

**Planning Report &
Statement of Consistency**

Proposed SHD Planning Application

**At Glenamuck Road North,
Carrickmines,
Dublin 18**

**On behalf of
Moran Park Homebuilders Ltd.**



April 2022



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1 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have prepared this Statement of Consistency and Planning Report on behalf of our client, **Moran Park Homebuilders Ltd, 19 Fitzwilliam Square, Dublin 2, D02 CD40**, for a Strategic Housing Development (SHD) proposal comprising 118 residential units on a site of 0.92ha, on lands at **Glenamuck Road North, Carrickmines, Dublin 18**.

For clarity, the site is located within the administrative boundary of Dun Laoghaire-Rathdown County Council.

A summary of the main points of this report are set out below.

1.1 The Subject Site

- The site is located on Glenamuck Road North, within close proximity to the village of Foxrock to the North and is very close to the M50, the Luas Green Line stop at Carrickmines and the N11 – providing easy access to Dublin City Centre.
- The site area is approximately 0.92 ha (c. 0.74ha relates to the main development site and c. 0.18ha relates to additional lands for drainage and access proposals) and is located in a mature suburban residential area at a site on Glenamuck Road North, Carrickmines, Dublin 18.
- It should be noted that the dwellings surrounding the site are all in individual private ownership and there is no further potential for a wider site to be developed.
- The proposed development will contribute significant element of residential development along with other complementary uses within a scheme of considerable architectural merit. The subject site is strategically located to accommodate development of this nature, having regard to its location in close proximity to a range of services and amenities, both existing and permitted, also being proximate to high capacity and frequent light rail services from the Glenamuck Luas Stop.
- The exception to this is the Carricail development to the south-east, which is a joint venture to which the applicant is a party to. The current proposal has considered this permission and has ensured appropriate connectivity and pedestrian linkage between the sites.
- It should be noted that the proposed strategic housing development and particularly the design layout now submitted is historically the product of a positive engagement process with the planning authority.
- The proposed development as now submitted in this planning application to An Bord Pleanála, is the product of an analysis of the subject site, its recent planning history, its characteristics and surroundings, surrounding planning history, national, regional and local planning policies.
- The final design of the proposed development responds to the items of specific information identified within the Boards Opinion in the conclusion of the pre-application consultation process. In its opinion, the Board indicates that the proposals represented a reasonable basis for a Strategic Housing Development Application.

1.2 The Proposed Development

- In terms of the layout proposed, the current proposal for 118 residential units has sought to maintain the general arrangement and layout of buildings permitted under D16A/0260 & ABP Ref. PL06D.247822. Specifically, we note that the southern elevation of Tullybeg faces the proposed area of open space, which was a welcomed design principle under the above permission.



- The key changes to the site layout relate primarily to the increase in the central area of open space and the introduction of the new Block C, comprising apartment units, in place of previously permitted house units.
- The other key change within the scheme is additional heights across the site, which is fundamentally supported by recent national guidance/objectives – which aim to deliver increased heights at highly accessible sites in proximity to high frequency and capacity public transport corridors.
- A total of 103 car parking spaces, 280 bicycle parking spaces and 5 motorcycle spaces are proposed.
- The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha - which is justified (for reasons set out hereinafter and in the application documentation) given the proximity of the site some 150m (1 minute walk) from the Luas line and Carrickmines stop.
- Open Space (approx. 2,071 sq. m) is provided by one major centrally located space (1158.3 sq. m) between Blocks A and B, which includes a play area of 63.2 sq. m. Two further communal open space areas are provided adjoining Blocks B (471.8m. sq) & Block C (440.8m. sq).
- The main open space, by virtue of its sense of enclosure and orientation, creates a strong sense of place, security and privacy for all residents of the development. The sense of security is reinforced and enhanced by the surveillance and overlooking provided by Blocks A and B.
- The current design has considered this context and has sought to deliver height ranging overall from 4 storeys and transitioning to a height of 6-7 storeys, which is considered appropriate given the location of the site to the Green Luas Line (150m or 1 minute walk). Furthermore, the design now presented has been prepared in the context of the surrounding development, maintaining significant separation distances. The subject site is located within a distance of approximately 150m of the Green Luas Line, with the Carrickmines stop located to the south of the site. The site is well serviced by the M50 motorway, which is located 400m to the southwest, and by cycle lanes on North Glenamuck Road. The 63 Bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. The nearby Luas stop provides an opportunity to avail of high capacity, high frequency services to the City Centre, the site is appropriately classified as an Accessible Urban Location, as defined under paragraph 2.4 of the 2018 Apartment guidelines.

1.3 Planning History

- Relevant planning history is detailed in the planning report, with 1 key application governing the subject site and 1 further permission of relevance in relation to Carricáil to the south
- There is 1 permission of relevance to the site at Carricáil to the south, D18A/1187 & ABP Ref. PLo6D.304995. This permission relates to 30 residential units (22 duplex units and 8 apartments) and was granted with revised conditions in November 2019.

1.4 Planning Context

- The current proposal for 118 residential units has sought to maintain the general arrangement and layout of buildings permitted under D16A/0260 & ABP Ref. PLo6D.247822. Specifically, we note that the southern elevation of Tullybeg faces the proposed area of open space, which was a welcomed design principle under the above-mentioned permission.
- The publication of the Urban Development and Building Heights Guidelines for Planning Authorities and the Regional Spatial and Economic Strategy for the Eastern and Midland Region has significantly changed the planning landscape of the site. This change in context is a key consideration for the density of the new proposal.

- The subject site, under the current Development Plan, is zoned 'A' – “*To Protect and/or improve residential amenity*”. Under this zoning, uses permitted in principle include 'Residential'. Accordingly, the proposed residential uses, the residential facility and gym element of the residential clubhouse are permitted in principle.
- The scheme design seeks to integrate the proposed development with the existing landscape as much as possible, ensuring that the natural characteristics of the site are retained and become an opportunity to provide a sylvan setting for the proposed new development.
- The proximity of the site to public transport, local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with national planning policy.
- The proposed development is in accordance with applicable national, regional and local planning policy. In particular, the proposed height and density for this scheme are supported by national planning policy.
- The residential units proposed are of exceptional quality with high amenity layouts, a communal area (Block B), connections to public transport links and car/bicycle/motorcycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.

2 INTRODUCTION

Our client, **Moran Park Homebuilders Ltd, 19 Fitzwilliam Square, Dublin 2, D02 CD40**, has instructed Brock McClure Planning & Development Consultants to lodge this Strategic Housing Development (SHD) application to An Bord Pleanála ('the Board'/'ABP') relating to 118 no. residential units on lands at **Glenamuck Road North, Carrickmines, Dublin 18**.

This Planning Report and Statement of Consistency is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of the Board. The Planning Report and Statement of Consistency should be read in light of, and having regard to, the totality of the documentation comprising the within SHD application.

2.1 Context for the lodgement of this Planning Application

This SHD application is lodged in accordance with Part 2, section 4 (1), of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

“(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and (v) be accompanied by the appropriate fee,

and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.”

This SHD application is lodged in compliance with the above requirements and particularly those set out in section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016. Furthermore, as evidenced from the application and documentation provided, this SHD application complies with the requirements of, *inter alia*, the Planning & Development (Housing) and Residential Tenancies Act 2016 (as amended); the Planning and Development Act 2000 (as amended) (*insofar as the provisions of same are relevant*); and, as appropriate/relevant, Part 23, entitled “Strategic Housing Development”, of the Planning and Development Regulations 2001, as amended ('the 2001 Regulations').

2.2 Hard and Digital Copies

In addition, it is confirmed that, pursuant to the requirements of Article 297(5) and (6) of the 2001 Regulations, the following have been submitted to the Board:

- 2 hard copies and 3 digital copies of all materials for review.
- 6 hard copies and 1 digital copy of all materials have been issued to the Planning Authority of Dun Laoghaire-Rathdown County Council.
- 1 digital copy has been sent to Prescribed Bodies listed in the Board's Opinion.



3 APPLICANT AND DESIGN TEAM

The applicant for permission is Moran Park Homebuilders Ltd. Moran Park Homebuilders Ltd has appointed an experienced design team to prepare this SHD application, lodged under the Strategic Housing Development process to the Board. The immediate design team comprises:

- McGrane & Partners Architects – Design Architects
- Aramark – Aramark Property Management
- ARC Architectural Consultants – Visual Impact Consultants
- AWN Consulting – Waste Management, Hydrological and Noise Consultant
- B Fluid – Microclimate
- Brock McClure Consultants – Town Planning Consultants
- Waterman Moylan Engineers – Design Engineers
- Ronan McDiarmada – Landscape Architects
- Enviroguide – Ecologists
- Joe McConville – Arborist
- RM Breen Associates – Electrical Engineers
- Saber Electrical Services Ltd – Lighting Consultants
- Digital Dimensions – Daylight and Sunlight and CGIs

4 SITE DESCRIPTION

This Section sets out the subject site and its location, as well as a description of the proposed development.

4.1 Subject Site

The subject development site area extends to approximately c. 0.92 ha (c. 0.74ha relates to the main development site and c. 0.18ha relates to additional lands for drainage and access proposals) and is located in a mature suburban residential area at a site on Glenamuck Road North, Carrickmines, Dublin 18. As detailed hereinafter, the site is situated 150m to the north of the Green Luas line, which is a fundamental asset to the site's location. The overall site is outlined in red in Figure 1 below for context purposes.

At this point, we note that in order to construct the outfall foul and surface water sewers, it is necessary to cross a portion of lands forming a wayleave to the south of the site via 'Carricáil' and Brennans Town Vale. The portion of lands for this wayleave is identified as forming c. 0.18 ha of land, bringing the overall main development site area to 0.92ha. The extent of this wayleave is identified in the Site Location Plan prepared by McGrane & Partners Architects and included in the within SHD application documentation.

For clarity, the full extent of the site (main development site and wayleave area) is outlined in Figure 2 below.



Figure 1 - Site Plan (outlined in red)

Glenamuck Road North is located to the west of the site and forms the western boundary to the site. Carrickmines Croquet and Lawn Tennis Club is located further west of Glenamuck Road North, as detailed in the aerial view. There is also an existing access point serving the site from Glenamuck Road North.

Existing mature dwellings of 2 storeys in height bound the lands as follows:

- ‘Stafford Lodge’ and ‘Carricáil’ directly adjoins the site to the south.
- ‘Tullybeg’ adjoins the site to the north.
- ‘Chigwell’ adjoins the site to the northeast.
- ‘Cloverdale’ and ‘Bridgefield’ residences, part of Brennanstown Vale, are located to the east of the site.

The exception to this is the Carricáil development to the south-east, which is a joint venture to which the applicant is a party to. The current proposal has considered this permission and has ensured appropriate connectivity and pedestrian linkage between the sites.

4.2 Overall Context – Proximity to Local Facilities and Amenities

Glenamuck Road North is located to the west of the site and forms the western boundary to the site. Carrickmines Croquet and Lawn Tennis Club are located further west of North Glenamuck Road, as detailed in the aerial view. There is also an existing access point serving the site from Glenamuck Road North.

The subject site is located within a distance of approximately 150m of the Green Luas Line (high capacity and frequent public transport), with the Carrickmines stop located to the south of the site. The site is well serviced by the M50 motorway, which is located 400m to the Southwest, and by cycle lanes on North Glenamuck Road. As detailed herein (*and in the application documentation*), in addition to the proximate Luas Stop, the site is also located in close proximity to bus routes operating along Glenamuck Road.

The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site.

The established character of the surrounding area is mature and comprises large detached two-storey family homes set on generous plots. Residential densities are characterised as low within the immediate context. These dwellings and large plots reflect an area as it once was – i.e., suburban with weak transport and retail links.

These planning weaknesses have been eliminated by factors such as the Luas stop (approx. 150m from the site) and the M50 including its Junction (approx. 400m from the site), as well as the new retail and medical centre at The Park (approx. 1.0km from the site) and Dundrum Town Centre (9 Luas stops from the site). These services now enable the redevelopment of this area into a more sustainable community.

To the west of Glenamuck Road North, the established character of the surrounding area consists of (again) of two-storey houses in the form of estates on smaller plots such as Pavilion Gate, Brighton Avenue and Carrickmines Little. Glenamuck Road North acts as a buffer to these sites, with lower density development to the east and medium density to the west, all of which were built prior to Luas operating.

5 PLANNING HISTORY

The relevant planning history of the site is set out below, with 1 key application governing the subject site and 1 further permission of relevance in relation to Carricáil to the south.

5.1 Subject Site

A full review has been conducted on Dun Laoghaire Rathdown (DLR) County Council and the Board's online planning portals to establish the planning history of the site. We note the following relevant applications:

(i) D16A/0260 & ABP Ref. PL06D.247822

The site was granted planning permission for residential development consisting of 42 no. dwellings in the form of 36 no. apartments and 6 no. houses. The permitted development provided for (a) apartment blocks A (18 no. units) and B (18 no. units), both 3 storeys with set back at fourth floor level, over basement level; and (b) 6 no. 4-bed house units (3 storeys), all with associated rear gardens and balconies. Permission was also granted for basement and surface car parking spaces; bicycle parking spaces; plant areas; storage areas; bin storage areas; and access via Glenamuck Road North.

The extent of the layout permitted is identified below:

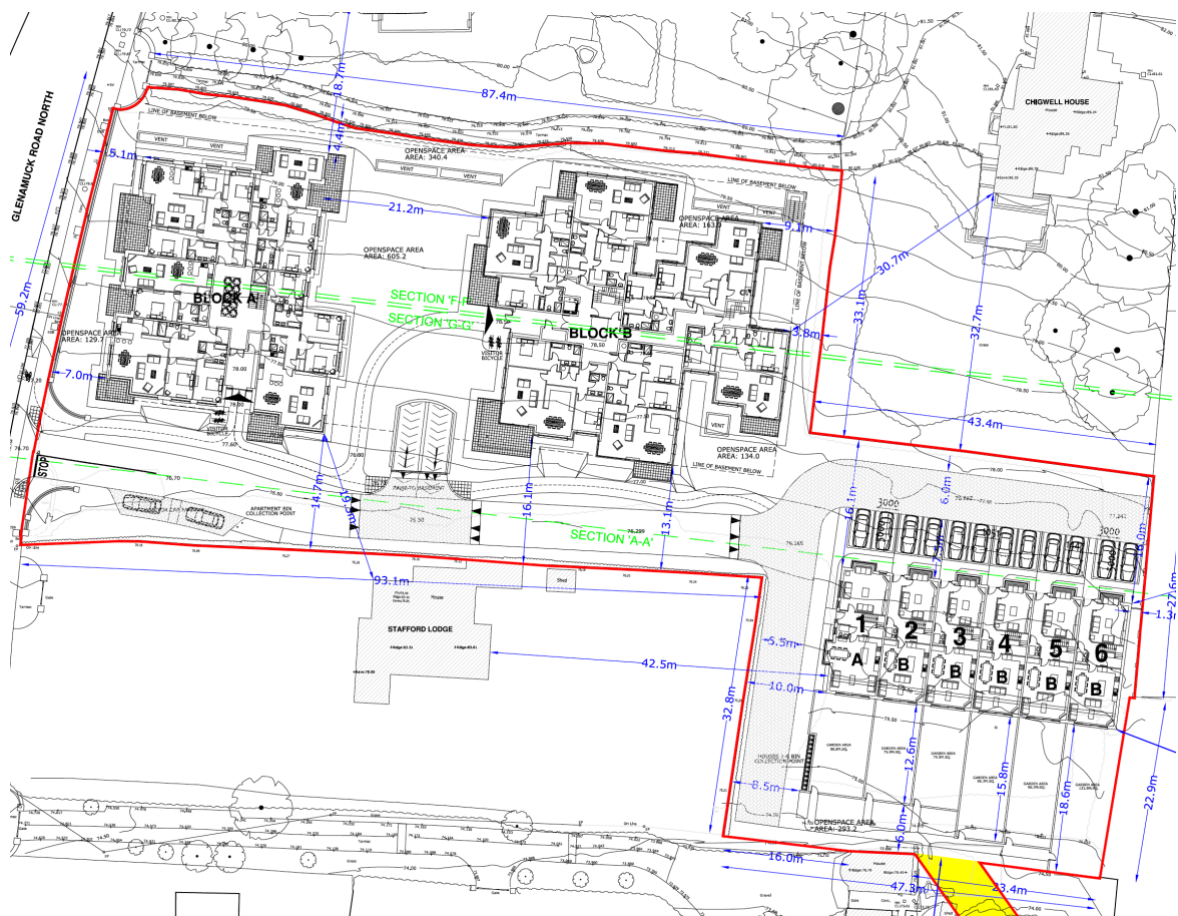


Figure 3 - Permitted Site Layout

On review of the scheme (before the Board), the Board's Inspector noted the following key points:

Density

*"Having regard to the site context in close proximity to Carrickmines LUAS stop and the previous refusal of development on the site on the basis that an appropriate density was not provided, **I am of the opinion that a density of circa 60 dwellings per hectare does warrant consideration** subject to the proposed design and layout not unduly impacting upon the residential amenities of the area and that all other relevant planning considerations being satisfactorily addressed" (page 23).*

Impact on Surrounding Residential Amenity

"Accordingly, having reviewed the proposed site layout of the scheme including the revised proposals relative to the existing surrounding properties, I consider having regard to the proposed siting and design of the apartment buildings the relative separation distances to the existing dwellings to the north and south of the site that the proposed scheme would not result in any undue overlooking of residential properties" (page 26).

It is worth pointing out that the separation distances set by this permission are as follows:

1. Tullybeg

This dwelling is situated 14m from the northern site boundary.

At the closest point, the dwelling at Tullybeg was located 18m from the permitted Block A and 19m from the permitted Block B.

The Inspector commented that the scheme had been designed with regard to the location of that dwelling, with the south facing elevation of Tullybeg directly addressing the proposed open space area between Blocks A and B. This was a welcomed design principle in terms of layout.

2. Chigwell

This dwelling is situated 19m from the closest site boundary.

The permitted Block B was located a minimum distance of 28m from the closest point of the dwelling. The basement would be slightly closer at 23m.

In respect of this previous application/permission, following the request for further information and the clarification of further information, the design of the apartment blocks was revised to address the Planning Authorities concerns in relation to the proximity of the apartment blocks to the property at Chigwell. In relation to Block B, a separation distance of 11m was provided between Block B and the eastern boundary of Chigwell from the second floor, and the eastern boundary of Chigwell 12.3m from the third floor. The tapering of the apartment block at these floor levels provided an acceptable separation distance between the closest point of Block B and the boundary of Chigwell.

3. Stafford Lodge

In relation to the property at Stafford Lodge to the south, the side elevation of the dwelling would be located 20m from Block A and 15m from Block B.

In review of the precedent set by the above application, the current proposal has sought to maintain the layout permitted and has, in general terms, sought to maintain the separation distances. This report sets out a rationale for any deviation from this.

5.2 Carricáil

There is 1 permission of relevance to the site at Carricáil to the south.

D18A/1187 & ABP Ref. PL06D.304995

This permission relates to 30 residential units (22 duplex units and 8 apartments). The extent of the site layout for this permission is as follows:

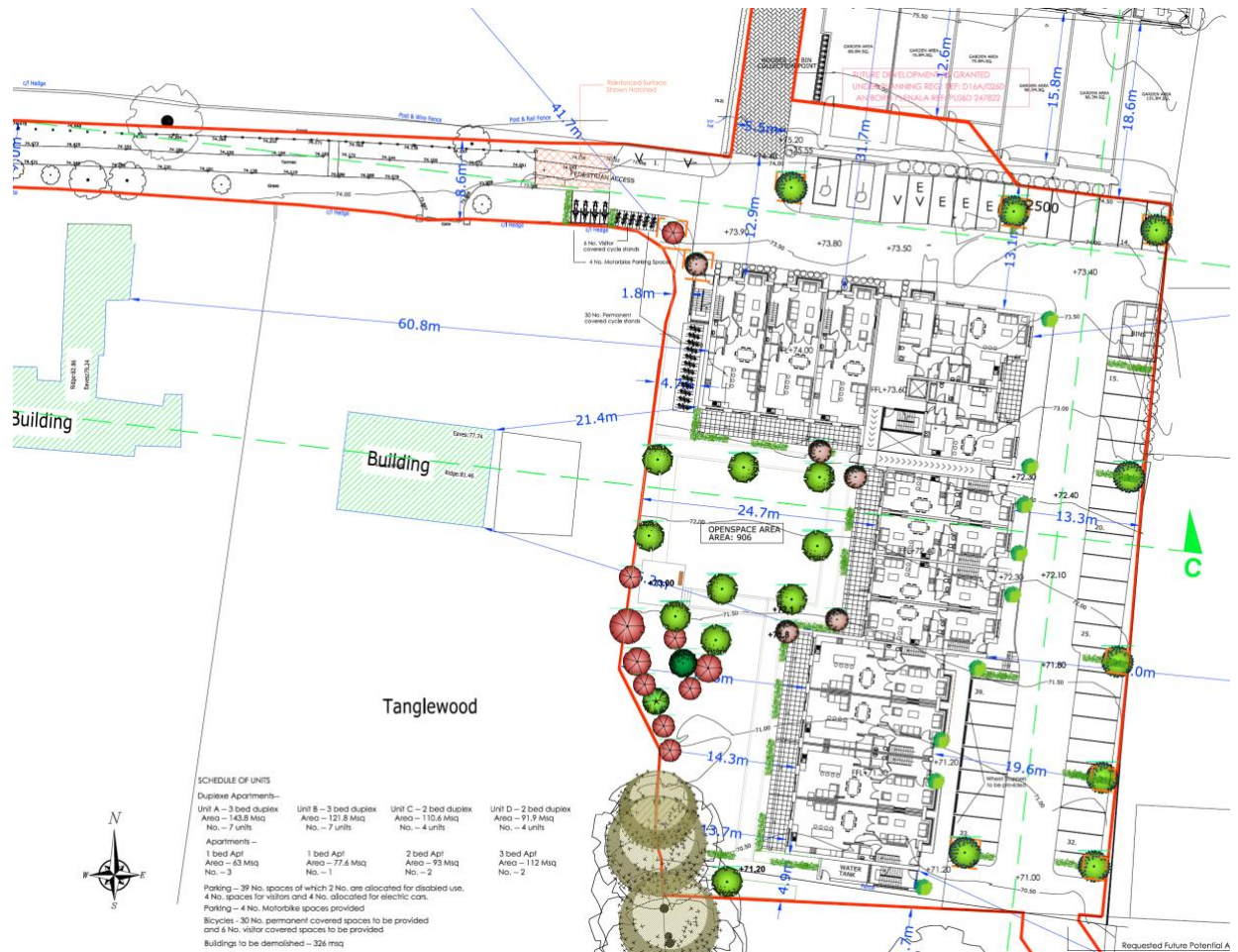


Figure 4 - Permitted Site Layout

As set out previously, the current proposal has considered this permission and has ensured appropriate connectivity and pedestrian linkage between the sites. This permitted development will also benefit from the approved site access junction, granting permeability between both developments.

