

Statement of Consistency Addendum

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 Introduction

This addendum to our Statement of Consistency has been prepared for An Bord Pleanála (*‘the Board’* / *‘ABP’*) in the event that the Dun Laoghaire Rathdown Draft Development Plan 2022-2028¹ (*‘the Draft Plan’* / *‘the Draft Development Plan’*) is in effect when the Board is making its assessment on the subject application.

A Chief Executive’s Draft Plan was circulated to members in October 2020. This was considered and amended by the 40 elected members at a series of Special County Development Plan meetings. At a meeting held on the 18th of December 2020 it was deemed to be the Draft Plan. The Draft Plan was then placed on public display from 12 January to 16 April 2021 with a total of 1263 no. submissions received. A Chief Executive’s Report on all submissions / observations received was prepared and circulated to the Elected Members in July 2021. Having considered the Draft County Development Plan and the Chief Executive’s Report on submissions received, it was resolved by the Elected Members to amend the Draft Development Plan. These amendments constituted a Material Alteration and went on public display from 11 November 2021 to 17 January 2022 in accordance with section 12(7)(b) of the Planning and Development Act 2000 (as amended). The Executive have prepared a Chief Executive’s Report on all submissions / observations made in relation to the material alterations to the Draft Plan and associated Environmental Reports. This report and all proposed amendments to the Draft Plan will be considered by the Elected Members not later than 6 weeks after receiving the Chief Executive’s report.

Having considered the Chief Executive’s Report, the Elected Members are required to make the Plan with or without the proposed amendments. Six weeks after making the Plan, the Draft Plan for the period 2022-2028 will come into force.

As noted in the main Statement of Consistency submitted with this SHD application, the proposed development will provide for, *inter alia*, 118 no. residential units in 3 no. residential blocks (A-C), parking, open space and site development works. A full description of the development is contained within the accompanying application documentation. For the purposes of this addendum, we specify the proposed development provides for:

- Building Height
- Residential Mix
- Residential Density
- Dual Aspect
- Parking
- Public and Community Open Space

This addendum is intended to outline consistency with guidelines issued under section 28 of the Planning and Development Act 2000 (as amended) and the key policies, objectives and development management standards contained within the Draft Plan.

¹ Available at: <https://www.dlrco.ie/en/county-development-plan/draft-county-development-plan-2022-2028>

2 Dun Laoghaire Rathdown Development Plan 2022-2028

The draft/proposed provisions of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (as provided for at the time of writing this Report), insofar as same are relevant to the proposed development, are outlined below.

2.1 Planning Policy

This section of the within addendum report reviews the compliance of the scheme with the Draft Development Plan policies, as per Table 1, set out below:

Policy Ref.	Policy	Applicant Response
PHP1	<p>That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:</p> <ul style="list-style-type: none"> - Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. - Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Interim Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment - Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities. 	<p>As detailed in the application documentation, the proposed development is in line with the NPF and the RSES, the site is zoned residential and is considered appropriately serviced with infrastructure to deliver on a sustainable residential development in close proximity to the main town centre and public transport nodes.</p> <p>In addition, the proposal also accords with the core strategy as set out in Chapter 2 of the Draft Development Plan 2022-2028, the Housing Strategy and the HNDA, as it provides Social housing under Part V (24 no.).</p> <p>As part of this development, 24 units are to be provided for social housing. In keeping with Housing Strategy, the units which will be provided are:</p> <ul style="list-style-type: none"> • 10 x 1-bed units • 14 x 2-bed units <p>We refer the Board to the proposed residential mix enclosed herewith, which is outlined in the development summary section at the rear of the Design Statement prepared by McGrane and Partners.</p> <p>The residential mix provided for by the proposed development is considered appropriate and in line with ministerial guidance contained within the 2020 Apartment Guidelines. Given the specific requirements of the Draft Development Plan in relation to mix, the Addendum Material Contravention Statement (which has been prepared in light of and having regard to the Draft Development Plan) enclosed herewith outlines further details on the mix proposed vis-à-vis the Draft Development Plan requirements.</p>
PHP5	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Implement a strategy for residential development based on a concept of sustainable urban villages. 	<p>The proposed development is well served by public transport with high capacity, frequent services.</p> <p>Walking time from the proposed site entrance to the Carrickmines Luas Station is approximately 2-minute (150m walk). There dedicated footpaths</p>

	<p>- Promote and facilitate the provision of ‘10-minute’ neighbourhoods.</p>	<p>connecting the proposed development to the Carrickmines Luas Station.</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>
PHP 6	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs. - Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage. 	<p>We note that 42 no. units would have the demand for a childcare facility (<i>in this regard, see Statement of Consistency and Community Infrastructure Statement</i>).</p> <p>Having regard to the above (<i>including the Community Infrastructure Statement</i>), it is considered that the childcare need 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.</p> <p>Further, as detailed in the Community Infrastructure Statement, and the Planning Report “..., <i>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</i>”.</p>
PHP18	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites. - Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development. 	<p>The overall proposed development provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha, and a proposal for 118 units on a central site. This residential density is considered appropriate to the site given the proximity of the site to the public transport corridor.</p> <p>Enclosed with this application is the Design Statement prepared by McGrane and Partner Architects. It refers to the proposed site as offering 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>The proposed development along the M50, Glenamuck Road North, positively contributing to</p>

