

Statement of Consistency

In respect of

**Lands at Concord Industrial Estate,
Naas Road, Dublin 12**

Prepared by

John Spain Associates

On behalf of

Development Ocht Ltd.

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1.0 INTRODUCTION

- 1.1. On behalf of the applicant, Development Ocht Ltd., 88 Harcourt Street, Dublin 2, we hereby submit this Statement of Consistency with Planning Policy to accompany this planning application for a strategic housing planning application to An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 in relation to a proposed development on lands at Concord Industrial Estate, Naas Road, Dublin 12.
- 1.2. The proposed development comprises the demolition of the existing building on site and the construction of a “Build to Rent” residential and commercial development comprising of 492 no. residential units and 3,347 sq.m. of commercial development.
- 1.3. The proposed residential units are proposed as “Build to Rent” accommodation in accordance with Specific Planning Policy 7 and 8 of the Apartment Guidelines 2018 and will be subject to the 15 year covenant in this regard. The applicant is committed to delivering a high quality residential rental accommodation in this location with a good mix of unit types, complemented by high quality landscaping and improvements to the public realm, which has regard to the existing site features and the established character of the area.
- 1.4. The Naas Road has been identified as a strategic land bank for redevelopment with the capability of delivering significant proportions of residential development in the area. The location of the subject site is located adjacent to the Red Line Luas and is in close proximity to a number of major employment areas including St. James Hospital, Tallaght and the City Centre. The subject site is well connected by bicycle links and is adjacent to direct cycle links into the City Centre.
- 1.5. The location of the subject site and the proposed use of the development as a “Build to Rent” scheme will significantly enhance the overall character and vitality of the area. The existing former industrial use of the site is unsustainable in such a well served public transport location.
- 1.6. The inclusion of supporting commercial facilities such as medical, centre, co-working space, car show room, café, restaurant, shops and creche significantly enhance the residential scheme on the site and provides for a high quality residential development significantly well served by public transport development.
- 1.7. In this regard the proposed development presents a significant improvement to the area and emphasises the importance of the Naas Road in delivery high quality residential developments within the city.
- 1.8. This Statement of Consistency with Planning Policy has been prepared to specifically address the requirements of the Regulations and the Guidelines issued by An Bord Pleanála. The proposed residential development has been prepared in accordance with the Ministerial Guidelines, and the requirements of the Dublin City Development Plan 2016-2022.
- 1.9. This Statement of Consistency also includes details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.
- 1.10. The development has been the subject to a section 247 pre-application consultation with the Planning Authority in compliance with Section 5 (2) of the Planning and

Development (Housing) and Residential Tenancies Act 2016. Details of the pre-application meetings and details of the Part V proposal are summarised in this report.

- 1.11. The proposed development is designed in accordance with the National Policy Guidelines such as the National Planning Framework 2040, Apartment Guidelines 2018 and the Urban Development and Building Height Guidelines 2018 in addition to the Dublin City development Plan 2016-2022.
- 1.12. This standalone planning policy consistency statement, prepared by John Spain Associates, demonstrates that the proposed development is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation as follows:
 - Strategic Housing Development Application Form including form attachments;
 - Application Fee cheque €80,000;
 - 3 no. Digital Copy – CD;
 - Copy of Site Notice;
 - Copy of Newspaper Notice;
 - Part V Proposal;
 - Cover Letter prepared by John Spain Associates;
 - Architectural Drawings and Design Statement prepared by Reddy Architecture and Urbanism
 - Housing Quality Assessment prepared by Reddy Architecture and Urbanism;
 - Life Cycle Report prepared by Reddy Architecture and Urbanism;
 - Landscape Report and Drawings prepared by Stephen Diamond Landscape Architects;
 - Statement of Consistency prepared by John Spain Associates;
 - An Bord Pleanála Response Document prepared by John Spain Associates;
 - Engineering Drawings prepared by BM Consulting Engineers;
 - Road Safety Audit prepared by ILTP Stage 1/2
 - Quality Audit prepared by ILTP Stage 1/2
 - Ground Investigation Report prepared by Causeway Geotech
 - Civil Engineering Infrastructure Report including Flood Risk Assessment prepared by BM Consulting Engineers; Parking and Mobility Study prepared by BM Consulting Engineers; Construction and Demolition Waste Management Plan prepared by BM Consulting Engineers; Construction Management Plan prepared by BM Consulting Engineers;
 - Residential Travel Plan Framework prepared by BM Consulting Engineers;
 - Operational Waste Management Plan prepared by AWN Consulting
 - Operational Management Plan prepared by Hooke McDonald
 - Daylight / Sunlight Analysis prepared by IES Consulting;
 - AA Screening prepared by Openfield Ecological Consultants;
 - Site Lighting Report prepared by Homan O'Brien Engineering
 - Sustainability and TGD L Report prepared by Homan O'Brien Engineering;
 - CBRE Report on Mixed Use Commercial and Residential Scheme
 - CGI's prepared by Modelworks;
 - Environmental Impact Assessment Report including Non – Technical Summary
- 1.13. For details of compliance with the quantitative standards for residential units as set down in the Apartment Guidelines 2018, the Quality Housing for Sustainable Communities and

the 2016-2022 Development Plan please refer to the Housing Quality Assessment prepared by Reddy Architecture.

- 1.14. The purpose of this report is to provide an assessment of the subject site having regard to current development trends and taking cognisance of the current planning policy framework. In particular, this report reviews the subject lands in the context of relevant national, regional and local policy and the planning history of the area. The report evaluates the potential of the lands in planning terms.

