plan (2020-2026) or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.</p> | <p>An objective of the overall development is to adopt compensatory measures for the scheme, including the use of pollinator plants.</p> <p>Where possible the development will conserve trees and shrubs on site to support biodiversity on site.</p> <p>The inclusion of a wooded walkway and public park will maximise biodiversity potential of the site, providing for expansion of habitats whilst also providing an attractive area of green open space with high visual and recreational amenity value.</p> |
| <p>COS5 Objective 12: To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and</p> | <p>Proposed SuDS measures are incorporated seamlessly into the landscaping of the proposed development.</p> |

| | |
|---|--|
| biodiversity value. | |
| COS5 Objective 13: To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability | Opportunities shall be provided in the proposed development for all ages of people with different levels of mobility to interact with their surroundings as they rest in or meander through the parks. |
| COS5 Objective 14: To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations. | The open space recreational network is designed for optimal access for all |
| COS5 Objective 15: To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity/ hobbies, and visual interest. | Public open space is overlooked as far as practicable to achieve maximum passive surveillance. |
| COS5 Objective 16: To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures: <ul style="list-style-type: none"> - Providing active frontages and maximising passive surveillance from adjacent housing and/or public thoroughfares; - Eliminating buildings which back-on or gable-front public open spaces; - Designing corner units with active frontage; - Encouraging increased use through improved access and quality of facilities'; and Careful location, design and choice of surface materials and site furniture. | |
| COS5 Objective 17: To ensure that incidental areas of open space which do not function as useable open space and/or are not clearly visible from the public realm, are designed out of a proposed scheme. | Noted. Open space calculations exclude those listed. |
| COS5 Objective 18: To ensure that incidental areas of open space and areas immediately underneath high voltage electricity lines are not included in open space calculations. | |
| COS5 Objective 19: To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and | The proposed development incorporates play areas for all ages throughout the scheme. Open green spaces provide multi-functional ones for kickabouts as well as formal and informal play areas. Outdoor gym equipment is also provided to promote physical activity. The scheme offers equipment such as table tennis and, chess, boules, grass mounding for the interest of people of all ages. |

| <p>participate in play, and to ensure play spaces and play facilities comply with universal design principles.</p> | <p>A range of materials, trees and shrubbery of different colour, form and texture, are incorporated within the landscape design of open spaces, play areas and walkways to provide visual interest all year round,</p> <p>Please see Doyle & O’Troithigh landscape documents for more details.</p> | | | | | | | | | | |
|--|---|---------------------------------------|------------------|-----------------------------|---|--------------------------|---|--------------------------|--|--------------------------|---|
| <p>COS5 Objective 20: To ensure that children’s play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13: Implementation and Monitoring.</p> | | | | | | | | | | | |
| <p>COS5 Objective 25: To continue to provide innovative play spaces, including sensory play areas and play trails, in parks and open spaces throughout the County and to identify the quietest and busiest times at SDCC playgrounds and share this information so it may be useful to visitors so they can identify quiet times and quieter playgrounds and plan their visits accordingly.</p> | <p>The chosen play elements throughout the play facilities of the development will enable all ages play, exploration of sensory input, individual play, group play, and social interaction, imaginative play, climbing, spinning, and sliding movement.</p> <p>A range of materials, trees and shrubbery of different colour, form and texture, are</p> | | | | | | | | | | |
| <p>COS5 Objective 28: To deliver better accessibility for wheelchair users in parks, across all features (pathways, furniture, sensory and recreational amenities etc), including a check of compliance with universal design principles as part of the design process.</p> | <p>incorporated within the landscape design of open spaces, play areas and walkways to provide visual interest all year round.</p> | | | | | | | | | | |
| <p>Section 8.7.3 Quantity of Public Open Space</p> <p>The overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element. Within that standard, there are specified percentages as set out in Table 8.2 which must, as a minimum, be provided on site. Only in exceptional defined circumstances, as set out in the objectives below, will flexibility be provided for.</p> <p>Table 8.2: Public Open Space Standards</p> <table border="1" data-bbox="199 1608 703 1854"> <thead> <tr> <th>Land Use</th> <th>Public Open Space Standards (minimum)</th> </tr> </thead> <tbody> <tr> <td>Overall Standard</td> <td>2.4 Ha per 1,000 Population</td> </tr> <tr> <td>New Residential Development on Lands Zone RES-N</td> <td>Minimum 15% of site area</td> </tr> <tr> <td>New Residential Development on Lands in Other Zones including mixed use</td> <td>Minimum 10% of site area</td> </tr> <tr> <td>Institutional Lands / ‘Windfall’ Sites</td> <td>Minimum 20% of site area</td> </tr> </tbody> </table> | Land Use | Public Open Space Standards (minimum) | Overall Standard | 2.4 Ha per 1,000 Population | New Residential Development on Lands Zone RES-N | Minimum 15% of site area | New Residential Development on Lands in Other Zones including mixed use | Minimum 10% of site area | Institutional Lands / ‘Windfall’ Sites | Minimum 20% of site area | <p>The subject site is zoned residential (RES). The development provides 9,800 sqm of open space which equates to c. 28% public open space. The development therefore meets the required standard set out by the SDCC Development Plan.</p> |
| Land Use | Public Open Space Standards (minimum) | | | | | | | | | | |
| Overall Standard | 2.4 Ha per 1,000 Population | | | | | | | | | | |
| New Residential Development on Lands Zone RES-N | Minimum 15% of site area | | | | | | | | | | |
| New Residential Development on Lands in Other Zones including mixed use | Minimum 10% of site area | | | | | | | | | | |
| Institutional Lands / ‘Windfall’ Sites | Minimum 20% of site area | | | | | | | | | | |
| <p>Section 8.7.4 Contributions in Lieu</p> <p>The Council may, in certain circumstances and at its sole discretion, allow for an element of open</p> | <p>This is considered to provide sufficient open space to provide for the development itself as well as the wider area. However, should the council disagree, this can be addressed by way</p> | | | | | | | | | | |

| | |
|---|---|
| <p>space to be located off-site where it exceeds the minimum on-site requirements. Alternatively, the Council may in certain circumstances and at its sole discretion, determine a financial contribution in lieu of all, or part of, the public open space requirement for a particular development. These circumstances may include (but are not limited to) situations where public open space requirements cannot be met on site in full or partially because:</p> <ul style="list-style-type: none"> - the provision of open space would be so small that it would not be viable due to the size, shape, configuration or context of the site; - an element of off-site provision would better facilitate the proposed development and allow for the improvement of existing open space or improvements to the GI Network located in the vicinity of the site. | <p>of condition.</p> |
| <p>Section 8.7.5 Quality of Public Open Space</p> <p>The provision of high quality public open space that is appropriately designed, located and maintained is a key element of placemaking. Public open space should have active and passive recreational value and should enhance the identity and amenity of an area.</p> | <p>The provision of public open space throughout the scheme is of a high standard. The design team has ensured that the public open space is welcoming and accessible to all.</p> |
| <p>Section 8.7.6 Play Facilities</p> <p>The Council will require children’s play areas to be provided as an integral part of the design and delivery of new residential and mixed-use developments, addressed as part of a landscape plan, according to the minimum requirements set out in Chapter 12: Implementation and Monitoring.</p> | <p>Play elements, natural and structured, have been implemented throughout the scheme in both public and semi-private open space. These play facilities cater for a wide age range. Structured play areas are also provided to facilitate the creche proposed to the north-west of Block A.</p> |
| <p>Policy COS7: Childcare Facilities</p> <p>Support and facilitate the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee</p> | |
| <p>COS7 Objective 1: To support and facilitate the provision of childcare facilities on well-located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF</p> | <p>The proposed development includes a 656 sq.m creche which is sized to cater for the predicted demand of c. 100 children from the development itself as well as provided spaces for the existing wider community. The facility can cater for over 124 children.</p> |
| <p>COS7 Objective 2: To require provision of</p> | <p>The creche has been purposely sited to allow ease of access from the wider community</p> |

| | |
|---|------------------------------------|
| <p>appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities (2001) or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity</p> | <p>should they wish to use it.</p> |
| <p>COS7 Objective 3: To require childcare facilities to be provided in new communities in tandem with the delivery of residential development and, where a Local Area Plan or Planning Scheme applies, in accordance with the phasing requirements of that plan/scheme.</p> | |
| <p>COS7 Objective 4: To support investment in the sustainable development of the County’s childcare services as an integral part of social infrastructure provision, including support of the Affordable Childcare Scheme; ensuring quality and supply of sufficient childcare places; and support of initiatives under a cross- Government Early Years Strategy, consistent with RPO 9.20 of the RSES.</p> | |