5.3 Quadrant 3, The Park, Carrickmines

Reg Ref: D18A/0257

ABP Ref: ABP-304396-19

On the 26th of September 2019, permission was granted by An Bord Pleanála for development of Quadrant 3, The Park, Carrickmines. The development permitted consists of the following:

- **Block A**, containing two supermarkets (to include off license use) with a GFA of 1,725 sq.m and a GFA of 1,390 sqm service yard and loading bays, 6 no. Retail units and 26 no. own door office units (over

level two), external courtyard, a gym, a leisure facility, 5 no. restaurant/café units, a medical centre, and management suite.

- **Block B** containing 3 no. retail service units at ground floor level, 2 no. restaurant/café units at ground floor level. A car showroom (at level -1) and a creche (over two levels) and 150 no. apartments at first floor, second, third, fourth and fifth floor level and a courtyard at first floor level.
- **Block C** containing 6 no retail warehousing units including a mezzanine level, 12 no. retail units, indoor skydiving facility, 2 no. restaurant /café units and a cinema.
- **Block D**, comprising of a 12,980sqm office block.

This permitted development will constitute a significant additional level of facilities, amenities, and retail provision for the area, which is within close proximity to the subject site. This new neighbourhood centre and mixed-use development will serve the growing population of the area, including on the subject site and adds to the significant existing development at the Park Carrickmines. The Board in granting permission noted the existing, permitted and planned development in the vicinity.



Figure 5 - CGI Image of the permitted Q3 neighbourhood centre and mixed-use development

The planning history pertaining to the subject site clearly demonstrates that a strong architectural response is required to respond with the requirements of An Bord Pleanála in developing these lands. The surrounding planning history, including the recently permitted development at Q3 of the neighbourhood centre, demonstrates the ongoing development of the surrounding area as a significant growth area within the county - which the proposed development will contribute to and fit in with.

5.4 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis-à-vis the subject site:

Do any statutory notices (e.g., Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

There are no statutory notices which apply to the site of the proposed development or any building thereon.

6 SECTION 247 PRE - PLANNING

Details on the Pre-Planning Meetings held are set out in brief below.

6.1 Pre-Planning Meeting

A formal pre-planning meeting was scheduled for 19th April 2021 to discuss the proposal in principle. The matters raised by the planning authority and the subsequent response to those issues from the applicant is detailed below.

Item	Planning Authority Discussion Point	Applicant Response
Drainage		
1.	A high-level engineering submission was identified; however, a more detailed submission was required for the next stage.	We refer to the Engineering Assessment Report and drawings enclosed from Waterman Moylan which provide a high-level engineering submission for the Planning Application.
2.	Letter of consent to be submitted for service across the site.	Letter of Consent has been issued to DLR for service access across the site.
3.	Waterman Moylan to engage further with DLR in terms of drainage strategy.	The submission enclosed from Waterman Moylan addresses the drainage strategies questioned by DLR.
4.	Confirmation of Feasibility and Design Acceptance for Irish Water have been required for Stage 3.	Confirmation of Feasibility and Design Acceptance is included as an appendix to the Engineering Assessment Report provided by Waterman Moylan.
Roads/Traffic		
5.	1:1 Car parking has been welcomed by DLR. Provision is to be made for visitor parking, set down and deliveries.	We refer to the enclosed Car Parking Strategy/ Mobility Management Plan prepared by Waterman Moylan for further details on car parking submitted with this application.
6.	Higher Apartment Standards within the Apartment Guidelines will be considered by the team.	Apartment Standards within the apartment Guidelines have been taken into consideration by all consultants when preparing the Planning Application.
7.	Letter of Consent is required for works proposed along Glenamuck Road.	Please find attached Letter of Consent from DLR for works proposed along Glenamuck Road North.
8.	Location of the entrance v's the access permitted – this will need to be detailed in the application.	There is an existing access point serving the site from Glenamuck Road North. This access is proposed by way of an entrance designed by the Consultant Traffic Engineer and is located at a point already approved under planning reference D16A/0260.
9.	Consideration is to be given to the pedestrian access permitted under the Carricáil application and if this can be tied into the current proposals also.	As detailed in the Traffic and Transport Assessment prepared by Waterman Moylan, the access point to the south (via Carricáil) is for emergency vehicles and pedestrians only and the

		current proposal will have the potential for future use of this pedestrian access point.
Parks		
10.	Consideration should be given to the impact on perimeter trees during the application as it progresses.	<p>Under the Development Plan, there is an objective identified on the Development Plan zoning map along the northern and eastern boundary of the site <i>“To protect and preserve Trees and Woodlands”</i>.</p> <p>Section 8.2.8.6 of the Development outlines that <i>“New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerow and new developments shall have regard to objectives to protect and preserve trees and woodlands as identified on the County Development Plan Maps.”</i></p> <p>The objective <i>“To protect and preserve Trees and Woodlands”</i>, must also be considered in the context of the other provisions of the Development Plan. Section 8.2.8.6 provides:</p> <p><i>“New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerow and new developments shall have regard to objectives to protect and preserve trees and woodlands as identified on the County Development Plan Maps.”</i></p> <p>The Plan further states in Section 8.2.8.6 that:</p> <p><i>“Where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planting or replacement trees and other plant material. This will be implemented by way of condition”.</i></p> <p>The proposal in this case has been the subject of significant Arboricultural input from the outset of the design. An Arboricultural Report has been prepared by Joe McConville and is included with the application.</p>
11.	Topographical levels (post-construction) be identified in the arborist input for consideration.	We refer to the report of Joe McConville Arborist for details on the topographical levels proposed for the development.
12.	The amount of useable open space has been questioned and it has been requested that consideration be given to all age groups for play.	The increase in level of open space has been discussed in detailed in the Landscape Design Statement and in the Architectural Design Statement enclosed with this application.
13.	A detailed landscape specification for planting is requested.	A detailed landscaping specification has been included in the Landscape Design Statement provided by Ronan McDiarmada and is included as part of this application.
14.	Additional engineering proposals are being sought for co-ordination of landscaping plans.	Waterman Moylan have provided additional proposals to Ronan McDiarmada in preparation of the Landscape Architectural drawings for the Planning Application.



		These drawings and plans accompany this planning application.
15.	Reference should be made to the pollinator plan.	A pollinator plan is included in the Arboricultural Report prepared by JM McConville and Associates.
16.	Regard should be given to sections 4.11 and 4.12 of the Apartment Guidelines in the final proposal.	Careful consideration has been taken by all consultants to ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal space throughout the year. The Daylight and Sunlight analysis provided by Digital Dimensions details the levels of sunlight in each communal space.
Planning		
17.	How will the proposal be managed? The residential amenity building doesn't provide for integration of the public open space area. It is not accessible to the wider public. Consider placing the residential amenity building at the ground floor under Block A or B.	The development shall be a private development maintained by the owner's management company.
18.	Daylight access to proposed units and clarification on the VSC of these units is required.	Daylight and Sunlight to the proposed development and clarification on the VSC of all units is detailed in the Daylight and Sunlight Analysis prepared by Digital Dimensions.
19.	Integration of adjoining sites should be considered.	The design team confirmed that consideration was given to an indicative masterplan that would identify how adjoining sites could potentially be developed. DLR confirmed that there should be an equal amount of space given for setbacks and boundaries.
20.	Additional viewpoints from the M50 up towards the site should be prepared.	Modelworks have prepared additional photomontages and CGI images from the M50 to the proposed site. These can be viewed in the Photomontages and CGI Report accompanied with this report.
21.	The setback of buildings from shared boundaries should be given further consideration. Overlooking of adjoining amenity space is the key issue.	Blocks B and C have been set back by an extra 6 sqm from the previous proposal. Details of this can be seen in the Architectural Design Statement prepared by McGrane and Partners Associates.
22.	Further detail on the impact of Carricáil to this proposed development is required.	We refer to the enclosed Design Statement, by McGrane and Partners Architects, which details the impact of Carricáil to this proposed development
23.	Potential for 6 storeys could potentially be considered for this site, but the 7-storey elements would prove difficult to support.	Justification for the proposed height of 7 storeys is provided both in the Planning Report and the Design Statement provided by McGrane and Partners Architects.
24.	The road layout should be designed to full TIC standards.	The submitted drawings 'Typical Road Construction Details' show the proposed works with specifications in accordance with the Council's Taking in Charge Standards.

25.	The boundary on to Glenamuck Road should be given further consideration in terms of presentation and boundary treatment within the site.	The boundary treatment on Glenamuck Road has been enhanced and details of the proposal submitted in the Landscape Design Rationale prepared by Ronan MacDiarmada & Associates Ltd.
26.	Photomontage and CGI locations should be issued to DLR for comment.	We refer to Digital Dimensions' Photomontages and the CGI report enclosed which details the proposed development in its proposed surroundings.
27.	The 'blockiness' of the apartment buildings was identified as a concern.	The 'blockiness' of the apartment buildings as proposed is considered appropriate to the location of the proposed site. A detailed analysis of the design of the apartments are included in the Design statement prepared by McGrane and Partners Architects.
28.	DLR noted that they were less than enthused by the scheme as shown and further consideration should be given to the quality of the design. A cleaner parapet line should be considered with residential services located at the ground floor of one of the blocks.	We refer to the Design Statement by McGrane and Partners Architects which details the quality of the proposed design and the materials used. Same sets out that the proposed buildings have been carefully designed to ensure no greater impact on the existing buildings within the surrounding area.
29.	A residential unit number of between 42-120 would be more appropriate for this site.	A residential unit of 118 is proposed for this development site.

Table 1 - Pre-Planning Meeting Issues and Response

All matters raised by the Planning Authority have, where possible, been addressed throughout the documentation now submitted. It is important to note that where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale and justification in support of the scheme in terms of its strong footing in national policy and ministerial guidelines.

7 SHD PLANNING APPLICATION CONSULTATION REQUEST

On 7th October 2021, a Strategic Housing Development pre-application request was submitted to the Board. Reference ABP-310772-21 refers.

The pre-application development proposal consisted of 118 no. residential apartments and a new residential amenity facility. A comprehensive pre-application request was submitted to the Board setting out the basis on which the pre-application request could be favourably considered.

7.1 Planning Authority Opinion

As part of this pre-application process, Dun Laoghaire Rathdown County Council issued an opinion of the proposal, dated 4th August 2021.

7.2 Pre-Application Consultation Meeting

A tri-partite pre-application consultation meeting was convened to discuss the proposal on 19th April 2021. Representatives from the Board, Dun Laoghaire Rathdown County Council and the applicant attended this meeting.

7.3 An Bord Pleanála Opinion

Following consideration of the pre-application request, the opinion of the planning authority and the matters raised at the tri-partite pre-application consultation meeting, the Board issued its Opinion on 12th October 2021. Having considered the issues raised during the pre-application consultation process, the Board's opinion was that the documents submitted with the request required **further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.**

The Board outlined issues that needed to be addressed in order to constitute a reasonable basis for an application for permission. Specific information was also requested to be submitted with the application. A separate report has been prepared addressing the issues raised and outlining the specific information submitted. As appears from that Response to Opinion of the Board, all issues raised in its Opinion as requiring further consideration and amendment have now been addressed. All prescribed bodies have been notified of the lodgement of this application as appropriate.

8 DESCRIPTION OF PROPOSED DEVELOPMENT

8.1 Overview of Proposed Development

The proposed development shall provide for the construction of (a) 118 no. residential apartment units in the form of 3 no. residential blocks of apartments ranging in height from 4 storey's and transitioning to 6-7 storeys overall.

The overall development proposal shall provide for the following:

- Block A (7 storeys) comprising 44 no. units (13 no. 1 bed units, 28 no. 2 bed units and 3 no. 3 bed units);
- Block B (6-7 storeys overall) comprising 38 no. units (11 no. 1 bed units, 26 no. 2 bed units and 1 no. 3 bed units); and
- Block C (6 storeys overall) comprising 36 units (10 no. 1 bed units; 22 no. 2 bed units and 4 no. 3 bed units);

Each new residential unit has an associated area of private open space in the form of balcony / terrace area and set back upper floor levels.

Open space (approx. 2,071 sqm) is provided by one major centrally located public open space (1158.4 sqm) between blocks A and B which include a play area of 63.2 sqm, two further communal open space areas are provided adjoining Blocks B (471.8 sqm) & Block C (440.8 sqm).

Communal Area located at the ground floor of Block B (approx. 161.3 sqm) comprising of a shared working space (35.6 sqm), meeting rooms (42.2 sqm.), a gym (36.6 sqm) and changing/tea stations (46.7 sqm) is also proposed.

2 no. basement level areas (approx. 2,340.9 sqm) are also proposed at lower ground / ground floor level of Blocks A, B (1,470.0 sqm) and C (834.9 sqm) and include car parking, bicycle parking, refuse storage areas, plant areas and ESB Substation which is located between Block B and C.

A total of 103 no. car parking spaces (67 no. at basement level and 36 no. at surface level to include 17 no. electric power points and 5 no. accessible parking spaces) are proposed. In addition, 5 no. motorcycle parking spaces (3 no. at basement level A and B, and 2 no. at basement level C). A total of 280 no. bicycle parking spaces (254 no. at basement level and 26 no. at surface level) are also proposed.

Proposals for vehicular and pedestrian access comprise via Glenamuck Road North and all associated upgrade works; The access point to the south (via Carricáil) is for pedestrians and cyclists only.

Associated site and infrastructural works including the provision for water services, foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works to include new tree and hedge planting; green roofs; boundary treatments; internal roads and footpaths; and electrical services.

8.2 Design Rationale

The proposed development consists of 3 no. blocks ranging from 6 to 7 storeys in height, incorporating an attractive large open space area between Blocks A and B which includes a children's play area for the enjoyment of the residents.

The majority of parking for the proposed development is located at basement level, with additional spaces provided at surface level. In addition, there is a total of 280 no. bicycle parking spaces proposed for the development.



Figure 6 - Proposed Site Layout

In terms of the layout proposed, the current proposal for 118 residential units has sought to maintain the general arrangement and layout of buildings permitted under D16A/0260 & ABP Ref. PL06D.247822. Specifically, we note that the southern elevation of Tullybeg faces the proposed area of open space, which was a welcomed design principle under the above permission.

The key changes to the site layout relate primarily to the increase in the central area of open space and the introduction of a new Block C in place of previously permitted house units.

The documentation submitted herewith illustrates how the site layout has evolved following consideration of key site features, constraints, and opportunities, including land use zonings, planning policy objectives, site topography, surrounding land uses and access. The final layout also taken account of the specific information requested by An Bord Pleanála. Providing enhanced legibility of the proposed pedestrian / cycle routes, promoting connectivity and permeability through the site, with an easily identifiable and welcoming entrance provided from Glenamuck Road.

8.3 Development Mix

The proposed development includes 118 residential units in total, all of which are apartments. The total development mix proposed is identified as:

- 34 x 1-bed units (29%).
- 76 x 2-bed units (64%).
- 8 x 3-bed units (7%).

The majority of the residential units proposed will exceed the minimum standards for unit areas set out within the 2020 Apartment Guidelines by 10% or more. The generous size of these apartments, in addition to their high quality materiality, considered internal layout, and access to good quality private and communal open space will ensure an excellent level of residential amenity within the scheme for a range of occupants.

8.4 Dual Aspect

A proposal for dual aspect of 67.8% is delivered. Specifically, we note that a total of 80 of the 118 no. units proposed deliver dual aspect as follows:

- Block A - 33
- Block B - 28
- Block C - 19

This is an exceptional provision for dual aspect and is well in excess of the 50% requirement as set out in the Apartment Guidelines 2020.

8.5 Residential Density

The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha. This residential density is supported by national policy which aims to deliver increased heights and densities at appropriate locations. The site can accommodate this density given its proximity to high capacity and frequent public transport – e.g., Luas Stations and bus services.

8.6 Residential Amenity Building

The current proposal delivers a new offering to the site in the form of a residential amenity building, Block B, 161.3 sq. m. Provision is made for a shared workspace (35.6 sq. m), meeting rooms (42.4 sq. m), a gym (36.6 sq. m) and changing/tea stations (46.7 sq. m).

8.7 Building Heights Proposed

Heights proposed across the site are identified as follows:



Figure 7 - Proposals for Building Height

- Block A – 4/7 storeys.
- Block B – 4/7 storeys.
- Block C – 4/6 storeys.

Proposals for height are considered to align with the national policy mandate to increase height and densities at appropriate locations. Specifically, the Building Height Guidelines 2018 (considered in detail hereinafter) set out that there is a presumption in favour of buildings of increased height in locations with good public transport accessibility. Blanket numerical limitations on height should be avoided and a set of Development Management Criteria should be applied to test the appropriateness of the heights proposed.

As evidenced in the within application documentation, the current design has considered this context and has sought to deliver height ranging overall from 4 storeys and transitioning to 6-7 storeys high, which is considered appropriate given the location of the site to excellent, high capacity and frequent public transport links, including the Green Luas Line (150m or 1 minute walk). Furthermore, the design now presented has been prepared in the context of the surrounding development, maintaining significant separation distances.

The layout provides for taller buildings towards the south of the site, in close proximity to the M50 corridor, with scale of the buildings transitioning on the 6th and 7th floors - responding sensitively to the prevailing context and ensuring a good level of separation from adjacent properties to the subject site.

8.8 Parking

Given the highly accessible location of the subject site, it is intended to provide for car parking at a rate below the maximum standards set out within the Dun Laoghaire Rathdown County Development Plan 2016-2022.

The proposal includes a total of 103 car parking spaces, 68 are proposed at basement level and 35 spaces at surface level. This equates to a ratio of 0.87 spaces per residential unit. 5 no. car parking spaces will be accessible car parking spaces, and 17 no. spaces for electric vehicles, and 5 no. motorcycle spaces are proposed.

The level of parking proposed is considered appropriate having regard to the site's accessible location in close proximity to excellent, high capacity and frequent public transport, including a Luas stop and other public transport services (bus stops).

280 bicycle parking spaces are provided, 68 spaces are proposed at basement level and 35 spaces at surface level. The level of provision exceeds the minimum standards set out within the DLR cycle manual document and meets the requirements of the 2018 Apartment Guidelines.

A total of 68 spaces are proposed at basement level and 35 spaces are proposed at surface level. The car parking provision delivers close to a 1 : 0.87 ratio, which is considered an exceptional provision for this site, given its close proximity to the aforesaid public transport services.

8.9 Public and Communal Open Space

A detailed and comprehensive landscape design for the proposed development has been prepared by RMCA Architects and a full scale masterplan and detailed open space landscape drawing accompanies this application. Public open space provision is identified as 2,071 sq. m. This is broken down as follows:



Figure 8 - Proposed Areas of Open Space

The central area of open space within this development at 1,158.4 sq. m, when considered alone, meets, and exceeds the minimum 10% Development Plan requirements as set out below

DLR Requirements

- DLR Requirement – 10% of site area (as a minimum).
- Site Area 0.74 ha.
- Proposed Open Space 2,071 sq. m.

In addition, we note that the overall public open space proposal of 2,071 sq. m meets with the requirements of the Apartment Guidelines 2020 as follows:

Apartment Guidelines Requirements

5 sq. m for 1 beds – $34 \times 5 \text{ sq. m} = 170 \text{ sq. m}$

7 sq. m for 2 beds – $76 \times 7 = 532 \text{ sq. m}$

9 sq. m for 3 beds – $8 \times 9 \text{ sq. m} = 72 \text{ sq. m}$

Total Communal Open Space required = 774 sq. m

Furthermore, we note that the open space provision is considered to be of exceptional quality, given the central location of the main area of open space within the development:

We note the following comment from the daylight and sunlight analysis prepared by Digital Dimensions:

“The site has a variety of public and communal amenity spaces designated into the scheme. The BRE recommends that 50% of the area receive more than 2 hours of sunlight on the 21st of March, all three areas meet these criteria.” (Page 21 of the attached Daylight and Sunlight Analysis)”

It is important to set out that the central area of primary open space 1158.4 sq. m receives appropriate sunlight, which is the key area of open space. The two additional generous communal open spaces areas located east

of block B of 471.8 sq.m and east of Block C of 440.8 sq.m both deliver on the quantum and quality of open space required.

8.10 Part V Provision

The proposal provides for 24 Part V residential units within the scheme. We refer the competent authority to the detailed Part V booklet, enclosed herewith and prepared by McGrane and Partners Architects, which also includes correspondence from Part V section, Dun Laoghaire Rathdown County Council and clearly sets out the following in relation to the overall Part V proposal:

- Location of the Units.
- Floor Plans.
- Elevations.
- Schedule of Accommodation.
- Detailed Costings.

As per the attached Part V booklet, we can confirm – as per the correspondence from Dun Laoghaire Rathdown on Part V Section, dated 01 March 2022 – that 24 no. units on site comprising 10 no. 1-bed and 14 no. 2-bed units are proposed and agreed.

Note: Please note that the content of this proposal is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. Please also note that the information set out herewith is purely for the purposes of facilitating the making of a valid planning application and will ultimately be subject to possible amendment and formal agreement with the Local Authority. The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015 and should be read as being indicative as a result.

- We note, under the Amendment to the Act and its accompanying Regulations, that the ultimate agreement with regard to Part V is dependent (a) upon receipt of a final grant of permission and (b) upon a site value at the time the Permission is granted – neither of which can be available at this time.
- The above is obviously subject to change depending upon the nature of any final grant of permission, including Conditions and the assessment by the Housing Authority of the ultimate proposal. Final costs will be based on site value at the time the Permission is granted.
- Finally, we wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. The final details of any agreement with the Local Authority regarding compliance with Part V, including agreements on costs, will not be arrived at until planning permission has been secured as provided for under the Planning & Development Act 2000, as amended.

8.11 Environmental Impact Assessment Report - Screening

We confirm for the competent authority that an Environmental Impact Assessment Screening Statement has been prepared by Enviroguide Environmental Consultants and is submitted with this application.

8.12 Appropriate Assessment Screening Report

We confirm for the competent authority that an Appropriate Assessment Screening Report has been prepared by Enviroguide Environmental Consultants and is submitted with this application.



9 RELATIONSHIP TO SURROUNDING DEVELOPMENT

This section of the report provides a summary of the relationship between the proposed development and the existing surrounding development.

