



PLANNING STATEMENT OF CONSISTENCY

PROPOSED STRATEGIC HOUSING DEVELOPMENT AT LANDS ADJOINING
CLONKEEN COLLEGE, CLONKEEN ROAD, BLACKROCK, CO. DUBLIN



PREPARED FOR:
CLONKEEN INVESTMENTS DAC

PREPARED BY:
TOM PHILLIPS + ASSOCIATES
TOWN PLANNING CONSULTANTS
80 HARCOURT STREET
DUBLIN 2
D02 F449

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1.0 INTRODUCTION

1.1 Introduction

This Planning Statement of Consistency is prepared for the purposes of demonstrating the extent to which the proposed residential development at Lands Adjoining Clonkeen College, Clonkeen Road, Blackrock, Co. Dublin is consistent with the relevant policies pertaining to the site at national, regional, and local levels.

1.2 Legislative Context

In accordance with Section 4 of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, Clonkeen Investments DAC is seeking planning permission from An Bord Pleanála, in respect of proposed Strategic Housing Development (SHD) as outlined above. The subject report constitutes the *Statement of Consistency* in accordance with the requirements of the Act.

1.3 Outline of This Report

This Planning Report provides a description of the proposed development followed by a list of the various statutory and strategic policy documents considered and demonstrates the extent of consistency with the pertinent *Development Plan* (i.e. the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*) and the relevant Section 28 National Guidelines as required under Section (5)(b)(i) and (ii) of the Act.

The following policy documents have been considered in this Report:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*;
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
4. *Urban Design Manual: A Best Practice Guide (2009)*;
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
6. *Quality Housing for Sustainable Communities (2007)*;
7. *Childcare Facilities – Guidelines for Planning Authorities (2001)*;
8. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
9. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
10. *The Planning System and Flood Risk Management (2009)*;
11. *Urban Development and Building Heights, Guidelines for Planning Authorities (2018)*;
12. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
13. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
14. *Dún Laoghaire-Rathdown County Development Plan 2016-2022*;
15. *Draft Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

2.0 DESCRIPTION OF PROPOSAL

2.1 Site Location

The subject site is located south of Deansgrange Village, Blackrock, Dublin. It is bound to the north by the playing pitches associated with the adjoining Clonkeen College. The area generally constitutes 2 no. storey, mature residential development. The site is located within a mature residential area and is surrounded by existing residential developments, which generally comprise semi-detached and terrace housing, the back gardens of which back onto the site. The adjoining existing school buildings are confined to the northern end of their own lands, which generally comprise two storey, flat roofed buildings, and a single storey element with a pitched roof. These are separated from the subject site by the school playing fields. Monaloe Park housing estate is to the south east of the site, with Meadow Vale housing estate running along the north and eastern boundary of the site. A number of individual dwellings in Monaloe Crescent and Clonkeen Road adjoin the site to the south-western boundary of the site, with a Texaco filling station and childcare facility adjoining the site to the north of these dwellings on Clonkeen Road.

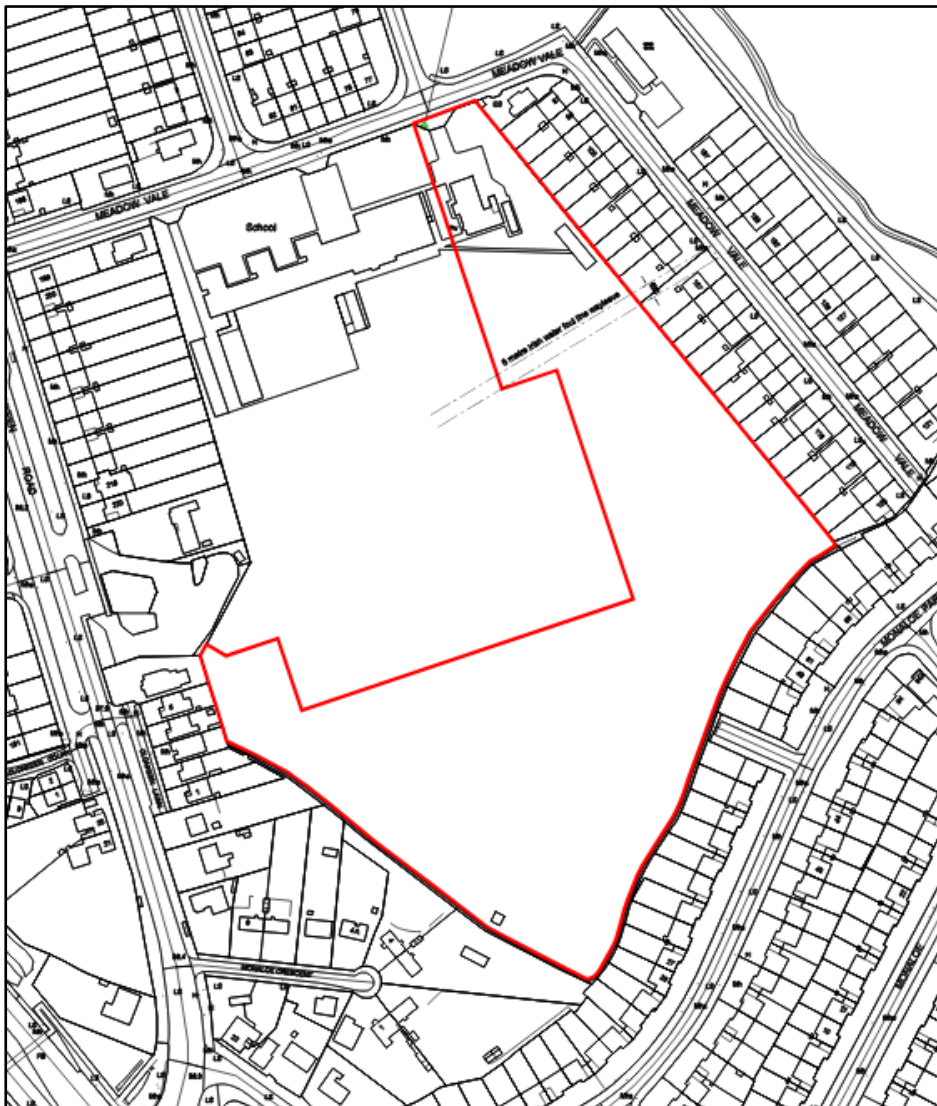


Figure 2.1: Extract of *Site Location Map*, prepared by Scott Tallon Walker Architects. [Cropped and annotated by TPA, 2021.]

2.2 Proposed Development Description

The proposed development is described as follows in the Statutory Notices;

“Clonkeen Investments DAC intend to apply to An Bord Pleanála (the Board) for permission for a Strategic Housing Development with a total application site area of c. 3.3 ha, on a site located at Lands Adjoining Clonkeen College, Clonkeen Road, Blackrock, Co. Dublin. The development, with a total gross floor area of c 33,851 sq m, will provide 299 no. residential units and a 1 no. storey 353 sq m childcare facility with dedicated play area 231 sq m. The development will consist of 18 no. ground floor 3 bedroom duplex apartments and 18 no. 2 bedroom apartments above and 12 no. ground floor 2 bedroom apartments with 12 no. 3 bedroom duplex apartments above. The 60 no. duplex units are arranged in 6 no. three storey blocks. The development will also consist of 239 no. apartment units (111 no. 1 bedroom apartments, 120 no. 2 bedroom apartments and 8 no. 3 bedroom apartments) arranged in 4 no. 6 storey blocks over 1 no. storey basement; public open space, communal open space and private open space (including all balconies, terraces and individual unit gardens at all levels); 614 sq m communal resident facilities including concierge and welcome area (195 sq m), residents’ flexible work facility (219 sq m), residents’ lounge (100 sq m) and residents’ gym area (100 sq m).

The development will also provide for the demolition of the 2 no. storey office building (‘St. Helen’s’, Meadow Vale - 470 sq m) to facilitate new vehicular, pedestrian and cyclist access to the site, to the north of the proposed development via Meadow Vale.

The development will also include the provision of 2 no. designated play areas; internal roads and pathways; bin stores; 248 no. car parking spaces, including 167 no. at basement level and 2 no. shared vehicle (GoCar) spaces, 388 no. bicycle parking spaces, and 10 no. motorcycle parking spaces at basement and surface level; hard and soft landscaping; plant; boundary treatments including the repair and replacement of some existing boundary treatments; the provision of new surface water and foul drainage pipes and any required pipe diversion works or build over works; internal foul pumping station; a new internal access road and paths; changes in level; services provision and related pipework, ducting and cabling; electric vehicle charging points; 4 no. stormwater attenuation tanks; 1 no. ESB substation; photovoltaic panels; SUDS including green roof provision; signage; provision for future pedestrian access to Monaloe Park to the east of the development, including the provision of a pedestrian bridge, extending over the drainage ditch; public lighting and all site development and excavation works above and below ground.”

The proposed development will have a net density of 90 No. units per hectare. We contend that this density is appropriate for the site having regard to the following:

1. The National Planning Framework (Ireland 2040 – Our Plan), RPGs, and Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018), which promote higher residential densities and consolidation in the Dublin area;

2. The provision of high-quality open space;
3. The established suburban nature of the wider surrounding area;
4. The site's proximity to a range of facilities and amenities including nearby Deansgrange, Blackrock and Dún Laoghaire town centres, employment centres, schools and University College Dublin;
5. The infrastructural capacities in the area, including, *inter alia*, the roads and drainage networks.

The supporting documentation enclosed demonstrates that the proposed scheme will not negatively impact on the neighbouring land uses nor contravene the site's land use zoning *Objective A*, which aims to '*protect and-or improve residential amenity*', where residential use is '*Permitted in Principle*'

For example, the proposed building heights conform to more-recently established building heights for residential developments in Dún Laoghaire-Rathdown area, allowing for the increase in residential densities. We purport that generous separation distances between the new and proposed residential units ensure there is no undue overshadowing or overlooking impacts arising from the proposed development.

In addition to the high-quality design approach that has been adopted for the residential units, the proposed landscaping plan for the proposal will ensure from the outset that the proposed development matures into the surrounding context. Further information on the proposed development is outlined in the documentation accompanying this planning application.