Green Infrastructure

| Policy/Objective | Statement of Consistency |
|--|---|
| <p>Policy GI1: Overarching Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change</p> | <p>The proposed development provides a large area of public open space with green areas, new and existing trees and shrubbery.</p> <p>The proposed development will enhance the biodiversity of a drainage ditch on the southern boundary of the site. Plans include improving habitats on site and the presence of flora and fauna, introduce native woodland area to create a strong ecological corridor.</p> |
| <p>GI1 Objective 1: To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County</p> | <p>The proposed open spaces will contribute to the green infrastructure network in the area. The proposed open spaces have been located to connect with the ecological corridor on the south of the site.</p> <p>The public open spaces will provide both recreational space for the residents and space for the local biodiversity to thrive.</p> <p>The open space landscape network has been designed to provide for ecological value in the area and this function will be enhanced by incorporating SUDS features.</p> |
| <p>GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks</p> | <p>Please refer to the Landscape documents by Doyle O’Troithigh accompanying this application.</p> |

| | |
|--|--|
| <p>Policy GI2: Biodiversity Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council’s commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF)and the East Region Spatial and Economic Strategy (RSES).</p> | <p>Please refer to the Landscape documents by Doyle O’Troithigh accompanying this application.</p> <p>The development adds to the green infrastructure network in the area providing additional routes and walks through the new park and open spaces.</p> <p>The landscape Design response improves the management practices for the identified key habitats on the site and areas of green infrastructure. It also recognises the ecosystem services which they provide (such as recreation, carbon sequestration, biodiversity etc). The landscape plan also utilises open habitats, drainage ditches, hedgerow networks and park to improve ecological connectivity on the site and surrounding areas.</p> |
| <p>GI2 Objective 2: To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.</p> | <p>Green infrastructure will form part of the current design proposal, with mitigation for removed hedgerows and trees provided through additional planting and rewilding of some parts of the site. This includes the enhancement of the ditch to the south and the creation of a woodland walk to the south and east.</p> |
| <p>GI2 Objective 4: Integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this chapter.</p> | |
| <p>GI2 Objective 5: To protect and enhance the County’s hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.</p> | <p>The proposal includes the planting of a range of native plant species to support and enhance the area.</p> |
| <p>GI2 Objective 10: To enhance biodiversity and the health of pollinator species by banning the use of glyphosate in or close to public parks, public playgrounds, community gardens/allotments and within residential estates, whether by directly employed Local Authority staff or private contractors.</p> | <p>Noted.</p> |

| | |
|--|---|
| <p>Policy GI3: Sustainable Water Management Protect and enhance the natural, historical, amenity and biodiversity value of the County's watercourses. Require the long-term management and protection of these watercourses as significant elements of the County's and Region's Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate. Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian corridors and the application of appropriate restrictions to development within these corridors</p> | <p>DBFL have provided reports and information regarding water management on site. This includes the management of the ditch to the south of the site and outfalls to the Owendoher river. This is in line with best practice.</p> |
| <p>GI3 Objective 1: To ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan.</p> | <p>The SSFRA by DBFL includes a hydromorphological assessment. This looks at the impact the development will have on the wider area. This report has found that the impact of the development is acceptable</p> |
| <p>GI3 Objective 2: To require development proposals that are within riparian corridors to demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.</p> | |
| <p>GI3 Objective 3: To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained/reinstated along all watercourses within any development site.</p> | <p>A 10m buffer has been provided to the ditch to the south of the site.</p> |

| | |
|---|--|
| <p>Policy GI4: Sustainable Drainage Systems Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.</p> | <p>DBFL have proposed a series of SUDS measures as part of the water management system. The proposal also includes enhancement of the ditch/ mill race to the south as set out in the landscape drawings.</p> |
| <p>GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council’s Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.</p> | <p>SuDs are proposed as part of the drainage solution for the development and are detailed in the Engineers Planning Report prepared by DBFL Consulting Engineers.</p> <p>All of the SuDs proposals are multifunctional and incorporate the provision of open spaces and biodiversity.</p> |
| <p>GI4 Objective 2: To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.</p> | <p>The SuDs features proposed aim to replicate the natural characteristics of rainfall runoff of any site by providing control of run-off at source and this has been achieved by the current proposal.</p> |
| <p>GI4 Objective 3: To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.</p> | <p>The proposed development includes proposals that are designed to mitigate against climate change through landscaped areas and SuDs.</p> |
| <p>GI4 Objective 4: To require that all SuDS measures are completed to a taking in charge standard.</p> | |
| <p>GI4 Objective 5: To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.</p> | |
| <p>Policy GI5: Climate Resilience Strengthen the County’s GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.</p> | <p>The site layout, infrastructure design and water management and landscaping measures are in line with this policy.</p> |
| <p>GI5 Objective 1: To protect and enhance the rich biodiversity and ecosystems in accordance with the ecosystem services approach to development enabling mitigation of climate change impacts, by absorbing excess flood water, providing a buffer against extreme weather events, absorbing carbon emissions and filtering pollution</p> | <p>DBFL have completed an SFRA for the site as well as a water management plan. these are in line with this policy and enable the mitigation of climate change impacts.</p> |

| | |
|--|--|
| <p>GI5 Objective 4: To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).</p> | <p>A minimum score of 0.5 is required for lands zoned RES-N, this is achieved.</p> |
| <p>GI5 Objective 7: Require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDS strategy development.</p> | <p>Please refer to Doyle & O'Troithigh Landscape Architecture documentation for further details.</p> <p>Please see the DBFL report on SUDS strategy.</p> |

| | |
|---|---|
| <p>Policy GI6: Human Health and Wellbeing Improve the accessibility and recreational amenity of the County's GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.</p> | <p>The proposed development includes the creation a new public park and woodlands walk with the development. The proposal enhances the existing natural features on site, creating an attractive environment for humans and creatures throughout.</p> |
| <p>GI6 Objective 1: To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses (See Chapter 8 Community and Public Open Space).</p> | <p>The proposed development provides a range of open spaces. The open spaces provided are capable of accommodation multiple uses.</p> |
| <p>GI6 Objective 4: To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 Community and Public Open Space of this Development Plan and South Dublin County's Parks and Open Space Strategy.</p> | |
| <p>GI6 Objective 5: To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</p> | <p>The proposal is a pedestrian/ cycle dominated environment at ground level, with new attractive walks provided within the site through the woodland walk. These proposed facilities will complement the ecological features on the site.</p> |

| | |
|---|---|
| GI6 Objective 6: To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3 Natural, Cultural and Built Heritage). | A public lighting report & an Ecological Impact Assessment is submitted with this planning application. Please refer to both documents for further details. |
|---|---|

| | |
|---|---|
| Policy GI7: Landscape, Natural, Cultural and Built Heritage Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the County Heritage Plan. | In line with this policy the mill race to the south is being enhanced within the development. |
| GI7 Objective 2: To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, in accordance with the provisions of South Dublin’s Landscape Character Assessment and the provisions of Chapter 3 Natural, Cultural and Built Heritage of this Development Plan. | The proposed development makes best use of land on this highly accessible site while also providing over 28% of the site as public open space including a new public park to the north and a woodland walk to the south and east. |

Quality Design and Healthy Placemaking

| Policy/ Objective | Statement of Consistency |
|---|---|
| Policy QDP1: Successful and Sustainable Neighbourhoods Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities. | The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to/from adjoining residential developments to the west, north and east. These will provide more direct access to local services and public transport. |
| QDP1 Objective 1: To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009). | The application is designed in accordance with these S28 Ministerial Guidelines as assessed above. |
| QDP1 Objective 2: To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated). | The application is designed in accordance with these S28 Ministerial Guidelines as assessed above and the DMURS statement prepared by DBFL Consulting Engineers. |

| | |
|---|---|
| <p>QDP1 Objective 5: To promote the re-development of underutilised Local Centres within the County as new mixed use neighbourhood hubs continuing to provide for local retail and services in a manner which respects and consolidates the existing urban character of these areas ensuring adherence to the eight key design principles in ‘The Plan Approach’ including quality of design, integration, accessibility and connections to the surrounding areas.</p> | <p>The proposed development includes a childcare facility and 2 no. retail facilities within Block A. A community facility is located within Block C.</p> <p>The provision of such facilities is beneficial to future residents as well as the wider community.</p> |
| <p>QDP1 Objective 6: To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy towards the delivery of long-term sustainable communities.</p> | <p>The proposed development will comprise a fully integrated mix of private and part V and supported by residential amenities including new public parks, childcare, and community facilities.</p> |

| | |
|--|---|
| <p>Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.</p> | <p>The scheme has regard to the eight key design principles as well as the 12-point criteria set out in the Urban Design Manual – A Best Practice Guide, 2009.</p> |
| <p>QDP2 Objective 1: To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how ‘The Plan Approach’ has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.</p> | <p>This LRD application is accompanied by a Design Statement prepared by MCROM Architects which outlines how the development responds to the 12 design criteria in the Design Manual of the Sustainable Residential Guidelines.</p> <p>The 8 Design Principles underlining “The Plan Approach” policy of the Development Plan is also assessed in the following review under Policies QDP2 to QDP11 as well as in the MCORM Architects Design Statement Response.</p> |
| <p>QDP2 Objective 2: To ensure that ‘The Plan Approach’ to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under section 247 of the Planning & Development Act, 2000, as amended).</p> | |