Chapter 8 of the Development Plan, entitled “Principles of Development”, provides, at Section 8.2.3.3 (pg.174), relevant principles for apartment developments. In respect of the separation between blocks, it provides that:

“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.

*The minimum clearance distance of circa 22 metres between opposing windows will normally apply 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.**” [Emphasis Added]*

It is clear from the foregoing that the Development Plan envisages a minimum clearance distance of 22 metres in the case of apartments of up to 3 storeys in height and a greater distance for taller blocks, such as the proposed development herein. Furthermore, such distances may be reduced depending on (i) orientation; and (ii) location in built-up areas.

9.1 Separation Distances between Blocks

Having regard to the foregoing, the separation distance between the three Blocks comprising the proposed development are set out below.

Block A

Block A is located on the western boundary of the site fronting Glenamuck Road. The nearest point of Block A to the Northern boundary is 5.4m. The distance between Block A and Block B is ranging from 38 m to the north, to 41.9m to the south of the Blocks. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Block B

The distance of Block B from the northern boundary has been increased from 2.4m to 5.5m at the closest point. Block B has also been moved an additional 4m from the eastern boundary to 5.6m while at the closest point the total number of floors at the S.E corner is 7 this reduces to 6 at the northeast corner to the 3m slope of land from north to south.

The separation distance between Block A and Block B is ranging from 38 m to the north, to 41.9m to the south. These separation distances are considered acceptable having regard to the layout, size and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

In addition, the separation distance between the corner of Block B and C is (noting the location, design and orientation, as evidenced in the application documentation, of Block B the distance of 17.5m to Block C is considered acceptable). These separation distances are considered acceptable having regard to the layout, size and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.





Block C

The eastern side of Block C has been moved an additional 4m from the boundary with the houses in Brennanstown Vale on the eastern side from 3.3m to 7.3m at a minimum.



Figure 9 - Separation Distances from Level 1-4



Figure 10 - Separation Distances from Level 5



Figure 11 - Separation Distances from Level 6



Figure 12 - Separation Distances from Level 7



9.2 Separation Distance between adjoining developments

Tullybeg

We note that separation distances of 20.6m and 27.5m from Blocks A and B to the property at Tullybeg are delivered, which is a significant improvement on the 18m and 19m separation distances under the above permission. The separation distances increase as the blocks increase in height from the fourth floor. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Chigwell

In addition, we note that separation distances of 35.1m-46.3m are delivered from Blocks B and C to the property at Chigwell. This is an increase in separation distances of 28m permitted under the previous permission and supports the reduction in distance to boundary from Block B to this shared boundary. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Stafford Lodge

Distances of 19.3 m and 46.3m are delivered between blocks B and C to the residence at Stafford Lodge. We note again that the northern elevation of this building faces onto an area of open space between Block A and Block B. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Carricáil

The proposed Carricáil apartments, to the south, are within the same ownership of the proposed development, has not been constructed yet. The separation distance between Block C and the proposed Carricáil development is 17.1m. This is below the required 22m separation distance; however, the architects have taken great detail to increase the stepping levels overlooking Carricáil in order to reduce the impact on the proposed development.

The dominant point of height impact is at the parapet of the 5th floor on the northern side with the 6th floor set back, and at the parapet of the 4th floor at the southern side with significant setback at 5th, 6th and 7th floors to relate to the approved development of Carricáil, which is a joint venture to which the applicant is a party to. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Brennanstown Vale

On the eastern side Block C has been moved an additional 4m from the boundary with the houses in Brennanstown Vale and on the eastern boundary the section of the block nearest to the boundary is 4 storeys at the dominant point of visual impact. At 5th & 6th floor levels the distance from the houses in Brennanstown Vale varies from 40.6m to 48.0m at the point where the building is 4 storeys with a further set back at the 5th floor level. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.



These separation distances are outlined below.



Figure 13 - Separation Distances

9.3 Daylight and Sunlight

In terms of any perceived impact on Daylight and Sunlight to adjoining properties, we note that a detailed daylight and sunlight report is enclosed herewith from Digital Dimensions. This report is exceptionally positive, and we note that the following key conclusions from the document include:

Daylight to Adjoining Properties

"There will be a minor reduction to some of the windows to the adjacent existing houses, but all retain a VSC in excess of 27% or are not reduced below 80% of their former value and there will be no perceived reduction in available daylight. The proposed development meets the requirements of the BRE Guidelines, and any impact will be negligible." (Page 13)

Daylight to Permitted Development at Carricáil

"The proposed apartment is within the same ownership of the proposed development, has not been constructed yet and will not experience any reduction in daylight. All the rooms assessed considerably exceed the minimum recommendations for the Average Daylight Factor and will be well daylit. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting." (Page 15)



Sunlight in Adjoining Residential Living Areas

“All windows assessed exceed the target values set out for sunlight. The proposed development meets the recommendations of the BRE guidelines.” (Page 16)

Sunlight to Adjoining Gardens

“All the amenity space to the neighbouring properties will retain 2 hours sunlight in excess of 50% of the amenity space. The proposed development will not reduce the existing availability of sunlight below 80% of the current levels” (Page 18)

Daylight to Proposed Development

“100% of the rooms assessed exceed the minimum recommendations for the Average Daylight Factor and will be well daylight. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting’.” (Page 19)

Sunlight to Proposed Areas of Open Space

“The site has a variety of public and communal amenity spaces into the scheme. The BRE recommends that 50% of the area receive more than 2 hours of sunlight on the 21st of March and all three areas meet these criteria.” (Page 21)

Overall, it can be concluded that the scheme design is supported in terms of access to daylight and sunlight, with no significant impacts within the development or to adjoining dwellings.



10 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT

10.1 Introduction

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy are set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Project Ireland 2040: National Planning Framework (2018)
- Housing For All – A New Housing Plan for Ireland (2021)
- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031
- Sustainable Residential Development in Urban Areas (2009)
 - Urban Design Manual - Best Practice Guidelines
- Delivering Homes, Sustaining Communities (2008)
 - Best Practice Guidelines - Quality Housing for Sustainable Communities
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2020)
- Urban Development and Building Height Guidelines (2018)
- Design Manual for Urban Roads and Streets (DMURS) (2013)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, dated August 2018, issued pursuant to s.28 of the 2000 Act
- Climate Change and Low Carbon Development Act 2015 (included for completeness)

10.2 Project Ireland 2040 – National Planning Framework



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country up until the year 2040. It caters for:

- The extra one million people that will be living in Ireland by 2040.
- The additional two thirds of a million people working in Ireland by 2040.
- The half a million extra homes needed in Ireland by 2040.





The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centers of scale.
- Better outcomes for communities and the environment through more effective and coordinated planning, investment and delivery.

As a strategic development framework, this Plan sets out the long-term context for the country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Project 2040 is followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high-level objectives of the Plan are:

- To continue on a path of economic, environmental and social progress that will improve our prosperity, sustainability and wellbeing.
- To ensure that Ireland's many unique assets can be built upon with an emphasis on improving economic output and stability, as well as quality of life, environmental performances and the livability of Dublin, our cities, towns and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and coordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of areas in Ireland and how that can be achieved through planning, investment and implementation.

In relation to residential development the plan states:

- "A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out in the countryside, at the expense of town centres and smaller villages the target is for at least 40% of all new housing to be delivered within the existing build up areas of cities, towns and villages in infill and/or brownfield sites."
- *The NPF seeks to achieve* "better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied higher housing and job densities, better serviced by existing facilities and public transport"
- It is also apparent from the NPF that low-density housing development and underused sites have, heretofore, been a feature of Ireland's housing landscape in cities, towns, and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in urban areas.
- The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 2.85 million people – at least half a million more than today. It is identified that progressing the sustainable development of appropriate sites for housing, and particularly those close to public transport corridors, is key to enabling growth.



The following policies are considered key in the context of the site:

National Policy Objective 2a:

“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”

The current proposal provides for 118 no. residential units within the boundary of Dublin City and suburbs, close to highly accessible public transport nodes. The site is in a mature suburban residential area at a site on Glenamuck Road North, Carrickmines, Dublin 18. The site is situated 150m to the north Green Luas Line which is a fundamental asset to the site's location. In addition, the site is also well serviced by the M50 motorway, with the nearest junction located 400m to the southwest, and by cycle lanes/bus services on the North Glenamuck Road. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site. The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha and is therefore supportive of the objective to accommodate population growth in the Dublin region.

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 current proposal for 118 no. units in a development of 4-7 storeys is a well-designed and high-quality scheme and one that has carefully considered existing levels of residential amenities at adjoining residential developments. The proposed development consists of a variety of sizes of apartments to cater for a wide range of households and individuals. All apartments are generous in size and in excess of current residential design guidelines. The design and layout provide ease of access by lifts or stairs to clearly define public open spaces which will be privately maintained and provide an enclosed secure space for children and elders. The sense of security in the development is reinforced and enhanced by the surveillance and overlooking provided by Blocks A and B, and by accessibility afforded from the community facilities building which address and access the space.

National Policy Objective 5:

“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of nation and regional growth, investment and prosperity”.

The proposed development will deliver a significant number of residential units which will assist in the realisation of a critical mass of population at an accessible location, thereby according with this objective.

National Policy Objective 6:

“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area”.

The proposed development will accommodate the increasing residential population in the area, within a scheme of considerable architectural merit. Therefore, the proposed development accords with this policy.

National Policy Objective 7:

“Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on Dublin....and the need to encourage population growth in strong employment and service centres”.

The proposed development will accord with this objective, via the delivery of additional residential accommodation to accommodate the growing population of the Dublin Area, at a location which is accessible and proximate to significant employment opportunities.



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 subject site is located within an existing central and accessible urban location and is opportunistically located in proximity to a number of quality, high capacity and frequent, public transport services/nodes, local shopping facilities, quality venues and surrounding employment opportunities. It is ideally suited to ensure a better quality of life via access to services and facilities, while ensuring a more efficient use of land and allowing a greater integration of existing amenities and infrastructure. The site is therefore opportunistically located adjacent to key employment areas. The overall site is 0.74 ha which allows for a quality design and layout, and the site is appropriately zoned for residential use under the statutory Development Plan governing the site. The proposal will offer a range of wider planning gains including a high-quality public realm proposal in the form of new public open spaces and new pedestrian connections.

National Policy Objective 13:

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

The proposed development has been designed as an exemplar architectural model by award-winning architects, McGrane and Partners Architects. The proposed development will contribute positively towards the achievement of this targeted growth, whilst promoting compact growth and urban consolidation objectives through the intensification of a centrally-located and accessible site that is well served by existing public transport. Accordingly, the application site is considered highly suitable for high-density residential development purposes.

National Policy Objective 27:

“To ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity for all ages”

The proposed development is located at an accessible location with access to high frequency, high capacity public transport in the form of the nearby Luas Green Line. The scheme also provides access to existing cycle facilities in the area and new pedestrian and cycle linkages within the scheme and crossing Glenamuck road. The site is also accessible by bus. The proposed development, by virtue of its accessible location and the ratio of car and bicycle parking provided will encourage the use of sustainable transport modes, minimising the use of private cars to the greatest degree possible. .

National Policy Objective 32:

“To target the delivery of 550,000 additional houses by 2040”

The current proposal will deliver 118 units which will go a significant way towards addressing the delivery of 550,000 houses by 2040.

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.”

As detailed above, the subject site is zoned for residential development and is opportunistically located in proximity to public transport, all of which support a sustainable approach to development.

Careful consideration has been given to the proposal in relation to how it addresses the existing surrounding development and local topography. The high-quality design submitted provides for an



appropriate transition between the neighbouring sites through the delivery of 4-storey heights with a transition to 6 and 7 storeys at set back levels.

The Daylight and Sunlight assessment prepared by Digital Dimensions confirms that there are acceptable levels of access to natural daylight and sunlight. Similarly, the detailed Wind and Microclimate Study also confirms that the proposal does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.

National Policy Objective 35:

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

The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha. The subject proposal aims to rebalance residential density in the area and provides a variety of 1-bed, 2-bed, and 3-bed unit typologies to cater for the current lack of supply of this type in the area. Proposals for heights of 4-7 storeys are well considered and cognisant of established levels of residential amenity in the area. It is on this basis that the proposed residential density is considered to align with National Policy Objective 35.

In summary, the NPF shows broad policy support for residential development as proposed in an existing settlement area on appropriately zoned land, within the metropolitan area of the GDA, and in close proximity to good public transport. The proposals will achieve compact growth and densification of urban areas and ensure efficient use of zoned land under which residential development is permissible and constitutes effective land and transport planning.

The existing site is underutilised and presents a key opportunity site as identified in the NPF for redevelopment as a residential scheme. The proposed building height from 4 storey and transitioning to a 6-7 storey. The proposed density and height of the development is considered appropriate for the location of the site and the availability of high capacity and frequent public transport facilities.

Thus, having regard to the above, it is respectfully submitted that the proposal is a suitable form, design and scale of development for this strategically located underutilised site and is considered with the objective of the NPF.

We submit to the Board that the proposal for the proposed 118 units at this appropriate location is consistent with the National Planning Framework for 2040.



10.3 Housing For All – A New Housing Plan for Ireland 2021



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness.
- Protecting tenants.
- Supporting social inclusion.

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants, supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State-led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing Policy Objective 15, no. 15.1, states that the HFA plan will “Introduce the Croí



Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.”

In addition to this, the new fund will focus on “activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.” The fund will “stimulate activation of existing planning permissions for build-to-sell apartment developments of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.”

Moreover, Housing Policy Objective 11, no. 11.2, supports high-density housing: “Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.”

Additionally, Housing Policy Objective 12, no 12.2, is to deliver a new approach to active land management: “Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.”

Furthermore, the HFA plan will drive economic sustainability and reduce construction costs. Objective 23, 23.11, states that the HFA plan will: “Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.”

We submit to the Board that the proposed development is consistent with the targets set out in this document. The proposed development provides for 118 no. new apartment units. This will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, local retail, recreational and associated social infrastructure.

10.4 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:



- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment, and to promote sustainable transport and strategic green infrastructure.

Section 4.4 of the RSES identifies that in order to achieve compact growth of 50%, housing needs to be provided within or contiguous to the built-up area of Dublin City and suburbs. To achieve this the Metropolitan Area Strategic Plan identifies strategic residential and employment corridors along key public transport corridors, both existing and proposed.

RPO 4.3 seeks to “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 of the RSES sets out the key guiding principles for the growth of the Dublin Metropolitan Area. Of relevance to the current proposals, this section of the RSES states:

“Compact sustainable growth and accelerated housing delivery – to promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target growth of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.”

The proposed development is consistent with this key guiding principle as it will achieve increased housing provision within the existing built up area of Dublin on an infill site. The proposed development will accelerate housing supply at an appropriate location which is well served by public service and public transport.

The proposed development is located on the Luas Green Line corridor identified in Table 5.1 of the RSES. The RSES document notes that new residential communities at Ballygogan and environs and Kilternan-Glenamuck, will play a part in the realisation of growth along this major transport corridor, which is targeted for additional population capacity of 28,000 in the short term, 25,000 in the medium term, and a further 18,000 in the long term.



Metrolink / LUAS Greenline Corridor (Metrolink/ LUAS) Population capacity Short 28,000 Medium 25,000 Long 18,000 Total 71,000	Dún Laoghaire - Rathdown - New and emerging mixed-use districts of Cherrywood and Sandyford. New residential communities in Ballyogan and environs and Kiltiernan-Glenamuck	Continued development of high-density business districts at Cherrywood and Sandyford. New mixed use centres in Ballyogan and Kiltiernan	Short to Medium term LUAS green line upgrades. Public transport and roads upgrades. New road and bridge and N11 junction (Cherrywood) and water upgrades
	Swords - sequential development of strategic residential sites within Swords and development of Oldtown-Mooretown lands	Airport related, commercial facilities and employment linked to development of Metrolink	Short to Medium term Public realm, pedestrian and cyclist provision. Road improvements, BusConnects. Additional runway and improved access (Airport). Waste water upgrades. Local and wider area water network upgrades
	Swords - Lissenhall - new mixed-use urban district on the northern side of Swords linked to delivery of Metrolink	Development of high-tech research and development employment within a campus setting at Lissenhall East	Medium to Long term Improved bus connections, Metrolink, roads improvements and expanded internal road network and waste water upgrades

Figure 14 - RSES - Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area as set out below:



Figure 15 - Dublin City and Suburbs/MASP Boundary

The Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large-scale strategic residential and economic development areas that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of



MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12–20-year strategic planning and investment framework for the Dublin Metropolitan area.

The following housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration:

“RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists”.

The proposed development accords with this objective, via the delivery of significant new pedestrian and cycling infrastructure, strong provision of bicycle parking, and proximity to high frequency, high capacity public transport services.

“RPO 5.4: 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 ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.”

The proposed development is consistent with this objective due to its compliance with the guidance documents referenced therein. Consistency with these relevant planning policy documents are set out below.

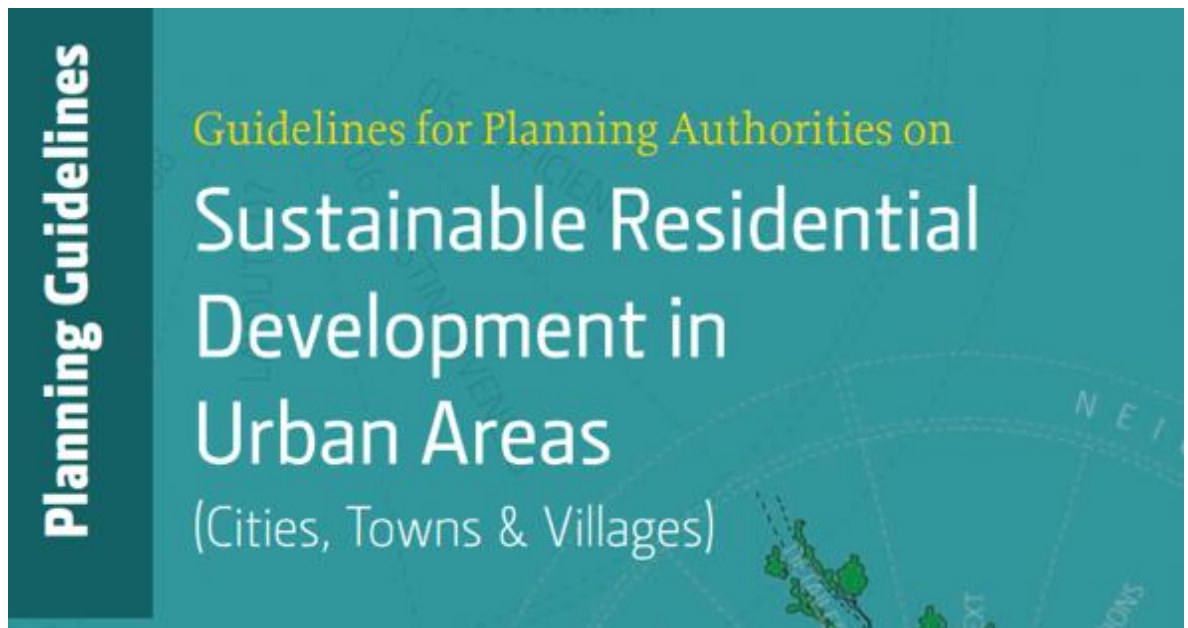
It is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high-quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel, and the development of strategic amenities to provide for sustainable communities.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES. The proposal delivers a consolidated approach to development in that it maximises on height, delivering appropriate site coverage and residential density on a site with exceptional public transport accessibility.

We submit to the Board that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.



10.5 Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009)



The role of these guidelines is to ensure the sustainable delivery of new development throughout the country. The Guidelines provide direction on the core principles of urban design when creating places of high quality and distinct identity. High-quality design is recommended in the development management process. The Guidelines are accompanied by an Urban Design Manual, which demonstrates how key principles can be applied in the design and layout of new residential development.

Chapter 5 of this document focuses on Cities and Larger Towns. It is our view that Carrickmines (within Dun Laoghaire) falls under the category larger towns in the Guidelines, given that the population here is over 5,000 which appropriately defines larger towns.

We examine the contents of the Guidelines below as they relate to Larger Towns.

Design Safeguards

The key elements of design in the context of larger towns are as follows:

- Acceptable Building Heights.
- Avoidance of Overlooking/Overshadowing.
- Provision of adequate public and private open space.
- Internal Space in Apartments.
- Suitable parking provision.
- Provision of ancillary facilities including childcare.

The current proposal has been designed in the context of the above and we note the following in this regard:

- Appropriate building heights are proposed in accordance with the performance criteria under the Building Heights Guidelines 2018. Section 8.6 & 10.11 of this report refers and contains the specifics of heights proposed.
- The potential for overlooking has been reduced through the clever positioning of the residential blocks, appropriate separation distances, appropriate setback distances and the strategic positioning and design of the windows and balconies. We refer the Board to the Architectural Design Statement prepared by McGrane and Partners Architects and detailed drawings submitted



herewith for further details. Specifically, we note the following distances which have been mostly set by a precedent from the previous permission for this site:

- Separation distances of 20.6m and 27.5m are delivered from proposed Blocks A and B to the property at Tullybeg.
- Separation distances of 35.1m and 46.3m are delivered from Blocks B and C to the property at Chigwell.
- Separation distances of 19.3m and 46.3m are delivered from Blocks B and C to the property at Stafford Lodge.
- Separation distances of 71m from Block B and 40.6m – 41.2 m from Block C are delivered from to the property at 4 Brennanstown Vale.
- Separation distances of 42m – 48m from Block C are delivered from to the property at 6 Brennanstown Vale.
- Separation distances of 17.1 from Block C are delivered from to the development at Carricáil.



Figure 16 - Separation Distances

- Overshadowing is not considered an issue in this case, and we note the submission of Daylight and Sunlight Assessments herewith, prepared by Digital Dimensions, for further detail.
- The proposed apartment units will comply with the 2020 Apartment Guidelines. Specifically, the internal layouts will comply with the relevant provisions (i.e., minimum floor areas, etc.). Over half of the units will also meet the +10% floor space requirement. Details on this provision are set out further in this report.
- Adequate car, bicycle and motorcycle parking will be provided to cater to the proposed development. Specifically, we note that the provision of 103 car parking spaces (67 at basement



level and 36 at surface level), 280 no. bicycle parking spaces (254 at basement level and 26 at surface level) and 5 motorcycle spaces are proposed.