3.0 NATIONAL POLICY COMPLIANCE

3.1 *National Planning Framework (Ireland 2040 – Our Plan)*

The *National Planning Framework (NPF)*, published in February 2018, sets out a strategic development framework for the Country to 2040. The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

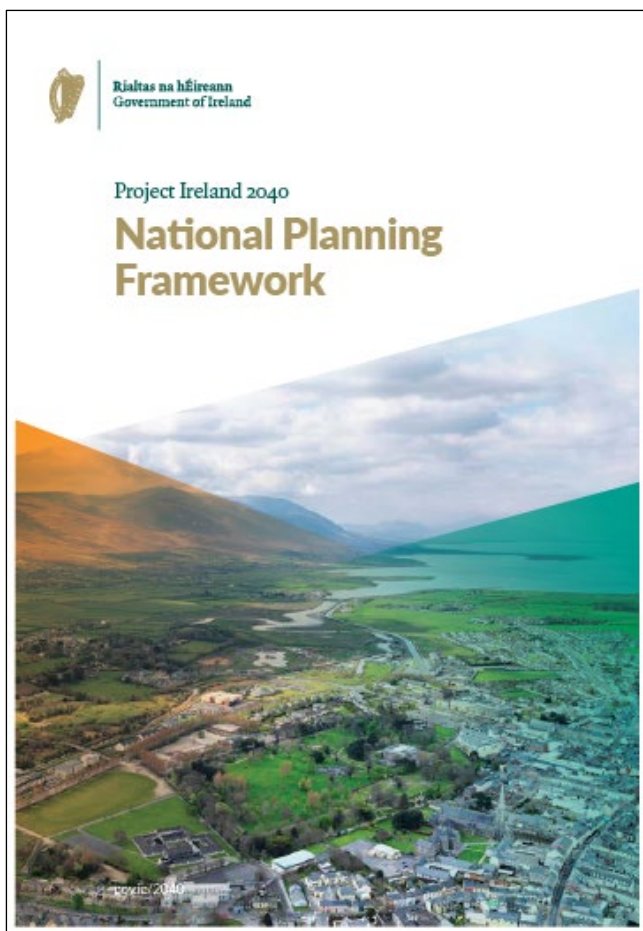


Figure 3.1: Cover of National Planning Framework (Ireland 2040- Our Plan)

The Framework focuses on:

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

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

Under the heading of *'Compact Growth'*, the NPF is:

"Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport". [Our emphasis.]

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The NPF estimates that Dublin City and suburbs will grow by c. 264,000 people in the period to 2040. Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

National Policy Objective 3a aims to “deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements”. **Objective 3b** further states that “at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints”.

National Policy Objective 13 indicates a shift away from blanket planning standards in favour of standards based upon adherence to specific performance criteria.

“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.”

With particular respect to housing and community development, **National Policy Objective 33** of the NPF has the following stated objective:

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

Additional Objectives contained within the National Planning Framework that are of relevance to the subject scheme are outlined below:

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.

National Policy Objective 27: 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 facilities for all ages.

National Policy Objective 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Subject Proposal is Fully Consistent with the Provisions of NPF

The subject development inherently complies with the overarching themes of the *NPF* by proposing a compact well-designed sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the *NPF*'s aims to consolidate Dublin through the development of underutilised, infill sites in locations that benefit from high quality public transport links.

3.2 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (RSES)* is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Eastern & Midland Region.

The RSES includes a strategic plan for Dublin, the Metropolitan Area Strategic Plan (MASP). To achieve the Vision the MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area including Compact sustainable growth, which aims to:

“Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.” [Our emphasis.]

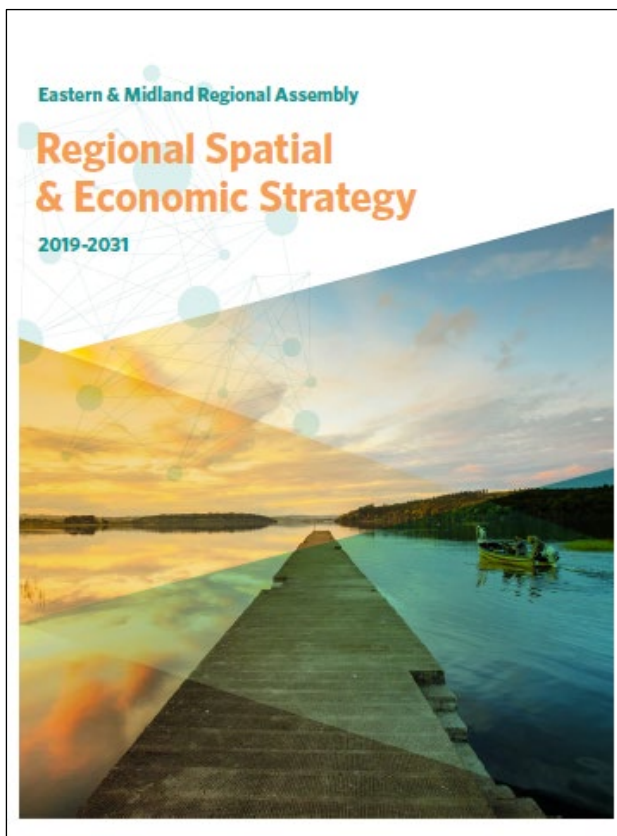


Figure 3.2: Cover of Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The RSES includes Policy RPO 5.5 which focuses on housing delivery. It states:

*“RPO 5.5: Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a **primary focus on the consolidation of Dublin and suburbs**, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the draft RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.” [Our emphasis.]*

In addition, Regional Policy Objectives 3.3 and 5.4 state:

Regional Policy Objective 3.3

“Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities.’” (p.39.)

Regional Policy Objective 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.’” (p.112.)

Table 4.3 of the RSES Document sets out a ‘Policy Response’ for the Dublin City and Suburbs settlement typology. It states:

“Continued consolidated population and employment growth with a focus on improving housing supply and amenity provision to create sustainable communities and improve public transport and sustainable travel options.” (p.47.)

It is clear from the RSES Policies and Objectives that the achievement of compact growth through the development of strategically located residential sites, such as the subject site, should ensure that higher densities are delivered to ensure the projected population growth is delivered sustainably within the contiguous built-up area of Dublin City and Suburbs. This will be achieved in tandem with the provision of increased building heights at such strategic sites, including the subject site.

In our opinion, the subject development is fully in accordance with the objectives of the RSES realising the potential of infill lands in the consolidation of Dublin and its suburbs.

3.3 *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*

The *Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, (2009)* and its associated document *Urban Design Manual – A Best Practice Guide (2009)* illustrate essential criteria for sustainable urban residential development and describes how a scheme can integrate seamlessly into a site, taking consideration of its surroundings and thus presenting the best possible residential design scheme in built-up areas.

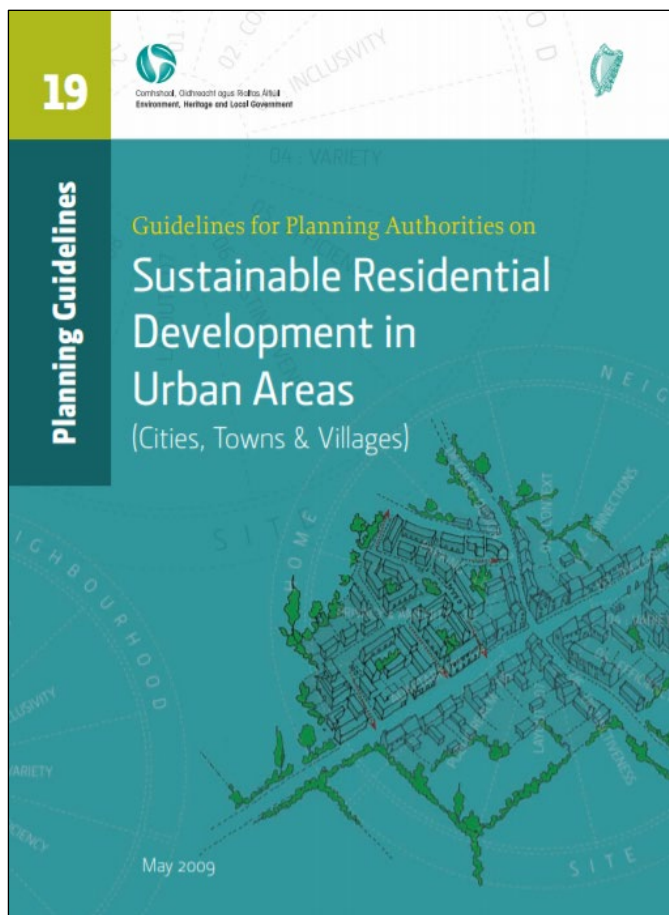


Figure 3.3: Cover of *Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities (2009)*

These Guidelines provide national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question. We contend that the subject site is best described under the Guidelines as ‘Infill Residential Development’, which is referred to in the Guidelines as:

*“Potential sites may range from small gap infill, **unused or derelict land and backland areas**, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, **a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.**”*

*The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. **The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.** Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands."* [Our emphasis.]

The proposed development will have a density of 90 No. units per hectare (based on 299 No. units being provided on a net site area of c. 3.3 ha). We contend that this density is appropriate for the site having regard to the following:

1. The National Planning Framework (Ireland 2040 – Our Plan), RPGs, and Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018), which promote higher residential densities and consolidation in the Dublin area.
2. The provision of high-quality open space.
3. The established suburban nature of the wider surrounding area.
4. The site's proximity to a range of facilities and amenities including Deansgrange Village, employment centres, schools and University College Dublin.
5. The infrastructural capacities in the area, including, inter alia, the roads and drainage networks.

The supporting documentation enclosed demonstrates that the proposed scheme will not negatively impact on the neighbouring land uses nor contravene the site's land use zoning (Objectives 'A') which aims "to protect and/or improve residential amenity".

For example, the proposed building heights conform to more-recently established building heights for residential developments in the area, allowing for the increase in residential densities. Generous separation distances between the new and proposed residential units ensure there is no undue overshadowing or overlooking impacts arising from the proposed development.

The heights proposed are greater than that historically in the area, but must be assessed in the context of the site's zoning as the pivotal point of the locality; other tall developments in the area, particularly on the N11.

In addition to the high-quality design approach that has been adopted for the residential units, the proposed landscaping plan for the proposal will ensure from the outset that the proposed development settles into the surrounding context.

In summary, we are of the opinion that the proposed scheme strikes an appropriate balance between the protection of the amenities and privacy of adjoining dwellings; the protection of established character of the area; and the need to provide residential infill development at an adequate density, particularly in serviced urban areas. The scheme provides a layout and housing typology that responds appropriately to the site and surrounding area. Further information on this is also outlined in the enclosed *Material Contravention Statement*.

3.4 Urban Design Manual: A Best Practice Guide (2009)

The *Design Guide* presents 12 No. criteria that should be used to facilitate assessment of planning applications and should therefore be used as a guide to steer best design practice for residential proposals. The figure below illustrates how the 12 No. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted i.e. not moving onto matters of detail until the important structural decisions have been taken.

The 12 No. criteria are subdivided into three groups:

Neighbourhood / Site / Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process.



Figure 3.4: Urban Design 12 Criteria. [Source: Urban Design Manual, 2009; p. 9 – Extracted by TPA, 2021.]

The proposal's response to the various criteria set out by the Guidelines have been outlined in great detail in the accompanying *Design Statement*, prepared by Scott Tallon Walker Architects. Some extracts of this are provided below for ease of reference.