| | |
|---|---|
| <p>Policy QDP3: Neighbourhood Context Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.</p> | <p>The proposed development contributes positively to the character and uses within the surrounding area. It enhances public amenities through the provision of public open space as well as a new community facility.</p> |
| <p>QDP3 Objective 1: To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 Implementation and Monitoring in relation to design statements.</p> | <p>The proposed development contributes positively to the character and uses within the surrounding area. It is appropriate in size and scale to the location and the size of the site.</p> |
| <p>QDP3 Objective 6: To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.</p> | <p>The proposed layout reflects the location of the site. The layout, density and mix of units and heights provides a suitable approach to this key junction within the suburban area which has excellent access to a wide range of facilities.</p> |
| <p>QDP3 Objective 7: Any development on the RES-N lands (Killinarden and Ballycullen / Oldcourt) abutting the Rural Zone at Map 9 shall be designed, located, scaled and serviced in a manner that does not detract from the character and landscape of the receiving environment bearing in mind its proximity to the HA-DM zone.</p> | <p>The proposed development is within zoning Map 10 of the SDCC Development Plan. The site is zoned RES. Doyle & O' Troithigh Landscape Architecture have prepared a Landscape and Visual Assessment which illustrates that the proposed development will blend in seamlessly with the surrounding character and landscape along Taylor's Lane and surrounding areas.</p> |
| <p>Policy QDP4: Healthy Placemaking Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.</p> | <p>The layout of development has been designed around a number of public open spaces with a range of residential character areas provided. The site is unique given its topography and site constraints offers the opportunity to provide a bespoke residential development with a distinctive sense of place.</p> <p>The proposal provides an attractive development which increases the legibility of the area and through the locating of the apartments ensures all open spaces are overlooked ensuring safety and security as well as universal access to all.</p> |
| <p>QDP4 Objective 1: To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and infrastructure in line with the provisions of NPO4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES.</p> | |
| <p>QDP4 Objective 2: To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction</p> | |

| | |
|---|--|
| <p>Policy QDP5: Connected Neighbourhoods Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities</p> | <p>The scheme supports the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to services in surrounding larger settlements.</p> <p>Pedestrian links into the area are created and new public open spaces are provided. The layout is logical, and wayfinding is uncomplicated.</p> |
| <p>QDP5 Objective 1: To improve the accessibility of all identified centres (see Chapter 9 Table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure including cycling and walking, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7: Sustainable Movement and Appendix 12: Our Neighbourhoods for further details).</p> | <p>DBFL Consulting Engineers have prepared a Traffic and Transport Assessment which outlines all of the listed.</p> |
| <p>QDP5 Objective 2: To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.</p> | <p>The proposed design maximises accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to/from adjoining road network. These will provide more direct access to local services and public transport.</p> |

| | |
|--|--|
| <p>Policy QDP6: Public Realm Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.</p> | <p>All of the objectives including 2, 3, 4, 5, 8, and 9 have been considered in this assessment. The ones below are the most relevant ones to this policy.</p> |
| <p>QDP6 Objective 1: To require that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 13 Implementation and Monitoring - Design Statements and Public Realm).</p> | <p>The layout of development has been designed around public open spaces creating an enhanced public realm within this area. The open space along Taylors Lane along with the woodland walk gives the development a parkland setting creating a distinctive sense of place.</p> |
| <p>QDP6 Objective 6: To ensure that all new developments but particularly apartment developments where gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, both mentally and physically.</p> | <p>All apartments all have private balconies/terraces.</p> |
| <p>QDP6 Objective 7: To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County's Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).</p> | <p>Suitable boundary treatments to be provided to the parkland/ amenity spaces throughout the scheme.</p> <p>Please see the landscape report for further information on boundary treatments.</p> <p>The public open spaces will be publicly accessible and crossings to these spaces will be denoted by a change in the surface treatment.</p> |
| <p>Policy QDP7: High Quality Design – Development General Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines as assessed above.</p> |
| <p>QDP7 Objective 1: To actively promote high quality design through the policies and</p> | <p>Please refer to the architect's design statement.</p> |

| | |
|---|--|
| <p>Policy QDP7: High Quality Design – Development General Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines as assessed above.</p> |
| <p>To actively promote high quality design through the policies and objectives which form ‘The Plan Approach’ to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County’s Building Height and Density Guide.</p> | |
| <p>QDP7 Objective 2: To actively promote well-designed streets and public spaces that provide for active frontages and ‘live’ edges that feel safe, secure and attractive for all to use.</p> | <p>Streets areas are fronted by apartments, retail units or the creche, creating safe, active streets.</p> |
| <p>QDP7 Objective 5: To ensure that development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines on Quality Housing for Sustainable Communities, DEHLG (2007), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), or any superseding guidelines, including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines as assessed above.</p> |
| <p>QDP7 Objective 6: To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</p> | <p>The application is designed in accordance with these S28 Ministerial Guidelines as assessed above and the DMURS statement prepared by DBFL Consulting Engineers.</p> |
| <p>QDP7 Objective 7: To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County’s Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019)</p> | <p>The height of the buildings provide an appropriate sense of enclosure to the streets while ensuring all open spaces are overlooked. The development performs well in terms of BRE Guidance as set out in the Daylight/ Sunlight report. The layout of the development is fully compliant with DMURS. As the buildings are only 5 storeys there will be limited impact on the micro climate within the area.</p> |

| | |
|--|--|
| <p>QDP7 Objective 8: To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – 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. (See also Chapter 8 Community Infrastructure and Open Space).</p> | <p>Particular emphasis was placed in the detailed design stage on how walkable the scheme is for people of all abilities and ages. The set of guidance in ‘Building for Everyone. A Universal Design Approach’ is a design manual that the Design Team is familiar with and that will inform detailed design decisions.</p> |
| <p>QDP7 Objective 9: To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin County’s Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide (2009) and the guidance on Lifetime Homes as set out in the Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).</p> | |
| <p>QDP7 Objective 10: 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 users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</p> | |
| <p>QDP7 Objective 11: To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county.</p> | <p>A variety of apartments and duplexes are proposed with a broad range of unit sizes. Please refer to the architects accommodation schedule for more information.</p> <p>Significant public open space will be provided across the entire scheme incorporating SuDS, promoting biodiversity, and providing residential amenity.</p> |

| | |
|--|--|
| <p>Policy QDP8: High Quality Design – Building Height and Density Guide (BHDG) Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County’s Building Heights and Density Guide 2021.</p> | <p>This is noted. The site ranges in height from 2 to 5 storeys over basement level. The development is in line with the topography of the site and reflecting urban design considerations for the development. As such it is fully compliant with this policy.</p> |
| <p>QDP8 Objective 1: To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a ‘Design Statement’. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County’s Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).</p> | <p>The proposed development has had regard to the planning policy framework as set out in the building height guidelines and National Planning Framework. The provision of residential development at this location is supported by the height guidelines which encourages increased density and building heights. The proposed development complies with such objectives therefore is considered to be in accordance with the provisions of national policy guidelines.</p> |
| <p>QDP8 Objective 2: In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin County’s Building Height and Density Guide that it is contextually appropriate to do so.</p> | <p>The height of the proposed development is 5 storeys, however, the height within the wider area varies from single storey to three storey (including the existing buildings on the subject site). The proposed development is on a site of sufficient size and distance from neighbouring developments that it can establish its own character. The proposed development of 5 storeys enables a parkland setting along Taylors Lane while still providing an appropriate urban frontage and streetscene to this roundabout junction on Taylors Lane/ Edmondstown Road. It will enhance the legibility of the area in accordance with best practice guidelines.</p> |

| | |
|--|--|
| <p>Policy QDP9: High Quality Design - Building Height and Density Apply a context driven approach to building heights in South Dublin, as supported by South Dublin's Building Heights and Density Guide.</p> | <p>The proposed development's building height has been developed in a context driven approach. It is considered that the proposed height of 5 storeys is appropriate at this location.</p> |
| <p>QDP9 Objective 1: To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.</p> | |

| | |
|--|--|
| <p>Policy QDP10: Mix of Dwelling Types Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</p> | <p>There is a mixture of units from 1 to 3 bed apartments providing a variety of sizes and shapes for future homes.</p> |
| <p>QDP10 Objective 1: To ensure that all new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</p> | <p>The proposal introduces apartments into this area which is predominantly larger family housing at lower densities. This will provide a better range of choice to the area. The proposal includes for PART V housing as part of this planning application.</p> |
| <p>QDP10 Objective 2: To ensure that our ageing society is catered for in a choice of housing provision having regard to South Dublin Age Friendly County Strategy and Age Friendly Ireland's Principle and Guidelines for the Planning Authority (2021).</p> | <p>All of the apartment types are designed as suitable for older people.</p> |

| | |
|---|---|
| <p>Policy QDP11: Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.</p> | <p>Appropriate materials have been proposed as set out in the architects statement.</p> |
| <p>QDP11 Objective 1: To require the use of high quality and durable materials and finishes that make a positive contribution to placemaking.</p> | <p>The Building materials proposed for use on external elevations and roofs have zero to low active maintenance requirements. Building materials proposed for use in the public realm</p> |

| | |
|--|---|
| <p>QDP11 Objective 2: To promote the use of structural materials that have low to zero embodied energy and CO2 emissions and ensure a wood-first policy on public buildings funded or part-funded by the Council.</p> | <p>achieve a durable standard of quality that will not need regular fabric replacement or maintenance outside general day to day care.</p> <p>The building has been designed to nZEB (Near Zero Energy Building) standards and energy costs will be significantly lower than would have been the case in the past.</p> |
| <p>QDP11 Objective 3: To promote the reuse and recycling of materials to promote the circular economy and reduce construction and demolition waste.</p> | <p>The construction of the development will lead to the generation of waste. The key to minimising the production of waste is to implement the waste hierarchy of Prevent, Reuse, Recycle, Recover and Dispose. The Contractor will apply the principles in “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects” to reduce the number of materials used thereby minimising use of natural resources and reducing costs.</p> |

| | |
|--|--|
| <p>Policy QDP14: Prepare Local Area Plans as appropriate, prioritising areas that are likely to experience large scale residential or commercial development or regeneration.</p> | <p>A local area plan for Ballyboden has not been drafted/adopted at the time of submitting this planning application. The design team is aware of non-statutory plans for Ballyboden/ Ballyboden village which date back to 2005 & 2006 however these plans are outdated and do not hold status.</p> |
| <p>QDP14 Objective 1: To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines</p> | |
| <p>H1QDP14 SLO 2: To prepare a new Local Area Plan for Ballyboden.</p> | |