- Public and private open space provision will meet and exceed the relevant standards of the Dun Laoghaire-Rathdown County Development Plan and 2020 Apartment Guidelines. This report sets out this provision in detail. McGrane & Partners Architects have broken down provision into primary open space and formal open space for visual purposes and to show that all requirements are being met by way of the 10% open space standard (DLR Development Plan) governing this site and also the communal requirements of the 2009 guideline and the Apartment Guidelines 2020.
- Pedestrian access and permeability is key across the site. The site layout maximises permeability through appropriate block sizes, block heights and connectivity. The exception to this is the Carricail development to the southeast, which is a joint venture to which the applicant is a party to. The current proposal has considered this permission and has ensured appropriate connectivity and pedestrian linkage between the sites.
- A residential amenity facility of 161.3 sq. m will be delivered within the scheme. This will provide a shared workspace, meeting rooms, a gym and changing/tea stations.

Appropriate Locations for Increased Densities

The proposed development aims to deliver an appropriate density and form of residential development on this primarily located site along the Glenamuck Road North. The site is well serviced by the M50 motorway, which is located 400m to the Southwest, and by cycle lanes on North Glenamuck Road.

Section 5.4 of the guidelines sets out appropriate locations for increased densities. They state that:

“where there is good planning, good management, and the necessary social infrastructure, higher density housing has proven capable of supporting sustainable and inclusive communities. In general, increased densities should be encouraged on residentially zoned lands and particularly in the following locations:

- a) City and town locations
- b) Brownfield sites (within city or town centres)
- c) Public transport corridors
- d) Inner suburban / infill”

The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha. The site can be classified as a ‘**city and town centre site**’ and the guideline for density here refers to there being no upper limit, subject to the following safeguards:

- Compliance with the policies and standards of public and private open space adopted by development plans;
- Avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours;
- Good internal space standards of development;
- Conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing;
- Compliance with plot ratio and site coverage standards adopted in development plans.

In response to the above, we note the following:

- As advised above, the proposed public and private open space provision will comply with the Dún Laoghaire-Rathdown County Development Plan 2016-2022 and, where relevant, the Apartment Guidelines 2020. McGrane & Partners Architects have broken down the provision of same into

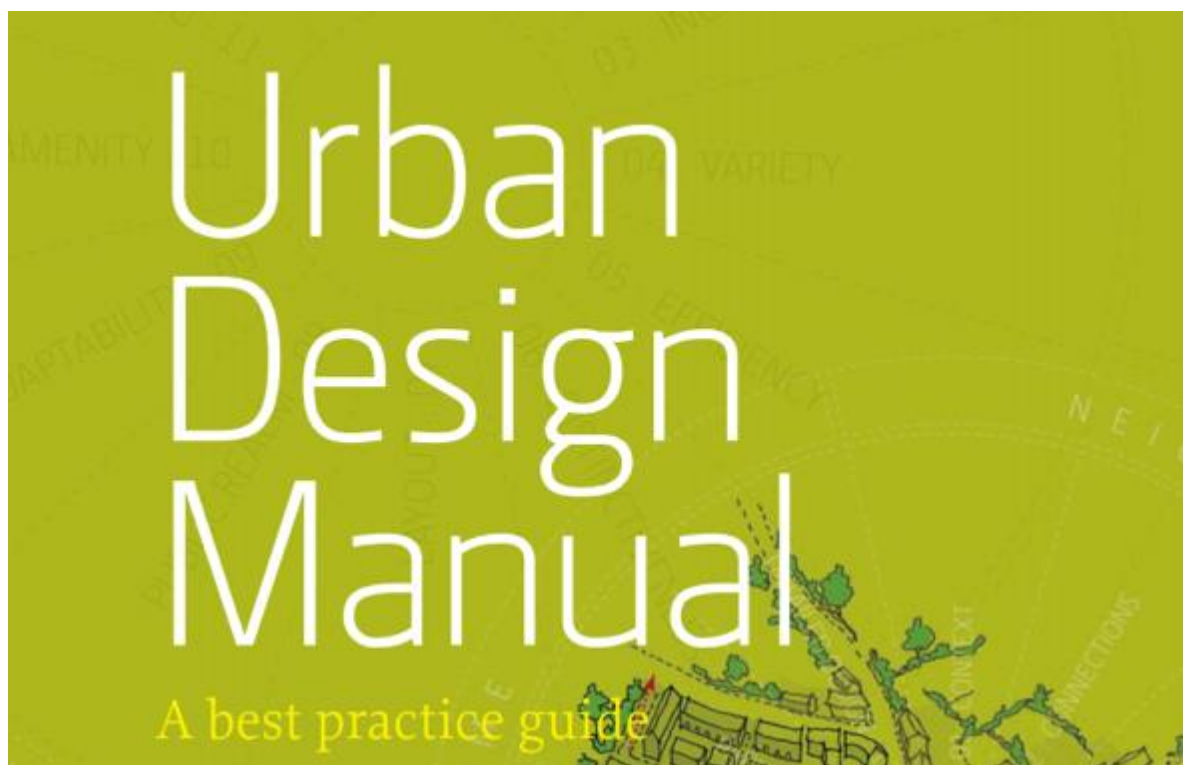


primary open space and formal open space for visual purposes and to show that all requirements are being met by way of the 10% open space standard (DLR Development Plan) governing this site and also the communal requirements of the Apartment Guidelines 2020.

- The proposed scheme design is supported in terms of access to daylight and sunlight, with no significant impacts within the development or to adjoining dwellings.
- The proposed development will comply with the minimum standards required for internal floor areas in the 2020 Apartment Guidelines. Further detail on requirements and provision are set out below and in accompanying documentation from McGrane & Partners Architects.
- This report sets out how the development now proposed will conform with the Building Height Strategy (Appendix 9) of the Dun Laoghaire-Rathdown County Development Plan 2016-2022. Where relevant, consideration is given to the overriding guidance of the Building Height Guidelines 2018.
- Plot Ratio and Site Coverage is identified as 1.50% and 25.17% and this accords with the requirements of the adopted Dun Laoghaire-Rathdown County Council Development Plan 2016-2022. This matter is set out further in this report.

It is considered that the proposed development is located on suitably zoned land for residential purposes. The density requirement set out by the current County Development Plan and national guidance has been taken into consideration when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights, connectivity, and the limited use of cul-de-sacs. Careful consideration has been given to adjoining levels of residential amenity and compliance with all Development Plan standards having been achieved.

10.5.1 Urban Design Manual





Aside from the above, we draw the attention of the Board to the compliance of the scheme with the guideline's 'sister' document for these guidelines, the 'Urban Design Manual'. This planning application is accompanied by an Architectural Design Statement, prepared by McGrane & Partners Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect of urban design.

The Design Statement should be read in conjunction with this Planning Report and Statement of Consistency, along with the plans and particulars accompanying this planning application.

For the purposes of this Planning Report and Statement of Consistency, compliance with the key requirements of the Urban Design Manual is detailed below:

CRITERIA	PROPOSAL RESPONSE
<p>CONTEXT</p> <p>How does the development respond to its surroundings?</p>	<p>An understanding of the existing site and its constraints has steered the design of this proposal. The proposal also protects the existing residential amenity of adjoining and adjacent residential development through locating height and massing away from these boundaries. The proposed development specifically responds to the size of the site to allow for a gradual height increase from the site boundaries towards the center of the site.</p> <p>The proposed development has been designed to respond positively to the existing residential developments to the south, north and east. Open space areas are designed to maximise on passive surveillance and take advantage of the proximity of the surrounding green network. An integrated development is delivered – one which enhances the presence of the natural landscape with high-quality materials sympathetic to the surrounding area.</p>
<p>CONNECTIONS</p> <p>How well is the new neighbourhood/site connected?</p>	<p>The site is located on Glenamuck Road North within close proximity to the village of Foxrock to the North. The subject site is located within a distance of approximately 150m of the Green Luas Line, with the Carrickmines stop located to the south of the site.</p> <p>The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site</p> <p>The site is well serviced by the M50 motorway, which is located 400m to the Southwest, and by cycle lanes on North Glenamuck Road. The established character of the surrounding area is mature and comprises large detached two-storey family houses set on generous plots. Residential densities are characterised as low within the immediate context. These dwellings and large plots reflect an area as it once was – i.e., suburban with weak transport and retail links.</p> <p>These planning weaknesses have been eliminated by factors such as the Luas stop (approx. 150m from the site) and the M50 including its Junction (approx. 400m from the site), as well as the new retail center at The Park (approx. 1.0km from the site) and Dundrum Town Centre (9 Luas stops from the site). These services now enable the redevelopment of this area into a more sustainable community. There are also cycle and pedestrian routes connecting the site to the wider area. The introduction and improvement of pedestrian and cyclist access to and through the site with the proposal will further enhance this network.</p>



<p>INCLUSIVITY</p> <p>How easily can people use and access the development?</p>	<p>The proposed development consists of a variety of sizes of apartments to cater for a wide range of households and individuals. All apartments are generous in size and in excess of current residential design guidelines. The design and layout provide ease of access by lifts or stairs to clearly defined public open spaces, which will be privately maintained and provide an enclosed secure space for children and elders.</p> <p>The creation of a central open space means that the adjoining existing houses to the north (Tullybeg) and to the south (Stafford Lodge) of the site are not overshadowed or otherwise impacted by buildings directly opposite them. The introduction of a Communal Area (Block B), c. 161.3 sq. m, comprises shared workspaces, meeting rooms, a gym and changing/tea stations.</p>
<p>VARIETY</p> <p>How does the development promote a good mix of activities?</p>	<p>Activities enacted by residents of the development will contribute to the existing social and commercial life of the area. New residents will contribute through the activity of the area by supporting existing sports and commercial establishments and by increased support for public transport, thus increasing its viability. Variety in the development is provided through a range of design proposals in both the built environment and the landscaping layout.</p> <p>In the built environment: The choice of 1-bed, 2-bed and 3-bed apartments provide an opportunity for an infusion of new residences from varying economic levels into the area and will add to the choice of residential types available. It will further enhance the current preponderance of large houses on large sites, resulting in greater efficiency in land use and infrastructural facilities.</p> <p>The landscaped elements: The central open space will be landscaped to the highest quality to provide a semi-enclosed location of natural beauty and tranquility, while the central open space is accessible to all residencies. Two further formal open space areas are provided adjoining Blocks B and C. Pedestrian paths are also provided around Block A to integrate the lesser spaces surrounding this block with the central open space.</p>
<p>EFFICIENCY</p> <p>How does the development make appropriate use of resources including land?</p>	<p>The development seeks, by way of higher density development, to increase the greater efficiency of land use. The intensification of residential occupants in this location prevents the further outward spread of development, concentrates the population in an area already served by quality transport nodes, and contributes to the efficient use of existing services and facilities.</p> <p>The increase in the local population in an area of current low density residential units will significantly increase the population of the immediate area. This increase in population will significantly contribute to the viability of the surrounding small businesses, shops, restaurants and sporting facilities, hence contributing to their efficiency.</p> <p>Buildings and apartments are designed to exceed the minimum standards of insulation required by the current building regulations. The proposed method of heating is individual heat pumps to minimize the carbon footprint of the development. The size and quality of the apartments provide space and amenities commensurate with a quality living environment.</p> <p>The residential proposal in this case is delivered in line with the Dun Laoghaire-Rathdown Development Plan 2016-2022. The main open space provides a large, landscaped area accessible to all. Most of the car parking is at basement level,</p>



	with an element of on-street parking to encourage activity and passive surveillance.
DISTINCTIVENESS How do the proposals create a sense of place?	<p>The layout of the proposal will make the most of this site. The scheme promotes the principles of DMURS – Design Manual for Urban Roads and Streets – and we refer the Board to the DMURS statement enclosed from Waterman Moylan Engineers. This balance of road planning, public space and site layout will provide an inviting and enticing setting for a new community. The proposal will provide a positive addition to the locality, while retaining existing natural features to maintain the identity of the site and utilising existing landform and ecological features.</p> <p>The layout makes the most of the existing landscape, topography, and flora to create a sensitive and memorable scheme. It will have a distinct appearance along Glenamuck Road North and the proposed open space areas will merge into the existing landscape of the site, exploiting views into and out of the scheme. The materials used reflect the existing developments in the neighbouring environment and are of a high quality.</p>
LAYOUT How does the proposal create people-friendly streets and spaces?	<p>There are no ‘through roads’ within the new development proposal and the objective is to reduce car speeds to a minimum when accessing surface level car parking and the basement. The street hierarchy favors pedestrians and cyclists over drivers. Traffic speeds are controlled by design and layout. The nature of the proposed internal road network is the principal element that enhances the setting for this development as it allows for the promotion of the public realm over that of vehicular access. The current design delivers a central open space area and permeable landscape layout which will be accessible to all users.</p> <p>Furthermore, the layout of the buildings is the result of a detailed design process that has given significant consideration to existing levels of residential amenity to the north, south and west, and appropriate set back distances along all boundaries. The configuration of buildings has been designed to deliver a comfortable microclimate environment. Evidently, the design has been focused on the concept of placemaking and residential amenity.</p>
PUBLIC REALM How safe, secure and enjoyable are the public areas?	<p>Public open space has been carefully positioned and designed to a high level of quality design and implementation to enhance the public realm. The density and number of apartments proposed demands that space forming the make-up of the public realm be designed and constructed to a very high quality. We submit that this has been achieved by the landscaping design submitted by our landscape architect, RMDA Landscape Architect.</p> <p>Insofar as possible, cars and bicycles have been accommodated out of sight in internal storage rooms or in enclosed parking areas. Where this has not been possible, the impact of these elements on the public realm have been minimised by careful planting and screening.</p> <p>Space which forms the public realm has been located so that it is overlooked by apartments, thus ensuring the security of the public realm and the users of same.</p>
ADAPTABILITY How will the buildings cope with change?	<p>The apartments are designed as 1-bed, 2-bed and 3-bed units. They are generous in size and profiled in space to be suitable for families living in 2-bed and 3-bed units. The variety of design and choice provides the opportunity to either scale up or down if circumstances demand.</p> <p>The quality of the units is considered appropriate to enable adaption over time, depending on residential needs. There are units with their own doors and social</p>



	units proposed within the scheme – same is considered a welcome approach to urban living.
<p>PRIVACY AND AMENITY</p> <p>How do the buildings provide a high quality amenity?</p>	<p>Each apartment has access to private open space in the form of a balcony. Additionally, over half of the apartments will have dual aspect. Appropriate setbacks and window/balcony design will be provided between the proposed buildings so as to avoid overlooking and provide privacy. While ground floor apartments have patios opening directly onto open space, all apartments have access to the public open space and to the community Centre (Block B) which is its further amenity.</p> <p>Apartment blocks are located at sufficient distances from each other to ensure the privacy of each apartment. Positioning of windows in apartments are so located to avoid any infringement of privacy.</p>
<p>DETAILED DESIGN</p> <p>How well thought through is the building and landscape design?</p>	<p>For further details on design, we refer the Board to the Architectural and Master planning Design Statement prepared by McGrane & Partners Architects, the Landscape Masterplan by Ronan McDiarmada, and the Planning Report and Statement of Consistency prepared by Brock McClure.</p>

Table 2 - Compliance with Urban Design Manual

The above table clearly outlines how the development proposal is envisaged to deliver on the key provisions of the Urban Design Manual.

We submit to the Board that the proposal is consistent with the objectives of the Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual.

10.6 Delivering Homes Sustaining Communities (2007)





The Department's policy on housing provides the overarching policy framework for an integrated approach to housing and planning, and notes that demographic factors will continue to underpin strong demand for housing. In turn, this presents challenges for the physical planning of new housing and associated services. The quality of the housing environment is central to creating a sustainable community.

The *Delivering Homes Sustaining Communities* policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities' and these are the focal point in terms of the consistency of the current proposal.

10.7 Quality Homes for Sustainable Communities (2007)



The purpose of these Guidelines is to promote high standards in design and construction and in the provision of residential development and services in new housing schemes. It is our considered view that the proposal for the site has delivered on the key principles of this document by delivering the following:

- Diversity in the unit type and mix proposed (1-bed, 2-bed and 3-bed apartments).
- Pedestrian Access is prioritised within the scheme.
- The design and layout provide ease of access by lift or stairs to clearly defined public spaces which will be privately maintained and provide an enclosed secure open space for children and elders.
- There are appropriate play areas delivered across the scheme with the theme of natural play spaces evident throughout the network of open spaces. Play areas ensure security and benefit from passive surveillance.

An Architectural Design Statement and Housing Quality Assessment has been prepared by McGrane & Partners Architects and submitted with this planning application. We direct the Board to consider this assessment for full details on the extent of proposals.

We submit to the Board that the current proposal is supportive of the objectives of the *Delivering Homes Sustaining Communities* (2007) and the associated Best Practice Guide 'Quality Housing for Sustainable Communities'.

We submit to the Board that the proposal is consistent with the *Delivering Home Sustaining Communities* (2007) and the guidelines *Quality Housing for Sustainable Communities* (2007).



10.8 Guidelines for Planning Authorities on Childcare Facilities (2001)



The Childcare Guidelines provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, as well as developers and childcare providers, in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines identify a number of appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments.
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working.
- In the vicinity of schools.
- Neighborhood, District and Town Centers.
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways.

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces, based on a requirement of 75 of such dwellings requiring childcare spaces. The guidelines state that 50% of units can be assumed to require childcare.

Based on the mix proposed, we note the following requirements for childcare:

- 50% of 2-bed and 3-bed units will require childcare provision. We have identified that there are 84 x 2-bed and 3-bed units (76 x 2-bed units and 8 x 3-bed units) proposed and so 50% equates to 44 units having the potential to require childcare.
- 1 facility is required for every 75 units requiring childcare.
- Given that there are only 42 units considered to require childcare, an argument can be made for no creche facility in this case.

The Community infrastructure Statement (submitted with the within application) has noted the following:

Proposal	Estimated Demand	Available Capacity
118 residential units	42 units	62 spaces minimum

Table 3 - Estimated Demand vs. Available Capacity for Childcare Spaces

The proposed development comprises 118 no. units, with 34 of those units comprising of 1-bed only. Accordingly, 84 no. units are to be provided to accommodate families and must be considered in the context of generated requirements for an additional childcare facility. Using the average household size of 2.7 persons per unit, in accordance with standardised Census of Population Data, 84 no. units will yield a population of 226 persons.





According to Census 2016, there were 13,810 children aged 0 to 4 years residing in the DLR area. This represents 6.3% of the total population in DLR. This proportion was lower than the State average of 7%, the Eastern and Midlands average of 7.1% and the Dublin regional average of 6.8%^a

Through further analysis of the 2016 Census Report Data, it has been determined that the average family contains 1.38 children (persons aged 18 and under). This number of children per family has remained unchanged at 1.38 children since the 2011 Census.

The proposed development would therefore, theoretically in accordance with current rates of population, yield 116^b no. children, of which 7 no. children^c would be between the 0-4 age group that is within the creche requirement age. It is relevant to note that the “Quarterly National Household Survey, Childcare, Quarter 3, 2016” reports that only 25% of pre-school children attend a childcare facility. Therefore, if this ratio was applied to the development, theoretically, only 2 no. childcare spaces would be required. This is below the requirement of the provisions within the Apartment Guidelines 2018 on the basis of this assessment (Community Infrastructure Assessment submitted with the within application), it is considered that there is likely to be sufficient childcare capacity and availability within the vicinity of the proposed development to accommodate the childcare going age generated by the proposed development. Therefore, having regard to the proximity and availability of existing childcare facilities to the proposed development, there is no need or requirement for the provision of additional childcare spaces as part of the proposed development.

We ask the Board to consider the current proposal and the nature of the units proposed, as well as the available capacity of existing childcare facilities, and that same does not warrant a requirement for childcare spaces.

All considered, the above analysis, the demographic analysis for the area and the nature of the proposal support the position that a childcare facility is not required for this development.

^a -available at: https://www.cypsc.ie/_fileupload/Dun%20LaoghaireRathdown%20CYPSC/UPDATED_Final_DLRCYPSC_111218.pdf (p.24)

^b - 84 units multiplied by the average family size of 1.38

^c - 116 multiplied by the average percentage of 6.3% in the 0-4 age group



10.9 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that, where relevant, flood risk is a key consideration in the assessment of planning applications.

For full details on the assessment carried out in line with the above guidelines, we direct the Board to the enclosed Flood Risk Assessment prepared by Waterman Moylan. The key conclusion of this document is as follows:

“There are no recorded instances of flood events or recurring flood events in the vicinity of the site.”

We submit to the Board that the proposal is consistent with the Planning System and Flood Risk management Guidelines 2009.



10.10 Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)

Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities

Under Article 6 (3) of the EU Habitat Directive, “[any plan or project not directly connected with or necessary to the management of the site [Natura 2000 Site, i.e., SAC or SPA] but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. (i.e., SAC or SPA). This requirement is also detailed under Irish law in, *inter alia*, the Planning and Development Act 2000 (as amended) and associated Regulations.

An Appropriate Assessment Screening Report was prepared by Enviroguide and is submitted as part of this application. The report establishes that none of the habitats and species listed as ‘qualifying features’ in the Natura 2000 site designations in proximity to the subject lands will be affected by the proposed development and it has been assessed that the possibility may be excluded that the proposed development will have any significant effect on the single European site noted to be linked by a Source-Pathway-Receptor impact pathway. The proposed development, either alone or in combination with other plans or projects, would not be likely to have a significant effect on any European Site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required

We submit to the Board that the proposal is consistent with the Appropriate Assessment of Plans and Projects in Ireland guidance for Planning Authorities.



10.11 Design Standards for New Apartments (2020)



‘Sustainable Urban Housing: Design Standards for New Apartments 2020’ are intended to 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 2020 Apartment Guidelines replace the 2018 version and are updated to reflect the conclusions from the review of co-living and shared accommodation.

The current proposal provides for 118 no. residential units. This Planning Report and Statement of Consistency sets out the compliance of the proposed development with the key policy requirements and standards as follows:

10.11.1 Location

The ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, identify a number of locations suitable for apartment development primarily ‘Intermediate Urban Location’ and ‘Central and/or Accessible Urban Locations.’

Central and/or Accessible Urban Locations are defined as follows:

“Such locations are generally suitable for small-to-large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- Sites within walking distance (i.e., Up to 15 minutes or 1,000 – 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions:
- **Sites within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m) to/from high-capacity urban transport stops (such as DART or LUAS):**
- Sites within easy walking distance (i.e., up to 5 minutes of 400-500) to/from high frequency (i.e., min 10 minute peak hour frequency) urban bus services.” **(Emphasis added)**

The subject site falls into the category of “Accessible Urban Locations” given that the site is well served by public transport and located within 500metres of the Carrickmines Green Luas Stop. In addition to the proximate Luas Stop, the site is also located in close proximity to bus routes operating along Glenamuck Road. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities.