01: Context

"...the site is well serviced by existing transport links and enjoys a wide range of services and facilities within walking distance. Conditions in the immediate vicinity of the site comprise Clonkeen College Secondary School playing fields to the north and existing residential developments to the south, east and west.

We have located the apartments to the more central areas of the site, with the lower scale duplex units arranged around the perimeter to respond directly to the established surrounding housing. These 3 storey blocks with low pitch roofs are of an appropriate domestic scale so as to be in sympathy with the existing 1960's houses adjacent to site boundary.

The massing of buildings has been stepped towards the six storey apartment blocks at the centre of the site so as to minimise visual impact and potential for overshadowing whilst simultaneously generating a clear hierarchy of form which gives the development as a whole a coherent character and identity.

The apartment buildings have been organised on a north / south axis so as to maximise daylight to the school playing pitches to the North. This arrangement also allows the majority of apartments to be east / west aspect, maximising their amenity value whilst minimising overlooking of adjacent lands.

A central village green is to be developed at the heart of the scheme providing a generous green space amenity which is easily accessible to all residents. This core amenity is further reinforced by the location of the apartment entrance plaza to the north and network of interlinked green spaces which permeate the site.

Existing boundary conditions have been studied in detail, with a key strategy underpinning the proposed design being the retention of all existing trees and the water ditch to the southern and eastern boundary. These features will be reinforced through carefully selected new planting and boundary treatments to ensure that the scheme provides a sensitive response to all local conditions at the site perimeter.

02: Connections

“The success of the new neighbourhood will depend on the quality of the connections to places, facilities and amenities that help support a good quality of life. The design has carefully considered the connections not only within the neighbourhood itself but also with the wider community of Clonkeen.

The design seeks to encourage walking and cycling by providing attractive routes in and out of the new development, thus encouraging sustainable travel patterns. This approach is further reinforced by the provision of an integrated network of pedestrian, bicycle and vehicular routes within the site providing connections between all character areas as outlined in Section 2.3.

Integral to the design is the careful consideration of the connections between distinct character areas within the neighbourhood. These connections have been designed to prioritise safe and sustainable movement through the scheme, creating a sense of place for the new neighbourhood within the fabric of Clonkeen as a whole.

The new neighbourhood benefits from further sustainable travel links beyond Clonkeen delivered by the existing bus routes which are located directly adjacent to the development. This provides the local commuter community with regular service to the city centre and surrounding areas.”

03: Inclusivity

“A clear and efficient roads and parking layout will facilitate vehicular access to the immediate vicinity of all apartment buildings and duplex units. All roads will be DMURS compliant with pedestrian crossing points provided at regular intervals.

Permeability across the site will be further reinforced through the provision of a complementary network of dedicated pedestrian and cycle routes, as illustrated in the diagram on the following page. These pathways will improve the accessibility and amenity value of the green spaces and courtyards as described in Section 3.3 of this report.

As part of the wider neighbourhood context, the development will also play a vital role in providing much-needed family housing, with the development designed to be inclusive to all potential residents and visitors alike.

The inclusivity, accessibility and adaptability philosophy of the proposed design goes beyond the statutory requirements of the Disabled Access Certificate application by providing homes of different types, sizes and tenures. The development will enable people from different backgrounds to benefit from the opportunities afforded by the development, helping to create a balanced and sustainable community.

With varying unit layouts and types, the mix within each apartment building is intended to offer a variety of high-quality tenure options to potential residents. The apartments are also designed to provide lift access to all levels.

Key to the success of the design of the neighbourhood is the diversity of open spaces provided. With this in mind, the new neighbourhood incorporates a range of public communal and private amenity spaces and facilities suitable for all residents, including children of different ages, parents and the elderly.

These include larger formal public spaces with civic character for walking and sitting, formal and informal games areas for adults and youths and smaller semiprivate spaces with good passive supervision suitable for young children’s play.”

04: Variety

“The layout and design of the streetscape, provision of quality amenity areas, landscape mitigation and the protection and enhancement of the peripheral vegetation is central to the long-term successful establishment of this Strategic Housing Development (SHD) at Clonkeen Residential scheme.

As part of the master planning exercise as developed at initial concept stage, the open spaces were established and sited at appropriate locations throughout the scheme. The open spaces, as now developed, are woven into the scheme to provide regular breaks to the built form providing a complimentary aspect and a strong sense of cohesion to the ‘landscape’. The landscape design development has been guided and influenced by both the Ecological and Arboricultural appraisal of the site.

Second to the core principal of amenity was the development of a palette of materials for both hard and soft landscaping to both the amenity lands and the streetscape. To aid us during the process to select materials we have developed a simple check list of both hard and soft landscape materials.

By approaching the design at both macro and micro levels, the proposed scheme will provide a high level of amenity; delivering a workable, aesthetically appealing, and robust solution which will work within the local landscape. It is proposed that both the streetscapes and landscape amenity areas will receive treatments of a high standard in terms of materials and specification; both for hard and soft landscape elements.

As outlined above, our design is intended to reinforce the legibility of differing character areas across the site whilst also providing a wide range of dwelling types and tenures for future residents. This variety will bring a high visual and social amenity to the local area and is conceived to play its role in the success of the new neighbourhood.”

05: Efficiency

“...the development is well connected to existing facilities in Clonkeen, all within walking distance, as well as being served by excellent links to local and national public transport networks. This high degree of connectivity will provide residents of the new neighbourhood with easy access to a wide variety of services, facilities and amenities.

The proposed design aims to maximise available resources whilst responding to the site context. A key aspect of this approach is the massing strategy illustrated on the following pages. As outlined in Section 2.1, the buildings have been arranged to minimise impacts on surrounding development whilst simultaneously creating a clear identity for the new neighbourhood.

A number of design adjustments have been made to the previously submitted ‘Pre-Planning’ scheme in response to ABP’s feedback as outlined in the ‘Notice of Pre-Application Consultation Opinion’ contained in Appendix A of this document.

Specifically, further design consideration has been given to the design of Blocks A1 - A4 having regard to the potential impacts on the residential amenities of the adjoining houses and visual impact on Clonkeen College. This has led to a number of adjustments in order to ensure that there will be no undue overshadowing or other potential negative impacts on the surrounding amenities, including an overall reduction in the height to six storeys including a setback top-most floor. Boundary treatments between the proposed apartment blocks and Clonkeen College playing fields have also been softened with increased soft planting and palisade fencing as outlined in Section 3.4 of this report.

We have also addressed ABP’s concerns in relation to the proximity of Blocks B1 - B4 to the site’s boundary to the rear gardens of dwellings on Meadow Vale, with the proposed units relocated to maintain a minimum distance of 11 meters to this boundary.

The configurations of these blocks has also been revised with the larger duplex units relocated to occupy ground and first floor levels, with generous private gardens provided to the rear.

Balconies to the upper units have also been relocated to the front of the block so as to avoid any undue overlooking into the rear gardens of adjoining properties.

Consideration has been given to the location of the areas of public open space with specific regard to passive surveillance / overlooking of these spaces. This has led to revisions to the landscaping scheme, with gardens and soft landscaping in-lieu of the previously proposed perimeter running track and a significant enlargement of the previously proposed open amenity green space at the heart of the scheme.”

06: Distinctiveness

“The scheme is designed to respond to and maximise the natural resources available on the site in a way which is sympathetic with the surrounding conditions. By responding to local conditions in this way we have identified several distinct ‘Character Areas’ as outlined in the diagram on the following page.

This clarity in design approach allows for the creation of generous formal open amenity spaces as outlined in Section 3.3 which are further reinforced with high quality landscaping as outlined in Section 3.4.

When this network of open spaces are viewed in conjunction with the high level of amenities within the apartments and duplex units as described in Section 4.2, along with the quality of detailed design outlined in Section 4.4, it is clear that the proposed scheme will provide a vibrant, healthy and sustainable new neighbourhood which is integrated into the fabric of Clonkeen as a whole.

07: Layout

“The layout has been considered in detail as part of the design development stage with a view to ensuring the highest quality private and open space amenity. The proposed design generates a series of open spaces in close proximity to end users with buildings positioned so as to provide passive surveillance. This approach unites the built form and landscape design to deliver a new neighbourhood with a clear identity which will benefit the health and lifestyle of all residents. The open space arrangements are varied in size and form, aspect and function and will provide a range of opportunities for the future users of the scheme. These spaces have the ability with the surrounding built elements to create a localised character offering an opportunity for living and play.

Some of the spaces are open and offer an opportunity for active recreation and greater opportunity for statement artwork, and quality tree planting; whilst other spaces are more intimate and enclosed which include seating zones with good aspect offering opportunity for local gathering, grass mounding for interest and play, interconnecting pedestrian links to preempt desire lines and feature tree planting with an element of native planting species.

Formal courtyards are also proposed in association with the apartment blocks which offer quality spaces for residents to relax, gather and play. 'Linear' open spaces are also provided which promote active recreation in the form of walking and cycling.

The apartments blocks are served by a mix of defensible, communal and plaza type spaces, ensuring a high quality residential environment with generous open spaces for future residents. The external spaces to the apartment blocks include a proposed landscape space over a podium arrangement. These zones have been developed to include positive amenity features such as boules, table tennis, callisthenics and outdoor yoga class areas as well as; providing formal pedestrian access to building, seating zones with good aspect, screening of ventilation, ornamental planting and formal hedge planting to edge the space. The finished planting scheme has been developed in accordance with restricted soil zones over the proposed podium arrangement."

Further information on the site's 'Green Infrastructure' is outlined in detail in the enclosed Design Statement.

08: Public Realm

"All public spaces within the scheme are easily accessible from the proposed dwelling units. The layout has been arranged to maximize visual links and overlooking to ensure these spaces are safe, secure and will be well maintained into the future. As outlined on the following pages the spaces will provide an attractive amenity for residents and offer a significant contribution to the public realm of Clonkeen as a whole...

The site has been assessed holistically from the outset at the concept masterplan stage in terms of the existing site features and retaining elements. The existing trees and hedgerows, drainage ditches, archaeological and ecological aspects have been considered. This process has been important in determining an end masterplan layout whilst being respectful of the landscape fabric.

The existing trees and hedgerows pertaining to the said lands have been reviewed by the Consulting Arborist (Independent Tree Surveys), the Consulting Ecologist (Altemar Ltd.) and the Consulting landscape architect (Doyle + o'Troithigh landscape architecture Ltd.) Whilst a portion of trees shall be removed to the north-western 'entrance' area of the site, the trees and hedgerow vegetation along the drainage ditch to the south-west and south-east of the scheme shall be retained.

This retention of the boundaries along the drainage ditch to the south-west and south-east will create a strong and reinforced boundary to the scheme, by adding further appropriate tree planting to this zone it will mitigate in part against the loss of a tree removal, will provide opportunity to increase the site's biodiversity and will improve links in terms of green infrastructure outwards to the adjoining local landscape.