Sustainable Movement

| Policy/Objectives | Statement of Consistency | | |
|---|---|--|---|
| <p>Policy SM1: Overarching Transport and Movement</p> <p>Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.</p> | <p>The proposed site layout has been designed to promote active travel from this development including providing pedestrian and cyclist prioritisation throughout the development. The site is also highly permeable allowing ease of access through the site to public transport.</p> | | |
| <p>Section 7.5.2 Cycle South Dublin</p> <p>The objectives of Cycle South Dublin are to:</p> <ul style="list-style-type: none"> - Provide a comprehensive and connected cycle network across South Dublin County; - Increase participation and make cycling a more achievable mode of transport for people of all ages and abilities; and - Improve the cycling identity of the County | <p>The immediate vicinity of the subject site benefits from existing cycle facilities along Taylor’s Lane which contains mandatory cycle lanes on both sides. The existing cycle lane continues down through the roundabout on Ballyboden Way.</p> <p>The GDA Cycle Network Proposals envisage the introduction of a ‘secondary route’ along Ballyboden Road. Works to this proposal should occur within the next 5 years. This proposed development would benefit from this proposed cycle infrastructure.</p> <p>DBFL Consulting Engineers have also confirmed in their TTA that SDCC will ensure the <i>“Taylor’s Lane roundabout adjacent to the subject site will be upgraded to provide a safer and greater Level of Service (LOS) for vulnerable road users (pedestrians and cyclist) in accordance with National Policy.”</i></p> | | |
| <p>Table 7.1 Cycle South Dublin Routes and Projects: Route 17</p> <table border="1" data-bbox="204 1402 625 1621"> <tr> <td data-bbox="204 1402 300 1621">17</td> <td data-bbox="301 1402 625 1621"> <p>Citywest Avenue, City West Road to R136</p> <p>Citywest Avenue, N82 to Outer Ring Road</p> </td> </tr> </table> | 17 | <p>Citywest Avenue, City West Road to R136</p> <p>Citywest Avenue, N82 to Outer Ring Road</p> | <p>The SDCC LRD Opinion specifically references route 11 however the subject site is located further east of route 17. Route 11 is northeast of the subject site and route 19a-e is envisaged to run directly north of the subject site. Reference was made to the ‘Cycle South Dublin A programme of work’ to obtain this information.</p> |
| 17 | <p>Citywest Avenue, City West Road to R136</p> <p>Citywest Avenue, N82 to Outer Ring Road</p> | | |
| <p>Policy SM2: Walking and Cycling</p> <p>Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</p> | <p>The scheme incorporates cycle and pedestrian provisions, making a largely car free environment.</p> | | |

| | |
|--|---|
| <p>SM2 Objective 3: To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.</p> | <p>The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the residential developments. These will provide more direct access to local services and public transport.</p> |
| <p>SM2 Objective 4: To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities through filtered permeability, while also taking account of existing patterns of anti-social behaviour in the removal of such barriers with due consideration of consultation with local residents where need is evident or expressed.</p> | <p>The routes are also overlooked by adjoining residential developments and a safe environment will be created.</p> |
| <p>SM2 Objective 5: To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</p> | <p>A single vehicular route is provided into the site, with limited access for vehicles around the site. This prioritises cyclists and pedestrians around the development enabling them to travel safely.</p> |
| <p>SM2 Objective 6: To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</p> | <p>the scheme adheres to standards set out in the National Cycle Manual.</p> |
| <p>SM2 Objective 13: To ensure that new walking and cycling routes are designed, insofar as possible, to function as links in the County's green infrastructure network and that adequate replacement and additional planting of native species and pollinators is provided, and that SuDS approaches are used to deal with surface water run-off.</p> | <p>The green infrastructure within the site includes pedestrian and cyclist routes only through the site and also includes a new woodland walk along the south and eastern boundary.</p> |
| <p>SM2 Objective 14: To ensure that all walking and cycling routes have regard to environmental conditions and sensitivities including biodiversity, protected species and designated sites and to incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</p> | <p>Walking and cycle routes have been designed to seamlessly blend in with landscaping of the scheme.</p> <p>Significant public open space will be provided across the entire scheme incorporating SuDS, promoting biodiversity, and providing residential amenity.</p> |

| | |
|---|--|
| <p>SM2 Objective 16: To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the National Disability Inclusion Strategy (NDIS) 2017-2022.</p> | <p>The proposed streets have been designed In accordance with the principles, approaches and standards contained in the NDIS.</p> |
| <p>SM2 Objective 17: To support bike parking provision at villages, centres, parks and any other areas of interest, as well as near public transport nodes to support multi-modal transport options.</p> | <p>Bike parking has been incorporating throughout the proposed scheme and sufficient bike parking has been provided at the community facility.</p> |

| | |
|---|--|
| <p>Policy SM3: Public Transport – General Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.</p> | <p>The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the development. These will provide more direct access to local services and public transport.</p> <p>A car parking ratio of c. 0.7 is achieved for the scheme overall, however, as 25 of the total 290 spaces are for the commercial and creche uses, there is 0.68 spaces per apartment. Justification for the proposed parking standard is outlined in the TTA prepared by DBFL Consulting Engineers.</p> |
| <p>SM3 Objective 1: To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail.</p> | <p>Please consult DBFL Consulting Engineers documents for further information.</p> |
| <p>SM3 Objective 3: To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.</p> | <p>The development supports the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.</p> |
| <p>SM3 Objective 4: To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</p> | <p>The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the residential developments. These will provide more direct access to local services and public transport.</p> |
| <p>SM3 Objective 10: To work with the relevant transport agencies to ensure that all public transport proposals have regard to pertaining environmental conditions and sensitivities including biodiversity, protected species and designated sites and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments</p> | <p>Traffic and transport specifications have been addressed within the Ecological Impact Assessment prepared by Altamar Limited.</p> |
| <p>SM3 Objective 12: To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.</p> | <p>The transportation and movement context of the site is well defined within Bus Connects New Dublin Area Bus Network with multiple proposed direct services to this area. Please see DBFL Consulting Engineers TTA for further information with regards to Bus Connects.</p> |

| | |
|--|---|
| <p>Policy SM4: Strategic Road Network Improve and, where necessary, expand the County-wide strategic road network to support economic development and provide access to new communities and new development areas.</p> | <p>DBFL Consulting Engineers have conducted a traffic model of the existing network and proposed links were created. Please see DBFL Consulting Engineers TTA for more information.</p> |
| <p>SM4 Objective 4: To ensure that developing areas have sufficient access to the County's Road network.</p> | <p>See DBFL Consulting Engineers documents for information on connectivity to the existing road network.</p> |
| <p>SM4 Objective 8: To work with the relevant transport agencies to ensure that all road and street network proposals have regard to pertaining environmental conditions and sensitivities including biodiversity, protected species and designated sites and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</p> | <p>Traffic and transport specifications have been addressed within the Ecological Impact Assessment prepared by Altemar Limited.</p> |
| <p>SM4 Objective 9: To ensure that all new roads and streets are designed to enhance insofar as feasible, the County's green infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</p> | <p>The scheme presents an integrated design approach that seeks to deliver a sustainable residential community connected by well-designed streets and attractive open spaces which together deliver safe, secure, convenient, and attractive networks in addition to promoting a real and viable alternative to car-based journeys.</p> |
| <p>SM4 Objective 10: To support sustainable measures including car-pooling and car clubs which promote access to cars rather than car ownership and which facilitate higher utilization of vehicles rather than higher numbers of vehicles.</p> | <p>The proposed development has incorporated a car club element into the scheme. It is proposed to provide 4 no. car share spaces within the development for residents to utilise.</p> <p>The residential car parking ratio for the scheme is at 0.68 bringing the overall car parking nos. to 290 spaces.</p> |

| | |
|---|---|
| <p>Policy SM5: Street and Road Design Ensure that streets and roads within the County are designed to balance the needs of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.</p> | <p>The layout of the site is designed to promote place making and sustainable movement and road safety including the prioritisation of active travel.</p> |
| <p>SM5 Objective 1: To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that promotes active travel modes and public transport.</p> | <p>The design team is of the opinion that the design presented for the proposed residential development has maximised every opportunity to ensure consistency with both the principles and design guidance outlined within the Design Manual for Urban Roads and Streets.</p> |