		<p>its surrounding neighbourhood 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 neighbourhood and streetscape at this location.</p> <p>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.</p> <p>As detailed in the application documentation, the proposed residential development is in keeping and consistent with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities'. 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>
PHP20	It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.	<p>As evidence in the application documentation, the proposed development takes the context of its surrounding developments into account in terms of design, block formation, height, and density.</p> <p>The proposal utilises a key infill site on a prime suburban site within the metropolitan area of Dublin. It is located on a key public transport corridor. Relevant policy documents have been carefully referred to, to establish appropriate density, height and car parking provision.</p> <p>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>
PHP25	It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) 2022 – 2028.	As noted above the proposed development accords with Housing Strategy and HNDA.
PHP26	It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) and any future Regional HNDA.	The subject proposal aims to rebalance residential density in the area and provides a variety of one, two and three bed unit typologies to cater for the current lack of supply of this type in the area. Proposals for heights of 4 storeys transitioning to a height of 6-7 storeys are well considered and cognisant of established levels of residential amenity in the area.
PHP27	It is a Policy Objective to facilitate the provision of Build-to-Rent and Shared Accommodation in suitable locations across the County and accord with the provisions of 'Sustainable Urban Housing: Design Standards for New Apartments', 2018 (and any amendment thereof). Proliferation	As noted, the proposed development will be a purpose built 118 residential unit development located within the required 10-minute walking time from high frequency public transport routes.

	of these housing types should be avoided in any one area.	
PHP29	<p>It is a Policy of the Council to;</p> <ul style="list-style-type: none"> - Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES. - Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties. - Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community. 	<p>We note that the proposal provides for 1 bed, 2 bed and 3 bed apartments on a subject site that is well served by public transport. The site is located 150m from the Carrickmines Green Luas line stop, which in turn 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. 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>
PHP30	It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'.	<p>The Part V proposal is based on the provision of 10% of the units. These units are identified on plan and schedules submitted herewith. 24 no. units are proposed.</p> <p>We refer An Bord Pleanála to the Part V Brochure 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>
PHP31	It is a Policy Objective to support the provision of homeless accommodation and/or support services throughout the County.	This proposal contributes positively to the current national shortfall in housing supply. Large residential developments will assist in addressing the ongoing housing and homelessness crisis, in an effort to increase housing supply.
PHP34	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. - Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013). 	<p>The proposed development takes into account the Urban Design Manual and Design Manual for Urban Roads and Streets (DMURS), as updated, in order to help develop a sense of place (as set out in the application documentation).</p> <p>We note specifically that Section 10.5.2 of the combined Planning Report and Statement of Consistency Report, which reviews in detail the requirements of the Urban Design Manual, with a clear compliance of the scheme with same identified.</p>

	<p>- 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.</p>	<p>We also refer the Design Statement submitted by McGrane and 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 proposed 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>
PHP35	<p>It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</p>	<p>The proposed development is accessible universally. McGrane and Partners Architects have included a detailed drawing detail with the drawing pack submitted setting this out.</p>
PHP36	<p>It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.</p>	<p>The proposed development will contribute positively to the public realm by providing a pedestrian and cyclist linkages accessible to the wider community.</p> <p>We refer An Bord Pleanála to the Design Statement prepared by McGrane Architects and the Landscape Booklet has been prepared and submitted by Ronan McDiarmada & Associates, Landscape Architects & Consultants, both submitted, for further details on how the proposal enhances the local public realm.</p>
PHP37	<p>It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).</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.</p>
PHP38	<p>It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.</p>	<p>The design and layout provides ease of access by lift or stairs to clearly define public open spaces which will be privately maintained and provide an enclosed secure space for children and elders.</p> <p>The sense of security in the development is reinforced and enhanced by the surveillance and overlooking provided by blocks A and B.</p>
PHP39	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Encourage high quality design of all new development. - Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF). 	<p>The proposed 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). The compliance of the proposal with the Building Height Strategy has been set out in the application documentation submitted.</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, which demonstrate that the design proposals are appropriately considered which have confirmed that no adverse or negative impacts arise. These assessments are submitted as part of the application.
PHP41	It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and 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) and incorporates adaptability of units and/or space within the scheme.	A Design Statement has been prepared and submitted by McGrane and Associates Architects and accompanies this application which sets out how the proposed development addresses or responds to the design criteria set out in the Urban Design Manual – A Best Practice Guide.
T16	It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES).	A Traffic and Transport Assessment has been submitted by Waterman Moylan as part of this application.
OSR4	It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual – A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2018).	<p>The provision of public open spaces in the proposed development is over and above the requirements of the relevant Development Plan and Apartment Guideline requirements.</p> <p>We refer An Bord Pleanála to the Housing Quality Assessment prepared by McGrane and Partners Architects for full details on private open space provision and other residential amenity requirements set out by the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)'. An Bord Pleanála will note that all proposals are consistent with requirements.</p>
T17	It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.	There is one Go Car station within the vicinity of the proposed development at Carrickmines Park Shopping Centre. This is 1 km away (c.14-minute walk). At the time of writing this report, the Go Car Station has one car and one van available at this station. Details of how to join the scheme will be provided to all residents when the move into their apartment. Information will also be displayed within the resident amenity area and updated when required.
T18	It is a Policy Objective to manage carparking as part of the overall strategic transport needs of	The proposed development is located within Parking Zone 2 in the Draft Plan. The Draft Plan stated for residential uses reduced provision may