Further ecological compensatory measures are proposed as part of the scheme which include the provision of native hedgerows, compensatory woodland mixes / planting blocks, incorporation of water loving plants in the form of SUDS bio-retention areas, planting of flowering trees which are beneficial for pollinators and planting diverse meadow mixes where considered appropriate...”

In order to reinforce the quality of open spaces throughout the scheme we developed a palette of materials for hard landscaping treatments across both amenity lands and streetscapes. Materials selected on the basis that they;

- Allow for ease of movement for all users
- Enhance the space and not conflict with the building materials
- Work and look attractive in both wet and dry conditions
- Have a long timeline appeal

The courtyards and formal ‘arrival’ space zones shall receive natural paving, with the remaining pathways being formed with a pattern of concrete block paving. The paving mix shall be considered in detail to ensure there is a unity whilst creating contrast. The street furniture selected shall be contemporary in nature and shall respond well to the built environment. Informal paths at the perimeter of the site shall consist of a ‘ballylusk’ bound gravel finish.

Further information on the site’s public realm offering is outlined in detail in the enclosed *Design Statement*.

09: Adaptability

“Apartment Blocks

A holistic sustainable approach has been adopted in the design of the apartments within the scheme with a number of sustainability and efficiency features included as follows;

- *All apartments have been designed in compliance with Part M of the building regulations; providing wheelchair accessible toilet and washing facilities at entrance level.*
- *The apartment façades will limit heat loss, achieve high standards of air tightness and thermal transmittance and maximise natural daylight.*
- *High efficiency central plant will be specified where applicable to take advantage of the optimised central-core layout of each apartment block.*
- *A low energy lighting design will be utilised to further reduce energy consumption and increase occupant thermal comfort.*
- *Allowance for renewable energy technologies such as Air Source Heat Pumps, Exhaust Air Heat Pumps, Solar PV, and Variable Refrigeration Flow systems has been factored into the apartment design.*

Duplex Units

- *The proposed duplex designs exploit good practice lessons, with traditional forms of construction to be used to facilitate future alterations.*
- *The structure of the duplex units allows for adaptation and subdivision, with engineered metal web joists to be used so internal walls are non-structural in order to facilitate future remodelling as the owner's requirements change.*
- *The homes are energy-efficient and equipped for challenges anticipated from a changing climate."*

10: Privacy & Amenity

"Apartments

As outlined in detail on the following pages, a wide range of residential amenities have been incorporated at ground floor level of the apartment buildings. This includes a reception lounge, post area, co-working facilities, a lounge/games room and gym.

Apartment units at ground floor level have been designed to include a generous external terrace, screened for privacy with east and west aspects facing onto landscaped areas.

At upper levels each apartment has private balcony space. Balconies are predominantly orientated to face east or west, with north facing balconies only provided where units are dual aspect.

The top floor accommodation of each apartment building is setback so as to provide private terraces around the entire perimeter. Internal storage is provided to all of these units in accordance with the requirements of Dun Laoghaire Rathdown County Development Plan 2016-2022 and the Sustainable Urban Housing: Design Standards for New Apartments.

Courtyard spaces between the central apartment buildings provide easily accessible communal open amenity space for apartment residents with a the communal open space village green also located immediately to the south.

Duplex Units

Duplex housing terraces are located so as to provide views across landscaped amenity spaces including the central "village green" and perimeter park. All duplex units are provided with private amenity space and internal storage in accordance with the requirements of Dun Laoghaire Rathdown County Development Plan 2016-2022 and the Sustainable Urban Housing: Design Standards for New Apartments."

11: Parking

Secure basement car and bicycle parking facilities provided below the central apartment buildings, as well as parking at surface level. 248 no. car parking spaces, including 167 no. at basement level and 2 no. shared vehicle (GoCar) spaces, 388 no. bicycle parking spaces, and 10 no. motorcycle parking spaces at basement and surface level are provided in total.

12: Detailed Design

“The highest design standards have been maintained throughout the development of the proposed scheme; underpinned by attention to local site conditions, sensitivity to the requirements of the surrounding community and a focus on the selection of sympathetic and robust materials. This section is intended by way of an Architectural Report, outlining details of material selection and elevational treatment / expression of façades in addition to giving background on the detailed design and coordination process.”

As noted above, further information on all of these design criteria are outlined in significant detail in the enclosed Design Statement, prepared by Scott Tallon Walker Architects.

3.5 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)

These guidelines seek to promote high density apartment development on appropriately zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

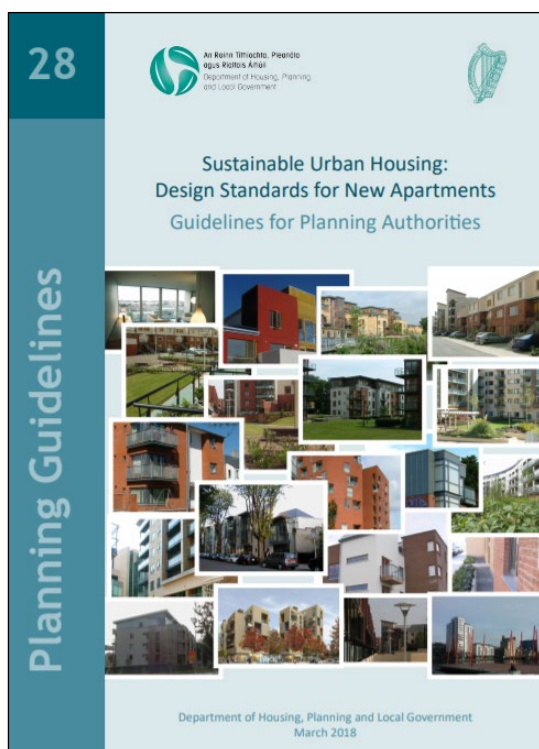


Figure 3.5: Cover of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)* identifies three broad types of locations suitable for apartment development, and advises that Planning Authorities should have regard to these proximity and accessibility considerations. The site is within short walking distance of the Stillorgan Road/N11 QBC, which is due to be upgraded further under Bus Connects.

With regard to the *Apartment Guidelines*, the subject site location is classified as an 'Intermediate Urban Location.' This is defined below, with the items applicable to this scheme underlined:

"[Locations] generally suitable for smaller large-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:

- Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services."

[Our emphasis.]

Due to the site's location in proximity to Deansgrange village, Blackrock village, Dún Laoghaire and Dublin City Centre employment locations, the proposed density of 90 No. units per hectare is considered acceptable at this location.

The Guidelines also provide new apartment design standards that supersede Development Plan provisions in relation to:

- Apartment mix;
- Apartment sizes;
- Dual aspect ratios;
- Floor to ceiling heights; and
- Apartment to stair/lift ratios.

The Guidelines also provide standards in respect of:

- Internal space standards, including storage spaces;
- Amenity spaces including balconies and patios; and
- Room dimensions.

Compliance with the above noted design provisions has been achieved in this development, full details in this regard are provided on the enclosed *Housing Quality Assessment* completed by Scott Tallon Walker Architects. Height and density considerations, which are outlined in the Guidelines, are considered further in the enclosed *Material Contravention Statement*.

3.6 Quality Housing for Sustainable Communities (2007)

The stated aim of the *Quality Housing for Sustainable Communities, Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)* is to:

“identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant.”



Figure 3.6: Cover of *Quality Housing for Sustainable Communities (2007)*

These Guidelines along with the Development Plan standards for housing have informed the design of the residential units proposed in the scheme. Scott Tallon Walker have provided a *Housing Quality Assessment* for the proposed residential units. This shows that the proposed apartments are compliant with the above *Guidelines* and *Development Plan* standards.

We note that this document was updated by the Department 2020., however it is not indicated that they have been issued under s. 28 of the *Act*. This has however been assessed for consistency and we note that the proposed development is compliant with the above.

3.7 Childcare Facilities Guidelines (2001)

The *Childcare Facilities Guidelines (2001)*, generally recommend the provision of childcare facilities for residential development with 75 No. units or more, having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area.

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)* note that 1-bed or studio type units should not generally be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

A *Childcare Capacity Audit*, prepared by TPA, is enclosed with this submission in the *Social Infrastructure Audit*. As the potential childcare uptake of the proposal is likely to only be 18-70 No. places and the local childcare network had indicative capacity of c. 20% in 37 No. existing facilities, we submit that the total number of childcare places to be accommodated by this facility could potentially be reduced with respect to the geographical distribution of existing childcare facilities and the emerging demographic profile of the area evidenced by the childcare audit, subject to the agreement of the Planning Authority.

Notwithstanding the above, given the current uncertainties arising from the COVID-19 public health emergency and the potential resultant impacts on existing childcare facilities, a new, substantial, purpose-built childcare facility of 353 sq. m is proposed to be provided as part of the subject development, with indicative capacity for 50 No. childcare spaces. This is considered to be an appropriate size and capacity childcare facility for a development of this scale. This ensures that development population will be adequately provided for in terms of childcare without placing additional pressure on the existing childcare network.

3.8 Part V of the Planning and Development Act 2000: Guidelines (2017)

This guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the *2017 Guidelines*, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”

Our Client is to provide Part V units within the scheme. 30 no. units are proposed to be provided and further information in relation to this is appended to the *SHD Application Form*.

3.9 Design Manual for Urban Roads and Streets (DMURS) (2019)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement.

The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

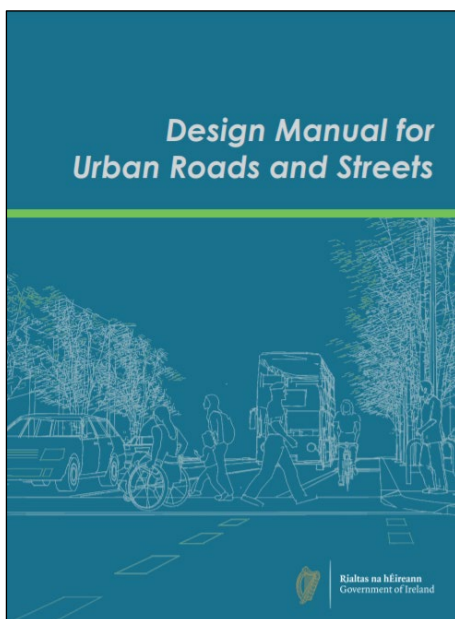


Figure 3.7: Cover of *Design Manual for Urban Roads and Streets* (2013)

CS Consulting prepared the enclosed DMURS Compliance Statement, which confirms that the proposed development is consistent with the principles and guidance of DMURS.

3.10 The Planning System and Flood Risk Management (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009). These Guidelines introduce the principle of a risk-based sequential approach to managing flood risk.