2.0 SITE LOCATION & DESCRIPTION

- 2.1. The subject site is c. 1.8 hectares and is located on the southern side of the Naas Road, Dublin 12. The site is a brownfield site formerly used as a car sales showroom, and other commercial uses.
- 2.2. The site is well served by public transport including the Luas Red Line and Dublin Bus.
- 2.3. The existing building on site comprise of former industrial type units which comprise of the majority of the site. The site is entirely covered by buildings and hard standing with a single tree line to the rear of the site adjoining lands to the south.
- 2.4. A number of services adjoin and intersect the site including a 38KV Pylon which runs through the south eastern corner of the site, a 110KV Pylon which adjoins the site to the west and a trunk sewer pipe which runs along the northern and eastern boundary of the site.
- 2.5. The site is bound to the north by the Naas Road, and the Luas Line, to the south by greenfield lands and a hard standing car park, to the east by industrial / warehouse buildings and a residential development under construction and to the west by a electrical pylon and an industrial building.
- 2.6. The subject site is located in an emerging area for high density residential and commercial development with high quality public transport services. The location of the subject site is identified for re-generation as set out in the Naas Road LAP and has the potential to provide for significant residential and commercial development in this part of the city.



Figure 1: Aerial View of the subject site

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 3.1. The proposed development comprises of the demolition of the existing industrial building (5,810sq.m.) on the site and the construction of a “Build to Rent” Residential and commercial development on lands at Concord Industrial Estate (1.88ha), Naas Road, Dublin 12.
- 3.2. The proposed development comprises of 492 no. residential units comprising of 104 no. studios, 136 no. 1 beds and 252 no. 2 beds. The proposed development includes the provision of communal residential facilities such as concierge, resident lounge, shared winter gardens, shared work space, meeting rooms, events spaces and external residential courtyards and all associated resident support facilities to accompany the “Build to Rent” development.
- 3.3. The development also includes the provision of 3,347 sq.m. commercial uses comprising of retail, café, restaurant, medical centre, car showroom, and creche. The proposed development also accommodates 200 no. car parking spaces at basement level and 38 no. at surface level including 10 no. car club spaces, 516 no. cycle parking spaces, 258 no. at basement level and 234 no. cycle spaces at surface level within the courtyards to serve the residential development with a further 24 no. surface level visitor spaces to serve the commercial uses, plant rooms, refuse storage, public open space, landscaping, SUDS drainage, and all associated site development works necessary to facilitate the development.
- 3.4. Section 5.1 of the Apartment Guidelines in relation to “Build to Rent” developments states :
- “Larger scale apartment developments that typically include several hundred units, that are designed and constructed specifically for the needs of the rental sector are a prominent feature of house provision in many countries. These types of housing developments also have a potential role to play in providing choice and flexibility to people and in supporting economic growth and access to jobs in Ireland. They can provide a viable long term housing solution to households where home -ownership may not be a priority, such people starting out on their careers and skills development in the modern knowledge-based economy”.*
- 3.5. As such, the provision of “Built To Rent” accommodation provides for positive impacts on both the residential market increasing typologies and choice into the market and also creates significant economic benefits by providing accommodation for highly skilled workers at the beginning or careers where home ownership is not viable.
- 3.6. Section 5.9 of the Guidelines states that *“the promotion of BTR development by planning authorities is therefore strongly merited through specific BTR planning and design policies and standards”*. Therefore the provision of BTR development should be encouraged and supported by the planning authorities in appropriate locations such as the subject site.

Residential Accommodation

- 3.7. The proposed development provides for a mix of 104 no. studios, 136 no. 1 beds, and 252 no. 2 bed units. The proposed apartments have been designed having regard to the Sustainable Urban Housing: Design Standards for New Housing 2018 and the requirements for Build to Rent developments. A full Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including

private open space, room sizes, storage and residential amenity areas for built to rent developments.

- 3.8. The proposed units meet the standard for unit and room sizes, however in accordance with Specific Planning Policy Requirement 8, some of the unit standards in particular the provision of private open space to each unit, have been relaxed due to the Build to Rent nature of the development. These units are identified in the Urban Design Statement prepared by Reddy Architecture submitted with the application.
- 3.9. As a compensatory measure and in respect of the provision of private open space, the units without a balcony / terrace have been designed to be larger in size and with additional design features such as bay windows to increase the level of amenity obtained within these units. The combined loss of private open space is also offset by the provision of high quality communal open space within the development. The proposed development provides for 4,638 sq.m. of communal space which significantly exceeds the requirements of 2,839 sq.m. therefore accommodates the loss of private open space in this regard.
- 3.10. The proposed development will provide for a significant proportion of residential amenities and residential support facilities within the development in accordance with the Apartment Guidelines 2018. The resident support facilities include concierge and management offices, maintenance and repair services and waste management facilities.
- 3.11. The resident services and amenities include the provision of communal gardens and roof terraces, shared work spaces, meeting rooms, multi-function rooms for movie screenings, events, larger functions, lounge areas, games rooms, and exercise areas. The provision of the communal services on the site are of a high quality and are a significant enhancement to the residential quality of life and level of amenity provided within the proposed development.
- 3.12. The orientation of the proposed development has been designed to ensure that all of the proposed units achieve adequate levels of daylight/sunlight throughout the year. A total of 43% of the proposed units are dual aspect which is above the minimum requirement at set out in the Apartment Guidelines.

Build to Rent Accommodation

- 3.13. The proposed development will be managed as a built to rent development. Build to Rent schemes are defined as “*Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord*”. Full details of the BTR Management strategy are set out in Section 5 of this report.