	the County in accordance with the parking standards set out in Section 12.4.5.	be acceptable dependent on certain criteria which include, proximity to public transport services, walking and cycling accessibility and availability of car-sharing.
T28	It is a Policy Objective to introduce Traffic Management Schemes on particular roads and in appropriate areas throughout the County to reduce vehicle speeds to an acceptable level and to reduce the potential for traffic congestion and associated vehicular emissions in urban areas	<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.</p> <p>The street hierarchy favours the 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>
E114	It is a Policy Objective to adhere to the recommendations of the ‘National Hazardous Waste Management Plan 2014-2020’ and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.	An Operational Waste Management Report has been provided as part of this application by AWN.
E123	It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (2001/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on ‘The Planning System and Flood Risk Management’ (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives of the Strategic Flood Risk Assessment set out in Appendix 16 of this Plan.	There is no inland waterway or marine frontage within the current proposal. We refer to the material from Waterman Moylan Consulting included herewith which provides for comment on flood risk.

Table 1 - Evaluation of the proposed development in terms of relevant county plan development management policies

2.1.1 Zoning

The site remains zoned for residential development (Objective A) with no significant changes in the Draft Development Plan. 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 (in Figure 1 and Figure 2):



Figure 1 - Existing DLR Zoning Map 2016 -2022



Figure 2 - Draft DLR Development Plan Zoning Map 2022-2028

2.1.2 Height

The Draft Development Plan contains a Building Height Strategy (Appendix 5), which is considered of particular relevance to the subject site. However, we acknowledge that the recently published ‘Building Height Guidelines’ entitled ‘Urban Development and Building Heights - Guidelines for Planning Authorities December (2018)’ supersede the requirements of the Building Height Strategy. Section 34(2) (ba) of the 2000 Act, provides in effect that the requirements of an SPPR will take precedence over any conflicting provisions of the Development Plan:

“(ba) 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.”

We note also that this is reflected in the terms of section 1.14 of the Building Height Guidelines specifically states:

“1.14 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.”

In consideration of the above, we consider the Building Height Guidelines to be the predominant context for assessment of building heights in this case and we direct An Bord Pleanála the Planning Report and Statement of Consistency, which clearly demonstrates compliance of the scheme with the provisions of same.

Notwithstanding the above, it is considered appropriate to consider the development vis a vis the objectives and general principles of the Building Height Strategy in the Draft Plan. The sections below deliver this review.

General Context

The general context for building height in Dun Laoghaire is set out in Section 3 of the Building Height Strategy to the Draft Development Plan. In the Draft Development Plan Kiltiernan – Glenamuck are identified as a ‘Key Growth Corridors’, and section 3.6 specifically states that ‘*there are a number of planning permissions granted for higher buildings in what are called the key growth corridors of the County as identified in the Regional Spatial and Economic Strategy (RSES)*’.

In addition, there has been a noticeable pattern of gradual increase in residential density in ‘infill’ sites within the built-up area of Dun Laoghaire. Many infill developments have been a higher density and with a taller height profile than the prevailing local low-rise context. This pattern of development is supported by the Building Height Strategy with the Draft Development Plan 2022-2028 which allows for increases in height at appropriate locations or on sites in excess of 0.5ha which set their own context.

The height of all 3 blocks A, B & C extends to 7 floors with the top floor being set back with the proposed heights sympathetic to the surrounding residential area. The site, due to its location in proximity to a number of quality public transport nodes, local shopping facilities, quality sports venues and surrounding employment opportunities, is ideally suited to ensure a better quality of life

through the accessing of these services and facilities while ensuring a more efficient use of land and allowing for greater integration of existing infrastructure and amenities.