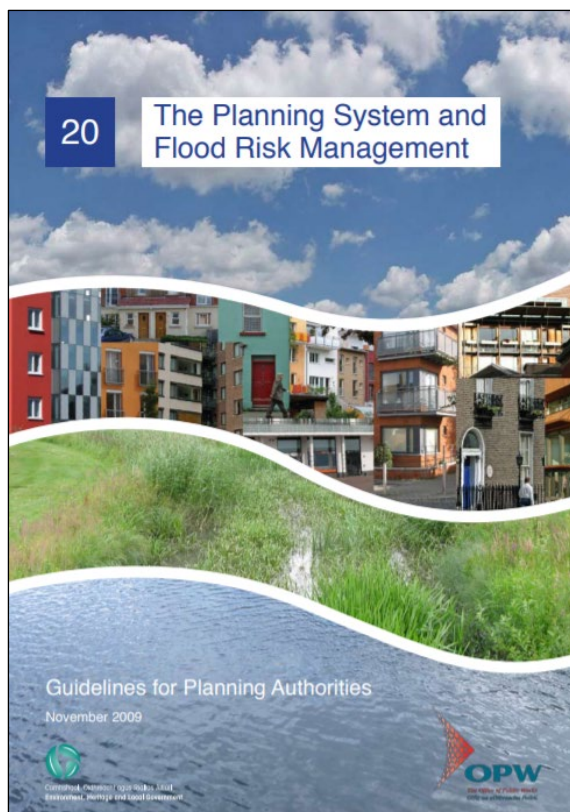


Figure 3.8: Cover of *The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009)*

CS Consulting have prepared the enclosed *Flood Risk Assessment (FRA)*, in accordance with the requirements of the Guidelines. This Assessment concludes that historically, the site has not been subject to flooding events, as noted by the OPW's historical flood maps. Dún Laoghaire-Rathdown County Council's Development Plan notes that the site is in Flood Zone C. Due to the proposed nature of the development, a Justification Test, for the purposes of these Guidelines, is not required.

Tidal mapping for the current 1-in-200-year flood and the predicted 1-in-200-year flood (based on the predicted effect of climate change) indicates that no dwelling will have a finished floor level in the tidal zone. The risk of the site contributing to offsite flooding, or the site's vulnerability to flooding from the public drainage network, is mitigated by the installation of an attenuation tank to retain the storm volumes experienced on site during high intensity storm events and the existing topography of the site. The site's local geology and hydrogeological conditions do not indicate that flooding from groundwater is an issue at the site. Further information is outlined in the enclosed FRA.

3.11 *Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*

The *Urban Development and Building Heights: Guidelines for Planning Authorities* were published on foot of the *National Planning Framework*. The aim of the Guidelines is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built up areas.

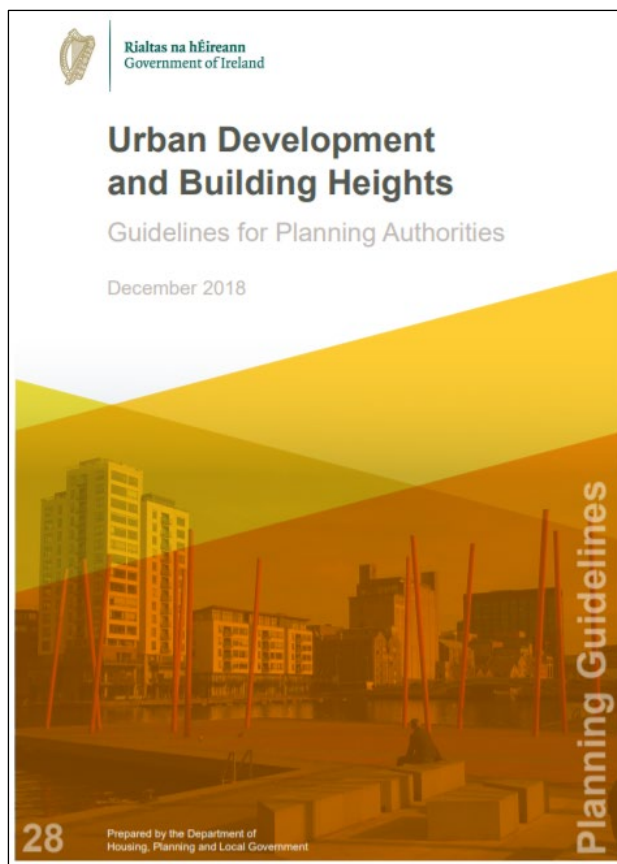


Figure 3.9: Cover of *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*

The proposed development provides for an appropriate residential density, and has been designed to protect the residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

The Guidelines also note best practice in relation to building height in suburban/edge locations in cities and towns (Section 3.4 – 3.8) We note again that the proposed development provides a suitable unit mix and size. The proposed development will benefit from attractive urban realm design, with a good sense of enclosure and passive surveillance. The proposed development ranges in height from 3 – 6 no storeys which provides an effective mix of development and integration into existing neighbourhoods. In addition, a *DMURS Compliance Statement* has been prepared by CS Consulting and is enclosed with the application.

Notwithstanding this, it is noted that the application of Upward modifiers under Appendix 9 the Development Plan height parameters it is our opinion that the proposed development could be considered to be a material contravention of the current Development Plan. A detailed analysis of the development in the context of the height parameters of the Development Plan is included in the enclosed Material Contravention Statement, prepared by Tom Phillips + Associates, to which the Board is referred. Ultimately, the question of whether the proposed development is in material contravention of these height parameters under the Plan will be a matter for the Board to determine.

On a conservative reading of the Development Plan, it is our opinion that the proposed development is not consistent with its provisions in relation to height and that it would constitute a material contravention of the development plan in this respect.

3.12 ***Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)***

The Appropriate Assessment Guidance was published to guide compliance with the Birds Directive, 1979 and the Habitats Directive, 1992.

MKO Planning and Environmental were retained by the Applicant to provide a Natura Impact Statement in respect of the proposed development. That Report, along with an *Ecological Impact Statement* and 2 no. *Wintering Bird Survey Reports* are included with this application.

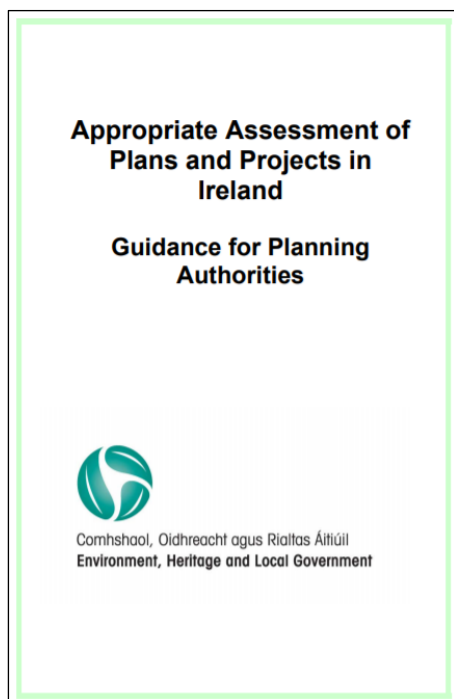


Figure 3.10: Cover of *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*

3.13 ***Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)***

Rebuilding Ireland was launched in 2016 with the aim of addressing ongoing supply issues for residential accommodation in Ireland. The overarching aim of the Action Plan is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that:

“Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”



Figure 3.11 - Five Pillars of the Rebuilding Ireland: Action Plan for Housing and Homelessness (2016).

The proposed development is located on zoned, serviced lands within walking distance of a range of amenities and services and will deliver 299 no. units in the coming years. The development is proximate to existing residential areas and employment opportunities, which is in line with the provisions of the Action Plan.

The Action Plan provides five key Pillars, which will support a range of actions to support the increased delivery of housing. The proposed development will directly respond to Pillar 2 of the Action Plan, which seeks to 'accelerate the delivery of social housing.' The proposed development is subject to the requirements of the Part V of the *Planning and Development Act 2000 (as amended)*. Social housing provision requirements have been discussed with the Housing Department in DLRCC and 30 no. units are envisaged to be provided.

Pillar 3 of the Action Plan seeks to 'build more homes' in order to meet ongoing demand. The proposed development of 299 no. units will provide a wide mix of unit types and will be suitable for a range of household types and needs.

Pillar 4 of the Action Plan has the objective to improve the rental sector and Pillar 5 relates to utilisation of existing housing stock. Pillar 5 is not applicable to the scheme. We note the scheme is not a Build to Rent Scheme, but should any private owners of the scheme intend to rent their homes or rooms within their homes, subsequently rental accommodation will be provided, thereby supporting Pillar 4.

4.0 LOCAL POLICY COMPLIANCE

The *Deansgrange Local Area Plan 2010-2020* (hereinafter referred to as the *LAP*), is the Local Area Plan for the immediate area, however, it is noted that the subject site is outside of the LAP boundary area.

4.1 Core Strategy of *Development Plan*

The *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, which was adopted by the Local Authority on 16 March 2016, is the statutory plan for the area and will guide all future development relating to the subject lands.

Section 1.2 of the *Development Plan* sets out its Core Strategy. As stated in the *Development Plan*:

“The purpose of a Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional development objectives as set out in the National Spatial Strategy 2002-2022 (NSS) and the Regional Planning Guidelines 2010-2022 (RPGs)

[...]

The central focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for residential development and the projected demand for new housing, over the lifetime of the Plan. In this respect, two key datasets are examined:

- *Housing Land Availability Study (Supply of zoned land)*
- *Regional Planning Guidelines for the GDA (Population Targets)”*

The Core Strategy supports the delivery of 18,000 No. residential units, on 410 hectares of serviced land, with further units provided elsewhere. (See Figure 4.1.)