10.11.2 Specific Planning Policy Requirements (SPPRs)

SPPRs considered relevant for consideration in this case are set out below, followed by a compliance response for the current proposal.

Specific Planning Policy Requirement 1

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

Applicant Response to SPPR1

The proposed residential mix is as follows:

- 34 no. 1-bed units (approx. 29%).
- 76 no. 2-bed units (approx. 64%).
- 8 no. 3-bed units (approx. 7%).

This unit mix is consistent with the guidelines set down in SPPR 1, as the percentage of 1 bed units do not exceed 50%. There is no requirement for 3 bed units under SPPR1, however 7% has been provided to provide a good range of unit types within this substantial development.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- 1-bedroom apartment (2 persons) 45 sq. m
- 2-bedroom apartment (4 persons) 73 sq. m
- 3-bedroom apartment (5 persons) 90 sq. m

Applicant Response to SPPR3

The subject proposal complies with the minimum apartment floor areas as follows:

- 1-bed units 50.6 to 64.3 sq. m.
- 2-bed units 70.8 to 95.6 sq. m.
- 3-bed units 103.5 to 122.8 sq. m.

The subject proposal complies with the minimum apartment floor areas as set out in the enclosed Housing Quality Assessment from McGrane & Partners Architects.

Section 3.8 of the Apartment Guidelines state “The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%”. As demonstrated in the HQA, the majority of units within the proposed development will exceed the minimum apartment size by at least 10% thereby complying with this requirement.



Specific Planning Policy Requirement 4

“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (5) A minimum of 33% of dual aspect units will be 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 where appropriate.

(ii) 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.

(iii) 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.”

Applicant Response to SPPR4

A proposal for dual aspect of 67.8% is delivered. Specifically, we note that a total of 80 of the 118 no. units proposed deliver dual aspect as follows:

- Block A – 33 units.
- Block B – 28 units.
- Block C – 19 units.

This is an exceptional provision for dual aspect and is well in excess of the 50% requirement as set out in the Apartment Guidelines 2020.

Specific Planning Policy Requirements 5

“Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly 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.”

Applicant Response to SPPR5

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 2.7 metres in compliance with the above policy requirements.

Specific Planning Policy Requirements 6

“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.”

Applicant Response to SPPR6

SPPR 6 is the predominant policy on the number of apartments per core. However, we can confirm that the number of apartment units per core varies and aligns with policy requirements at 6-12 per core. We refer the competent authority to the floor plans enclosed herewith.

**10.11.3 Other Relevant Standards from the Apartment Guidelines 2018****Internal Storage**

The Board will note that full compliance with the Guidelines is achieved in respect of storage to individual units.

No. Of Bedrooms.	Minimum Storage Requirements	Proposed.
1	3 sqm	4.1 sqm to 7.5 sqm
2	7 sqm	7.0 sqm to 10.7 sqm
3	9 sqm	8.3 sqm to 11.2 sqm

Table 4 - Storage Requirements

Please refer to the Housing Quality Assessment prepared by McGrane & Partners Architects for further details on storage compliance. Detailed apartment drawings are also included within this application which demonstrate the compliance of each apartment type

Private Amenity Space

We submit that the proposal fully complies with the minimum required areas for private amenity space.

No. Of Bedrooms.	Minimum Private Open Space Standards	Proposed.
1	6 sqm	6.4 sqm to 15.7 sqm
2	8 sqm	8.0 sqm to 37.6 sqm
3	10 sqm	10.2 sqm to 64.3 sqm

Table 5 -Private Amenity Space

All balconies will exceed the minimum depth requirement of 1.5 m with a provision of 1.8m for each balcony.

Part V

The applicant has entered into discussions with the Housing Department on Part V proposals and correspondence with the housing department is enclosed with this application. Specifically, we refer to the McGrane & Partners Design Statement enclosed herewith, which includes the following:

- Part V Schedule of Accommodation.
- Site Layout Plan.
- Floor Plans and Elevations.
- Part V Obligation Letter.
- Part V Costings.
- Part V Validation Letter from the Housing Department.

We note the following proposal in summary:





- Total Units Proposed (118).
- Part V Proposal (24 units) – as agreed in principle with Housing.
- Proposals for Part V provide for 10 no. 1 beds units & 14 no. 2 bed units.

Childcare Facilities

The recommendation for new housing developments is the provision of 1 facility providing for a minimum 20 childcare places per approximately 75 dwellings. The relevant guidelines state that it is assumed that 50% of all units require childcare. This means that in a new housing area of 75 dwellings, approximately 35 will need childcare. However, 1-bed units are not considered to contribute to the childcare provision under the new apartment's guidelines. This may also apply in part to the provision of 2-bed units.

The proposed development is comprised of 118 new residential apartments.

The following indicative summary mix is identified for a total of 118 units:

- 34 x 1-bed apartment units.
- 76 x 2-bed apartment units.
- 8 x 3-bed apartment units.

It is noted that the 2-bed and 3bed units should only be considered as contributing to a requirement for childcare in accordance with the provisions of the Apartment Guidelines of 2018. **A total of 84 units therefore has the potential to require childcare facilities based on the relevant guidelines.** We note the following calculations based on these uppermost requirements:

- 50% of all 2-bed and 3-bed units = $84/2 = 42$

We note that 42 no. units would have the demand for a childcare facility. Having regard to the above and the Community Infrastructure Assessment (submitted with the within application), it is considered that the childcare requirements generated by the proposed development scheme can be readily accommodated in the vicinity of the subject site and particularly given that the scheme does not have a demand arising from 75 units or above. Further as detailed in the Community Infrastructure Statement, there are enough facilities to meet this estimated demand within proximity of the development, therefore it is submitted that the proposal does not require a creche facility onsite to meet the demand which is considered acceptable in this case.

The proposed development comprises 118 no. units, with 34 of those units comprising of 1-bed only. Accordingly, 84 no. units are to be provided to accommodate families and must be considered in the context of generated requirements for an additional childcare facility. Using the average household size of 2.7 persons per unit, in accordance with standardised Census of Population Data, 84 no. units will yield a population of 226 persons.

According to Census 2016, there were 13,810 children aged 0 to 4 years residing in the DLR area. This represents 6.3% of the total population in DLR. This proportion was lower than the State average of 7%, the Eastern and Midlands average of 7.1% and the Dublin regional average of 6.8%^d

Through further analysis of the 2016 Census Report Data, it has been determined that the average family contains 1.38 children (persons aged 18 and under). This number of children per family has remained unchanged at 1.38 children since the 2011 Census.

^dAvailable at - https://www.cypsc.ie/_fileupload/Dun%20LaoghaireRathdown%20CYPSC/UPDATED_Final_DLRCYPSC_111218.pdf (p.24)



The proposed development would therefore, theoretically in accordance with current rates of population, yield 116^e no. children, of which 7 no. children^f would be between the 0-4 age group that is within the creche requirement age. It is relevant to note that the “Quarterly National Household Survey, Childcare, Quarter 3, 2016” reports that only 25% of pre-school children attend a childcare facility. Therefore, if this ratio was applied to the development, theoretically, only 2 no. childcare spaces would be required. This is below the requirement of the provisions within the Apartment Guidelines 2018.

On the basis of this assessment (Community Infrastructure Assessment submitted with the within application), it is considered that there is likely to be sufficient childcare capacity and availability within the vicinity of the proposed development to accommodate the childcare going age generated by the proposed development. Therefore, having regard to the proximity and availability of existing childcare facilities to the proposed development, there is no need or requirement for the provision of additional childcare spaces as part of the proposed development.

Refuse Storage

The Apartment Guidelines require that the storage and collection of waste materials be provided in apartment schemes. The Guidelines also state that: “Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems.”

The refuse storage proposed as part of this application is considered to comply with the requirements under the Apartment Guidelines. Refuse storage will be provided for each block and located at basement level with easy access from all apartments via lift. These storage areas will be secure and easily accessible to residents and other required users.

Bicycle Parking and Storage

The Apartment Guidelines require that “planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”

We submit that the proposal will fully comply with the minimum requirements for cycle parking as identified in the below table.

Minimum Requirement	Required	Proposed
1 cycle space per bedroom	210 cycle spaces	280 cycle spaces
1 visitor cycle space per 2 residential units	59 visitor cycle spaces	
Total	269 cycle spaces	

Table 6 -DOE Bicycle Parking Requirements and Proposals

^e - 84 units multiplied by the average family size of 1.38

^f - 116 multiplied by the average percentage of 6.3% in the 0-4 age group



The Dun Laoghaire Rathdown Standards for ‘Cycle Parking and associated Cycling Facilities for New Developments (January 2018)’ require the following provision for residential use:

- Long Stay: 1 space per unit.
- Short Stay: 1 space per 5 units.

As the proposal is for 118 units, a total of 141.6 no. spaces are required under the DLR standards. The provision of bicycle parking spaces is set out in the below table.

Type	DLRCC Requirements	Apartment guidelines	Provided Parking	Parking Ratio
Long Stay	1 Long Stay parking space per 1 unit	Min, of 1 parking space per bedroom	280	1:2.4
Short Stay (Visitor)	1 Short Stay (visitor) parking spaces per 5 units	1 space per 2 residential units		

Table 7 - Bicycle Parking DLR Standards

The proposal will therefore be consistent with the DLRCC standards for bicycle parking.

The level of bike storage provided is as follows:

Area	Bike spaces proposed
Basement Block A & B -	202 spaces
Basement Block C -	52 spaces
Surface	26 spaces
Total Spaces -	280 spaces



Figure 17 - Standard Parking Proposal



Car Parking

The Apartment Guidelines generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

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

Our review of these 3 categories identified that the site can be categorised as a Central and/or Accessible Urban Location. This categorisation is made on the basis that the site is “*within easy walking distance (i.e., up to 5 minutes or 400-500m) to / from high frequency (i.e., min 10 minute peak hour frequency) urban bus services*”. (page 5)

With regard to car parking, the Apartment Guidelines set out the following requirements for Central and/or Accessible Urban Locations:

“Central and/or Accessible Urban Locations:

*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, **the default policy is for car parking provision to be minimised, substantially reduced, or wholly eliminated in certain circumstances.** The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.*

*These locations are most likely to be in cities, especially in or adjacent to (i.e., within 15 minutes walking distance of) city centres or centrally located employment locations. **This includes 10 minutes walking distance of DART; commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.***

The site is directly served by an existing bus route just outside the proposed development site. It is approximately a 150m walk (c. 1-minute walk) from the proposed site entrance to the bus stop travelling both directions. Both bus stops are currently on Glenamuck Road North. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site

A total of 103 no. car parking spaces are proposed to cater to the residential element of the proposed development. A total of 68 spaces are proposed at basement level and 35 spaces are proposed at surface level. Given the accessible nature of the site and proximity to key public transport, a car parking ratio of .87 (103 spaces for 118 units) is considered appropriate for the site. The proposal provides a reduced overall car parking standard when compared to Development Plan Standards, which in the context of the 2018 Apartment Guidelines is considered to be justified by the proximity of the proposed residential development to high quality Transport.

With regard to the City and/or Accessible Urban Location of the proposed site, the default policy for car parking provisions be minimized. With a car parking ratio of 1:0.87, this is considered an exceptional provision. We also note that the Development Plan makes provision for a reduced level of parking in cases where the site is located in proximity to public transport.

Quantitative Requirements of the Apartment Guidelines

In review of the quantitative requirements of the Apartment Guidelines, we refer the Board to the detailed housing quality assessment included in the Design Statement from McGrane & Partners, enclosed herewith. Details within set out the compliance of each individual residential unit with the guideline minimum standards regarding the above matters.



10.12 Urban Development and Building Height Guidelines (2018)



The 'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)' are intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December 2018. The competent authorities are obliged to consider the content of these guidelines in consideration of the matter of building height.

Section 1.14 of the document sets out the following:

*"Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements."*

10.12.1 Policy Context

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

Chapter 3 of the Height Guidelines, entitled 'Building Height and the Development Management process', provides (pg.13) that "it is Government policy that building heights must be generally increased in appropriate urban locations." The planning criteria set out in the Height Guidelines are an application of the requirements of the National Planning Framework and are contained in Chapter 3 of the Guidelines. Section 3.2 of the Height Guidelines sets out the multiple Development Management Criteria at various scales: at the scale of the relevant city/town; at the scale of district/neighbourhood/street; at the scale of the site/building; and Specific Assessments.

Section 3.1 of the Height Guidelines provides:

"In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility"





Under section 3.1 of the Guidelines, three following broad principles or criteria must be applied in considering development proposals for buildings taller than prevailing building heights, as per the information set out above, is located in an urban/inner suburban area:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centers and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

As set out in accompanying documentation, the proposal secures the relevant objectives of the National Planning Framework. The location of the proposed development is on a suburban infill green site and is considered a unique opportunity for the delivery of strategic housing and the delivery of compact growth in accordance with national strategic planning policy.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?

This document sets out how the current proposal complies with the provisions of the Dún Laoghaire Rathdown County Development Plan 2016-2022. Whilst the Development Plan is currently the subject of a review process, the plan has not yet been formally adopted or amended with a view to implementing the requirements of Chapter 2 of the Building Height Guidelines.

A Statement of Consistency Addendum also accompanies this application, detailing how the proposed development complies with the Draft Dun Laoghaire Rathdown Development Plan 2022-2028.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

With regard to existing policies and objectives of the Dún Laoghaire Rathdown County Development Plan 2016-2022, there is a clear misalignment with the National Planning Framework in relation to height. Specifically, we note that the National Planning Framework provides for an increased residential density in settlements through a range of measures, including increased building heights. National Policy Objective 35 refers. Development Plan policy and objectives on height, by comparison, being restrictive in that there are particular locations earmarked for building height and blanket limits are set for all other areas unless a set of exceptional circumstances in the form of upward and downward modifiers are met.

Notwithstanding the above, SPPRs (as stated in the Building Heights Guidelines) take precedence over policies and objectives of development plans and local areas plans. Where such conflicts arise, Section 9(3)(b) of the 2016 Act, as amended, provides that to the extent that they differ from the provisions of the Development Plan or Local Area Plans, the provisions of SPPRs must be applied instead. Section 9(3) provides:

“(3)(a) When making its decision in relation to an application under this section, the Board shall apply, where relevant, specific planning policy requirements of guidelines issued by the Minister under section 28 of the Act of 2000.

(b) Where specific planning policy requirements of guidelines referred to in paragraph (a) differ from the provisions of the development plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the development plan.

(c) In this subsection “specific planning policy requirements” means such policy requirements identified in guidelines issued by the Minister to support the consistent application of Government or national policy and principles by planning authorities, including the Board, in securing overall proper planning and sustainable development.”



Section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.*

10.12.2 Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered to be of particular relevance to the current site context, and the compliance of the scheme with these SPPRs is set out below.

- SPPR 3A of the Urban Development and Building Heights Guidelines 2018 requires applicants for planning permission to set out how the proposal complies with the “criteria above”. This refers to the Development Management criteria at Section 3.2 of the Guidelines, which are discussed below.
- If the Board is satisfied that the criteria under section 3.2 have been met, it “may approve such a development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”. The paragraph introducing SPPR 3 itself is set out below for ease of reference, following which each of the criteria (denoted by italics) are considered in turn:

Where the relevant planning authority or the Board considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).

SPPR 3 (A)

“It is a specific planning policy requirement that where;

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

Applicant Response to SPPR 3A

The performance of the proposal vis-à-vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’. The consistency of the proposal with the National Planning Framework has been considered above.

10.12.3 Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/the Board, that the proposed development satisfies a number of criteria. The relevant criteria, followed by an applicant response, is set out below to clearly set out for the Board that the current proposal qualifies as a site that can accommodate additional building height:





At the scale of the relevant city/town:

- **“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.**

As stated previously, the site is well served by high capacity and frequent public transport, with the site located 150m from the Carrickmines Green Line Luas stop which provides a direct connection north to Dublin City Centre and beyond, and south to Brides Glen (last stop). The site is also well serviced by the M50 motorway, with the nearest junction located 400m to the southwest, and by cycle lanes/bus services on North Glenamuck Road.

The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site

- **Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.**

The scale of the proposed development is considered to integrate appropriately with its surroundings, whilst introducing an element of increased height, along the perimeter with adjoining roads to define a strong urban edge to the M50 and the other adjoining streets at this important location.

The proposal is not located within an architecturally sensitive area, nor is there a requirement to protect views across this site. Public open space has been carefully positioned and designed to a high level of quality design and implementation to enhance the public realm. Space which forms the public realm has been located so that they are overlooked by apartments, thus ensuring the security of the public realm and the users of same.

The proposal will provide for a strong sense of place and a public realm which will be more comfortable and inviting for pedestrians due to improved enclosure, and permeability around and through the scheme. also note that the benefits offered by the proposal to the public realm have been identified, such as new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road.

- **On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”**

Careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development and local topography. The high quality design submitted provides an appropriate transition between the neighbouring sites, through the delivery of 4 storey height with a transition to 6 and 7 storeys at set back higher levels. The Daylight & Sunlight Assessments prepared by Digital Dimensions, confirms that there are acceptable levels of access to natural daylight and sunlight. Similarly, the detailed Wind and Microclimate Study also confirms that the proposal does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby building.





It is considered that the proposed development would make a positive contribution in terms of place-making – again through the provision of new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road. The main open space, by virtue of its sense of enclosure and orientation, creates a strong sense of place, security and privacy for all residents of the development. This provides an open vista to the south across the proposed open space with the result of enhancing its prospect and enjoyment of the proposed landscaped open space.

The proposed scheme presents in a series of new residential blocks which are focused on placemaking and a central area of open space. There is sufficient variety in scale and form of the Blocks through the use of a variety of building layouts, sizes and heights. Care has been given at height sensitive areas (along boundaries with Tullybeg, Chigwell, Stafford Lodge) to ensure there is no undue impact on established levels of residential amenity adjoining the site. The development creates visual interest at the site through a high quality design which responds to the surrounding pattern of development.

In this respect, the proposals are considered to be of an appropriate scale, height and massing to complement the existing urban form whilst successfully introducing a high quality element of architecture to the site, making optimal use of the strategic, prominent location.

At the scale of district/ neighbourhood/ street:

- **The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighborhood and streetscape.**

The proposed development along the M50, Glenamuck Road North, will positively contribute to its surrounding neighbourhoods and streetscape by virtue of its context sensitive and carefully considered design. It will provide for high quality contemporary design at an appropriate location and make a significant positive contribution to the existing urban neighbourhoods and streetscape at this location.

It is considered that the proposal introduces a high-quality development at an underutilised site within a setting which is swiftly developing, and which is destined for significant planned further growth. The proposed development responds appropriately to the surrounding urban pattern and scale, with higher built elements situated along the M50 and Glenamuck Road North.

The proposal constitutes the sustainable development of these underutilised lands and will enhance the appearance of the site, providing integration with the existing context and enhancing the urban public realm at this location. This will add positively to the quality and aesthetic appearance of the area, allowing for vibrancy within the public realm, and building heights that avoid any sense of monotony or monolithic design.

- **The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.**

Careful consideration has been given to ensure that a monolithic appearance is avoided. The design of the buildings and the materials used serve to express the architectural intent of the scheme. This is apparent from the design rationale submitted by McGrane & Partners Architects, which clearly sets out that a number of options were considered in design. The choice of materials would be of high quality, with stone cladding and brick combined with plaster finish – as indicated on drawings.





Balcony features will be plastered and will include glass screens. Windows will be aluminium or Aluclad to provide a sustainable and high-quality finish and appearance. Entrance doors and screens will be of aluminium construction. Glazing will be double or triple-glazed to meet insulation standards. The cladding to the top floor of all blocks will be zinc finished metal cladding. The layout and sitting of the development has been sensitively chosen to create an attractive new streetscape along surrounding routes, giving the area a more urban feel, and imbuing it with a greater sense of place. The buildings have been complemented by a high quality hard and soft landscaping scheme which further enhances the visual appeal of the proposal, as well as attracting public use and animation along the street frontages and within the internal open spaces.



Figure 18 -CGI of Open Space Area



Figure 19 - CGI of Open Space Area

- **The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favorably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).**

The proposed development will significantly enhance the existing M50, which is a key thoroughfare in the area and for the city at large. It will provide for a high-quality contemporary development at an appropriate location and make a significant contribution to the existing streetscape.

The proposal introduces a development which is compatible with its land use zoning and adjacent residential development. The additional height proposed makes optimal use of an underutilised area of land which benefits from a strategic location. The layout of the residential blocks contributes to a sense of place and benefits from passive surveillance from the residential buildings.

As set out above, the proposal offers significant enhancement to the local public realm by way of new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road. There is no inland waterway or marine frontage within the current proposal. We refer to the material from Waterman Moylan, included herewith, which provides for comment on flood risk.

- **The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.** Legibility through the site is delivered by way of a comprehensive landscape plan and specifically a series of permeable connections through the site and quality areas of open space. Open space is provided by one major centrally located open space between Blocks A & B and enclosed to the



south glass rail hence, creating a sense of place and enclosure still allowing the space to benefit from the southerly aspect sunlight.

The central open space will be landscaped to the highest quality to provide a location semi-enclosed of natural beauty and tranquillity while the central open space is accessible to all residents. Two further formal open spaces are provided adjoining Blocks B & C. Pedestrian paths are also provided around Block A to integrate the lesser spaces surrounding this block with the central open space.

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

An appropriate mix of unit types and sizes are incorporated into the development proposal. Notably, A residential mix – 34 x 1-bed units (29%), 76 x 2-bed units (64%) and 8 x 3-bed units (7%) – is proposed to provide an opportunity of an infusion of new residents from varying economic levels into the area and will add to the choice of residential type available. The proposed development will counterbalance the current preponderance of large houses on large sites resulting in greater efficiency in land use and infrastructural facilities

In addition, we note that the proposal offers a significant residential amenity offering by way of a new residential amenity building within the centre of the site.

At the scale of the site/building:

- The form, massing and height of proposed developments has been carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The proposed scale, massing and height of the development has been informed by the emerging built environment in the surrounding area. The development introduces a higher built environment which seeks to optimise the sites' location and position on a key thoroughfare. The scale and height of the proposed residential blocks take cognisance of the surrounding urban form, tapering in at the 6th and 7th floor. This is seen to integrate successfully with the urban environment whilst introducing an element of height which effectively responds to the site's prominent location.

The Daylight & Sunlight Assessments prepared by Digital Dimensions, enclosed herewith, confirms that there are acceptable levels of access to natural daylight and sunlight.