| | |
|---|---|
| <p>SM5 Objective 2: To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets</p> | <p>A slow speed residential street network is provided throughout where pedestrians and cyclists will be able to travel safely.</p> |
| <p>SM5 Objective 5: To design new roads and streets to incorporate green infrastructure elements such as planting of native trees, hedgerows and pollinator species in medians and on roadside verges, as appropriate to the location.</p> | <p>The design minimises the impact of highway features by avoiding excessive signing, road markings and street furniture. Significant levels of enclosure along each street type is achieved by the building orientation and tree planting contribute to providing a more intimate and supervised street environment.</p> |
| <p>Policy SM6: Traffic and Transport Management Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.</p> | <p>Only one vehicular access point and route through the site is provided. This minimises the impact of traffic on the development as a whole.</p> |
| <p>SM6 Objective 3: To minimise the impact of new development on the County's Road and street network through prioritising active travel and public transport and implementing appropriate traffic and transport management measures.</p> | <p>See DBFL Consulting Engineers documents for information on traffic and transport management measures.</p> |
| <p>SM6 Objective 8: To require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment.</p> | <p>A TTA is submitted with this application along with a Mobility Management Plan.</p> |
| <p>SM6 Objective 9: To ensure that appropriate design and mitigation measures are applied to all transport schemes to reduce the impact of noise and air pollution within residential communities in accordance with the EU directive on Assessment and Management of Environmental Noise.</p> | <p>An EclA is submitted with this planning application. The assessment provides a list of appropriate mitigation measures which will be implemented throughout the scheme upon a grant of permission.</p> |
| <p>SM6 Objective 10: To prioritise traffic calming measures, where appropriate, and works needed to improve safety at road crossings.</p> | <p>DBFL Consulting Engineers have adopted DMURS standard design approaches throughout the proposed development to ensure safety for all road users.</p> |

| | |
|---|---|
| <p>Policy SM7: Car Parking and EV Charging Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.</p> | <p>DBFL have assessed the car parking and management of same in full in their reports.</p> |
| <p>SM7 Objective 5: To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</p> | <p>The provision of car parking considers the requirements of South Dublin County Council Development Plan (2022-2028) as well as the recommendations of Sustainable Urban Housing: Design Standards for New Apartments (December 2020). In summary a total of 290 car parking spaces are proposed on-site within the development. Provision of Electric Vehicle Charging Points is incorporated into the subject development car parking area. A total of 59 no. EV spaces will be provided with an additional 265 no. of basement parking spaces provided with ESB ducting for future potential use by electric vehicles.</p> |
| <p>SM7 Objective 9: To ensure that car parking is designed in such a manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements:</p> <ul style="list-style-type: none"> • Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species. • Provision of not more than two parallel or five perpendicular spaces between trees/planting bays; • Use of permeable paving, where appropriate. | <p>Please refer to the Site Layout Plan by MCORM SKA, the landscape architecture pack by DoT and the Traffic and Transport information prepared by DBFL. The proposed car parking is predominantly located at basement level and when at surface has been integrated into the landscaping of the site.</p> |
| <p>SM7 Objective 10: To ensure that parking provision, including the provision of EV charging facilities, does not detract from the comfort and safety of pedestrians and cyclists, visual amenity or the character of an area. (refer also to Chapter 10 Energy).</p> | <p>A total of 59 no. EV spaces will be provided with an additional 265 no. of basement parking spaces provided with ESB ducting for future potential use by electric vehicles.</p> |
| <p>SM7 Objective 11: To review and seek to improve the issue of on-street car parking in housing estates to eliminate any road safety or</p> | <p>Parking is provided through on street and in the basement. Throughout, the access road and</p> |

| | |
|---|---|
| <p>social issues they present, where issues of safety are clearly identified.</p> | <p>surface parking design is cognisant of the needs of pedestrians and cyclists.</p> <p>The incorporation of a slow speed residential road is provided to ensure that pedestrians and cyclists will be able to travel safely.</p> |
|---|---|

Monitoring and Implementation

| | |
|---|---|
| <p>12.6.1 Mix of Dwelling Types</p> <p>The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types.</p> <p>Unit Mix</p> <p>Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless:</p> <ul style="list-style-type: none"> • there are unique site constraints that would mitigate against such provision or • that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA. | <p>The overall unit mix provides for a range of apartments and duplexes from 1 to 3 bed units.</p> <p>The proposed development is comprised of c.15.2% no. 3 bed units, 75.1% 2 no. bed units and 9.7% 1 no. Bed units. This is an appropriate mix for the site taking into account the large two storey family homes within the area. It also allows the best and most efficient use of land on this highly constrained site.</p> <p>The proposed development will contribute to a greater mix of housing in the area as the current prevailing housing type in wider area is predominantly low density 3 and 4 bed houses.</p> <p>This enables the best and most efficient use of the site in line with best practice given the site constraints.</p> |
| <p>12.6.3 Unit Tenure</p> <p>The Council will support the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</p> | <p>There are numerous local facilities within a 10 minute walk/cycle of the development while the development itself is providing a new community centre, public park and childcare facility.</p> |

12.6.7 Residential Standards

Minimum Standards for Apartments:

| Type of Unit | Apartment | Private Open Space | Communal Open Space | Storage |
|---------------------------|-----------|--------------------|---------------------|---------|
| Studio | 37 sq.m | 4 sq.m | 4 sq.m | 3 sq.m |
| One bedroom | 45 sq.m | 5 sq.m | 5 sq.m | 3 sq.m |
| Two bedrooms (3 person) | 63 sq.m | 6 sq.m | 6 sq.m | 5 sq.m |
| Two Bedrooms (4 person) | 73 sq.m | 7 sq.m | 7 sq.m | 6 sq.m |
| Three bedrooms (5 person) | 90 sq.m | 9 sq.m | 9 sq.m | 9 sq.m |

The proposed development is fully compliant with the apartment standards set out below and in many instances in excess of these standards both in terms of internal and external space provision.

| | |
|---|---|
| <p>Apartment Size Safeguards</p> <ol style="list-style-type: none"> 1. In private residential developments, 2-bedroom (3 persons) units cannot exceed 10% of all proposed apartment units, 2. The majority of apartments in any proposed scheme of 100 units or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units, by a minimum of 10%. Any studio apartments must be included in the total but are not calculable as units that exceed the minimum by at least 10%. 3. The majority of apartments in any proposed scheme of 10-99 units or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units, by a minimum of 10%. In such schemes, it is acceptable to redistribute the minimum 10% additional floorspace requirement throughout the scheme, i.e., to all proposed units, to allow for greater flexibility. | <p>All proposed apartments are in line with safeguard standards set out in this section of the SDCC Development Plan 2022-2028</p> |
| <p>Private Space</p> <ul style="list-style-type: none"> • The quantum of private open space for apartments shall accord with Table 3.21. • This space shall be provided in the form of patios/terraces, and balconies or roof gardens at upper levels and should be located to optimise solar orientation and designed to minimise overshadowing and overlooking. • Balconies shall not overhang onto the public path in the interest of safety and must be set back. • Balconies should adjoin and have a functional relationship with the main living areas of the apartment. | <p>All apartment balconies/terraces either meet or exceed the minimum standards outlined in Section 28 Apartment Guidelines. The design, location and orientation of the balconies/terraces also ensures high qualitative standards are achieved.</p> |

| | |
|--|--|
| <ul style="list-style-type: none"> • In certain circumstances, glass-screened 'winter gardens' may be provided. A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the standards under Table 3.21. • Where amenity space is proposed at ground level, it shall incorporate boundary treatments to ensure privacy. • While private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or a 'privacy strip' between the two. | |
| <p>Communal / Semi-Private Space</p> <ul style="list-style-type: none"> • High quality communal open space should also be provided in schemes that include apartments. • Communal open spaces should form an integral part of scheme design, be screened from full public view and public access, and should be restricted through design and/or formal barriers. • Communal amenity space within apartment and/ or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. • The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme. • Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable. | <p>The layout of development has been designed around a number of public open spaces and creates its own unique character.</p> <p>A key element of the open space network is the creation of a new public park along Taylors Lane and a woodland walk along the south and east border which will provide an ecological connection with the mill race and allow for new tree line planting.</p> <p>Each individual block has attractive communal open space provided for the residents of that block. These are designed to get maximum amount of light into the area and provide an attractive area for residents.</p> |
| <p>Internal Storage Standards</p> <ul style="list-style-type: none"> • Storage should be additional to kitchen presses and bedroom furniture. • Hot press/boiler space will not count as general storage. • In providing the storage in accordance with Table 3.21, no individual storage room should exceed 3.5sq.m and storage shall be provided within the apartment unit. | <p>A breakdown of apartment/house typologies within the schedule of accommodation prepared by MCORM Architects provides information on internal storage space for each apartment/house typology. All of which meet the specified criteria.</p> |
| <p>Floor to Ceiling Height</p> <p>In line with SPPR 5 of the Apartment Guidelines, ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly</p> | <p>The permitted ground floor apartments have 2.7m floor to ceiling height in accordance with SPPR5.</p> |