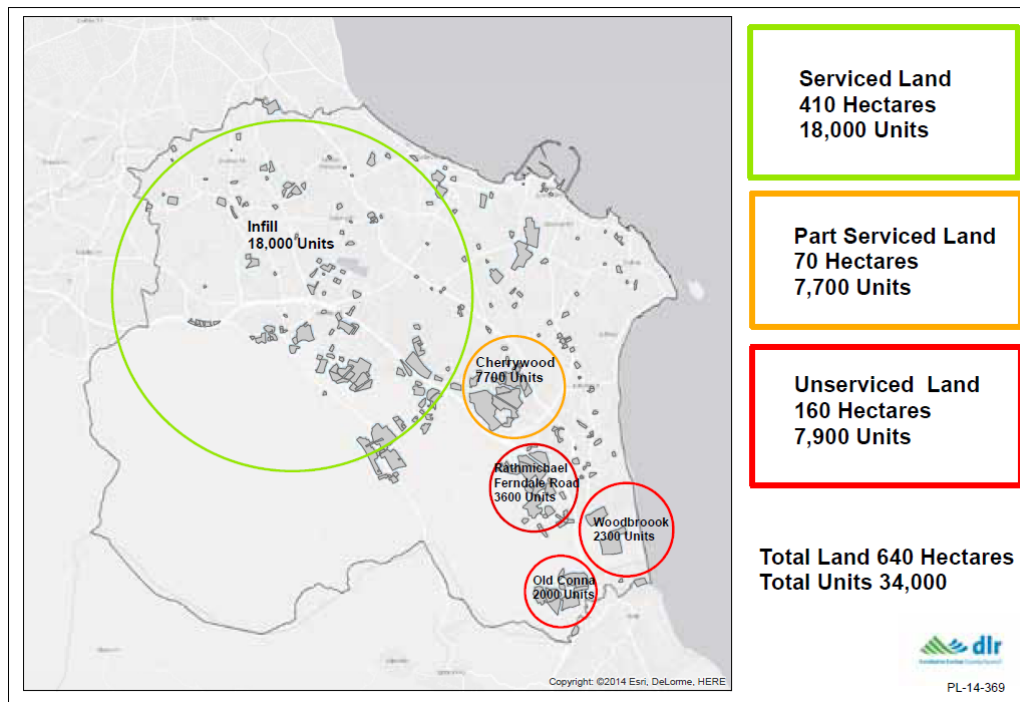


Figure 4.1: Serviced, Part Serviced and Unserviced Land in Dun Laoghaire-Rathdown County Council. [Source: *Dún Laoghaire Rathdown County Development Plan 2016-2022.*]

Subject Proposal is Fully Consistent with the Core Strategy

The provision of 299 No. residential units along with associated childcare facility on appropriately zoned lands accords in full with the stated objective of meeting the County's projected housing needs.

4.2 Subject Lands Zoned for Residential Development

According to Map 7 of the *Dún Laoghaire-Rathdown Development Plan 2016-2022*, the site is zoned Objective A – 'to protect and-or improve residential amenity', where residential use is 'Permitted in Principle'. (See Figure 4.2. overleaf.)



Figure 4.2: Extract of Map 7 of the *Dún Laoghaire Rathdown County Development Plan 2016-2022*, with indicative site location denoted with a red star [Cropped and annotated by TPA, 2021.]

Proposed Development will Protect and Improve Residential Amenity in the Area

The proposed residential development and childcare facility proposal is fully in accordance with the site's zoning objectives "to protect and/or improve residential amenity". Residential' and 'Childcare Service' are listed as 'Permitted in Principle' uses under this zoning objective.

The Applicant has retained a multi-disciplinary Design Team, which have designed the development to take account of the residential amenities of the area, as well as those of the proposed development. The various assessments enclosed demonstrate that the proposal will complement the surrounding land uses and contribute to the development of a vibrant residential community and neighbourhood centre in this established suburban area.

At present, the lands of the subject site are underutilised. This is not sustainable acknowledging the current housing crisis, and national policy to provide additional housing in existing built-up urban areas.

The proposed development incorporates generous communal and private open space for future residents and the existing local community. The proposed development provides adequate separation distances to the boundaries and will not result in overlooking or overbearing impacts on the adjoining residential properties or within the development.

We note that the previous *Development Plan* (2010-2016) included a formal 'INST' objective at the subject lands. This formal 'INST' designation was removed under the current *Development Plan*. However the former use of the lands were institutional in nature and are considered in the event that the Board may consider that it does in fact apply, out of an abundance of caution. We note that the site, which is currently vacant, is not accessible to the general public.

Sections 2.1.3.5 & 8.2.3.4(xi) of the *Dún Laoghaire-Rathdown Development Plan 2016-2022* state that: '*A minimum open space provision of 25% of the total site area (or a population based provision in accordance with Section 8.2.8.2 whichever is the greater) will be required on Institutional Lands.*'

The Public Open Space provision is 21.14% of the overall site area, as outlined in the supporting documentation prepared by Doyle - O' Troithigh and Scott Tallon Walker Architects. It is envisaged that 7,012 sqm public open space and 3,663 sqm communal open space will be provided as part of this application. Further information on the consideration of the institutional policies of the *Development Plan*, where applicable, are included in the enclosed *Material Contravention Statement*.

We have also provided several impact assessments and associated management plans to assess any potential impact on residential amenity enjoyed by existing and future residents during and post construction. These include an assessment of the following –

- Daylight, sunlight and shadow impact
- Landscape and visual impact
- Noise and vibration impact
- Construction impact.

Inclusion of these assessment, and others commissioned as a part of the iterative and informed approach to design, are enclosed with this application.

Considerations of the former use of the site as Institutional and associated policies are outlined in greater detail in the enclosed *Material Contravention Statement*.

4.3 Housing Policy

We outline below a number of key *Development Plan* policies and comment on their applicability to the proposed development.

4.3.1 Residential Density

In terms of the density provisions within the *Dun Laoghaire-Rathdown County Development Plan 2016-2022*, Policy RES 3 in relation to Residential Density states:

*"Policy RES3: 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.

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:

- *‘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).”*

The proposed scheme has a density of 90 units per ha which is compliant with local and national policy, to provide in excess of 50 units/ha, having regard to the site’s location. This report has confirmed that the proposed development is compliant with the *Guidelines* listed and more recent statutory plans, such as the NPF, which emphasises the need for increased residential densities in existing urban areas.

We note that the Development Plan requires that lands such as the subject lands which include the ‘INST’ designation are required to respect density parameters. The Plan states that average net densities should be in the region of 35 - 50 units per hectare. However, the Plan also acknowledges that in certain instances, higher densities will be allowed where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.

We again note that the site does not have the formal ‘INST’ designation, but may be considered institutional as this was their last active use. We submit that the density provided at the subject scheme, which is 90 no. units per hectare is appropriate for the lands, while maximising the provision of open space. While the land is not currently accessible to members of the public, the public open space proposed will be accessible to the public, therefore maintaining the character of the lands and constitutes a planning gain for the area. In our opinion, the scheme as proposed accords with National Policy which seeks to increase density and consolidate development in urban areas. Further information on this is outlined in the enclosed *Material Contravention Statement*.

This report has confirmed that the proposed development is compliant with the *Guidelines* listed and more recent statutory plans, such as the NPF, which emphasises the need for increased residential densities in existing urban areas.

4.3.2 Densification of Residential Areas

Section 2.1.3.4 of the *Development Plan* supports the densification of existing built up areas:

*“Policy RES4: Existing Housing Stock and Densification**

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.”

The proposed development complies with Policy RES4 as it provides additional residential units at residentially zoned lands, in an established urban area. The proposed development has been designed to respect the amenities of adjoining residential communities. In addition, a childcare facility and new public open space is to be provided, to the benefit of the future and existing community. Further information on this is outlined in the enclosed *Material Contravention Statement*.

4.3.3 Overall Housing Mix

Section 2.1.3.7 of the Development Plan relates to housing mix:

“Policy RES7: Overall Housing Mix

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.”

The proposed development provides a mix of dwelling types that will accommodate a variety of tenures. The housing mix is outlined in detail in the accompanying *Housing Quality Assessment*, prepared by Scott Tallon Walker Architects.

Notwithstanding that the proposed development in isolation provides for a relatively limited mix of units, it is considered that the proposed unit mix is fully in accordance with broader planning policies and is appropriate given the existing unit mix in the area. The proposed residential element of the development comprises the following:

- 111 no. 1-bedroom apartments;
- 120 no. 2-bedroom apartments;
- 8 no. 3-bedroom apartments;
- 30 no. 2-bedroom duplex units;
- 30 no. 3-bedroom duplex units.

It is considered that the proposed development by providing a mixture of one and two bed apartments and duplex units, with a number of 3 no. bedroom duplex units, in an area predominately characterised by larger family size houses would indeed contribute to the variety of accommodation types and sizes in the county.

The 2016 census results demonstrate that the housing stock in the Dublin area is dominated by larger units greater in size than one and two bedrooms. Of the 530,753 permanent households recorded in the census, just 55,091 or c.10% are comprised of one and two bedroom units. Given that changing demographics are resulting in smaller household size and more single person households, demand for these smaller units is high at present and very likely to increase further in the future.

4.3.4 Social Housing (Part V)

The Development Plan notes the following respect of Social Housing (Part V):

“Policy RES8: Provision of Social Housing

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’.”

The proposed development is subject to the requirements of the Part V of the *Planning and Development Act 2000* (as amended). As noted in the enclosed documentation, the Applicant has submitted a Part V proposal with the Local Authority and it is proposed that 30 no. units will be provided as a part of this Application. Further information on units to be provided is outlined in greater detail in documentation appended to the *SHD Application Form*, enclosed with this planning application.

4.3.5 Residential Development

Section 8.2.3.5 of the *Development Plan* is entitled Residential Development – General Requirements. This Section of the *Development Plan* states, *inter alia*:

“(iv) Phased Development

It is policy of the Planning Authority that no large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development. A phasing schedule for any such development shall be submitted with a planning application.”

The proposed development provides 299 No. residential units. The subject site is located within a well-established and serviced suburban area, which benefits from a wide range of community infrastructure and amenities.

The enclosed documents include assessments of the piped infrastructure and roads and confirm that capacity is available to support the proposed development.

There are a number of recreational and sporting facilities in the area including indoor and outdoor facilities. There are a number of local retail shops in Deansgrange within a short walking distance of the subject site.

The subject site is also close to existing primary and secondary schools. The subject site is also located in close commute of University College Dublin. The proposed development provides a new public amenity space, suitable for both passive and active recreation, as well as a number of formal and informal play spaces for children.

4.4 Compliance with the *Development Plan's* Development Management Standards

Chapter 8 of the *Development Plan* has the stated aims of ensuring orderly and sustainable development through the use of objectives and standards for development management. Development standards pertinent to the subject site are summarised below.

4.4.1 Public / Communal Open Space

Section 8.2.2 of the *Development Plan* relates to 'Public/Communal Open Space Quantity'. This section states *inter alia*:

“(i) Residential / Housing Developments

Open Space: For all developments with a residential component – 5+ units - the requirement of 15 sq m - 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.

It is Council Policy to retain the open space context of Institutional Lands which incorporate significant established recreational or amenity uses, as far as is practicable. In the event of permission for development being granted on these lands, open space provision in excess of the normal standards will be required to maintain the open character of such parts of the land as are considered necessary by the Council. For this purpose, a minimum open space provision of 25% of the total site area - or a population-based provision in accordance with the above occupancy criteria – will be required, whichever is the greater.

There may also be a requirement to provide open space in excess of the 25% if an established school use is to be retained on site in order to facilitate the future needs of the school (refer also to Section 8.2.3.4(xi)).”

The Public Open Space is 21.14% of the overall site area, as outlined in the supporting documentation prepared by Doyle - O' Troithigh and Scott Tallon Walker Architects. We note that the lands have no formal INST designation in the associated zoning map. However the site may be considered institutional by virtue of their former active use. It is envisaged that 7,012 sqm public open space and 3,663 sqm communal open space will be provided as part of this application. Please refer to the *Material Contravention Statement* in relation to Institutional Lands.