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. In addition, the Daylight & Sunlight Assessments prepared by Digital Dimensions, confirm that there are acceptable levels of access to natural daylight and sunlight. Similarly, the detailed Wind and Microclimate Study, prepared by B-Fluid 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.

Please refer to Figure 3 for the proposed height of Blocks A, B & C.



Figure 3 -Height of proposed blocks

Policy Approach

Section 4.4 of the Building Height Strategy to the Draft Development Plan sets out a policy approach for residual suburban areas not included within Cumulative Areas of Control as set out in the Building Height Strategy. The proposed development is not included within a Cumulative Area of Control.

To ensure application of the 4 SPPRs (Specific Planning Policy Requirements) and having regard to the other content of the Guidelines a number of policies have been formulated, which support increased building height and/or taller buildings at appropriate locations while ensuring adequate protection of residential amenities and the very unique character and environmental sensitivities of the County.

A very detailed Performance Management Criteria table has also been developed. It is overall policy for all proposals to justify increased height and/or taller buildings;

Policy Ref.	Policy	Applicant Response
BHS1	<p>It is a Policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NP0 35, SPPR 1& 3).</p> <p>Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria. Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.</p>	<p>The height of the 3 Blocks extends to seven floors with the top floor being set back, with the proposed heights being very much sympathetic to the surrounding residential pattern and, as demonstrated in the application documentation, it is submitted that the proposed heights and density are in accordance with the government policy for Urban Development and Building Height 2018.</p> <p>Careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development, local topography and to where additional height can be accommodated within the site and the overall framework for the site</p> <p>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.</p> <p>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.</p>

BH3	<p>It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area. Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria. Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.</p>	<p>As noted above, please see Table 2 below which sets out compliance with the said performance based criteria.</p>
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Table 2 - Performance Based Criteria

CRITERIA FOR ALL SUCH PROPOSALS	DM REQUIREMENT	COMPLIANCE
AT COUNTY LEVEL		
Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.		As per section 10.2 of the combined Planning Report and Statement Of Consistency, which is submitted with this application, the proposal secures the relevant objectives of the NPF.
Site must be well served by public transport – i.e., within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service, and good links to other modes of public transport.		<p>As detailed in the Planning Report and Statement of Consistency prepared by Brock McClure, and the Traffic and Transport assessment prepared by Waterman Moylan , the overall site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</p> <p>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. It is located East of Leopardstown Racecourse, North of Carrickmines and West of Loughlinstown and provides easy access to the M50 north and south. M50 south connects to the N11 and the M11.</p>
Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or crossroads or public transport interchange to the benefit of the legibility, appearance or character of the area.	Landscape and visual assessment by suitably qualified practitioner. Urban Design Statement. Street Design Audit (DMURS 2019).	<p>Careful consideration has been given to the successful integration of the proposal into the existing character and topography of the site and area. We note specifically that additional height is only proposed at locations where topography and existing site characteristics are favourable and in keeping within the surrounding development of the area.</p> <p>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>
Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.		The proposal does not affect any strategic protected views or prospects. Residential development is considered permitted in principle under this zoning objective. The site is not located within a Conservation Area and there are no Protected Structures on or bounding the lands.

Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.		Not applicable
Proposed Material Amendment - Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development		<p>A detailed Energy and Sustainability Report has been prepared by RM Breen Engineering Ltd which accompanies this application. Discussions between the client and the design team recognize the importance of creating a sustainable development which interplays between good urban design, and the most efficient use of energy and natural resources.</p> <p>The building services design strategy for the proposed development utilises as many sustainable design options as possible and energy efficient systems that are technically, environmentally, and economically viable for this project to achieve a low energy and environmentally friendly development.</p>
AT DISTRICT/NEIGHBOURHOOD/STREET LEVEL		
Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.	Proposal should demonstrate compliance with the 12 criteria as set out in “Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities” 2009. Street Design Audit (DMURS 2019).	Included in the within SHD application is a combined Planning Report and Statement of Consistency which fully sets out compliance with the criteria as set out in the aforementioned guidelines.
Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.	Design Statement.	Careful consideration has been given to ensure that a monolithic appearance is avoided within the proposal. We refer An Bord Pleanála to the McGrane and Partners Architects drawings and the Design Statement enclosed with the within SHD application for further details.
Proposal must show use of high quality, well considered materials.	Design Statement. Building Life Cycle Report.	Appropriate use of materials and fenestration details as proposed by McGrane, and Partners Architects has ensured that the building fabric is well considered. We refer An Bord Pleanála again to the Design Statement and the Building Life Cycle report prepared by Aramark.

Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.	Must also meet the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009”.	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.
Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.		<p>The proposal offers significant enhancement to the local public realm by way of a new pedestrian connections, a new residential amenity area (Block B), a new play area, and significantly improved frontage along Glenamuck Road.</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> <p>We also refer the Design Statement submitted by McGrane and Partner Architects for further details on matter of context, connectivity, inclusivity, public realm, adaptability, privacy and amenity, parking, and detailed design items.</p>
Proposal must positively contribute to the mix of uses and/or building/dwelling typologies available in the area.	Design Statement.	An appropriate mix of unit types and sizes are incorporated into the development proposal. Notably, a residential mix of 34 x 1 beds (29%), 76 x 2 beds (64%) and 8 x 3 beds (7%) is proposed. 1, 2 and 3 bedroom apartment typologies are set out in the Design Statement prepared by McGrane and Partners Architects.
Proposal should provide an appropriate level of enclosure of streets or spaces.	Design Statement.	<p>The proposed development is considered to make a positive contribution in terms of place-making again through the provision of new pedestrian connections, a new residential amenity area (Block B), a new play area, and significantly improved frontage along Glenamuck Road.</p> <p>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.</p>

<p>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>		<p>As set out by the Design Statement, 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.</p> <p>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 buildings.</p> <p>The proposal has been designed specifically to enhance connections to the surrounding area including the greenway to the north of the site. The proposed development has been designed to respond positively to the existing residential developments to the south, north and west. 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 and one which enhances the presence of the natural landscape with high quality materials sympathetic to the surroundings.</p>
<p>Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>		<p>The proposed development is considered to make a positive contribution in terms of place- making again through the provision of new pedestrian connections, a new residential amenity 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.</p>
<p>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties</p>		<p>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 in variety of building layouts, sizes, and heights.</p> <p>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.</p>

AT SITE/BUILDING SCALE		
Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.	Must address impact on adjoining properties/spaces/	A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Design Statement by McGrane and Partners Architects.
Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance “Site Layout Planning for Daylight and Sunlight” (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.		The current proposal is accompanied by a Daylight and Sunlight Analysis, which confirms that there are acceptable levels of access to natural daylight and that overshadowing is minimised. In this regard, appropriate consideration has been given to the relevant guidance documents and specifically ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 - ‘Lighting for Buildings - Part 2: Code of Practice for Daylighting’.
Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.		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, of which demonstrate that the design proposals are appropriately considered which have confirmed that no adverse or negative impacts arise. These assessments are submitted as part of the application.
Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.		The site is not located in or adjacent to an Architectural Conservation Area, nor does the site contain a protected structure.
COUNTY SPECIFIC CRITERIA		
Having regard to the County’s outstanding architectural heritage which is located along the coast , where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.	An urban design study and visual impact assessment study should be submitted and should address where appropriate views from the sea and/or piers.	Not Applicable
Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.	An urban design study and visual impact assessment study should be submitted.	The proposal responds to the surrounding context in the form of an appropriate transition in scale away from where the boundaries either adjoin or are adjacent to existing residential development. The proposed buildings will respond (in their setback from the boundaries, their height

		and steps in the massing) to the particular conditions and degree of sensitivity of the adjacent lands.
Additional specific requirements (Applications are advised that requirement for same should be teased out at preplanning's stage).		A pre-planning submission was lodged to the Planning Authority in March 2020 and a formal pre-planning meeting was held in 19 th April 2021 to discuss the proposal in principle. In addition, On the 7 th of October 2021, a formal Strategic Housing Development pre-application request was lodged with An Bord Pleanála. Reference ABP-310772-21 refers.
Specific assessments such as assessment of microclimatic impacts such as down draft.		We refer An Bord Pleanála to the enclosed input from BFluid, which examines in detail the impacts of proposed development in terms of Wind and Microclimate.
Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.		This SHD application is accompanied by an AA Screening Report prepared by Enviroguide, which demonstrates that the proposed building height does not have any potential to adversely impact on the biodiversity of the area. As outlined in the AA Screening, the development is not located within any European Site and therefore there will be no loss or alteration of habitat as a result of the proposed development.
Assessment that the proposals allows for the retention of telecommunications 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 for planning application stage.
An assessment that the proposal maintains safe air navigation.		<p>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</p> <p><i>“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.”</i></p>

Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.		An Appropriate Assessment Screening Report and an EIA Screening Report has been prepared and submitted by Enviroguide and is accompanied with this planning application.
Additional criteria for larger redevelopment sites with taller buildings		Not applicable
Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.		<p>The proposed development is considered to make a positive contribution in terms of place- making again through the provision of new pedestrian connections, a new residential amenity 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.</p> <p>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 in 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.</p>
For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.		We refer the board to the accompanying Daylight and Sunlight assessment prepared by Digital Dimensions which is submitted with this application.

In addition to the foregoing, we refer the competent authority to the enclosed combined Planning Report and Statement of Consistency which sets out the compliance of the development proposal with the provisions of the Building Height Guidelines entitled ‘Urban Development and Building Heights - Guidelines for Planning Authorities December (2018)’ and the criterion contained therein.