| | |
|--|--|
| <p>where necessary to facilitate a future change of use to a commercial use. 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</p> | |
| <p>Lift and Stair Cores In line with SPPR 6 of the Apartment Guidelines, a maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations</p> | <p>The proposed development is in line with SPPR 6 of the apartment guidelines as demonstrated in MCROM Architecture documentation.</p> |
| <p>Separation Distances and Block Layout</p> <ul style="list-style-type: none"> • A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. • In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. • In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development. | <p>A minimum 22m between opposing windows at upper floors is achieved within the layouts proposed.</p> |
| <p>Privacy and Security Considerations</p> <ul style="list-style-type: none"> • Apartment blocks and buildings should overlook the public realm. • Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. • Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas. • Dwellings with direct street frontage, or ground floor apartments should generally include a privacy strip of at least 1.5 metres in depth or a front garden. • This should be influenced by the design, scale and orientation of the building and by the nature of the street or public area and if provided, should be subject to | <p>Privacy and security for all unit types is achieved within the designs proposed. A clear definition between public, semi-private and private open spaces is achieved.</p> |

| | |
|--|--|
| <p>appropriate landscape design and boundary treatment.</p> | |
| <p>Dual Aspect</p> <ul style="list-style-type: none"> • There shall be a minimum of 33% dual aspect units required in more 'central and accessible urban locations', where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage. • In 'suburban or intermediate locations' it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. • For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects. • Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. • North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature. • Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings. | <p>53.5% of residential units proposed will be at least dual aspect.</p> <p>Of the single aspect units none are single aspect north facing units.</p> <p>All apartments overlook an attractive area of open space whether it is communal or public open space.</p> |
| <p>Sunlight / Daylight</p> <ul style="list-style-type: none"> • A daylight analysis will be required for all proposed developments of 30+ units or in any other case where the layout or design could unduly impact on residential amenity. • The impact of any development on existing habitable rooms should also be considered. | <p>Daylight, Sun lighting and Overshadowing calculations have been carried out in accordance with BRE's 'Site Layout Planning for Sunlight and Daylight: A Guide to Good Practice' (2022). Please see the Daylight Sunlight prepared by Digital Dimensions.</p> |
| <p>Access Cores and Communal Areas</p> <ul style="list-style-type: none"> • Apartment schemes should seek to minimise the use of shared entrances, where possible, in favour of own door access at street level. • Where shared access lobbies are proposed the number of units served by one entrance should be kept to a minimum. | <p>The proposed development aims to minimise the number of units served by a single access. There are also several own door duplex units throughout the development.</p> |

| | |
|--|---|
| <ul style="list-style-type: none"> Projecting external staircases to access upper floors should be avoided as they can dominate the streetscape | |
| <p>Clothes Drying Facilities Adequately ventilated clothes drying facilities should be provided for apartment developments in the form of suitably sized communal facilities or individual facilities within each unit.</p> | Noted. |
| <p>Building Lifecycle Report and Management Companies</p> <ul style="list-style-type: none"> An assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application, Property Management of the Common Areas of the development Service Charge Budget. The report should demonstrate what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents. | A building life cycle report has been submitted in line with this guidance. |
| <p>Building Design</p> <ul style="list-style-type: none"> All new buildings during the design process shall incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations, 2006. All new buildings will be required to incorporate water saving measures, which may include rainwater harvesting for internal service uses. In particular, all new dwellings with individual surface water collection systems will be required to be provided with water butts. The design of new buildings shall make provision for green and or brown roofs or walls to aid in both water absorption but also to contribute positively to the environment and visual amenity | The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations. |

12.6.10 Public Open Space

The occupancy rate used for the purposes of public open space calculations is 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.

Minimum Public Open Space Standards:

| Land Use | Public Open Space Standards (Minimum) |
|--|---------------------------------------|
| Overall Standard | 2.4 Ha per 1,000 Population |
| New Residential Development on Lands Zone RES-N | Minimum 15% of site area |
| New Residential Development on Lands in Other Zones including mixed use | Minimum 10% of site area |
| Institutional Lands / 'Windfall' Sites | Minimum 20% of site area |

Quality of Public Open Space Provision

| | |
|---|--|
| <p>Access</p> <ul style="list-style-type: none"> All neighbourhood areas should have access to a range of formal and informal public open spaces for amenity, recreation, sports and play. Open spaces should be designed and located to be publicly accessible by sustainable means such as walking, cycling and public transport depending on the type of open space and should be usable by all residents of the County. Adequate access points should be provided to open spaces to minimise distances to the areas they serve. Insofar as possible, open spaces should be linked to one another to increase their amenity value, encourage active travel between them and to facilitate the green infrastructure network. Continuous walls and other barriers between open spaces should be avoided. | <p>The proposal provides for 9,800sqm of public open space and a further 3,600sqm of communal open space. This results in a total of 13,400sqm of open space throughout the development. The public open space provision is well in excess of the 10% minimum requirement for this zoning for new residential development, and the 20% required for institutional lands.</p> <p>Regard is also had to the additional POS standard in the Development Plan of 2.4ha per 1,000 population to be achieved across residential communities as set out in section 8.4.1 Social/Community Infrastructure Audit and in policy COS5, in the context of New Development Areas and the Parks and Public Open Space – Overarching policy.</p> <p>It is noted that in the context of this site that it is close to several existing public parks, and in line with policy COS5 this site will also contribute further to this open space network.</p> |
| <p>Recreation Facilities</p> <ul style="list-style-type: none"> Open space should be designed to offer a variety of both active and passive recreation which is accessible to all regardless of age or ability. Children’s play areas should be provided as an integral part of the design of new residential and mixed-use developments and addressed as part of a landscape plan. Refer to section below on Children’s Play Areas. | <p>There is Elkwood Playing Fields, Edmondstown Park and St Enda’s Park all within 1km of the site, while Marley Park is c. 25 minutes’ walk away.</p> <p>The open spaces within the development provide for a variety of recreational uses, and includes children’s play areas.</p> |

| | |
|--|--|
| <p>Green Infrastructure, Biodiversity and Sustainable Water Management</p> <ul style="list-style-type: none"> • Parks and open spaces should be located to connect with each other so as to create green corridors and optimise their green infrastructure function. • Existing trees, hedgerows and watercourses should be retained to maximise the natural setting of parks and open spaces. • Planting should comprise native and pollinator-friendly species. • Sustainable water management in the form of features such as integrated constructed wetlands, ponds, swales and basins should be incorporated within public open spaces and add to the amenity and biodiversity value of the spaces (appropriate to level within the open space hierarchy). | <p>A key element of the open space network is the creation of a new park along Taylors Lane and also a new woodland walk to the east and south providing an ecological connection with the ditch/ mill race to the south.</p> <p>Existing trees are retained where possible and new planting is proposed including appropriate native species.</p> <p>The SUDS proposals are incorporated within the proposed landscaping.</p> |
| <p>Accessibility</p> <ul style="list-style-type: none"> • Age friendly and disability friendly measures should be incorporated into the overall design and layout of public open spaces, such as the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops. • Facilities, equipment and information materials should be accessible for all regardless of age or ability. | <p>The open space recreational network is designed for optimal access for all.</p> |
| <p>Safety</p> <ul style="list-style-type: none"> • Public open space should feel safe to the user and have adequate supervision by way of passive surveillance (e.g. windows overlooking the space; footpaths, cycleways and streets running through or beside the space, etc.). • Smaller parks and open spaces should be visible from and accessible to the maximum number of residential units. • Boundary treatment, public lighting and planting should be designed carefully to | <p>Public open space is overlooked as far as practicable to achieve maximum passive surveillance.</p> |

| | |
|---|---|
| <p>create a sense of security and to avoid opportunities for anti-social behaviour.</p> <ul style="list-style-type: none"> • Access points to parks should be maximised to increase use and thereby improve safety. • Inhospitable and inaccessible open space comprising narrow tracts, backlands, incidental or 'left-over' strips of land should be designed out of all schemes. • Incidental areas of open space will not be accepted as part of functional open space for the purposes of calculations. | |
| <p>Children's Play Areas</p> <ul style="list-style-type: none"> • All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play spaces. • Residential developments of 30 units or over shall include provision for children's play in semi-private or public open spaces, at the discretion of the Planning Authority, through provision of a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority. Where developments are predominantly 3 beds or greater, provision will be required for 10 units or over. • New play spaces should generally be based on the principles of natural play. • More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities. • Play spaces should be carefully sited within residential and built-up areas generally so that they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residents. • Play spaces should be designed to enhance the visual appearance of an area. • Robust natural materials that are less susceptible to vandalism should be used wherever possible. • Play spaces should cater for a wide range of age groups and abilities and be universally accessible. • Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), (or any superseding document). | <p>Play opportunities for all ages, as well as the opportunity for family friendly activities are proposed to be incorporated throughout the development and is informed by the National Children's Play Policy 'Ready Steady Play' and SDCC play space Programme and seeks to utilise natural materials and existing features of the site to create a natural, "free" playground across the parks network and inspire incidental play with sculptural elements located throughout the masterplan area. Incidental play sculptures shall be located throughout the site.</p> <p>The chosen play elements throughout the play facilities of the development will enable all ages play, exploration of sensory input, individual play, group play, and social interaction, imaginative play, climbing, spinning, and sliding movement.</p> <p>Please see the landscape pack for further details on children's play areas.</p> |

| | |
|--|--|
| <p>Chapter 12 Implementation and Monitoring Sets out development standards and criteria that should be read alongside the policies and objectives contained within each of the chapters.</p> | |
| <p>12.8.4 Early Childhood Care and Education Facilities Applications for childcare facilities should be assessed with regard to the requirements of the 'Childcare Facilities: Guidelines for Planning Authorities', DEHLG (2001) and Circular Letter PL 3/2016 (DECLG), 2016) and any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as:</p> <ul style="list-style-type: none"> • Type of residential units (e.g., if mainly one-bedroom units, childcare need may be reduced); • Emerging demographic profile; and • Availability of existing childcare services in the vicinity. | <p>The proposed development includes a 656sqm providing spaces for 124 no. children which can facilitate the predicted childcare demand of the proposed development.</p> |