4.4.2 Urban Design Principles

The *Development Plan* states the following in respect of Urban Design Principles:

“Policy UD1: Urban Design Principles

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.”

The proposed development complies with the ‘Urban Design Manual – A Best Practice Guide’ (2009), and the ‘Design Manual for Urban Roads and Streets’ (2013). As noted above, CS Consulting have prepared the enclosed *DMURS Compliance Statement*, which confirms compliance with same.

4.4.3 Design Statements

The *Development Plan* requires the preparation of Design Statements for residential developments:

“Policy UD2: Design Statements

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).”

In accordance with this Policy, Scott Tallon Walker Architects have prepared a *Design Statement* for this application, which, *inter alia*, demonstrates that the scheme’s layout and design conforms to design best practice.

4.4.4 Public Realm Design

The *Development Plan* states the following in respect of Public Realm:

“Policy UD3: Public Realm Design

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.”

The proposed development will result in the redevelopment of a private, underutilised site. It will provide *inter alia* an enhanced public realm, including a new sizable open space area.

In accordance with this Policy, Doyle – O’Troithigh have prepared a *Landscape Design Report*, which illustrates the range of design measures proposed to ensure that the development complements the surrounding area and contributes positively to an enhanced public realm. As noted above, it is envisaged that 7,012 sqm public open space and 3,663 sqm communal open space will be provided as part of this application.

4.4.5 Building Height Strategy

The *Development Plan* states the following in respect of Building Heights:

“Policy UD6: Building Height Strategy

It is Council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County.”

Appendix 9 ‘Building Height Strategy’ outlines *Development Plan* policy in relation to building height. Section 3.4 ‘Suburban Infill’ of the ‘Building Height Strategy’ states:

“There has been a discernible pattern of gradually increasing residential densities in ‘infill’ sites within the built up area of the County over the last decade or so. Many of these infill developments have been at a higher density and with a taller building height profile than the prevailing local low rise context. This pattern of development has been driven in response both to the Government document “Residential Density Guidelines” (1999) and through policies contained in the 2004 County Development Plan which encouraged higher densities, particularly on large development sites, in excess of 0.5ha in area

[...]

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 to the site boundaries where the height of adjacent buildings can often be lower.”

The proposed development, which includes 4 No. 6-storey apartment blocks.

The proposed development provides for an appropriate residential density, and has been designed to protect the residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents. The general approach in terms of building heights in the site has been to taper height from a high point in the centre of the site (on the boundary with the adjoining pitches) down to the site boundaries where the context of adjoining residential developments is generally two storeys.

This is outlined in detail in the enclosed *Material Contravention Statement*, prepared by Tom Phillips + Associates.

4.4.6 Residential Development Standards

Section 8.2.3 of the *Development Plan* outlines the development management standards for residential development.

The 2018 *Apartment Guidelines* provide a number of *Specific Planning Policy Requirements (SPPRs)*, including certain minimum and maximum standards the minimum standards for apartment units. Where any conflict arises between an SPPR and the *Development Plan*, the *Guidelines* supersede the *Development Plan*.

The enclosed *Housing Quality Assessment*, prepared by Scott Tallon Walker Architects, demonstrates compliance with the relevant standards for apartments and the duplex units.

4.4.7 Dwelling Size and Mix

The *Development Plan* requires that residential schemes provide a range of housing types and sizes, particularly having regard to the County's higher than national average proportion of population aged over 65, and the need to encourage mobility in the housing market.

In accordance with the *Development Plan*, a variety of dwelling unit types and sizes are proposed as part of the scheme, which will be suitable for a variety of household types.

The proposed residential element of the development comprises the following:

- 111 no. 1-bedroom apartments;
- 120 no. 2-bedroom apartments;
- 8 no. 3-bedroom apartments;
- 30 no. 2-bedroom duplex units;
- 30 no. 3-bedroom duplex units.

Policy RES7 of the *Dún Laoghaire Rathdown Development Plan 2016-2022* relates to overall housing mix and states the following:

"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."

Section 2.1.3.7 of the *Dun Laoghaire Rathdown Development Plan 2016-2022* encourages a *"good mix of house types creates neighbourhoods for people of different ages and lifestyles"* and notes that 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"*.

On page 36 of the Plan, it is further noted that future housing demand will be primarily for one and two person households given wider demographic shifts. The proposed development will contribute to the mix of household types and sizes in the county and thus adhere to the broad objective of the Development Plan to create neighbourhoods with a good housing mix capable of accommodating a range of demands and persons throughout different life periods.

Notwithstanding that the proposed development in isolation provides for a relatively limited mix of units, it is considered that the proposed unit mix is fully in accordance with broader planning policies and is appropriate given the existing unit mix in the area.

4.4.8 Residential Density

The *Development Plan* states that site densities should be determined with reference to the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009)*. The *Development Plan* states *inter alia*:

“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.”

As previously stated, the proposed development will have a residential density of 90 No. units per hectare. We contend that this is appropriate for the lands having regard to *National Planning Framework (Ireland 2040 – Our Plan)*, which promotes higher residential densities at serviced urban locations and considering the site’s context. We believe that the greater emphasis on higher densities allowed for within the NPF and the associated targets demonstrates that the current plan does not fully align with the objectives of the NPF.

We believe the proposed development, with a density of 90 no. units per hectare, is a more sustainable use of the site than if the 4 no. storey cap, as outlined in the *Development Plan Height Strategy* was applied. Further information on this is outlined in great detail in the accompanying *Material Contravention Statement*.

4.4.9 Car Parking Standards

Table 8.2.3 of the *Development Plan* stipulates maximum car parking standards of:

Table 8.2.3: Residential Land Use - Car Parking Standards	
Land use	Standards
Residential Dwelling	1 space per 1-bed unit and per 2-bed unit 2 spaces per 3-bed unit+ (depending on design and location).
Apartments, Flats, Sheltered housing	1 space per 1-bed unit 1.5 spaces per 2-bed unit 2 spaces per 3-bed unit+ (depending on design and location)

Table 4.0 – Extract of car parking standards from the Development Plan.

The development's proposed parking provision shall comprise 248 no. car parking spaces, 388 no. bicycle parking spaces and 10 no. motorcycle parking spaces. These include:

- 167 no. internal (basement level) car parking spaces for residents (of which 7 no. shall be disabled-accessible and 20 no. shall be equipped with EV charging facilities);
- 69 no. external (surface level) car parking spaces for residents (of which 5no. shall be disabled-accessible,10 no. shall be equipped with EV charging facilities, and 2 no. shall be reserved for shared vehicles);
- 8 no. external (surface level) car parking spaces for visitors (of which 2no. shall be disabled-accessible and 2no. shall be equipped with EV charging facilities);
- 4 no. external (surface level) car parking spaces to serve the crèche and
- 10 no. motorcycle parking spaces for residents.

This is considered to be appropriate with regard to the location of the site and its proximity to public transport, but also to quantum of car parking permitted in comparable schemes locally. Please refer to the enclosed Report prepared by CS Consulting, which outlines further information on parking facilities.

Including residents' spaces, visitor spaces, and shared vehicle spaces, the development's total residential car parking provision equates to 0.82 spaces per residential unit overall. This is considered to be appropriate with regard to the location of the site and its proximity to public transport and local amenities. This is in line with Government Guidance regarding reducing dependence on the private motor car and increasing use of public transport/cycling. Further information on this is enclosed in the accompanying *Material Contravention Statement*.

4.4.10 Bicycle Parking

Dún Laoghaire-Rathdown County Council's *Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)* outlines the bicycle parking for residential developments. In summary, 1 short stay (visitor) parking space per 5 units and 1 long stay parking space per unit is required.

Secure basement bicycle parking facilities provided below the central apartment buildings, as well as parking at surface level. 388 no. bicycle parking spaces are provided in total.

- 314 no. long-term bicycle parking spaces for residents;
- 64 no. short-stay bicycle parking spaces for visitors;
- 10 no. bicycle parking spaces to serve the crèche; and

Please refer to the enclosed Report prepared by CS Consulting, which outlines further information on parking facilities.

4.4.11 Private Open Space

Section 16.3 sets out requirements in relation to Private Open Space. In addition, the 2018 *Apartment Guidelines* outline minimum floor areas for private amenity space.

The *Housing Quality Assessment* (enclosed with the architectural Design Statement), prepared by Scott Tallon Walker Architects, demonstrates compliance with the relevant standards.

As noted above, it is envisaged that 6,254 sq m private open space (including all balconies, terraces and individual unit gardens at all levels) is to be provided. The enclosed *Landscape Design Rationale Report*, prepared by Doyle O'Troithigh Landscape Architects and the *Design Statement* prepared by Scott Tallon Walker outline greater detail in relation to public and private open space provision.

4.4.12 Public Open Space

Section 8.2.8.2(i) of the *Development Plan* states an absolute minimum of 10% of the overall site area for all residential developments of 5+ units be reserved for use as Public Open and/or Communal Space.

Furthermore, there is a requirement of 15-20 sq m of public open space per person shall apply based on the number of units provided. For the purpose of studio, 1-bedroom and 2-bedroom units, the presumed occupancy is 1.5 persons while for 3-bedroom units and larger, the presumed occupancy is 3.5 persons.

The Development Plan states that: “*Public’ open space refers to all areas of open space within a new development (be that public (taken in charge), communal, semi private or otherwise) that is accessible by all residents/ employees of the development and in certain cases may be accessible by the wider general public.*”

Further details on the provision of open space throughout the proposed development are provided in supporting material, prepared by Doyle - O’ Troithigh. As noted above, it is envisaged that 7,012 sqm public open space and 3,663 sqm communal open space will be provided as part of this application. Environmental open space is to be provided in addition to this, to help enhance biodiversity locally.

We note that the Development Plan requires that lands such as the subject lands which include the ‘INST’ designation are required to respect density parameters. The Plan states that average net densities should be in the region of 35 - 50 units per hectare. However, the Plan also acknowledges that in certain instances, higher densities will be allowed where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.

We note that the site does not have the formal ‘INST’ designation, however may be considered institutional due to their former use. We submit that the density provided at the subject scheme, which is 90 no. units per hectare is appropriate for the lands, while maximising the provision of open space. While the land is not currently accessible to members of the public, the public open space proposed will be accessible to the public, therefore maintaining the character of the lands and constitutes a planning gain for the area.

In our opinion, the scheme as proposed accords with Development Plan policy and national policy, which seeks to increase density and consolidate development in urban areas.

The Public Open Space provision is 21.14% of the overall site area, as outlined in the supporting documentation prepared by Doyle - O' Troithigh and Scott Tallon Walker Architects.