We note specifically that this addendum to the Statement of Consistency has also set out the consistency of the development proposal with the performance criteria of the Building Height Guidelines, which is the prevailing context for height in this case. It is submitted that there is a sufficient policy context to grant permission for the proposed development in line with the compliance of the scheme *vis a vis* SPPR 3A.

It is our view that additional height can be positively considered at this site in consideration of the above.

2.1.3 Car Parking

Section 12.4.5 of the Draft Development Plan sets out Car Parking standards. Within the Draft Plan parking has now been divided into four ‘Parking Zones’, reflecting the varying degrees to which parking criteria are met. The subject site is located within Parking Zone 2. Within Zone 2, the plan states for residential uses reduced provision may be acceptable dependent on the following assessment criteria :

DRAFT DEVELOPMENT PLAN ASSESSMENT CRITERIA	APPLICANT RESPONSE
Proximity to public transport services and level of service and interchange available.	<p>The site is well served by public transport with the site located 150m from the Carrickmines Green Luas line stop, which in turn provides a direct connection north to Dublin City Centre and beyond and south to Brides Glen (last stop).</p> <p>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</p> <p>Detailed in the Traffic and Transport Assessment that has been prepared by Waterman Moylan, it states that <i>“The site is directly served by an existing bus route running along the Glenamuck Road North. It is approximately a 150m walk (c. 1-minute walk) from the proposed site entrance to the bus stops travelling both directions. The subject bus stops - which are located on Glenamuck Road North, are served by Route 63. This bus route connects Kilternan to Dun Laoghaire via different itineraries.”</i></p>
Walking and cycling accessibility/permeability and any improvement to same.	<p>Cyclists can benefit from the provision of cycle tracks immediately on North Glenamuck Road. 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 through the proposal will further enhance this network.</p>

	The proposed layout of the development is highly permeable for both pedestrians and cyclists through the delivery of connectivity. We refer An Bord Pleanála to material enclosed from Waterman Moylan Engineering Consultants which sets out further detail on permeability and connectivity of the site.
The need to safeguard investment in sustainable transport and encourage a modal shift.	These facilities make the subject site highly accessible for cyclists which will encourage residents to shift away from private car use. In addition, 280 no. cycle parking spaces are proposed which will further assist in increasing the attractiveness of cycling as an alternative for car based travel.
Availability of car sharing and bike / e-bike sharing facilities.	There is no GoCar station located within the proposed development, however, there is one GoCar station within the vicinity of the proposed development at Carrickmines Park Shopping Centre. This is 1km away (c. 14-minute walk).
Existing availability of parking and its potential for dual use.	<p>A total of 103 no. car parking spaces are proposed to cater to the residential element of the proposed development. A total of 67 spaces are proposed at basement level and 36 spaces are proposed at surface level, 5 of which will be disabled spaces and 17 no. will be equipped with electric power charging points.</p> <p>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. This is considered an exceptional provision.</p> <p>The guidelines recommend 1 cycle parking space per bedroom and 1 visitor space for every 2 apartments. The proposed development provides c. 280 cycle parking spaces at basement and ground floor level to accommodate residents and visitor cycle parking requirements.</p> <p>This level of cycle parking provision is appropriate and justified in the context of the site location, public transport accessibility, the quantum of car parking proposed, and is supported by the Guidelines which states that “any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement”</p>
Particular nature, scale, and characteristics of the proposed development.	<p>The site, due to its location in proximity to a number of quality public transport nodes, local shopping facilities, quality sports venues and surrounding employment opportunities, is ideally suited to ensure a better quality of life through the accessing of these services and facilities while ensuring a more efficient use of land and allowing for greater integration of existing infrastructure and amenities.</p> <p>The site is directly served by an existing bus route running along the Glenamuck Road North. It is approximately a 150m walk (c. 1-minute 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</p>

	<p>There are additional bus routes along the N11 corridor which provide access to Dublin City centre via the bus routes 84A, 84X, 145 and 155. The walking distance to this bus stop is approximately a 2.1km walk (c. 26-minutes), there is no available cycle parking spaces within the area of the bus stop, so the cycle time is not necessary.</p>
<p>The range of services available within the area.</p> <p>Impact on traffic safety and the amenities of the area.</p>	<p>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</p> <p>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 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</p> <p>The site due to its location in proximity to a number of quality public transport nodes, local shopping facilities, quality sports venues and surrounding employment opportunities is ideally suited to ensure a better quality of life through the accessing of these services and facilities while ensuring a more efficient use of land and allowing for greater integration of existing infrastructure and amenities.</p>
<p>Capacity of the surrounding road network.</p> <p>Urban design, regeneration and civic benefits including street vibrancy.</p>	<p>Glenamuck Road North is a single carriageway road, which is subject to a speed limit of 50kph and is approximately 550 metres in length. Glenamuck Road North is c. 7.2 meters wide and at the priority junction with Pavilion Gate it comprises a right turning lane from Glenamuck Road North into Pavilion.</p> <p>To the north of Glenamuck Road North, there is a signalised junction between Glenamuck Road North / Brighton Road / Brennanstown Road / Cornelscourt Hill Road. Both Brennanstown Road and Cornelscourt Hill Road continue to the N11 corridor approximately 1.2 km away.</p> <p>To the south of Glenamuck Road North there are three roundabouts leading to the M50 Motorway northbound and southbound and continuing on to Glenamuck Road South which leads to Carrickmines Park Shopping Centre and parking for the Carrickmines Luas Station.</p> <p>There are currently cycle lanes travelling both directions along Glenamuck Road North. Both cycle lanes are separated from the road by a small curb for the majority of the road. The cycle lanes continue for the full length of Glenamuck Road North and ends at both the signalised junction to the north and the roundabout to the south</p> <p>The existing pedestrian network along Glenamuck Road North includes pathways on both sides of the road, separated by cycle lanes. Pedestrian facilities in the surrounding area comprise of a network of footways linking the various neighbourhoods to each other, to local schools and retail centres, and to the Carrickmines Luas Station.</p>