Commercial Uses

- 3.14. The proposed development also includes provision of a range of commercial uses at ground at first floor levels fronting the Naas Road. The proposed commercial uses amount to 3,347 sq.m., c. 7.3% of the total floor area. The proposed commercial uses will provide for a mix of supporting services such as café, restaurant, retail, office, medical, employment and creche uses. The proposed uses have been carefully considered in response to the availability of such uses in the surrounding area. The proposed breakdown of units is as follows:

Ground Floor:	Use	Floor Area
Unit 1	Creche	191 sq.m.
Unit 2	Car Showroom	350 sq.m.
Unit 3	Shop	146 sq.m.
Unit 4	Shop / Convenience Store	437 sq.m.
Unit 5, 6, 7	Café / Restaurant	282 sq.m.
Unit 8	Cafe / Restaurant	177 sq.m.
Total		1,583 sq.m.
1st floor:	Use	Floor Area
Unit 3, 4	Shared Office	716 sq.m.
Unit 2	Medical Centre	517 sq.m.
Unit 1	Creche	191 sq.m.
Total		1,424 sq.m.

- 3.15. It is considered that the proposed level of commercial uses on the site will increase employment over and above that previously provided on the site and will serve the existing and future residents of the area.
- 3.16. The proposed development has also carefully considered the level of employment opportunities generated from the proposed development. At present, the subject site is vacant and is not in use. Taking account the last known uses of the site, the overall level of employment generated amount to approximately 60 no. jobs. The proposed development having regard to the wide variety of uses proposed will provide for at least 150 no. employment opportunities. The proposed level of employment generated is considered to be a significant increase to the existing and last known uses of the site and will significantly improve the overall objective to regenerate the subject area.

Material Finishes

- 3.17. A simple palate of materials is proposed using red and white brick as the principle materials on all facades. The overall design and quality of the materials proposed will be complementary and in keeping with the existing context of the area. Full details of the proposed material and finishes are set out in the Architectural Design Statement prepared by Reddy Architects.

Car and Bicycle Parking

- 3.18. The development provides a total of 200 no. car parking spaces at basement level and 38 no. carparking spaces at surface level including 10 no. car club spaces. A total of 516 no. cycle parking spaces are provided at basement and surface level to serve the proposed development.
- 3.19. A total of 258 no. bicycle spaces are proposed within the basement and a further 258 no. within the courtyard areas to serve the residential development. All of the bicycle spaces will be secure and covered in accordance with the NTA Cycle Manual. A further 56 no. spaces are proposed at surface level to the front of the development to serve the commercial uses.
- 3.20. The proposed development also includes the provision of car club facilities and blepper bikes for the use of the proposed future residents and the existing residents in the area.
- 3.21. The car parking provision and access arrangements are further detailed in the Traffic and Transport Report prepared by BM Consulting Engineers.

Site Services

- 3.22. The proposed development will be serviced by a new drainage system with separate sewers for both foul and storm water within the site boundary. The proposed foul network has been designed in accordance with the Building Regulations. Please see Site Services Report prepared by BM Consulting Engineers for further details.

Pedestrian and Vehicular Access

- 3.23. The principle pedestrian entrance to the proposed development will be accessed off the Naas Road. Other pedestrian links are also provided through the site linking the Naas Road with other surrounding developments to the south and west of the site as well as linking into future connections from the surrounding developments to the east of the site. A series of pedestrian links are also provided along the Naas Road frontage.
- 3.24. The vehicular entrance will remain as per the existing arrangement on the site, access from the Naas Road and the internal road to the east of the site serving the industrial estate. The Traffic Impact Assessment prepared by BM Consulting Engineers sets out the capacity for this junction and confirms that there is adequate provision to accommodate the proposed development.
- 3.25. Following consultation with Dublin City Council it was recommended that a pedestrian crossing be provided across the Naas Road as indicated in the Engineering Reports and Drawings subject to agreement with Transport Infrastructure Ireland and Dublin City Council Roads Department.
- 3.26. The proposed pedestrian crossing is outside the red line boundary and does not form part of this planning application. The layout set out as part of this planning application is indicative for the purpose of illustrating the potential links with surrounding sites.
- 3.27. The applicant is happy to enter into discussions with Transport Infrastructure Ireland should this be required.

Waste Management

- 3.28. A Waste Management outline had been prepared by AWN and is set out in the Environmental Report submitted with this planning application.
- 3.29. A Construction and Demolition Waste Management Plan has been prepared by BM Consulting Engineers and is submitted with the application. The waste management plan sets out the strategy for the removal of waste from the site during the demolition and construction phase.

Flood Risk Management

- 3.30. The subject site is located within Flood Zone C. There is no risk of flooding effecting the site from fluvial sources. Any flood events do not cause flooding of the proposed development, and the development does not affect the flood storage volume or increase flood risk elsewhere. A flood risk assessment has been prepared by BM Consulting Engineers, please see enclosed for further details.

Housing Quality

- 3.31. A Housing Quality Assessment has been prepared by Reddy Architects to accompany this application. The proposed units are proposed comply with the relevant standards as set out in the Apartment Guidelines 2018 as relevant to BRT developments.

Daylight / Sunlight Access

- 3.32. A daylight/ sunlight assessment was prepared by IES to accompany this planning application. The assessment sets out a shadow analysis of the proposed development, a daylight analysis of the proposed building, a sunlight analysis of the proposed amenity spaces and an Average Daylight Factor test.
- 3.33. The shadow analysis shows different shadows cast at some times of the year for the proposed scheme. The daylight analysis indicated that 96% of the rooms tested receive a reasonable amount of daylight in line with the BRE Guidelines. The 4% that failed were west facing single aspect units that overlook a south facing landscaped courtyard. The sunlight analysis to the proposed amenity spaces indicates that the open space area receive in excess of 2 hours sunlight on 21st March in line with the BRE standards.
- 3.34. In general it is considered that the proposed development will significantly enhance the overall visual impact of the area and will create a more appropriate urban form of development at this location. The proposed development receives an appropriate level of daylight and sunlight as to ensure the proposed units are inviting habitable spaces. Full details of the daylight / sunlight analysis are set out in the IES assessment submitted with this application.