12.7.1 Bicycle Parking/Storage Standards

Table 12.23 sets out Minimum Bicycle Parking / Storage rates for all new development in the County. Bicycle parking / storage rates are divided into two main categories:

- **Long Term:** These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- **Short Stay:** These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access and allow for cargo bikes.

Bicycle Parking Design/Provision

| | | | |
|----------------------------------|-------------------------|---------------|--------------------|
| Retail and Retail Service | Café Restaurant | 1 per 5 staff | 1 per 10 seats |
| | Bar Club ² | 1 per 5 staff | 1 per 150 sq m GFA |
| | Retail Convenience | 1 per 5 staff | 1 per 50 sq m GFA |
| | Retail Comparison | 1 per 5 staff | 1 per 50 sq m GFA |
| | Retail Warehousing | 1 per 5 staff | 1 per 100 sq m GFA |
| | Vehicle Service Station | 1 per 5 staff | - |

The proposed development provides 1054 no. in total. Please refer to the schedule of accommodation by MCROM Architect's for a breakdown of long term/short term cycle parking.

These have been designed in accordance with all of the standards set out below.

| | | | |
|------------------|-----------------------------|---------------------------------------|---|
| Education | College of Higher Education | 1 per staff plus 1 per 15 students | 1 per 2 staff plus 1 per 30 students |
| | Crèche School ⁹ | 1 per classroom | 0.5 per classroom |

- Location: Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road
- Quantity: A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. 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 enhancement/enlargement, etc..
- Design: Cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Refer to the Apartment Guidelines for further details on design requirements.
- Management: An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking. Refer to the Apartment Guidelines for further details on management.

12.7.4 Car Parking Standards

| | |
|---|--|
| <p>Tables 12.25 and 12.26 set out the Maximum Parking rates for non- residential and residential development. Parking rates are divided into two main categories:</p> <ul style="list-style-type: none"> - Zone 1: General rate applicable throughout the County; - Zone 2 (Non Residential): More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction). <p>The provision of parking spaces for car sharing / pooling will be encouraged and will not impact on the maximum rates in Table 12.25</p> | <p>This site is considered to a zone 2 site as it is a brownfield site within the suburbs. As such the proposed rate of residential parking ratio of 0.68 is in line with these maximum rates.</p> <p>This is in line with the SDCC Opinion which set a target of 290 car parking spaces for this development. This has been achieved.</p> |
|---|--|

| | | | | |
|---|-----------------------------|---------------------------------------|---|---|
| Zone 2 (Residential): More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 400-500 metres of a high-quality public transport service | | | | |
| 12.7.4 Car Parking Standards Maximum Parking Rates (Residential Development) | | | | The proposed development includes 290 no. car parking spaces. Of which 25 are surface and accommodate creche and retail while the remainder is in the basement and accommodates the residential element. This is set out in full in the DBFL Mobility Management Plan and Car Parking Strategy. |
| Dwelling Type | No. of Bedrooms | Zone 1 | Zone 2 | |
| Apartment Duplex | 1 Bed | 1 space | 0.75 space | |
| | 2 Bed | 1.25 spaces | 1 space | |
| | 3 Bed+ | 1.5 spaces | 1.25 spaces | |
| Maximum Parking Rates (Non-Residential) | | | | |
| Education | College of Higher Education | 1 per staff plus 1 per 15 students | 1 per 2 staff plus 1 per 30 students | |
| | Crèche School ⁹ | 1 per classroom | 0.5 per classroom | |
| Retail and Retail Service | Retail Convenience | 1 per 15 sq m | 1 per 25 sq m | |
| | Retail Comparison | 1 per 25 sq m | 1 per 35 sq m | |

| | |
|---|---|
| <p>12.9.5 Retail Development</p> <p>(i) Retail Criteria</p> <p>Applications for new retail development shall accord with the requirements outlined in Chapter 9: <i>Economic Development and Enterprise</i>, in addition to the following criteria:</p> <ul style="list-style-type: none"> - Retail development should be in accordance with the role and function of the retail centre and accord with the scale and type of retailing identified for that location. - Retail development should be in accordance with the fundamental objective to support the vitality and viability of the retail centre and must demonstrate compliance with the sequential approach. Proposals to amalgamate retail units will be carefully considered; - Major retail proposals (exceeding 1,000 sq m) are required to provide a detailed Retail Impact Assessment (RIA) and a Transport Impact Assessment (TIA). | <p>The proposal includes for two new retail units to support the additional 402 no. new residential units as well as providing new retail facilities for the existing community.</p> <p>The proposed new retail units are</p> <ul style="list-style-type: none"> • Retail 1: 262 sqm • Retail 2: 97 sqm <p>These small units are proportionate to the size of the proposed development and will not impact on the viability or vitality of other neighbourhood centres in the vicinity.</p> |
| <p>9.5.6 Local Centres</p> <p>Maintain and enhance the retailing function of Local Centres</p> | |
| <p>EDE14 Objective 1</p> <p>To support the development and enhancement of local centres as sustainable,</p> | |

| | |
|---|--|
| <p>multifaceted, retail led mixed use centres, enhancing local access to daily retail needs, which do not adversely impact on or draw trade from higher order retail centres.</p> | |
|---|--|

| | |
|--|--|
| <p>Appendix 4 Green Infrastructure Local Objectives and Case Studies</p> | <p>The layout and design of the streetscape, the creation of inviting landscape amenity areas, adopting landscape mitigation and restorative measures, protection of ‘feature’ trees and enhancement of the existing drainage ditch to the south is central to the long-term successful establishment of this Residential Development (LRD) at Taylor’s Lane.</p> <p>As part of the master planning exercise, the open spaces were established and sited at appropriate locations throughout the scheme. The open spaces, as now developed, are woven into the scheme to provide regular breaks to the built form whilst providing a complimentary setting, a welcoming space and a strong sense of cohesion to the ‘landscape’. The landscape design development has been guided and influenced by both the Ecological and Arboricultural appraisal of the site, both of which have been enclosed as part of this application</p> <p>The use and mix of trees, shrubs and herbaceous plants have been considered in detail in order to be robust enough to establish, while still offering seasonal interest, movement and a focussed expression. Native plant material, where appropriate, has been considered for the scheme to improve the overall biodiversity of the site. Much of the herbaceous perennials shall be under-planted with a variety of bulb species to offer ‘flurries’ of colour from early to late spring. Leaf colour, bark tone and berries have all been considered for the scheme which allows for good contrast and again, seasonal variation.</p> <p>Please refer to documentation by Altamar Limited, Doyle & O’ Trothigh Landscape Architecture and Independent Tree Surveys Limited.</p> |
| <p>L11 – M50-DLR Crosslink Objectives</p> <ul style="list-style-type: none"> • To implement new street planting where required within the corridor • To implement biodiversity-friendly planting and management regimes in public open spaces and at roadside verges. • To promote the retrofitting of SuDS measures in pocket parks and public spaces in the L11 Corridor. • To develop active travel routes between public open spaces and the surrounding residential areas. | |
| <p>L16 Owendoher River Link Objectives</p> <ul style="list-style-type: none"> • To connect the Owendoher River Link to the proposed greenway under L15 to improve access and recreational amenity. • To protect the extensive trees and woodlands that mark the banks of the Owendoher River. • To monitor and ensure ongoing maintenance of the Owendoher River’s Water Quality. • To engage with landowners to investigate the provision of public pedestrian access into the woodlands at Ballyboden to improve local recreational access. | |