Robustness of Mobility Management Plan to support the development.	A robust Car Parking Strategy and Traffic and Transport Assessment has been prepared by Waterman Moylan and accompanies this application.
The availability of on street parking controls in the immediate vicinity	Parking Controls on street are managed by Dún Laoghaire Rathdown County Council.
Any specific sustainability measures being implemented including but not limited to: -The provision of bespoke public transport services. -The provision of bespoke mobility interventions.	<p>The Bus Connects project currently being promoted by National Transport Authority (NTA) aims to deliver a much-enhanced bus service to the Greater Dublin Area (GDA).</p> <p>The route proposed to serve the development area is L26 and L27, which is planned to connect Kilternan to Blackrock and Ballyogan to Dun Laoghaire respectively. The bus route, E1 is also available from the N11 corridor and provides a route from Northwood through the City Centre in Ballywaltrim. Please refer to the attached Traffic and Transport Assessment for further detail on this network.</p> <p>In addition, proposals for the GDA cycle Network Plan were published by the NTA in December 2013. The plan set out a vision and a strategy for the construction and/or designation of a comprehensive network of cycling routes throughout the GDA. The proposal provides a greenway directly south of the proposed development which continues on to Sandyford. Immediately adjacent to Glenamuck Road North there will be feeder cycle lanes continuing up to the N11 corridor and one of the Primary Cycle Networks which connects to the city centre.</p>

When the above standards are applied to the proposed development, a total 126 No. spaces are required for the residential proposal. The proposed development provides for 103 no. car parking spaces to cater for the residential element of the proposed development, which it is acknowledged does not meet the standards set out in the Draft Plan, but as per above, a deviation from the car parking standards may be considered by the Planning Authority as long as it complies with the assessment criteria in 12.6 of the Draft Plan.

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

Section 3.4.3.2 “CA16: Electric Vehicles” of the Dun Laoghaire Rathdown Draft Development Plan 2022-2028 provides that :

“The growth of E-bikes is recognised as an important means of encouraging alternatives to the private car, increasing journey length by bike and reducing GHG emissions. E-bikes are also opening up cycling as a transport mode for the disabled, elderly and families. E-cargo bikes also have a role to play in reducing commercial vehicles in the County.”

The proposed development provides for Surface parking of 36 spaces and basement in block A & B of 44 spaces and in basement block C of 23 spaces. Of the proposed parking spaces, 5 no spaces (5%) will be disabled parking spaces and 17 no. spaces (16.5%) will have electric power recharging points

Notwithstanding the above, we note that the DOE Apartment Guidelines (2020) generally encourage reduced standards of car parking and the content of these Guidelines supersede Development Plan requirements. As such, the DOE Apartment Guidelines are the predominant context for the provision 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 categorized as a Central and/or Accessible Urban Location. Compliance to the DOE Apartment Guidelines is set out in detail in the attached Statement of Consistency and also in the Car Parking Strategy and Mobility Management Plan, prepared by Waterman Moylan which also sets out a clear rationale behind the provision of car parking which should be duly considered by An Bord Pleanála.

2.1.4 Cycle Parking

Section 12.4.6 of the Draft Plan set out the standards for cycle parking and accords with the ‘Standards for Cycle Parking and Associated Cycling Facilities for New Development’ (2018). It is a requirement that, new residential developments of 5 residential units or more or non-residential type developments of 400 sq. m. or over, submit a Cycle Audit as part of the planning application. The Cycle Audit must be prepared by a suitably qualified person and shall clearly demonstrate, in plan format, how all the requirements of Council’s Standards for Cycle Parking and Associated Cycling Facilities for New Developments, are met within the development.