Further detail on daylight / sunlight is detailed as followed:

Daylight to Adjoining Properties

"There will be a minor reduction to some of the windows to the adjacent existing houses, but all retain a VSC in excess of 27% or are not reduced below 80% of their former value and there will be no perceived reduction in available daylight. The proposed development meets the requirements of the BRE Guidelines, and any impact will be negligible." (Page 13)

Daylight to Permitted Development at Carricáil

"The proposed apartment is within the same ownership of the proposed development, has not been constructed yet and will not experience any reduction in daylight. All the rooms assessed considerably exceed the minimum recommendations for the Average Daylight Factor and will be well daylight. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting." (Page 15)





Sunlight in Adjoining Residential Living Areas

“All windows assessed exceed the target values set out for sunlight. The proposed development meets the recommendations of the BRE guidelines.” (Page 16)

Sunlight to Adjoining Gardens

“All the amenity space to the neighbouring properties will retain 2 hours sunlight in excess of 50% of the amenity space. The proposed development will not reduce the existing availability of sunlight below 80% of the current levels.” (Page 18)

Daylight to Proposed Development

“100% of the rooms assessed exceed the minimum recommendations for the Average Daylight Factor and will be well daylight. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting’.” (Page 19)

Sunlight to Proposed Areas of Open Space

“The site has a variety of public and communal amenity spaces into the scheme. The BRE recommends that 50% of the area receive more than 2 hours of sunlight on the 21st of March and all three areas meet these criteria.” (Page 21)

Overall, it can be concluded that the scheme design is supported in terms of access to daylight and sunlight, with no significant impacts within the development or to adjoining dwellings.

- **Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings - Part 2: Code of Practice for Daylighting’.**

The proposed development meets the recommendations of the BS 8206-2 2008 and BRE guidance document (2011) Site layout planning for daylight and sunlight. The proposed apartments were also assessed for daylight provision in accordance with EN17037:2018 and all the units exceed the minimum target levels.

The Daylight and Sunlight Analysis confirms that there are acceptable levels of access to natural sunlight available to surrounding properties and that overshadowing is minimised. The Vertical Sky Component or VSC percentage is protected as much as possible with some impacts to be expected with the requirements in relation to high density infill development types that are required for sites such as this.

- **Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”**

All the units within the proposed development exceed the recommendations of the BRE guidelines for quality of Daylight. The bedroom and living space layouts have been optimised for daylight and sunlight. All the living spaces with a kitchen exceed the target ADF value of 2% and all the bedrooms exceed the target ADF value of 1%. The proposed amenity spaces will be bright and achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March. This meets the recommendations of the BRE guidelines.



Specific Assessments

The guidelines set out that in order to support proposals at some or all of these scales, specific assessments may be required, and these may include:

Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

A preliminary report has been prepared by BFluid and the following conclusions are identified:

- “The wind profile around the existing development environment was built using the annual average meteorology data collected at Dublin Airport Weather Station. In particular, the local wind climate was determined from historical meteorological data recorded 10 m above ground level at Dublin Airport.
- The prevailing wind directions for the site are identified as West, South-East and West-South-West, with magnitude of approximately 6m/s.
- We maintain that mitigation measures such as the use of landscaping on ground floor will be sufficient to ensure that the proposed Strategic Housing Development will be designed to produce a high-quality environment that is attractive and comfortable for pedestrians of all categories.
- Southwest corners of block A, B and C potentially experience high wind speeds. This wind speeds are not critical and can be further mitigated by the use of landscaping trees.
- High speeds are observed in the spaces between block B and C. These high speeds are due to funneling and recirculation effects and can be mitigated with the use of landscaping in these areas.
- Given the position of the development blocks, and the recommended landscape, critical wind speeds are not expected on footpaths of the proposed development blocks.
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings (page 59).”

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.

This SHD application is accompanied by an Ecological Impact Assessment, an EIA Screening Report and an AA Screening Report prepared by Enviroguide, which demonstrate that the development does not have any potential to adversely impact on the biodiversity of the area (including any bird or bats species). The proposed development, for the purposes of the above-mentioned criterion, is not located in proximity to sensitive bird and / or bat areas, and will not have any adverse impact, having regard to the aforesaid relevant planning application documentation, on flight lines and /or collision risk.

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

Given the height and scale of the development proposed, it is not anticipated that the proposal will interfere with important telecommunications channels such as microwave links. The applicant endeavours to engage a specialist to advise on this matter should permission be granted for the proposed development.



An assessment that the proposal maintains safe air navigation.

In preparation of this planning application, the applicant has entered into discussions with the IAA who had no significant comment to make on the proposal. As identified in the appendix to the rear of this report, the IAA in their review dated 18th January 2022 concluded that:

“It is the observation of the Safety Regulation Division Aerodromes that based on the information provided, the proposed development appears to be located approximately 18.9km Southeast of Casement Aerodrome and 19km South East of the Threshold of Runway 34 at Dublin Airport. It is likely that only general observations would be issued during the planning process relating to the construction process and the notification of proposed crane operations with at least 30 days notification to the Authority.”

An urban design statement including, as appropriate, impact on the historic built environment.

A comprehensive Design Statement has been prepared by McGrane & Partners, enclosed herewith. This statement addresses the site context and proposed design in urban design terms and sets out in clear detail the design rationale for the current proposal submitted.

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

We confirm that an Environmental Impact Assessment Screening Statement/Report and an Appropriate Assessment Screening Report have been prepared by Enviroguide and are enclosed in the within application.

On the basis of the initial foregoing analysis, it is in consideration of the above that the current proposal can be positively considered by the competent authority. The site is well placed to absorb a high-density development which is appropriately scaled and designed in the context of its urban surroundings, whilst introducing an element of building height on the M50 corridor, responding to the scale and width of the adjacent roadway and providing for an appropriate sense of enclosure along adjacent routes.

The proposals make optimum use of this underutilised area of land which is zoned for residential development, under which residential development and other associated uses are permitted in principle and open for consideration, the proposals are therefore considered compatible with adjacent existing land use. The scheme integrates appropriate with the urban environment and enhances public open space provision and pedestrian permeability without compromising the amenity of existing adjacent properties.

Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably, the site's location is considered to address the very spirit and intent of the Guidelines in that it is a location in proximity to a public transport corridor with high frequency services. The current site is therefore appropriate for increased building height and residential densities.

We submit to the Board that the proposal is consistent with the Urban Development and Building Height Guideline for planning authorities (2018).



10.13 Design Manual for Urban Roads and Streets (DMURS) (2013)

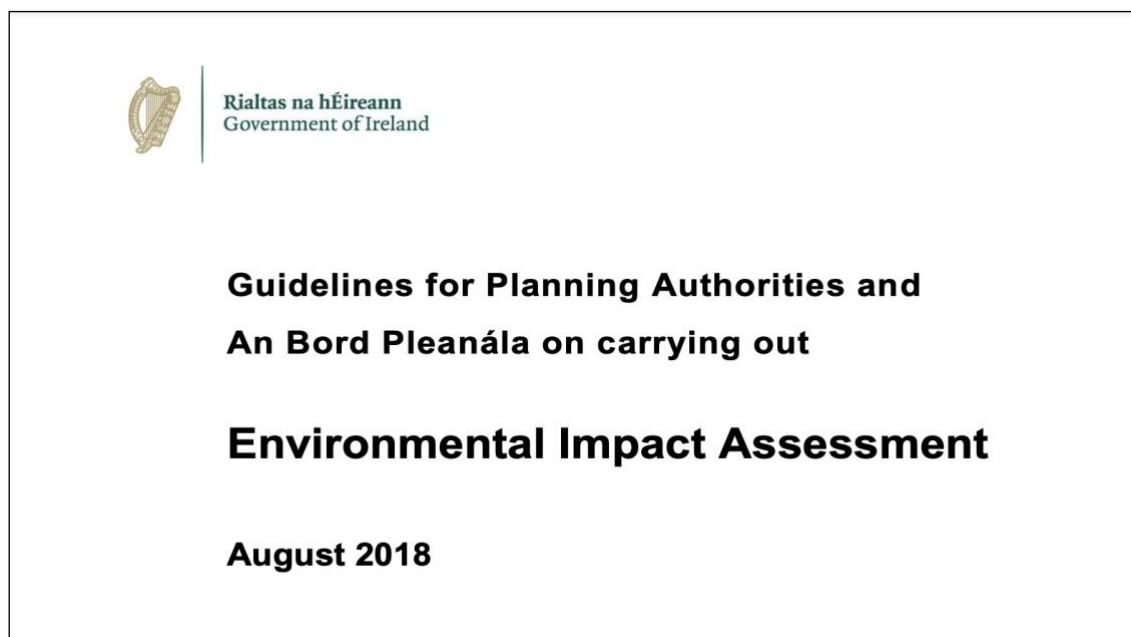


The 'Design Manual for Urban Roads and Streets' (DMURS) 2013, and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. A key element of the DMURS is the need to design roads and streets as destinations rather than traffic corridors. As such, a focus is placed upon the needs of pedestrians, cyclists, public transport users and enhancement of the public realm.

The proposed development creates a transport hierarchy providing primacy to pedestrians and cyclists through the introduction of shared surfaces, pedestrian-only areas, and traffic-calming in accordance with DMURS and current best practice. Vehicular movements are designed to be indirect so as to reduce speed and give primacy to cyclists, pedestrians, and the communal activity.

The subject application is accompanied by a number of additional documentations, including a DMURS Statement of Compliance and Traffic and Transportation Assessment prepared by Waterman Moylan. Same details the scheme's compliance with DMURS – for full details, please refer to same.

10.14 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, dated August 2018, issued pursuant to s.28 of the 2000 Act



Certain public and private projects that are likely to have significant effects on the environment are subject to EIA requirements derived from EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/4/EC, Directive 2009/31/EC, Directive 2011/92/EU and recently Directive 2014/52/EU which amends EIA law in a number of respects by amending Directive 2011/92/EU) which are designed to ensure that projects likely to have significant effects on the environment are subject to a comprehensive assessment of environmental effects prior to development consent being given. Article 2 of Directive 2014/52/EU provides that Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with the Directive by 16 May 2017.

The Department of Housing, Planning, and Local Government has brought forward amendments to the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001-2018 to provide for the transposition of the Directive into the Irish planning code. To this effect, the European Union (Planning and Development)(Environmental Impact Assessment) Regulations 2018 have now transposed the 2014 Directive into Irish law.

The Department has also provided an updated to the 2018 “Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment” to provide practical guidance on legal and procedural issues arising from the requirement to undertake EIA in accordance with Directive 2014/52/EU. These new Guidelines – ‘Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment’ were published in August 2018.

Projects requiring EIA are defined in Article 4 and set out in Annexes I and II of the Directive. All projects listed in Annex I require an EIA. For projects listed in Annex II, national authorities may set thresholds/criteria or determine effects on a case by case basis. Where a project is of a specified type but does not meet, or exceed, the applicable threshold then the likelihood of the project having significant effects on the environment needs to be considered. This is done by reference to the criteria specified in Annex III of the Directive.

National Thresholds



Schedule 5 of the Planning and Development Regulations 2001 (as amended) transposes Annex I and II into Irish law. Part 2 of Schedule 5 includes the following Annex II infrastructure projects and thresholds that are of relevance to the proposed development.

10. Infrastructure projects –

(b) (i) Construction of more than 500 dwelling units.

(b) (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.

(b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

Built-up area means a city or town (where “city” and “town” have the meanings assigned to them by the Local Government Act, 2001) or an adjoining developed area.

The proposed development provides for a total of 118 no. apartment units, therefore, a mandatory EIAR is not required in respect of 10(b)(i).

In terms of land area, the site extends to 0.92 hectares. The site area is zoned. The site area is below the 10 ha. threshold. Therefore, a mandatory EIA is not required in respect of 10(b)(iv).

In addition, as required under Article 299(B)(1)(b)(ii)(II)(C), the results of the Appropriate Assessment Screening Statement carried out under the provisions of the Habitats Directive have been taken into consideration in this report. It is noted that the AA Screening concludes that the proposed development, alone and in combination with other plans and projects, is not likely to have significant effects on a Natura 2000 site (conservation objectives).

The screening report has been prepared to accompany this application to An Bord Pleanála. The report has assessed the potential impact of the proposed development on the environment. The proposed development is below the thresholds for mandatory EIA. It is considered (for reasons more comprehensively detailed therein) that a sub-threshold EIA is not required for the following reasons:-

- Surface water will discharge to the local drainage network in accordance with SUDs.
- No impacts on Natura 2000 sites are envisaged.
- New planting as part of the development will result in long term benefits to biodiversity.

Therefore, no significant effects on the environment are envisaged.

10.15 Climate Change and Low Carbon Development Act 2015

For completeness, and for the benefit of the Board in considering the within application, it is noted that section 15 of the Climate Change and Low Carbon Development Act 2015 relates to the “duties of certain bodies” and requires that such bodies perform their respective functions, in so far as is practicable, in a manner “consistent with” specified matters.

In this regard, s.15(1)(a) to (e) set out a number of matters in respect of which the Board is required to exercise its functions in a manner consistent with (in so far as that is practicable). It is therefore considered appropriate to consider the proposed development by reference to the matters at (a) to (e) of section 15(1) as amended.

It is submitted that the proposed development is consistent with the most recent approved climate action plan as it will provide a medium to high density residential development in close proximity to existing community facilities and amenities. The proximity will reduce the need of future residents to





travel long distances by car because of its close proximity to public transport as a result will help reduce greenhouse car emissions.

In addition, the provision of more housing in this location will support the existing public transport serving the area and will make the provision of further public transport options (such as a further increase of the frequency of services – although it is noted that high capacity and frequent public transport already serves this locus) viable and worthwhile in the future. This will help the overall transition to more sustainable modes of transport and a reduction in our greenhouse gas emissions.

The development has been designed to give pedestrians and cyclists priority over cars which will help to encourage cycling and walking as a mode of transport especially those attending the nearby schools and working within the area. Movement away from the car as the main mode of transport will be key to achieving our climate change aims and it is hoped that the proposed development will encourage this change. The provision of car parking spaces throughout the site is an acknowledgement of the fact that this change will not happen overnight, and people in this location will likely still have their own cars. However, 17 no. car parking spaces will be equipped with electric charging points as part of the proposal.

The Building Lifecycle Report prepared by Aramark in relation to the proposed development has been reviewed and used to inform the operational phase climate assessment. This report outlines a number of measures in relation to building materials and energy usage for the proposed development. A number of measures have been incorporated into the overall design of the development to reduce the impact to climate where possible.

Furthermore, the inclusion of green roofs will also help with decarbonisation and the reduction of greenhouse gas emissions.

The proposed development has been designed and the within application documentation, has been prepared, in so far as is practicable, in a manner which ensures that the Board can comply with the requirements of s.15(1) of the Climate Change and Low Carbon Development Act 2015, as amended (insofar as same might apply to the functions of the Board, including in the determination of the within application)

Having regard, to the Screening Assessments for EIA and AA, the Ecological Impact Assessment, Art.299B Statement, the Flood Risk Assessment, Building Lifecycle Report and other relevant application documentation, and, in light of the matters set out in same, it is submitted that the proposed development gives rise to no inconsistency by reference to the matters set out in s.15(1) of the 2015 Act, which include, *inter alia*, the Climate Action Plan 2021. In the circumstances, it is submitted that the application documentation enables the Board, as decision maker to comply with the aforesaid statutory requirements under s.15(1) of the 2015 Act, as amended. The exercise by the Board of the function of making a decision to grant permission for the proposed development can be made by the Board in a manner consistent with the matters set out in s.15(1) of the 2015 Act as amended.



11 LOCAL PLANNING CONTEXT

11.1 Dun Laoghaire – Rathdown Development Plan 2016-2022



The Dun Laoghaire Rathdown County Development Plan 2016-2022 is the relevant statutory planning context for the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

11.2 The Core Strategy

The core strategy of this plan aims to create a coherent settlement strategy based on National and Regional population targets and associated requirements for housing land, alongside appropriate employment, and retail development. A key strand of the overall settlement strategy focuses on the continued “promotion of sustainable development through positively encouraging consolidation and densification of the existing urban/ suburban built form.”

The subject site fulfils this requirement, given its infill development within a serviced existing urban area.

It is set out in the core strategy that between 2016 and 2022, the regional planning guidelines have allocated approximately 19,850 housing units to be built in the Dun Laoghaire Rathdown area. That is roughly 3,300 a year. However, due to a lack of housing provisions between 2006 and 2013, there is a deficit of housing which now requires 3,800 units per annum.

The subject development ascertains to meet some of this deficit housing demand, while providing housing through densification of serviced land within existing settlements.

11.3 Planning Policy

This section of the report reviews the compliance of the scheme with Development Plan policy as per the table set out below.

Policy Ref.	Policy	Applicant Response
Res 2	<i>“It is Council policy to facilitate the implementation and delivery of the Interim Housing Strategy 2016 - 2022.”</i>	The proposed development is in line with the Housing Strategy as it provides social housing under Part V. The housing provided overall is energy efficient, good quality housing and is accessible for those with specific needs. This has been demonstrated in the objectives addressed below.
Res 3	<i>“It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for</i>	The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha. This residential density is considered





Res 4	<p>sustainable residential development. In promoting more compact, good quality, higher density forms of residential development it is Council policy to have regard to the policies and objectives contained in the following Guidelines:</p> <ul style="list-style-type: none"> • 'Sustainable Residential Development in Urban Areas' (DoEHLG 2009). • 'Urban Design Manual- A Best Practice Guide' (DoEHLG 2009). • 'Quality Housing for Sustainable Communities' (DoEHLG 2007). • 'Irish Design Manual for Urban Roads and Streets' (DTTaS and DoECLG, 2013). • National Climate Change Adaptation Framework: Building Resilience to Climate Change' (DoECLG, 2013)." <p>"It is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities."</p>	<p>appropriate to the site, given the proximity of the site to the public transport corridor.</p> <p>The site is considered to offer a unique opportunity to achieve greater building height and residential density and is considered to deliver on the very spirit and intent of the requirements of the national policy mandate for higher residential densities at key locations.</p> <p>Furthermore, it is our view that this proposed residential density is supported by national policy and guidance and can be favourably considered at this time. This is particularly the case given the quality of the proposal submitted, the location of this prime, underutilised, and serviced site, as well as the current national policy mandate to support more compact urban forms.</p> <p>The proposed residential development is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' as has been demonstrated above. The proposal also complies with the 'Irish Design Manual for Urban roads and streets.' As outlined in the DMURS Compliance statement prepared by Waterman Moylan.</p>
Res 7	<p>"It is Council policy to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the Interim Housing Strategy."</p>	<p>The proposed development provides a variety of housing mixes which support a range of households.</p> <p>We refer the Planning Authority to the proposed residential mix enclosed herewith, which is outlined in the development summary section at the rear of the McGrane & Partners Design Statement.</p> <p>This mix is considered appropriate and in line with ministerial guidance contained within the 2020 Apartment Guidelines. Given the specific requirements of the development plan in relation to mix, the Material Contravention Statement enclosed herewith outlines further details on the mix proposed, vis-à-vis the Development Plan Requirements.</p> <p>We note that the 2020 Apartment Guidelines are the overriding document in terms of guidance on development mix and the current proposal, as set out in the preceding sections of this document, complies in full with these guideline requirements.</p>
Res 8	<p>"It is Council policy to promote the provision of social housing in accordance with the projects outlined in the Council's Interim Housing Strategy and Government policy as outlined in the DoECLG 'Social Housing Strategy 2020'."</p>	<p>The Part V proposal is based on the provision of 20% of the units. We refer An Bord Pleanála to the preliminary McGrane & Partners Part V Allocation Booklet enclosed herewith, which details the location of the Part V units; the floor plans, elevations, and layouts for the units; and the appropriate costings.</p>



Res 9	<p><i>“It is Council policy to support the concept of independent and/or assisted living for older people and people with disabilities/mental health issues. In this regard the Council will support the provision of specific purpose-built accommodation, or adaptation of existing properties, and will promote opportunities for elderly householders to avail of the option of ‘downsizing’ within their community.”</i></p>	<p>We note that the proposal provides for 1-bed, 2-bed and 3-bed apartments on a subject site which is located within 150m of a Green Line Luas stop – a fundamental asset to the site’s location. The site is also well serviced by the M50 motorway, with the nearest junction located 400m to the southwest, and by cycle lanes/bus services on the North Glenamuck Road. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site</p> <p>It is therefore submitted that the proposal is appropriate for an ageing population.</p> <p>The apartments will also be built to comply with the relevant accessible standards. It is therefore submitted that the proposal is appropriate for independent and assisted living for persons within the categories referred to.</p>
Res 14	<p><i>“It is Council policy to plan for communities in accordance with the aims, objectives and principles of ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual – A Best Practice Guide’. In all new development growth areas, and in existing residential communities it is policy to ensure that proper community and neighbourhood facilities are provided in conjunction with, and as an integral component of, major new residential developments and proposed renewal/redevelopment areas, in accordance with the concept of sustainable urban villages outlined under Policy RES15.”</i></p>	<p>Community facilities will be provided in the form of a residential amenity of 161.3 sq. m, which will include shared working spaces, meeting rooms, a gym and changing/tea stations. These facilities are considered to be of a high quality and will be accessible to residents and to the wider community where appropriate.</p> <p>The broad needs of the community, including the proposed development, have been outlined and assessed in the Community Infrastructure report.</p>
UD 1	<p><i>‘It is Council policy to ensure that all development is of high quality design that assists in promoting a ‘sense of place’. The Council will promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013) and will seek to ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding, and detailed design.’</i></p>	<p>The proposed development takes into account the Urban Design Manual and Design Manual for urban roads and streets in order to help develop a sense of place.</p> <p>Specifically, we note that Section 10.5.2 of this report reviews in detail the requirements of the Urban Design Manual, with a clear compliance of the scheme as identified.</p> <p>We also refer the Design Statement submitted by McGrane & Partner Architects for further details on matter of context, connectivity, inclusivity, public realm, adaptability, privacy and amenity, parking, and detailed design items.</p> <p>The development takes the context of its surrounding developments into account in terms of block formation, height, and density. The layout and public realm elements of the development prioritise pedestrian linkages, connectivity, and amenity in order to best utilise the transport and open space amenities in the immediate facility.</p>