| Appendix 10 | Building Height and Density Guide |
|---|---|
| <p>The BHDG (prepared for SDCC by OMP Architects), serves the following purposes:</p> <ul style="list-style-type: none"> • <i>To satisfy the requirements of the Urban Development and Building Heights Guidelines for Planning Authorities, this Guide is required to respond to the provisions of SPPR 1 and 3 in particular, to provide the following:</i> • <i>To address the requirement under SPPR1 for planning authorities to identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and</i> • <i>To provide a toolkit for the assessment of proposed increased building heights in development applications and development management scenarios.</i> <p>Sections 2 and 3 describe the general approach to increased building heights and higher density forms within the South Dublin County Council Administrative area in the absence of numerical height limits. This provides <i>“applicants and decision-makers and all stakeholders with an understanding of how the urban design assessment parameters have been developed.”</i></p> <p>Section 4 and 5 describe key urban design considerations to inform proposals for higher density development. Section 4 <i>“provides all stakeholders with a shared ‘vocabulary’ by which the impacts of increased heights and density – and the design strategies informing proposals – can be discussed. Section 5 illustrates how this vocabulary can be used to develop diagrammatic analyses of proposals and their settings to demonstrate contextual fit”.</i></p> <p>The policy context is discussed further below</p> | |
| <p>The BHDG reviews in detail the <i>Urban Development and Building Height Guidelines for Planning Authorities, 2018</i>. In particular it states:</p> <p><i>To satisfy the requirements of the Urban Development and Building Heights Guidelines for Planning Authorities, this Guide is required to respond to the provisions of SPPR 1 and 3 in particular, to provide the following:</i></p> <ul style="list-style-type: none"> - <i>To address the requirement under SPPR1 for planning authorities to identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and</i> - <i>To provide a toolkit for the assessment of proposed increased building heights in development applications and development management scenarios.</i> | <p>This has been addressed in detail in the review of the Building Heights Guidelines in this planning report.</p> |
| <p><i>In line with NPO35 and SPPR1, this Guide supports the objective of the Plan to proactively consider increased building heights on lands zoned Regen, MRC, DC, LC, TC and Res-N as well as sites identified and on sites demonstrated as</i></p> | <p>This site is considered to meet the Apartment Guidelines requirements for increased capacity in line with the location criteria. This is discussed in detail in the review of the Apartment Guidelines in this report.</p> |

| | |
|---|--|
| <p><i>having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin Building Height and Density Guide that it is contextually appropriate to do so.</i></p> | <p>As such the increase in density and height is in line with this policy in appendix 10.</p> |
| <p>Section 4 Contextual Analysis Toolkit This sets out the 12 Criteria from the Urban Design Manual.</p> | <p>These have been addressed in detail above and in the MCORM Architects Design Statement.</p> |
| <p>Section 5 Indicative Development Scenarios</p> | |
| <p><i>For the purposes of relevance to the predominant forms of development to which the contextual analysis process will apply, the illustrative examples concentrate on locations where mid-to-high density and higher density ranges of 50 units per hectare would be expected in line with national guidance.</i></p> <p><i>The selected indicative locations are:</i></p> <ul style="list-style-type: none"> - I. District Centre; - II. Village Centre; - III. Town Centre; - IV: Suburban Infill (Medium); - V. Suburban Infill (Small); - VI. Local Centre; - VII: District Centre. | <p>This site does not fit neatly into any specific criteria under each of these typology scenarios. However it is considered to most closely relate to that of a “District Centre” site typology which is defined as follows:</p> <p><i>Setting</i> <i>The site is a brownfield opportunity site with frontage onto two roads and access to public transport. Public transport connectivity is not sufficient to support primary landmark classification of heights. The site has a history of mixed uses and is within a local context of smaller commercial mixed uses surrounded by prevailing two-storey residential development without a unified or historic character.</i></p> |
| <p>Setting The site is</p> <ul style="list-style-type: none"> - a brownfield opportunity site - with frontage onto two roads and - access to public transport. - Public transport connectivity is not sufficient to support primary landmark classification of heights. - The site has a history of mixed uses and - is within a local context of smaller commercial mixed uses. - surrounded by prevailing two-storey residential development without a unified or historic character. <p>Height Strategy</p> <ul style="list-style-type: none"> - Prevailing Contextual Height - Local Amplification of Height - Increased Height relative to Prevailing Context and derived from existing height in proximity. | <p>The site is a large, brownfield site, housing a now vacant religious order building which is substantial size in terms of height, length and massing relative to its suburban setting.</p> <p>The site fronts onto both Edmondstown Road and Taylors Lane.</p> <p>The site is within 5 minutes’ walk of several bus routes and is considered to have very good public transport access.</p> <p>The site is not on a LUAS or a public transport interchange and as such a “landmark” building is not proposed in this instance.</p> <p>The site was a religious order building which has been vacant for many years. This was used as a chapel, seminary and religious centre. On the eastern end of the site was a pitch and putt course.</p> |

| | |
|---|--|
| <ul style="list-style-type: none"> - Amplification of height within dominant streetwall - Vertical expression of secondary landmark at prominent junction. | <p>To the east of the site are a mixture of commercial and residential buildings, to the north is predominantly residential with a neighbourhood centre while to the south is a newly operational Primary Care Centre.</p> <p>The area is predominantly single and two storey buildings with the existing building on site being the largest buildings within the immediate area. There is no single unified character to the buildings along Taylors Lane or Edmondstown Road.</p> <p>As set out in the Conservation Report by IAC the building is of no particular architectural merit nor is the site in a conservation area. There are no protected structures within the immediate vicinity of the site.</p> <p>This height strategy has been developed throughout this development and is discussed in the context of the worked example of same from Appendix 10.</p> |
| <p>Urban Design Response - worked example</p> <p>1. Development of Edge Block at prevailing height to terminate terrace block from east and allow transition in scale at prominent corner</p> | <p>The proposed building is set back from the boundaries due to the constraints of the site. To the north by the underground pipes, to the south by the mill race and to the east by the existing line of mature trees.</p> <p>The proposed buildings are of a similar height to that of the existing building on site. They have been arranged in 3 urban blocks to provide a strong urban edge along both road frontages and providing a presence along these two main roads, improving legibility to the site.</p> |
| <p>2. Development of pedestrian linkage through site.</p> | <p>Multiple pedestrian linkages have been created through the site, with new linkages from the north and east. A new woodland walk to the south of the site is also proposed. This will provide a predominantly car free development, and will provide new linkages through the development to the newly opened primary care centre to the south.</p> |
| <p>3. One-storey amplification of height (1.5xCH) to bookend existing terrace, signal new pedestrian route, and turn the corner with built form.</p> | <p>Clear routes through the site are created by the spacing between buildings providing direct and visible routes through the site. The site also steps in line with the changes in the ground level.</p> |
| <p>4. Development at contextual height of 3-storeys to improve existing street edge to south-west.</p> | <p>The proposed buildings have been designed to provide a strong urban frontage both internally and externally ensuring a sense of overlooking and security throughout while creating an</p> |

| | |
|---|--|
| | attractive urban environment to be in. |
| 5. Development of new public space within block with permeable edges. | New public open space has been created to the north, so it is accessible to the existing community in the wider area. This links through to the woodland walk to the south. |
| 6. Development of mixed-use block appropriate to District Centre setting with retail to ground floor to turn the corner and residential development above. | Block A has been designed as a mixed use block to provide retail and creche facilities. This has been located next to the only vehicular entrance to provide ease of access for all. It will also provide animation and activity in this area. |
| 7. Increased height and vertical expression of prominent corner to c.3xCH beyond prevailing heights, sufficient to mark the location from district park to the north-west. Potential for amplified height between new height insertions into streetwall to provide variety and visual interest. | The proposed building height and the design of the building beyond that of the immediately surrounding area, and addressing the roundabout provide an attractive urban frontage to this currently undistinguished cornered. |
| 8. Retention / continuation of existing building lines; development of new building line as vertically expressed corner is approached. | There is no existing strict building line along either of these roads. |

As set out above the proposal is fully in accordance with the policies of South Dublin County Council Development Plan 2022 – 2028 and also in accordance with regional and national planning policy.

SECTION 9 CONCLUSIONS

The proposal submitted for this application is a reflection of the LRD Opinion from SDCC and the permitted development granted by An Bord Pleanála under reg ref 307222-20 along with feedback given by South Dublin County Council both in the Chief Executives report on the SHD application.

The layout is broadly the same the permitted SHD development due to the multiple site constraints which restrict where development can be located. However, the building design has been altered to take into account comments from SDCC. The building height has also been reduced which in turn reduces the density and the number of cars has also been reduced.

The proposed five storey over basement/ lower ground floor buildings are of a similar height to the existing building on site and are considered an appropriate scale, height and massing for this unique site within the context of the area. It creates a high-quality design that makes the best use of available allocated land in line with best practice and provides significant additional new facilities to the area including a new public park, attractive walks through the site, a creche and shops. It is a well-designed scheme that provides a sense of place and identity on this brownfield, under-utilised piece of land with good access to multiple frequent bus routes (which will be further improved by Bus Connects) and with easy access to many employment, commercial and recreational locations.

The proposed residential scheme is on zoned land and is in line with the zonings set out in the Development Plan. The density is appropriate, and the design provides a new public park along Taylor's Lane while, due to the proposed design and height, also providing a strong urban frontage. This proposal will not only provide additional public facilities, but it will also provide for 402 new residential units which are needed in a time of housing crisis.

The statement of consistency submitted with the application submission demonstrates that the proposed development complies with relevant national, regional and local planning policies and guidelines and that it will provide for an effective and efficient use of this serviced site located within the Taylors Lane area which is an established area close to local services.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines and will provide a high quality living environment on this underutilised site.