Sustainability / Energy

- 3.35. An energy statement has been prepared by Homan O'Brien Engineers. The report sets out the strategy for the utilities and site services within the development and compliance with Part L. Please see the accompanying report for full details of the proposed utilities and services. A separate lighting and utilities report has also been prepared by Homan O'Brien and is submitted with this application.

Appropriate Assessment

- 3.36. An Appropriate Assessment Screening Report has been prepared by Openfield Ecological Services. The AA Screening report concludes that significant effects to the Natura 2000 network are not likely to arise, either alone or in combination with other plans or projects.

Archaeological Assessment

- 3.37. An Archaeological Assessment has been prepared by IAC and is included within the EIAR submitted with this report. The proposed development is not likely to give rise to any archaeological findings. Standard mitigation measures are set out in the event that archaeological deposits are uncovered.

Noise

- 3.38. A noise impact assessment has been prepared by Awn and is included within the EIAR submitted with this planning application. The noise report sets out the noise

levels within the surrounding area and the potential mitigation measures to be considered.

Visual Impact Assessment

- 3.39. A Visual Impact Assessment has been prepared by Modelworks Media. The proposed CGI images and verified views clearly indicate that the proposed development is a significant improvement to the visual amenity of the area. The proposed development makes a positive contribution to the urban design quality of the area while at the same time respects the surrounding more sensitive views particularly from Drimnigh Castle.

Environmental Impact Assessment Report

- 3.40. The proposed development is accompanied by an Environmental Impact Assessment Report (EIAR). The proposed development is below the EIA threshold of 500 no. units. However given the number of units proposed at 492 no, it was considered that the preparation of an EIAR was appropriate.
- 3.41. The EIAR sets out a number of mitigation measure to ensure that the proposed development will not have an impact on the Environment.

4.0 PLANNING HISTORY

- 4.1. A planning history search was conducted using the Dublin City Council online planning search system. There are a number of previous applications on the subject lands for minor alterations and change of use to the existing building on site. The planning history on the site is not of direct relevance to redevelopment in this instance. A brief summary is set out below:

Reg. Ref. 3760/98

- 4.2. Planning permission granted on 29th March 1999 for internal layout alterations including new fire escapes and for change of use of front portion of building from warehouse to motor/ warehouse showrooms and for alterations to front elevations.

Reg. Ref. 2684/00

- 4.3. Planning permission granted on 20th November 2000 for change of use of existing first floor storage area to offices and associates work and alterations to existing front elevation.

Reg. Ref. 2715/00

- 4.4. Planning permission granted on 20th November 2000 for alterations to east elevation previously granted under Reg. Ref. 3760/98.

Reg. Ref. 2956/00

- 4.5. Planning permission granted on 14th December 2000 for new mezzanine floor and alterations to front elevation previously permitted under Reg. Ref. 3760/98.

Reg. Ref. 4105/00

- 4.6. Planning permission granted on 22nd March 2001 for alterations to front elevation previously permitted under Reg. Ref. 2956/00.

Reg. Ref. 0479/01

- 4.7. Planning permission granted on 28th May 2001 for alterations for the North and East elevations and revised subdivision, previously granted under Reg. Ref. 2715/00 and Reg. Ref. 3760/98

Reg. Ref. 4368/04

- 4.8. Planning permission granted on 29th November 2004 for retention permission for the change of use of part warehouse / showrooms / office unit to car showroom, new mezzanine level containing ancillary office space, demolition of existing reception, toilet and office area, alterations to front elevation and new signage.

Reg. Ref. 1922/05

- 4.9. Planning permission granted on 15th June 2005 for retention permission is sought for the change of use of part of warehouse / office unit to car showroom; new mezzanine level containing ancillary office space; demolition of existing reception; toilet and office areas; alterations to front elevation and new signage

- 4.10. A review of the planning history of the surrounding area revealed that there a number of permissions on the adjoining lands for residential development. The following permissions are of relevance.

Reg. Ref. 4244/15 – Carriglea

- 4.11. Planning permission was granted by Dublin City Council on 17th October 2016 for “development on a site of c. 2.62 ha at Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12. The proposed development shall provide for the demolition (c. 9,127 sq.m.) of existing structures on site to provide for development (total GFA c. 37,255 sq.m.) comprising 340 no. residential units and crèche facility (c. 258 sq.m.) all in a development proposal of 8 blocks (Blocks A- H) ranging in height from 4-5 storeys with associated basement level located at Blocks D-H. Overall, the development shall provide for 70 no. 1 bed units (c. 55-59.4 sq.m.); 159 no. 2 bed units (c. 81.9-95 sq.m.) ; and 111 no. 3 bed units (100 – 136 sq.m.); all associated balcony/ terrace private open space area. Block A (5 storeys) comprises 43 units in the form of 11 no. 1 bed, 27 no. 2 bed and 5 no. 3 bed units; bin storage area; 2 no. substations; and 2 no. switchrooms. Block B (5 storeys) comprises 27 no. 2 bed units and a crèche facility of c. 258 sq m. The crèche facility shall provide for 3 no. classrooms; reception area; office area; all associated ancillary space; and 2 external play areas. Block C (5 storeys) comprises 35 units in the form of 20 no. 2 bed units and 15 no. 3 bed units. Block D (4-5 storeys) comprises 55 units in the form of 9 no. 1 bed units, 28 no. 2 bed units and 18 no. 3 bed units. Block E (4 storeys) comprises 28 units in the form of 8 no. 1 bed units, 12 no. 2 bed units and 8 no. 3 bed units. Block F (4 storeys) comprises 24 units in the form of 8 no. 1 bed units, 8 no. 2 bed units and 8 no. 3 bed units. Block G (4-5 storeys) comprises 66 units in the form of 19 no. 1 bed units, 24 no. 2 bed units and 23 no. 3 bed units. Block H (4-5 storeys) comprises 62 units in the form of 15 no. 1 bed units, 13 no. 2 bed units and 34 no. 3 bed units. The overall development shall also provide for 348 no. car parking spaces (340 no. located at basement level and 8 no. located at surface level); 396 no. bicycle parking spaces (350 located at basement level and 46 located at surface level); plant room areas; water stores; bin stores; c. 3,510 sq m of public open space; c. 4,007 sq m of balcony/ terrace space; c. 11,753 sq m of communal open space; vehicular access and egress to the site via Muirfield Drive; and all associated site development, services, and landscape works”.
- 4.12. The subject development was amended at Further Information stage in response to the City Council’s planner’s comments. The layout of the site was reconfigured to provide for 11 no. Blocks ranging in height from 4 no to 5 no. storeys. The overall unit numbers were reduced to 283 no. units during the application process. The final grant of permission also requested the following in compliance with Condition No. 6 as follows:

“6. The development hereby approved shall be amended as follows:

- (a) The design and layout of Block A shall be revised such that no element of the block is less than 11m from the site boundary. The revised design shall not relocate the block closer to blocks B and C and shall retain the separation distances from these blocks as shown on the further information submission.*
- (b) The third floor shall be omitted from Block B.*
- (c) The ‘pavilion’ element of Block J shall be omitted – the block containing apartments no. J1.02, 03, 09, 10, 16, 17 and 23. This area shall be landscaped as part of the pen space area and retained free from development and the north-eastern elevation of block J shall be revised accordingly. Prior to the commencement of development, the applicant shall submit revised plans and*

elevations detailing these amendments, for the written agreements of the planning authority”.

Reg. Ref. 2438/17 – Carriglea

- 4.13. Planning permission was granted on 14th July 2017 for amendments to previously permitted residential development, Reg. Ref. 4244/15. The proposed amendments comprise of; (i) the infill of Blocks A and C at 2nd to 6th floor level to form new residential Block AC; (ii) amendments to previously permitted apartment Blocks A and C to increase the height from 5 no. storeys to 6 no. storeys with a 7 no. storey element on the north-east corner of proposed Block AC; (iii) amendments to all elevations of proposed Block AC; (iv) reconfiguration of internal layout of proposed Block AC to provide for a total of 108 no. residential units with private balconies and terraces on all elevations (35 no. 1 bed units, 59 no. 2 bed units and 14 no. 3 bed units) which increases the total number of units in the previously permitted Blocks A and C by 23 no. units (v) the provision of residential facilities at ground floor level to include gym; residents lounge, concierge/receptions area, entrance lobby, 3 no. meeting rooms and all ancillary facilities; (vi) provision of a double height walkway to access the rear central courtyard; (vii) relocation of plant and bin stores; (viii) reconfiguration of basement car park to provide for a total of 316 no. car parking spaces and 545 no. cycle parking spaces together with all necessary site development works to facilitate the proposed development. The proposed amendments will increase the overall unit number from 283 no. to 306 no. in total.
- 4.14. This permission increased the overall provision of units by 23 no. from 283 no. to 306 no.

Reg. Ref. 2875/17 – Carriglea

- 4.15. Planning permission was granted on 22nd November 2017 for amendments to the residential development permitted under Reg. Ref.:4244/15 to provide for an additional 56 no. units (21 no. 1 bed units, 26 no.2 bed units and 9 no. 3 bed units) increasing the total number of units from 283 no. to 339 no. The proposed amendments comprise of:
- I. Increase in height of Blocks E, D and L from 5 no. storeys over basement to 6 no. storeys over basement.
 - II. Increase in height of Block F from 4 no. storeys over basement to 6 no. storeys over basement;
 - III. Increase in height of Blocks H, J and K from 4 no. storeys over basement to 5 no. storeys over basement;
 - IV. New design and layout of Block H, J and K to provide 6 no. 1-bed units and 18 no. 2-bed units in each block;
 - V. Reconfiguration of internal layout of Block D to provide 24 no. 2-bed units and 12 no. 3-bed units;
 - VI. Reconfiguration of internal layout and increase in footprint of Block E to provide 12 no. 1-bed units, 18 no. 2-bed units and 12 no. 3-bed units;
 - VII. Reconfiguration of internal layout of Block F to provide 6 no. 1-bed units, 18 no. 2-bed units and 12 no. 3-bed units.
 - VIII. Block L with the additional storey will overall provide 1 no. 1-bed unit, 29 no. 2-bed units and 6 no. 3-bed units;
 - IX. Amendments to all elevations of Blocks D, E, F, H, J, K, and L incorporating new and revised balconies/ terraces generally on all floors;
 - X. Reconfiguration of basement car park within permitted footprint to provide for a total of 344 no. car parking spaces and 552 no. cycle parking spaces together with all necessary site development works to facilitate the proposed development

- 4.16. Planning permission was granted by condition which reduced the number of additional units to 32 no. additional units permitted in total. This increased the overall provision on site to 338 no. units.

Reg. Ref. 3940/17 – Carriglea

- 4.17. Planning permission was granted on 8th January 2018 for *amendments to previously permitted residential development, Reg. Ref. 4244/15 and Reg. Ref. 2438/17. The proposed amendments comprise of: (i) the provision of an additional floor on permitted Block AC (Reg. Ref. 2438/17) increasing the height of the block from 6 no. storeys with a 7 no. storey pop up corner element to 7 no. storeys on the north west elevation (ii) the provision of 2 no. additional floors on Block D and L, increasing the height of the Blocks from 5 no. storeys to 7 no. storeys. (iii) the reconfiguration of permitted basement increasing the car parking provision from 316 no. to 346 no. car parking spaces and 545 no. to 552 no. cycle parking spaces, (iv) Revised hard and soft landscaping masterplan, (v) provision of new balconies to serve each of the proposed 32 no. units; together with all necessary site development work to facilitate the proposed development. The proposed amendments will provide for 12 no. additional units in Block D (8 no. 2 bed, 4 no. 3 bed units), 12 no. additional units in Block L (10 no. 2 bed, 2 no. 3 bed units) and 8 no. additional units in Block AC (1 no. 1 bed, 6 no. 2 bed, 1 no. 3 bed units), increasing the total provision within the development from 306 to 338 no. units comprising of (55 no. 1 bed, 222 no. 2 bed, 61 no. 3 bed units).*
- 4.18. This permission increased the overall numbers on site by 32 no. additional units from 338 no. to 370 no.