4.4.13 Refuse Storage

Section 8.2.3.2(v) of the *Development Plan* requires that adequate refuse areas are provided.

Waste storage areas to cater for segregated waste streams are provided within the scheme and comply with the *Development Plan* in this regard. An *Operational Waste Management Plan*, is enclosed submitted, prepared by AWN Consulting. This has been developed in consultation with the Environment Office of DLRC.

4.4.14 Development Management Thresholds

Appendix 10 '*Development Management Thresholds Information Document*' of the *Development Plan* provides a guide for applicants on the documentation generally required for residential and commercial developments of specific sizes.

The following documentation is enclosed with the Application upon lodgement, and will broadly be in accordance with Appendix 10 of the *Development Plan*, providing, *inter alia*, the following assessments:

- *Travel Plan (as part of the Transport Impact Assessment)*
- *Operational Waste Management Plan including details on recycling and composting*
- *Landscape Design Rationale Report*
- *Construction Management Plan*
- *Energy & Sustainability Report*
- *Flood Risk Assessment*
- *Details in relation to Green Roof and SUDS provision*
- *Design Statement*

In addition, a *Building Lifecycle Report*, has been prepared in respect of the proposed development in accordance with *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)* and is submitted as part of the Application.

4.4.15 Riparian Corridors

Chapter 4 of the Development Plan sets out the County's environment policies. Policy LHB25, Rivers and Waterways, states;

"It is Council policy to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat. It is also policy (subject to the sensitivity of the riverside habitat) to provide public access to riparian corridors to promote improved passive recreational activities."

Existing County flood plain management policy seeks to limit development in identified floodplains and to preserve riparian corridors. Development proposals in riparian corridors will be considered providing they:

- Dedicate a minimum of 10m each side of the water's edge for amenity, biodiversity and walkway purposes (where practical).
- Where practical ensure no development - including clearance and storage of materials - takes place within a minimum distance of 10m measured from each bank of any river, stream or watercourse.
- Preserve the biodiversity of the site.
- Involve no land filling, diverting, culverting or realignment of river or stream corridors.
- Have no negative effects on the distinctive character and appearance of the waterway corridor and/or the characteristic and landscape elements of the specific site and its context.
- Do not impact on important wetland sites within river/stream catchments which provide an important function in terms of regulating the flow of water in these catchments and often support habitats and species of high nature conservation value.
- Take cognisance of any adverse impacts on the populations of protected species including otters and bats.

The proposed development has assessed and sensitively responded to the presence of an existing drainage ditch, which DLRC have indicated is considered to be a riparian corridor, on site through careful design consideration. This has been coordinated through a focused collaborative effort by the project ecologist, landscape architect, architect and drainage engineer and has ensured the enhancement of the area within the site. The drainage ditch is currently fenced off and is not accessible to the public, but it is envisaged that it will be incorporated into the proposed Landscape Masterplan and enhanced accordingly. The Landscape Design Rationale Report summarises this;

*“A series of planting plans PP-01-PP – PP-05-PP to details all planting proposed across the site lands. **As part of the design process for the site lands we have worked with the project ecologist to prepare a planting mix to strengthen the both the visual buffer with the adjoining dwellings and the improve upon the ecological and biodiversity value of the riparian corridor to the existing drainage ditch.** Through the planting of a native hedgerow which includes a spine of Hawthorn, Holly and Blackthorn a dense planting buffer will be formed between the proposed development and the existing dwellings. To the development side of the native hedgerow, the riparian corridor will be planted with a rich mix of plant types and species to provide habitat for insects, bats and birds. The planting of the riparian corridor will include wildflowers such as Teasle and Mullion; and shrub planting such as Cotoneaster, Pyracantha, Guelder rose, Dogwood and Viburnum. Scented plants for bats shall allow be considered including Nottingham catchfly (*Silene nutans*) Night-scented catchfly (*S. noctiflora*) Bladder campion (*S. vulgaris*) Night-scented stock (*Matthiola bicornis*) Sweet rocket (*Hesperis matronalis*) Evening primrose (*Oenothera biennis*) Tobacco plant (*Nicotiana affinis*) Cherry pie (*Petasites hybridus*) Soapwort (*Saponaria officinalis*). With scented herbs including Chives *Allium* spp. Borage (*Borage officinalis*) Lemon balm (*Melissa officinalis*) Marjoram (*Origanum vulgare*) and Mint (*Mentha* spp). And climbing planting including European honeysuckle (*Lonicera caprifolium*) Italian honeysuckle (*L. etrusca superba*) Japanese honeysuckle (*L. japonica halliana*) Native honeysuckle (*L. periclymenum*) White jasmine (*Jasminium officinale*) Dogrose (*Rosa canina*) Sweetbriar (*R. rubiginosa*) and Field rose (*R. arvensis*)*

Collectively this wide variety of planting will provide a rich habitat for insects and animals while providing a visually strong and secure green boundary between the proposed development the existing residential dwellings. See Section Proposed Planting Materials for details of all planting proposed across the site lands.”[Our Emphasis]

As noted above, the public open space provision is 21.14% of the overall site area, as outlined in the supporting documentation prepared by Doyle - O’ Troithigh and Scott Tallon Walker Architects. In addition, retention of existing trees and vegetation have also been considered following completion an Arboricultural Assessment, which is included with the application. In addition, construction and demolition management and associated measures are outlined in the enclosed documentation, prepared by AWN Consulting Engineers, to minimise any impact on the existing drainage ditch. It has also been assessed from a drainage and flood risk perspective by CS Consulting Engineers in their documentation.

5.0 Dún Laoghaire-Rathdown County Council Draft County Development Plan, 2022-2028

The Dún Laoghaire-Rathdown County Council Draft County Development Plan, 2022-2028 went on public display from January - April 2021. While its content is not strictly applicable to the assessment of the Application, it is considered prudent to highlight how the proposed development might be assessed in the context of the likely content of any future key Development Plan policies for the County.

Zoning Objective

The *Draft Development Plan* proposes to changes to the land use zoning of the application site. As noted above, it is currently zoned Objective A - *'to protect and-or improve residential amenity.'* The proposed new zoning is Objective SNI – *'to protect, improve and encourage the provision of sustainable neighbourhood infrastructure,'* where residential development is *'open for consideration'* rather than permitted in principle.

Quantum of Three-Bedroom units

While the current Development Plan has no unit mix restrictions with regard to the provision (or lack thereof) of three-bedroom units, the *Draft Development Plan* proposes a requirement whereby all residential schemes of 50 No. units or greater in existing built-up areas will be subject to a requirement to provide 20% of the overall quantum of units as three-bedrooms or larger.

Car Parking

The Draft Development Plan introduces 'Car Parking Zones'. The majority of the application site falls within Zone 3 the southern part of the site is within Zone 2, in recognition of the close link to the nearby QBC and high quality cycle facilities on the N11.

The relevant car parking standards are summarised and set out below:

Resi Unit Type and Size	No. of Car Spaces Required
1 and 2 bedroom houses and apartments	1 space per unit
3 bedroom + houses and apartments – 2 spaces per unit* * plus 1 in 10 visitor parking for apartments in zone 3, required.	1 space per unit

Table 5.0 - Summary of car parking standards contained within the *Draft Dún Laoghaire-Rathdown Development Plan 2022-2028.*

From a quantum perspective, this is largely unchanged from the current Development Plan. The main difference would appear to be the introduction of a requirement for visitor car.

An explanation relating to Parking Zone 2 is set out below:

"This zone generally includes areas, which are within the following walking bands/catchments:

- 10 minute walk of the proposed CBC 13 (Core Bus Corridor) from DCC boundary along the N11 to 5 minute walk of the N11 proposed CBC from Kill Lane Junction to Bray.
- 10 minute walk of the proposed CBC 15 from DCC boundary to Blackrock.
- 5 minute walk of Kill Lane/Avenue/Mounttownbus route.
- 10 minute walk of Dart and Luas stations.

Note: The N11 Quality Bus Corridor (QBC) and the Rock Road QBC will be replaced by CBC 13 and 15.

These are areas, which are generally characterised by:

- **Access to a good level of existing or planned public transport services.**
- **A good level of service accessibility, existing and planned, by walking or cycling.**
- **A capacity to accommodate a higher density of development than surrounding areas.**
- **Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. For residential uses reduced provision may be acceptable dependent on criteria.” [Our Emphasis]**

An explanation relating to Parking Zone 3 is set out below:

“This zone generally comprises the remainder of the County, excluding rural areas. These are areas, which are generally characterised by:

- *Access to a level of existing or planned public transport services;*
- *A reasonable level of service accessibility, existing and planned, by walking or cycling;*
- *A capacity to accommodate a higher density of development than rural areas.*

Within parking zone 3 maximum standards shall apply to uses other than residential where the parking standard shall apply. In zone 3 additional parking shall be provided for visitors in residential schemes at a rate of 1 per 10. In some instances, in zone 3 reduced provision may be acceptable dependent on the criteria set out in 12.4.5.2 (i) below with particular regard to infill/brownfield developments in neighbourhood or district centres.”

The criteria relating to reduced provision referred to above (criteria 12.4.5.2(i)) is also contained within the current Development Plan.

6.0 CONCLUSION

In summary, the proposed development will provide for, *inter alia*, 299 No. residential units on underutilised lands, in the suburbs of Dublin City.

The development will contribute to the area by providing a variety of housing types and sizes. As a result of the high-quality design, including generous separation distances, the scheme will not result in adverse overlooking or overbearing impacts on the existing residential premises in the surrounding area. Furthermore, the high-quality landscape proposal will ensure that the scheme integrates positively into the area and contributes to the wider area.

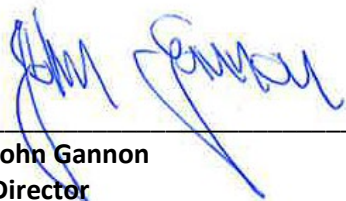
In conclusion, it is considered that the proposed development is consistent with the objectives of the Development Plan to the extent indicated above (issues of material contravention are addressed in the material contravention statement) and with the objectives of all relevant guidelines issued under section 28 of the *Planning and Development Act 2000*, as amended.

We contend that the proposed development is fully in accordance with the following national and local policy documents:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*;
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
4. *Urban Design Manual: A Best Practice Guide (2009)*;
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
6. *Quality Housing for Sustainable Communities (2007)*;
7. *Childcare Facilities – Guidelines for Planning Authorities (2001)*;
8. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
9. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
10. *The Planning System and Flood Risk Management (2009)*;
11. *Urban Development and Building Heights, Guidelines for Planning Authorities (2018)*;
12. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
13. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*
14. *Dún Laoghaire-Rathdown County Development Plan 2016-2022*;
15. *Draft Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

In conclusion, we contend that the development of the site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development.

Yours sincerely



John Gannon
Director
Tom Phillips + Associates