These standards require the following provision for residential use:

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

According to the parking standards a total of 141.6 no. cycle spaces are required to comply with the Draft Plan. A total of 280 no. bicycle spaces are proposed for the proposed development, 254 no. spaces at basement level and 26 no. spaces at surface level which fully comply with the above standards.

2.1.5 Public Open Space

Section 12.8 of the Draft Plans sets out the requirements for public open space and recreation. It states that for developments of 10+ residential units, a Landscape Design Rationale must be submitted with the application. We can confirm that a detailed ‘Landscape Design Statement’ has been prepared by Mitchell and Associates and submitted with the application. The public open spaces requirements as set out in the Draft Plan states that ‘Residential Developments in the existing built up area’ require a minimum of 15% of the site area

With regard to open space requirements, Section 8.2.8.2 of the 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.

We note at this time that the definition of open space with the Development Plan includes ‘primary and formal space’ and as such the total provision of 2,730.4 sq m can be accepted as addressing requirements here. A detailed breakdown of open space is included in the McGrane’s Architectural Design Statement enclosed here within.

In considering the above, we note the following proposal and calculations for public open space for the entire Masterplan of 2,7304sq m vis - a - vis Development Plan and the Apartment Guidelines standards:

DLR Standards & Apartment Guidelines Standards

The above considered, we acknowledge that the Apartment Guidelines (2020) take precedence in terms of the requirement and provision, and we set out below the requirement for the overall masterplan site in consideration of the permitted SHD and Phase 1 as currently proposed

Site Area	DLR Standards Requirement	Provision Provided
Total Masterplan Site Area (7,368sqm)	10-15% of Site Area Total Communal Open Space Required = 736.8 sqm – 1,107.9sqm	2,071 sqm

Table 3 - Table 3 – DLR Standards for Open Space Requirements

The proposed development will provide for significant public open space and communal open space facility offering within the development. We note specifically taking into account the specific requirements above from the apartment guidelines, as per table 5 below that this provision is over and above requirements of the relevant Draft Development Plan and the Apartment Guidelines.

Accommodation	Requirement	Provision Proposed
1 Bed	5 sqm x 34 = 170 sqm	Total Open Space Provided 2,071 sqm *
2 bed	7 sqm x 76 = 532 sqm	
3 bed	9 sqm x 8 = 72 sqm	
Total	= 774 sqm required	

Table 4 -Apartment Guideline Standards for Open Space Requirements

This provision is over and above requirements of the relevant minimum Draft Development Plan.



Figure 3 – Provision of Open Space Landscape Rational

2.1.6 Private Open Space

Section 12.8.3.3 (ii) of the Draft Plans sets out the requirements for private open space for apartment developments, relevant to the proposed development, it states as follows:

Type/No. of bedrooms	Min sq.m
1 Bed	5 sq m
2 Bed (3 persons)	6 sq m
2 Bed (4 persons)	7 sq m
3 Bed	9 sq m

Table 5 - Private Open Space Requirements as set out in the Draft Plan 2022-2028

We refer An Bord Pleanala to the Housing Quality Assessment prepared by McGrane and Partners Architects for full details on private open space provision and other residential amenity requirements. Each new residential unit has an associated area of private open space in the form of a terrace/balcony. An Bord Pleanala will note that all proposals are consistent with the above requirements.

Private Open Space Apartment Guidelines Requirement	Private Open Space Achieved
1 Bed - 5 sq m	Minimum 7.1 sq m - Maximum 15.7 sq m
2 Bed – 7 sq m	Minimum 8.0 sq m - Maximum 49.0 sq m
3 Bed – 9 sq m	Minimum 8.1 sq m - Maximum 55.7 sq m

Table 6 - Private Open Space requirement and space achieved

2.1.7 Density

Section 12.3.3.2 of the Draft Plans sets out the requirements for Residential Density. The Draft Plan states that ‘the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document: ‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport’.

Policy PHP18 of the Draft Development Plan generally promotes higher residential densities residential densities subject to the reasonable protection of residential amenity and the established character of the area.

Policy Objective PHP18: Residential Density

“It is a Policy Objective to:

- **Promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites**
- **Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”**

The overall development provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha, and a proposal for 118 units on a central site.

This residential density is considered appropriate to the site given proximity of the site to the public transport corridor, 150 m (1 minute walk) from the Luas Green Line stop at Carrickmines which is a high frequency transport node. The site is also well serviced by the M50 motorway, which is located 400m to the Southwest and by cycle lanes on Glenamuck Road North.

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.

The proposed residential development, as detailed in the application documentation, is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' and 'Irish Design Manual for Urban roads and streets’.

3 Conclusion

This addendum to the Statement of Consistency has identified the compliance of the scheme with the Dun Laoghaire Development Plan 2022-2028 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 invite the Board to consider the proposal now in front of them. 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 ask that the Board consider these points in their review of proposals, and we trust that they will view this application as a positive move towards delivery of sustainable development on zoned lands.