Reg. Ref. 2203/18 – Carriglea

- 4.19. Further information was requested by Dublin City Council on 28th March 2018 for *amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. The proposed amendments comprise of (i) New Design, layout and orientation of permitted block D to provide for 35 no. units (14 no. 1 bed, 14 no. 2 bed and 7 no. 3 bed) (ii) Repositioning reorientation and provision of an additional floor on the west side of Block E increasing the height from 6 no. storey as permitted to 6-7 storeys as proposed, all to provide for 46 no. units (13 no. 1 bed, 20 no. 2 bed and 13 no. 3 bed) (iii) Amendments to all elevations of Blocks D and E incorporating new and revised balconies / terraces generally on all floors; (iv) Revised hard and soft landscaping master plan; and (v) all associated site development works and ancillary infrastructure and site services to facilitate the proposed development . The proposed amendments will provide for a reduction of 7 no. units in Block D(from 42 no. as permitted to 35 no. as proposed) and 4 no. additional units in Block E (from 42 no. as permitted to 46 no. as proposed) bringing the total unit provision within the development from 358 no. as permitted to 355 no. as proposed (comprising of 84 no. 1 bed, 214 no. 2 bed, 57 no. 3 bed units)*
- 4.20. This application is currently at FI stage and is awaiting a response from the applicant.

Reg. Ref. 2319/18 – Carriglea

- 4.21. Further information was required on 12th April 2018 for *amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Ref. 2438/17, 2875/17 and 3940/17. The proposed amendments comprise of: i) Provision of an additional setback floor on the north-east elevation of Block A*

increasing the height from 6 no. storeys as permitted to 7 no. storeys as proposed, all to provide for 55 no. units (25 no. 1-bed, 29 no. 2-bed and 1 no. 3-bed); ii) Revised design and layout of permitted 4-storey Block B to provide for 16 no. units (5 no. 1-bed, 7 no. 2-bed and 4 no. 3-bed) iii) Revised design, layout and position of west portion of permitted 7 storey Block C to provide for 73 no. units (8 no. 1-bed, 51 no. 2-bed and 14 no. 3-bed); iv) Amendments to all elevations of Blocks A, B and C incorporating new and revised balconies/ terraces generally on all floors; v) Revised hard and soft landscaping masterplan; and vi) All associated site development works and ancillary infrastructure and site services to facilitate the proposed development. The proposed amendments will provide for an increase of 4 no. units in Block B (from 12 no. as permitted to 16 no. as proposed), an increase of 6 no. units in Block A (from 49 no. as permitted to 55 no. as proposed) and an increase of 6 no. units in Block C (from 67 no. as permitted to 73 no. as proposed).

- 4.22. This application is currently at FI stage and is awaiting a decision from Dublin City Council.

Reg. Ref. 2176/18 – Carriglea

- 4.23. Further information was requested on 26th March 2018 for *amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. The proposed amendments comprise of: Reduction in the size and reconfiguration of the permitted basement to include modifications to basement perimeter and internal layout (including plant, waste storage, parking, access stairs and cores); Reduction in quantum of permitted residential car parking provision (from 346 no. to 260 no.); Increase in provision of cycle parking from 552 no. as permitted to 594 no. as proposed; Minor amendments to permitted landscaping scheme; and, All Associated site development works, ancillary infrastructure and site services to facilitate the proposed development.*

- 4.24. This application is currently at FI stage, and is awaiting a decision from Dublin City Council.

Reg. Ref. 4312/09 – Carriglea

- 4.25. Planning permission was granted by Dublin City Council on 1st June 2010 for the construction of a 141 no. bed nursing home in a part 3 no., part 4 no. storey development on the eastern portion of the overall site. This permission expired in 2014.

Reg. Ref. 3636/04 – Lansdowne Gate

- 4.26. Planning permission was granted by An Bord Pleanála on 16th December 2005 for the construction of a mixed-use development consisting of 241 no. dwellings, a crèche (c. 824 sq.m.); 132 no. live/work units (c. 12,333 sq.m.) and office accommodation (c. 611 sq.m.) in 9 no. Blocks ranging in height up to 7 no. storeys. This development is presently known as Lansdowne Gate and has a density of circa 127 units per hectare. This development also includes a crèche – Cocoon. The subject proposed development would provide for a residential density of 129 units per hectare (excluding amendments proposed as part of 2438/17) and is therefore consistent with the densities permitted in the area.

5.0 NATIONAL AND REGIONAL PLANNING CONTEXT

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

- National Planning Framework 2040;
- Rebuilding Ireland – Action Plan for Housing and Homelessness;
- Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2018;
- Draft Urban Development and Building Height Guidelines 2018;
- Eastern and Midlands Regional Assembly; Draft Regional Spatial and Economic Strategy 2019- 2031;
- Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Quality Housing for Sustainable Communities (2007);
- Design Standards for New Apartments (2017);
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- The Planning System and Flood Risk Management (2009);
- Birds and Habitats Directive – Appropriate Assessment;

National Planning Framework (NPF) 2040

- 5.2. 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.
- 5.3. As a strategic development framework, Ireland 2040 sets the long-term context for our country’s physical development and associated progress in economic, social and environmental terms and in an island, European and global context.
- 5.4. National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process will be guided by these strategic outcomes in relation to the practical implementation of Ireland 2040. The NPF sets out the importance of development within existing urban areas by *“making better use of under-utilised land including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport”*.
- 5.5. Objective 3a of the NPF states that it is a national policy objective to *“deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements”*. The proposed development is a strategically located underutilised site in the centre of a regeneration area for emerging residential development and is adjacent to established residential areas such as Inchicore and Drimnagh.
- 5.6. Objective 4 states *“ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well being”*. The proposed development will provide for a high

quality of residential units in accordance with the apartment guidelines 2018. The proposed materials and finishes will also be of a high quality standard in order to create a unique quality urban place. The proposed development will also provide for a significant proportion of commercial development which will serve both the future and existing residents in the area.