UD 2	<i>“It is Council policy that, for all medium-to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as required by the Planning Authority) a ‘Design Statement’ shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009).”</i>	A Design Statement has been prepared and submitted by McGrane & Partners Architects, detailing how the proposal responds to the design criteria of the 2009 Urban Design Manual. Same is set out in this statement and Section 10.5 of this Planning Report and Statement of Consistency.
UD3	<i>“It is Council policy that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.</i>	<p>Public open space has been carefully positioned and designed to a high level of quality design and implementation to enhance the public realm. The main open space by virtue of its sense of enclosure and orientation creates a strong sense of place security and privacy for all residents of the development. The sense of security is reinforced and enhanced by the surveillance and overlooking provided by Blocks A & B.</p> <p>The density and number of apartments proposed demands that space forming the make-up of the public realm be designed and constructed to a very high quality. We refer the Board to the Design Statement prepared by McGrane & Partners Architects and the Landscape Booklet prepared and submitted by Ronan McDiarmada & Associates, Landscape Architects & Consultants – both have been submitted to provide further details on how the proposal enhances the local public realm.</p>
UD5	<i>“It is Council policy to promote safer and more attractive streets and public realm for all road users throughout the County by pro-actively engaging with, and adhering to, the ‘shared space’ concept and guidance set out in the ‘Design Manual for Urban Roads and Streets’ (2013).”</i>	The creation of a central open space means that the adjoining existing houses to the north (Tullybeg) and to the south (Stafford Lodge) of the site are not overshadowed or otherwise impacted by buildings directly opposite them.
UD 6	<i>“It is Council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County.”</i>	<p>The proposal for development is in keeping with the National Planning Framework and the provisions of the recently adopted Urban Development and Building Height, Guidelines for Planning Authorities (2018). This is the predominant context under which the matter of building heights should be considered.</p> <p>We note that the Material Contravention statement and Addendum, enclosed herewith, have addressed the matter of height as a potential material contravention of the Development Plan. We refer the Board to this document for further details.</p> <p>An analysis of the impact of building height and positioning of buildings has been carried out through specific assessment criteria including sunlight and daylight access analysis, visual impact assessment and wind analysis – same demonstrate that the design proposals are appropriately considered and confirm that no adverse or negative impacts arise. These assessments are submitted as part of the application.</p>



EL 3	<i>“It is Council policy to require that a Sustainable Drainage System (SuDS) is applied to any development and that site specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and the associated River Basin Management Plans and ‘Water Quality in Ireland 2007-2009’ (EPA 2011) or any updated version of the document.”</i>	<p>The proposed surface water drainage will be designed to comply with the requirements of SuDS. Attenuation will be provided to restrict surface water runoff from the proposed apartment blocks.</p> <p>Waterman Moylan Engineering Consultants have proposed a SuDS strategy for the proposed development:</p> <ul style="list-style-type: none"> ▪ Green Roofs. ▪ Filter Strips / Swales. ▪ Permeable paving. ▪ Bioretention Areas and Rain Gardens.
SIC 3	<i>“It is Council policy to promote and support universal design whereby all environments can be used to the greatest extent possible by all people, regardless of age, ability or disability.”</i>	The proposed development is designed to be universally accessible.
SIC 6	<i>“It is Council policy to support the development, improvement and provision of a wide range of community facilities distributed in an equitable manner throughout the County.”</i>	Facilities will be provided in the form of residential amenity. These facilities are considered to be of a high quality and will be accessible to residents and to the wider community where appropriate
SIC 7	<i>“It is Council policy to ensure that proper community infrastructure and complementary neighbourhood facilities are provided concurrently with the development of new residential growth nodes in the County.”</i>	Additionally, we note that the site is in proximity to local neighborhood facilities within the commercial center of Carrickmines.
ST 5	<i>“It is Council Policy to secure the development of a high quality walking and cycling network across the County in accordance with relevant Council and National Policy Guidelines”</i>	The proposed development will provide pedestrian and cycle linages through and within the site.
ST 20	<i>“It is Council policy to require the submission of Travel Plans for developments that generate significant trip demand. Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transportation over the lifetime of a development.”</i>	A Traffic and Transport Survey has been submitted by Waterman Moylan Engineering consultants as part of this application.
ST 27	<i>“It is Council policy to require Traffic and Transportation Assessments and/or Road Safety Audits for major developments – in accordance with the TII Traffic and Transport Assessment Guidelines 2014 – to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts – all in accordance with best practice guidelines.”</i>	A comprehensive Traffic and Transport Assessment has been submitted by Waterman Moylan Engineering Consultants which sets out further detail on permeability and connectivity of the site.
LHB 20	<i>“It is Council policy to ensure the protection of natural heritage and biodiversity, including European sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.</i>	An Ecological Impact Assessment Screening Report and an Appropriate Assessment Screening Report have been prepared by Enviroguide. These reports will be submitted herewith to address the requirements of this policy.



11.4 Zoning

The subject site is zoned 'A' - "To Protect and/or improve residential amenity".

Uses permitted in principle under this zoning include:

"Assisted Living Accommodation, Open Space, Public Services, Residential, Residential Institution, Traveller's Accommodation."

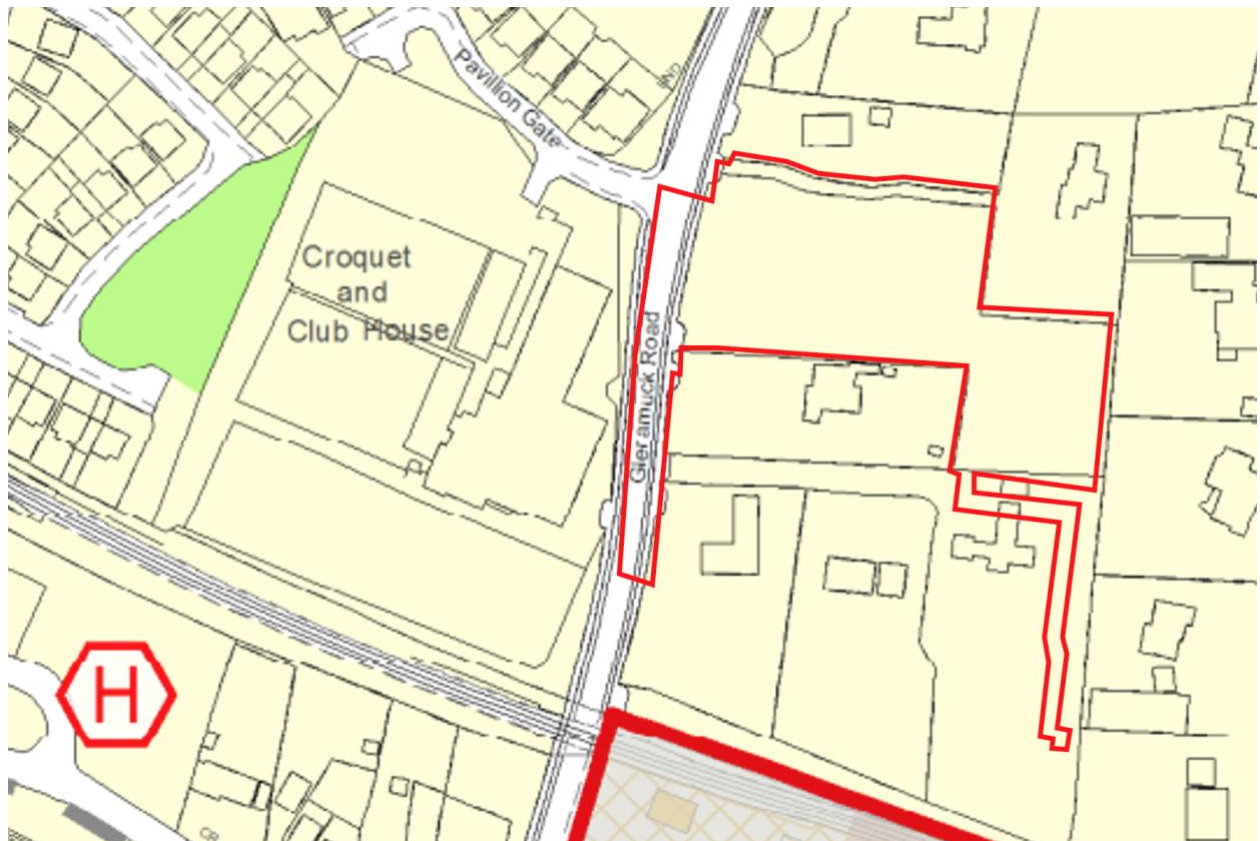


Figure 20 - Zoning Map with site outlined in Red

A residential development is therefore permitted in principle under this zoning objective.

Please note that this zoning remains in place under the proposed Draft Dun Laoghaire Rathdown County Council Development Plan 2018-2022 – not yet formally adopted.



11.5 Flood Risk

Waterman Moylan Engineering consultants have advised in their Engineering Submission that there are no recorded instances of flood events or recurring flood events in the vicinity of the site.

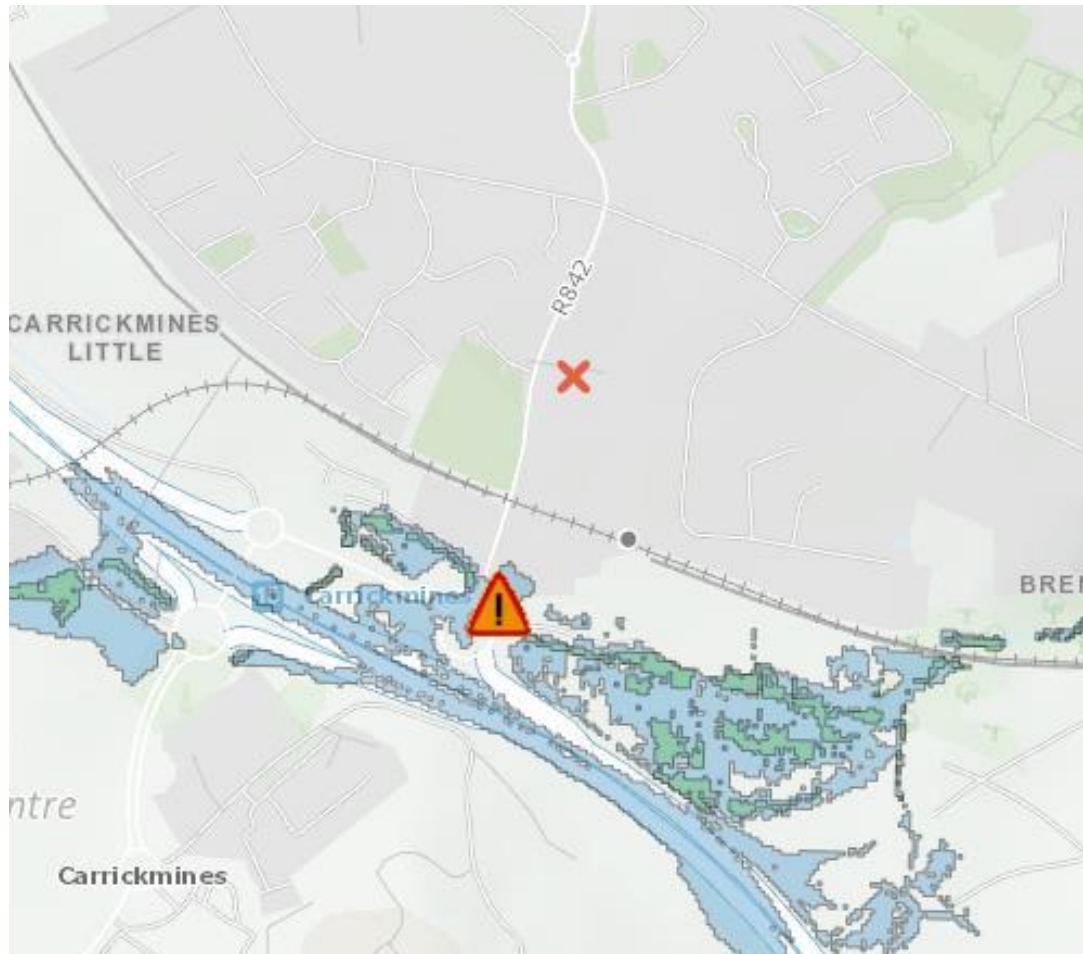


Figure 21 - Flood Events - OPW Extract

11.6 Residential Mix

The Development Plan requires a mix of no more than 20% 1-bed units and a minimum of 20% of units over 80 sqm (Section 8.2.3.3 (iii)). The proposed development does not comply with this requirement. The proposed development will be comprised of:

- 34 no. 1-bed units (29%).
- 76 no. 2-bed units (64%).
- 8 no. 3-bed units (7%).

Section 2.1.3.7 and Policy RES7 (Chapter 2 of the Development Plan 2016-22), which refers to objectives for all housing developments, including apartments. It provides:

“It is an objective of Dún Laoghaire-Rathdown that all housing developments, including apartment developments, contain an acceptable proportion of larger flexible units to ensure that such developments are sustainable and provide suitable and viable long-term options for families. Providing an appropriate mix of housing and implementing measures to mitigate against undue segregation of tenure types is also, important.



Providing a good mix of house types creates neighbourhoods for people of different ages and lifestyles. Encouraging good housing mix also allows people the choice and opportunity to remain in a given area while availing of accommodation that caters to their changing needs at particular stages of their life. This concept is explained as the 'Lifecycle Approach' and is a core objective underpinning the guidelines 'Delivering Homes, Sustaining Communities' (DoEHLG, 2007). This approach helps foster a greater sense of community and allows for increased social inclusion."

Section 8.2.3.3 (iii) of the County Development Plan sets out the requirements in relation to the mix of units provided as part of new apartment development as follows:

"Apartment developments should provide a mix of units to cater for different size households, such that larger schemes over 30 units should generally comprise of no more than 20% 1-bed units and a minimum of 20% of units over 80 sq.m....."

The following statement contained on the cover page of Chapter 8 of the Development Plan appears to exclude **Section 8.2.3.3.(iii)** as referred to above.

*"ADVISORY NOTE - Sustainable Urban Housing – Design Standards for New Apartments' DoECLG(2015) - Users of this Dún Laoghaire-Rathdown County Development Plan 2016-2022 are advised that the standards and specifications in respect of Apartment Development- as set out in **Section 8.2.3.3. (i), (ii), (v), (vii) and (viii)** of the Development Plan Written Statement –have been superseded by Ministerial Guidelines 'Sustainable Urban Housing – Design Standards for New Apartments' published by the Department of Environment, Community and Local Government (DoECLG) on 21st December 2015."*

It is our opinion that the guidance contained in the Apartment Guidelines take precedence over Development Plan requirements in terms of the mix of units. In summary and as set out earlier in this statement, the proposal will meet the 2020 Apartment Guidelines requirements of up to 50% 1-bed or studio units (no more than 20-25% of total studios) and no minimum for 3-bed or more units.

Therefore, the above mix is considered appropriate and in line with the guidance. We refer the Board to the Material Contravention Statement, enclosed herewith, further justifying this proposed mix.

11.7 Residential Density

The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha and is supported at this site, given the proximity of the site some 150m (1 minute walk) from the Luas line and the Carrickmines stop.

Policy RES3 of the County Development Plan refers to Residential Density:

"It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. The Government issued guidance to Planning Authorities in 2009 through the document 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual'. These Guidelines include recommendations regarding appropriate densities for various types of locations."

Where a site is located within circa 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and/or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a minimum of 50 units per hectare will be encouraged."

We also note Section 2.1.3.3. Policy RES3; Residential Density states:

"As a general rule the minimum default density for new residential developments in the County (excluding lands on zoning Objectives 'GB', 'G' and 'B') shall be 35 units per hectare. This density may not be appropriate in all instances, but will serve as a general guidance rule, particularly in relation to 'greenfield' sites or larger 'A' zoned areas. Consideration in relation to densities and layout may be given where proposals involve existing older structures that have inherent vernacular and/or streetscape value and where retention would be in the interests of visual and residential amenity and sustaining the overall



character of the area. Some dispensation in relation to separation distances, open space requirements and density considerations may also be appropriate.

In addition to the foregoing, that the development site is located in close proximity to Carrickmines Retail centre and lies just outside the Cherrywood Strategic Development Zone and Kilternan-Glenamuck Local Area Plan. The site is located very near the M50 and public transport, including a LUAS Stop and bus stop. The site also has good access to Cherrywood and Dundrum.

Considering this 'density' issue, we refer the Board to the Material Contravention Statement enclosed herewith.

11.8 Public Open Space

Section 8.2.8.2 of the Development Plan states that a requirement of **15 sq m - 20 sq m of Open Space per person** shall apply based on the number of residential/housing units. This is assumed 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.

The Development Plan however clearly sets out that the:

*"Planning Authority shall require **an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space irrespective of the occupancy parameters set out in the previous paragraph**".*

Notwithstanding the clear Development Plan provisions for public open space requirements, we note that the Apartment Guidelines of 2020 set out standards for communal open space provision as follows:

- 4 sqm for studios
- 5 sq m for 1 beds
- 7 sq m for 2 beds
- 9 sq m for 3 beds

The DLR County Development Plan 2016 – 2022 provides:

"Open Space: For all developments with a residential component – 5+ units - the requirement of 15 sq.m to 20 sq.m. of Open Space per person shall apply based on the number of residential/housing units. For calculation purposes, open space requirements shall be based on a presumed 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. A lower quantity of open space (below 20 sq.m per person) will only be considered acceptable in instances where exceptionally high quality open space is provided on site and such schemes may be subject to financial contributions as set out under Section 8.2.8.2 (iii) below.

The Planning Authority shall require an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space irrespective of the occupancy parameters set out in the previous paragraph."

In considering the above, we note the following proposal and calculations for public open space vis - a - vis Development Plan and the Apartment Guidelines standards:

DLR Standards

- 10% of site area (as a minimum).
- Site Area 7,400 sqm (Main Development Area)
- 10% Public Open Space Requirement – 740 sqm

In addition, we note that the overall public open space proposal of 2,071sq. m meets with the requirements of the Apartment Guidelines 2020 as follows:

Apartment Guidelines Requirements

- 5 sq. m for 1-bed units – $34 \times 5 \text{ sq. m} = 170 \text{ sq. m}$
- 7 sq. m for 2-bed units – $76 \times 7 \text{ sq. m} = 532 \text{ sq. m}$
- 9 sq. m for 3-bed units – $8 \times 9 \text{ sq. m} = 72 \text{ sq. m}$

Total Communal Open Space required = 774 sq. m

Furthermore, we note the open space provision is considered to be of exceptional quality, given the central location of the main area of open space within the development and adjacent to the residential amenity building.

We note the following comment from the daylight and sunlight analysis prepared by Digital Dimensions:

“The site has a variety of public & communal amenity spaces designed into the scheme. The BRE recommends that 50% of the area receive more than 2 hours of sunlight on the 21st of March and all three areas meet these criteria” (Page 21)

It is important to set out that the central area of open space 1,158.4 sq. m receives appropriate sunlight, which is the key area of open space. The second largest open space area to the south (to the east of Block C) of 440.8 sq. m also meets the relevant criteria. Within the third area of open space (to the east of Block B), 471.8sqm, there is a small area that receives shading. Overall, the central and southern open space areas both deliver on the quantum and quality of open space required.

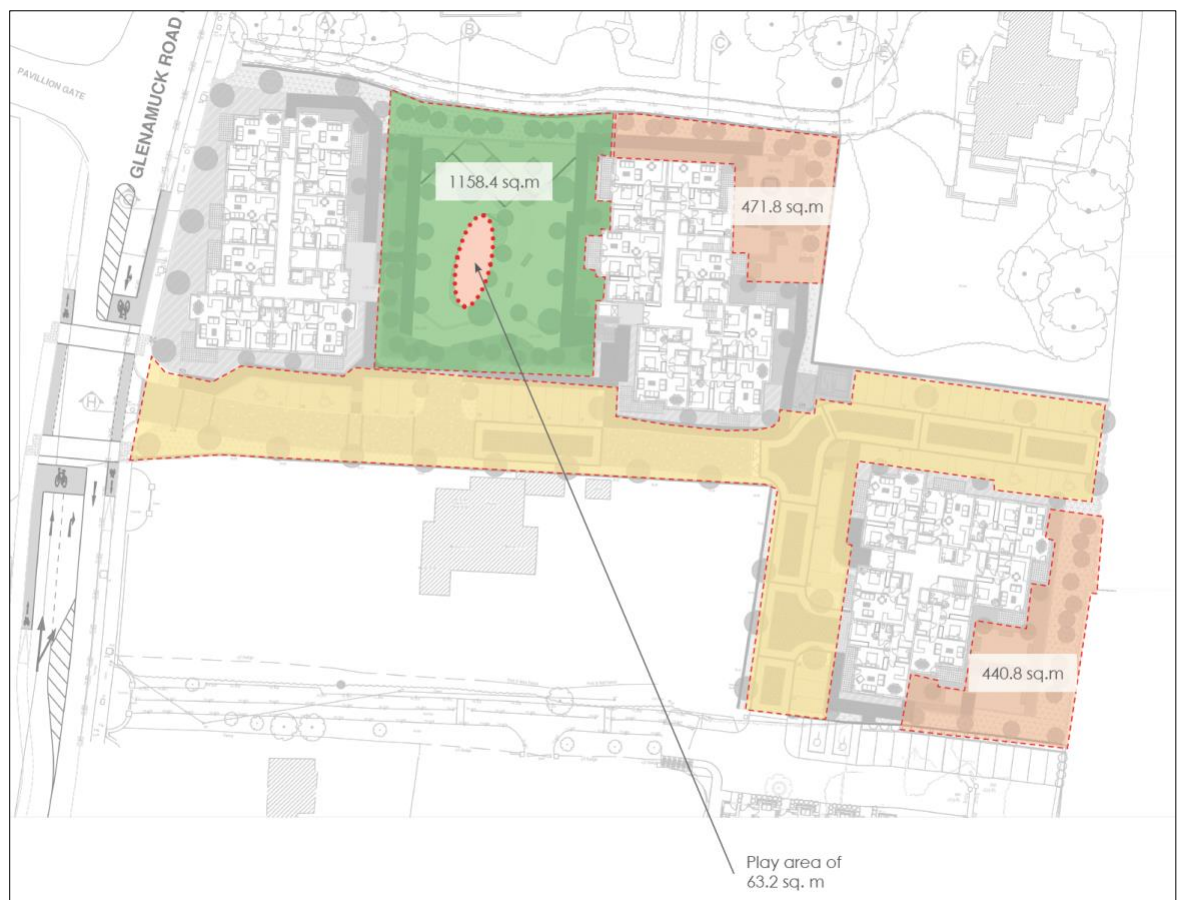


Figure 22 - Proposed Areas of Open Space

11.9 Building Height

As a summary, we note the following proposals for height across the scheme currently submitted to the Board:

- Block A – 7 storeys
- Block B – 6/7 storeys
- Block C – 6/7 storeys



Figure 23 - Building Heights

These proposals for height may be considered by the Board to materially contravene the Dún Laoghaire Rathdown County Development Plan 2016-2022 and the Building Height Strategy (Appendix 9) as they are in excess of the general 3-4 storey recommendations for height as set out in the Building Height Strategy for application within the County (in this regard please see the Material Contravention Statement submitted as part of the within application).