- 5.7. It is considered that the proposed development provides for the creation of an attractive, high quality, sustainable new mixed-use development within the existing built up area of the city and an emerging area for the creation of high quality and high density developments in accordance with sustainable public transport infrastructure with strong connections and links to the city centre. The provision of the new sustainable development is therefore consistent with the NPF objective.
- 5.8. Objective 11 of the National Planning Framework states that *“there will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth”*.
- 5.9. The proposed development will provide for high density residential development in an existing urban area adjacent to existing high quality public transport facilities. The proposed development will also include a significant proportion of commercial development which will encourage more people, jobs and activity within existing urban areas.

The NPF continues to state that:

- 5.10. *“Although sometimes necessary to safeguard against poor quality design, planning standards should be flexibly applied in response to well designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.*

This is in recognition of the fact that many current urban planning standards were devised for application to greenfield development sites and struggle to take account of evolved layers of complexity in existing built-up areas.

In particular, general restriction on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance based criteria appropriate to general locations e.g. city/ town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc”.

- 5.11. The proposed development is located directly on the red luas line and along one of the main routes into the city centre and is well served by public transport. The existing site is underutilised and presents a key opportunity site as identified in the NPF for redevelopment of a mixed use scheme. The proposed building height is predominantly 8 no. storeys with set back levels on the southern boundary from 4th to 7th floor level. The proposed density and height of the development is considered appropriate for the location of the site and the availability of high quality public transport facilities. The proposed development is therefore in accordance with the objectives of the NPF in this regard.

- 5.12. Objective 13 of the National Planning Framework also states that:

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that

seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment”.

- 5.13. The NPF also states that that “to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”. Objective 35 states that it is an objective to

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

- 5.14. The proposed development for a mixed use residential scheme on this brownfield site represents an opportunity to provide for increased densities and increased heights in accordance with the NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development of up to 8 no. storeys and at a density of 262 no. units per hectare is therefore considered appropriate in this location and in accordance with the NPF.

Rebuilding Ireland – Action Plan for Housing and Homelessness

- 5.15. Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.

- 5.16. Rebuilding Ireland is set around 5 no. pillars of proposed actions summarised as follows:

Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State – supported housing

Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.

Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible – focusing on measures to use vacant stock to renew urban and rural areas.

- 5.17. The proposed development is consistent with Pillar 4 to improve the rental sector. The proposed development provides for 492 no. new apartment units as part of a Build-To-Rent Scheme. The provision of the 492 no. residential units will substantially add to the residential accommodation availability of the area and cater to the increasing housing demand.

Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2018;

- 5.18. The Sustainable Urban Housing Design Standards for New Apartment were published in March 2018. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.
- 5.19. A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations is cities and town that may be suitable for apartment development as follows:
- Central and/or Assessible Urban Locations
 - Intermediate Urban Locations
 - Peripheral and/ or Less Accessible Urban Locations
- 5.20. The subject site is located within a central and/or accessible urban location. The Apartment Guidelines note that these locations are generally suitable for large scale apartment development and higher density developments. These locations are categorised as including the following:
- Sites within walking distances (i.e. up to 15 minutes or 1,000-1500m), of principle city centres or significant employment locations, that may include hospitals and third level institutions;
 - Sites within reasonable walking distance (i.e. up to 15 minutes or 1,000-1,500m) to/from high capacity urban public transport stops (such as DART or Luas); and
 - Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services.
- 5.21. The subject development is located adjacent to the Luas Line which provides for a high frequency service to the City Centre. The site is located in close proximity to two no. Luas Stations, Bluebell and Kylemore. The site is also adjacent to a number of Dublin bus routes connecting the site to the City Centre. The subject site therefore falls into the central and/or accessible urban locations category and is therefore suitable for high density apartment developments.
- 5.22. The Guidelines also note that the scale and extent of the development should increase where the site is strategically located near quality public transport hubs, service and urban amenities.
- “The scale and extent of apartment development should increase in the relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services also particularly suited to apartments.”*
- 5.23. The proposed development is located adjoining a Luas Line and a number of Dublin bus routes along this major thoroughfare into the city. The site is adjacent to established residential developments with a range of local services. The proposed development seeks to further enhance the residential and ancillary services in the area by provided for 492 no. residential units and a range of commercial uses such as, medical centre, shared office space, retail units, cafes, restaurant, car show room and

creche facilities. The proposed development also will provide for a pedestrian link through the site and public amenity space area linking the proposed development with the surrounding established residential schemes, greenways and public parks. It is therefore considered that the proposed development is suitable for increased heights and increased densities in accordance with the objectives of the apartment guidelines.

- 5.24. The Guidelines also note that in Central and/or Accessible Urban Locations planning authorities must consider a reduced overall car parking standard.

“In more central locations that are well served by public transport, the default policy is for car parking to be minimised, substantially reduced or wholly eliminated in certain circumstances.”