For the purpose of this Planning Report and Statement of Consistency, the following sections set out the key policy and provisions of the Dún Laoghaire Rathdown County Development Plan 2016-2022 as they relate to height and the subject site.

Policy UD6:

Policy UD6 of the Dún Laoghaire Rathdown County Development Plan 2016-2022 states that “It is Council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County.”



Building Height Strategy

Appendix 9 of the Dún Laoghaire Rathdown County Development Plan 2016-2022 contains the 'Building Height Strategy', which is the document referred to by the Planning Authority in consideration of proposal for height within the county. However, we wish to acknowledge that the national guidance for height has significantly changed since the adoption of the Dún Laoghaire Rathdown County Development Plan 2016-2022 (which includes the 'Building Height Strategy'), with the publication of the *'Urban Development and Building Height - Guidelines for Planning Authorities December (2018)'*. These guidelines, in effect, now supersede the requirements of the said 'Building Height Strategy'.

With regard to suburban infill sites, it is stated that the general approach in terms of building heights in these sites has been to taper height from a high point in the centre of the site down towards the site boundaries where the height of adjacent buildings can often be lower. This approach has been delivered within the current scheme, with particular care taken at sensitive locations at Chigwell, Tullybeg, Stafford Lodge and properties along Brennanstown Road.

Importantly, the height strategy refers to certain **Exceptional Circumstances** where a case may be made **for additional height at certain locations**. It is stated that a proposal **must meet more than 1 upward modifier** in order to qualify as a location suitable for additional building height

Upward Modifiers

The modifiers in question are as follows:

a) The development would create urban design benefits.

The proposal will further complement the frontage along Glenamuck Road North and will deliver a new and improved road frontage on a site that is significantly underutilised at present

b) The development would provide major planning gain.

- ***Significant improvements to the public realm.***
- ***The provision or significant enhancement of a public transport interchange.***
- ***The provision of new or improved transport infrastructure.***

The proposal delivers a significant improvement to the public realm by way of:

- The proposal will offer a range of wider planning gains including a high-quality public realm proposal in the form of new public open spaces and new pedestrian connections .
- The delivery of a network of new open space areas including courtyards and play areas etc.
- The subject site is located within an existing central and accessible urban location and is opportunely located in proximity to a number of quality, high capacity and frequent, public transport services/nodes, local shopping facilities, quality venues and surrounding employment opportunities. This will result in a future provision of new or improved transport infrastructure.

c) The development would have civic, social or cultural importance.

The proposal provides for a key connection to the adjoining site to the south. The current proposal offers an exceptional level of improvement to the local public realm with increased permeability.

d) The built environment or topography would permit higher development without damaging the appearance or character of the area, for example: - In an area where the location or scale of existing buildings would allow the recommended height to be exceeded with little or no demonstrable impact on its surroundings, - In a dip or hollow, behind a rise, or near a large tree screen, where the impact of a higher building would have little or no additional impact on its surrounding



The proposal responds to the natural and built environment, and careful consideration has been given to the proposal in relation to how it addresses the existing surrounding development and local topography.

- e) **A development would contribute to the promotion of higher densities in areas with exceptional public transport accessibility, whilst retaining and enhancing high quality residential environments.**

The site is located within approx. 150m of the Luas Green Line stop at Carrickmines, which is a high frequency transport node. The site is therefore well placed in terms of exceptional public transport accessibility. The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha and is considered an appropriate residential density for a suburban site proximate to public transport infrastructure.

The site is therefore well placed in terms of exceptional public transport accessibility. The current density proposal provides for 159 units per ha is considered an appropriate residential density for a suburban site proximate to public transport infrastructure. It is our view that the proposal contributes to the promotion of higher densities in areas with exceptional transport accessibility.

- f) **The size of a site, e.g. 0.5ha or more, could set its own context for development and may have potential for greater building height away from boundaries with existing residential development.**

The site is over 0.5 ha in size (c. 0.92 ha) and therefore would be in a position to justify a modest increase in height at this location.

The proposed development will provide for heights of 4 storeys, transitioning to a height of 6-7 storeys. Whilst the proposal exceeds the 3-4 storey maximum, it meets more than 1 Upward Modifier, qualifying it as a suitable location for additional building height. Notwithstanding this, it is our opinion that the Board may consider that the proposed development would give rise to a Material Contravention in respect of building height.

The above considered, we are of the view that upward modifiers apply to the site and as such additional heights of 1 and 2 floors above the 3-4 storey maximum can be considered for this site. Notwithstanding this, the current proposal provides for heights of up to 7 storeys, which is an increase above that envisioned by the 'Building Height Strategy' governing the site context for height.

Should the Board be of the opinion that the proposed height materially contravenes the key provisions of the Development Plan as they relate to height, it is our view that there is adequate support at national level (by way of ministerial guidelines) to justify the height as currently proposed and a material contravention may be permitted. We refer An Bord Pleanála to the enclosed Material Contravention Statement in this regard.

Whilst the Board may reach this conclusion, it is considered that a grant of permission is appropriate in circumstances where Section 9 (3) (b) of the Planning and Development (Housing) and Residential Tenancies Act 2016) of the 2000 Act provides **that the requirements of a specific planning policy requirement (SPPR) take precedence over any conflicting provisions of a Development Plan:**

“(b) where specific planning policy requirements of Guidelines referred to in sub-section 2(aa) differ from the provisions of the Development Plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the Development Plan.”

Specifically, it is our opinion that a grant of permission for increased building height is justified by reference to SPPR 3A of the 'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)', as detailed in Section 3 of this report.





Downward Modifiers

The applicant is also obliged to consider downward modifiers, where a decrease in height may be required where a proposal would adversely affect:

1. Residential living conditions through overlooking, overshadowing or excessive bulk and scale.
2. An Architectural Conservation Area (or candidate ACA) or the setting of a protected structure.
3. Strategic protected views and prospects.
4. A planning or social objective, such as the need to provide particular types of housing, employment or social facility in an area.
5. An Area of Particular character including a coastal fringe or mountain foothills

As a response, we note the following:

1. The material enclosed has clearly demonstrated that there is no adverse impact posed by the development by way of overlooking or overshadowing or excessive bulk and scale.
2. The proposed development is not in close proximity to any Architectural Conservation Area or within the setting of a protected structure.
3. The proposal does not affect any strategic protected views or prospects.
4. The proposal is consistent with national guidance on the types of housing to be delivered.
5. The site is not located within an Area of Particular Character such as the coastal fringe or mountain foothills.

As such, we consider none of the downward modifiers to apply to the subject site.

It is having considered both the policy approach on height and the general principles that are applied when considering new proposals for development that we consider the proposal submitted herewith to be acceptable in terms of building height. Notwithstanding this, it is our opinion that it could be interpreted that a Material Contravention in respect of building height is occurring this is a matter for An Bord Pleanála to ultimately adjudicate on.

General Principles

Notwithstanding the consideration given to upward and downward modifiers as they relate to the site, it is our submission that the dominant section of the Building Height Strategy which applies to the subject site is the General Principles section contained in Section 5 of the Strategy.

The general principles should be applied by the competent authority in assessing appropriate building heights throughout the County. The general principles referenced are set out below:

- To protect the residential amenities of the County.
- To protect the County's built heritage and natural areas of exceptional beauty.
- To promote high densities and allow for increased densities around public transport nodes and centres of activity.
- To encourage higher densities and also to allow for increased building heights at appropriate locations along public corridors.
- To promote high density through in-fill development.
- To allow for landmark buildings in the right places.

It is our submission that the current proposal of 4 to 7 storeys in height:

- The proposed buildings will be setback at all boundaries and the upper floors will be further setback where the boundary is shared with existing residential development. The massing of



the buildings has been concentrated away from boundaries shared with existing residential development.

- Does not impact on the County's built heritage and natural areas of exceptional beauty, given the proposal's consideration of the neighbouring Protected Structure.
- Promotes an appropriate level of infill development to allow for increased densities in proximity to key public transport. This principle of development is supported in national policy and the site is considered a unique opportunity to deliver appropriate building heights and residential density.

It is our view that the subject site is an ideal candidate for higher building height. Having regard to the Building Height Strategy we submit that the proposed building height is broadly consistent with the general principles referred to above and is not excessive given its close proximity to public transport and amenities and is of a suitable size for defining its own building height context.

On balance, reference to a Material Contravention in respect of site is considered by the applicant and design team. Details of this as submitted in the Material Contravention Statement prepared by this office and we refer An Bord Pleanála to same.

11.10 Car Parking

It is stated in the Development Plan that quantitative Car Parking Standards should comply with Development Plan requirements. Section 8.2.4.5 of the Development Plan concerns Car Parking Standards. In this regard, see Table 8.2.3: Residential Land Use - Car Parking Standards. For apartments, these requirements comprise 1 space per 1-bed unit, 1.5 spaces per 2-bed unit, 2 spaces per 3-bed unit+. It further provides that the car parking standards set out for residential land uses in Table 8.2.3 shall be generally regarded as 'standard' parking provision. Table 8.2.4 concerns Non Residential Land Use – Maximum Car Parking Standards. Section 8.2.4.5 provides that reduced car parking standards for any development (residential and non-residential) may be acceptable, depending on:

- The location of the proposed development and specifically its proximity to Town Centres and District Centres and high density commercial/business areas.
- The proximity of the proposed development to public transport.
- The precise nature and characteristics of the proposed development.
- Appropriate mix of land uses within and surrounding the proposed development.
- The availability of on-street parking controls in the immediate area.
- The implementation of a Travel Plan for the proposed development where a significant modal shift towards sustainable travel modes can be achieved.
- Other agreed special circumstances where it can be justified on sustainability grounds.

As set out above, we note that the requirements detailed under the Development Plan are as follows:

Apartments:

- 1 space per 1-bed units
- 1.5 spaces per 2-bed units
- 2 spaces per 3-bed units

Based on these requirements, a total of 169 spaces are required in respect of the proposed development. A total of 103 no. car parking spaces are proposed for 118 no. residential unit. We note that 5% of all spaces (5 spaces) will be disabled parking spaces and 16.5% (17) will have electric power charging points. This is considered an exceptional provision.

Notwithstanding these requirements, as detailed above, there is express provision within the Development Plan (Section 8.2.4.5) for reduced car parking standards for any development (residential or non-residential) in light of the proximity of the proposed development to public transport. For clarity, we can confirm the following distances to public transport:





- Luas – The site is situated approx. 150 m/1-minute walk from the Carrickmines Luas Line. The Luas provides regular services to Dublin City Centre.
- Bus – The site is directly served by an existing bus route running along the Glenamuck Road North. It is approximately a 150m walk from the proposed site entrance to the bus stops travelling both directions. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20-minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities. There are two no.63 bus stops from the proposed site, 140m travelling south of the proposed site and 100m travelling north of the proposed site

Based on the above, it is our contention that there is provision made within the Development Plan to reduce car parking standards that apply to this particular site.

Notwithstanding the above, we note that the 2020 Apartment Guidelines generally encourage reduced standards of car parking, and the content of these Guidelines supersede Development Plan requirements. An assessment of the proposal against these Guidelines can be found under Section 3.6.9 of this report.

The intention of the guidelines is to minimise, substantially reduce or wholly eliminate car parking for Central and/or Accessible Urban Locations. It is submitted that the subject sites are a prime location for this principle to be applied. The provision of car parking spaces is set out in the below table.

DLRCC Requirements	Apartment Guidelines	Parking Provided	Parking Ratio
1 space per 1-bed unit and 1.5 spaces per 2-bed unit (depending on design and location)	Parking provision minimised, substantially reduced, or wholly eliminated in certain circumstances.	103	0.87

Table 8 -Car Parking Provision

A reduced car parking ratio to what is required can be favourably considered given the site's proximity to key public transport links.

11.11 Bicycle Parking

The Dun Laoghaire Rathdown Standards for 'Cycle Parking and associated Cycling Facilities for New Developments (January 2018)' require the following provision for residential use:

- Long Stay: 1 space per unit.
- Short Stay: 1 space per 5 units.

As the proposal is for 118 units, 144 no. spaces are required under the DLR standards.

The provision of bicycle parking spaces is set out in the below table.

Type	DLRCC Requirements	Apartment Guidelines	Parking Provided	Parking Ratio
Long Stay	1 long stay parking space per 1 unit	Min. of 1 parking space per bedroom	280	2.40
Short Stay (Visitor)	1 short stay (visitor) parking space per 5 units	1 space per 2 residential units		

Table 9 - Bicycle Parking

The proposal will therefore be consistent with the DLRCC standards for bicycle parking.



12 DRAFT DUN LAOGHAIRE RATHDOWN DEVELOPMENT PLAN 2022-2028

The Draft Dun Laoghaire Rathdown Development Plan 2022-2028 (Draft Plan) went on public display on January 12th, 2021, until April 16th, 2021. The plan sets out Dun Laoghaire Rathdown County Council's policies and objectives for the proper planning and sustainable development of the area. While cognisance has been taken of the draft plan, we would like to note that the permission falls to be considered under whichever development plan is in force at the date the Board makes a decision on the application.

The site remains zoned for residential development (Objective A) with no significant changes. There are a number of additional uses permitted in principle under this zoning with the following list of uses now provided for: "Assisted Living Accommodation, Community Facility, Childcare Service, Doctor/Dentist etc., Education, Health Centre/ Healthcare Facility, Open Space, Public Services, **Residential**, Residential Institution, Travellers Accommodation."

A comparison between the current Development Plan zoning and the proposed zoning are set out below:

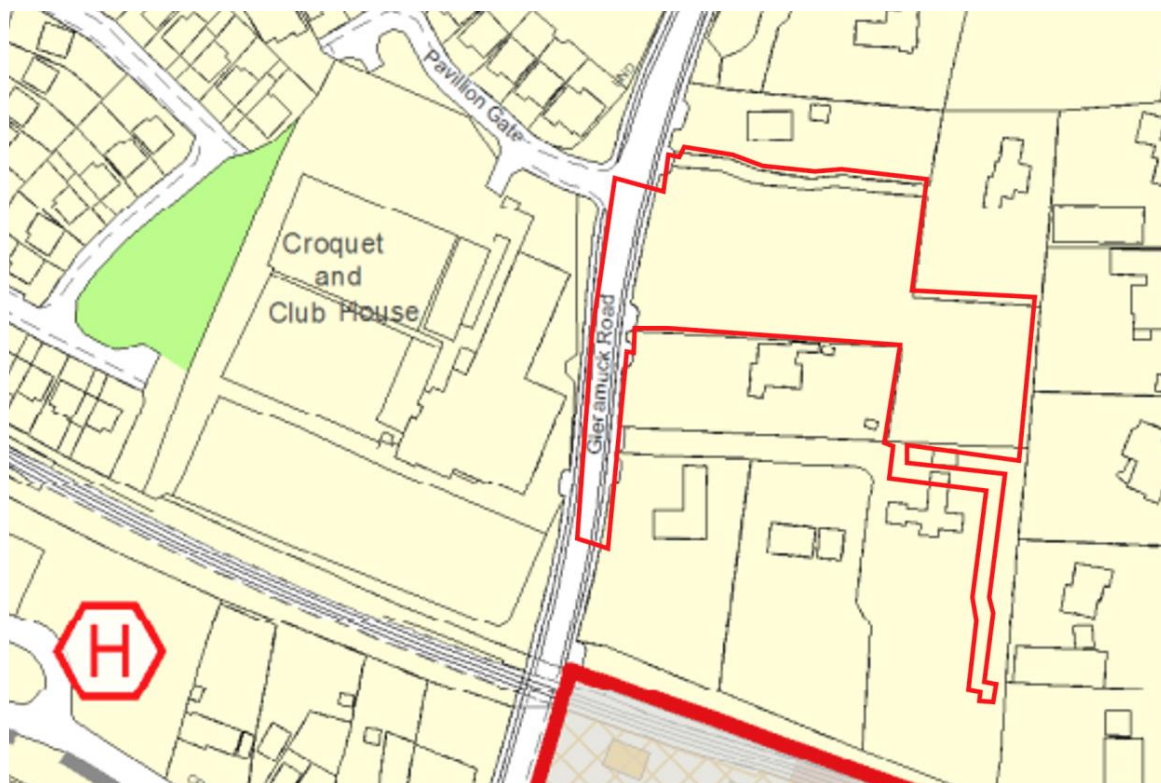


Figure 25 - Current Development Plan Zoning

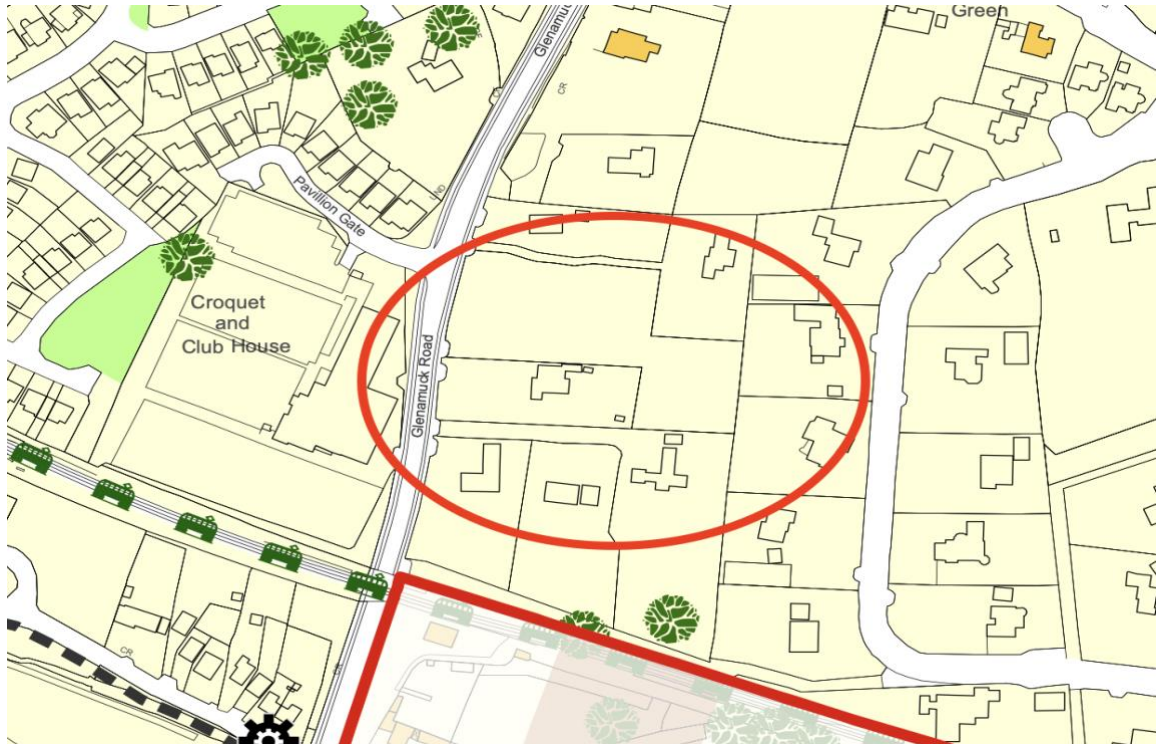


Figure 26 - Proposed Development Plan Zoning

The proposed development complies with the zoning objectives as set out in the 2022-2028 Draft Plan. However, the applicant fully recognises that this Draft Plan is subject to change and that the application for permission falls to be determined under the provisions of the Development Plan that is in force on the date the Board decides on the application for permission.

For ease, please refer to the attached addendum which sets out consistency with the policies and objectives of the Draft Plan 2022-2028.



13 CONCLUSION

This Statement of Consistency and Planning Report has identified the compliance of the scheme with relevant strategic and statutory planning policy documentation, and we trust that the Board will now accept that the key objectives of each of the documents cited in this report have been met.

We direct the attention of the Board to other material submitted herewith for further detail on the context of the site and a clear and concise development description.

We invite the Board to consider the proposal now in front of them. We note the following key summary points:

- The proposal is considered consistent with the relevant policies, objectives and development management standards outlined in the County Development Plan, as demonstrated above, with the exception of the 3 no. policies/objectives which are identified with the accompanying Material Contravention Statement. These relate to the proposed mix unit within the development, the density of the proposed development and the height of the proposed development.
- It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this under utilised, residential zoned site, while responding sensitively to the features and constraints associated with the subject site, including adjoining properties.
- The development will deliver a high-quality architectural scheme on this prominent site which has been specifically identified by the local Planning Authority for higher development.
- The site is zoned Objective A “*To protect and/or improve residential amenity*” which explicitly provides for residential development. The proposed use ‘residential’ is acceptable in principle at this site and under this zoning.
- This Planning Report and Statement of Consistency, accompanying this planning application demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and proper planning and sustainable development of the area.
- The current proposal maintains all established development parameters in terms of design layout and orientation of buildings and separation distances to adjoining development.
- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g., NPF, Rebuilding Ireland, and RSES) and we ask that the Board has regard to this in their consideration of the proposal.
- We can confirm that we have addressed, insofar as possible, all pre-planning feedback from Dun Laoghaire-Rathdown County Council.

In all the circumstances, as set out in this report and in the suite of application documentation, the Board is requested to carefully consider the proposed development and to grant permission for this SHD which will optimise the use of these suitably zoned lands in a manner which is consistent with the proper planning and sustainable development of the area.



1 APPENDIX 1 - CORRESPONDENCE WITH IAA

Proposed SHD Development at Chigwell, Glenamuck Road North, Carrickmines, Dublin 18.



O'LEARY Geraldine <Geraldine.O'LEARY@IAA.ie>

Tuesday 18 January 2022 at 16:01

To: Sara Jane Condon

Re: Proposed SHD Development at Chigwell, Glenamuck Road North, Carrickmines, Dublin 18.

Dear Sara Jane,

Thank you for your email and the attached drawings relating to the proposed Strategic Housing Development application to be located at Chigwell, Glenamuck road North, Carrickmines, Dublin 18.

It is the observation of the Safety Regulation Division Aerodromes that based on the information provided, the proposed development appears to be located approximately 18.9km South East of Casement Aerodrome and 19km South East of the Threshold of Runway 34 at Dublin Airport. It is likely that only general observations would be issued during the planning process relating to the construction process and the notification of proposed crane operations with at least 30 days notification to the Authority.

Kind regards.

Yours sincerely

Deirdre Forrest
Corporate Affairs

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