- 5.25. The proposed development in this regard will provide for 200 no. car parking spaces at basement level and 44 no. car parking spaces at surface level. The proposed car parking provision results in a ratio of 0.41 spaces per unit. The proposed development will provide for compensatory additional transport facilities in response to the reduced car parking provision such as car club facilities, increased bicycle parking and bleper bikes for the use of the future residents and the surrounding existing community.

- 5.26. A study has also been prepared by BM Consulting Engineers based on the car usage data in the surrounding area. The study identified that apartment type developments in the area all have reduced car parking usage, therefore given the availability of compensatory additional transport facilities proposed within the development, the availability of public transport facilities in the area and the built to rent nature of the development which typically attracts reduced car parking demand, the proposed car parking provision in the proposed development is appropriate for the subject site.

- 5.27. The proposed car parking spaces will be managed as part of the “Build to Rent” offering. The spaces will be let separately to the units on a first come first served basis. It will not be a given that car parking will be provided with each unit. the management of the build to rent development will make this clear to residents on leasing. The proposed apartment buildings and units are considered to be suitability located on the subject site, integrated within the landscape and well connected to adjacent facilities including public transport, and will provide a high quality development on the subject site.

Housing Mix

- 5.28. The apartment guidelines note that no restrictions on dwelling mix shall apply to Build-To-Rent schemes. However, the proposed development provides for 104 no. studios (21%), 136 no. 1 bed units (28%) and 251 no. 2 bed units (51%).

Apartment Sizes

- 5.29. The apartment guidelines set out the minimum floor areas for apartment units as follows:

Apartment Type	Minimum Size
Studio	37 sq.m.
1 bedroom	45 sq.m.
2 bedroom (3 person)	63 sq.m.
2 bedroom	73 sq.m.
3 bedroom	90 sq.m.

- 5.30. The studio and 1 bed units meet or exceed the minimum apartment size at 37/ 45 sq.m. The 2 bed units provide for a range of 2 bed (3 person) units and 2 bed (4 person) units. In total 21 no. units are provided as 2 bed (3 person) units and 231 no. units provided as 2 bed (4 person) units. The apartment guidelines state the following in relation to the provision of 2 bed (3 person) units:

“While providing necessary variation in dwelling size, it would not be desirable that, if more generally permissible, this type of two bedroom unit would displace the current two bedroom four person apartment. Therefore no more than 10% of the total number of units in any private residential development may comprise this category of two bedroom three person apartment”.

- 5.31. The proposed development provides for 21 no. 2 bedroom (3 person) (4%) units therefore does not exceed the 10% requirement. As such the provision of these type of units are acceptable in this regard.
- 5.32. The guidelines note that build to rent developments are not required to provide for 10% of the units to be above the minimum standard. A HQA has been prepared by Reddy Architects and accompanies this pre-application request to demonstrate compliance with the relevant standards.

Aspect Ratios

- 5.33. The apartment guidelines state that a minimum of 50% dual aspect apartments should be provided in any development and that a minimum of 33% dual aspect units should be provided in central and accessible urban location, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage.
- 5.34. The proposed development provides for an overall of 43% dual aspect units in accordance with the apartment guidelines. A Housing Quality Assessment prepared by Reddy Architects is submitted as part of this pre-application request which demonstrates compliance with the applicable standards.

Open Space

- 5.35. The apartment guidelines set out standards for private and communal open space. In Built to Rent developments it is noted that private open space standards may be relaxed in certain circumstances. The majority of residential units all contain private open space in the form of terraces or balconies, however, in certain circumstances particularly fronting the Naas Road, balconies have been removed.
- 5.36. The omission of balconies at this location is due to the immediate environment of the northern boundary of the site. Due to the orientation of the units fronting the Naas Road, it is considered that the provision of balconies at this location would not provide for any significant enhancement of amenity for residents within these units. In this regard, large projecting glazed bay windows have been provided to these units as an alternative to a balcony. The projecting windows enable views to be obtained within the units in a north, east and westerly direction. As a compensatory measure the size of these units have also been increased to provide for larger and lighter units at this location.

- 5.37. As such it is considered that the omission of balconies along the northern elevation increased the level of amenity obtained within the unit and provides for a nicer overall environment to be achieved.
- 5.38. It should also be noted that the proposed development provides for a significant increased level of communal space within the development to offset against the area of private amenity space lost through the omission of balconies.
- 5.39. Communal amenity space is calculated as 4 sq.m. for a studio, 5 sq. m for a 1 bed unit and 7 sq.m. for a 2 bed unit. The overall requirement would therefore equate to 2,839 sq.m.
- 5.40. The proposed development will provide for a mix of internal and external communal spaces. The outdoor amenity space is provided within each wing of the development in 4 no. courtyard areas. These areas will be landscaped to a high quality finish and will provide for passive recreational facilities such as seating area, informal children's play spaces and grassed lawn areas. The courtyard areas will provide for 3,702 sq.m. of external amenity spaces.
- 5.41. In addition, 3 no. shared roof top terrace areas are provided within the development. These areas will be particularly beneficial to the units fronting the Naas Road that do not contain private amenity space. The rooftop terraces will be accessed from the main block and will provide areas for passive recreation.
- 5.42. The proposed development will also provide for a significant amount of internal communal spaces amounting to 930 sq.m. The internal spaces will comprise of a concierge space, games room, co-working space, and a multifunctional space that can accommodate, exercise classes, meeting rooms, co- working, functions or larger spaces for entertaining, and cinema rooms. These spaces will be available to all residents through a booking system or will be managed by the BTR operator to facilitate movie nights / social gatherings for the residents.

Density

- 5.43. The proposed density on the subject site is 262 no. units per hectare. It is considered that the proposed density is appropriate given the National Policy objective to increase residential density in existing urban infill locations.

Build to Rent Accommodation

- 5.44. The proposed development will be managed as a built to rent development. Build to rent schemes are defined as "*Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord*".
- 5.45. Section 5.1 of the Apartment Guidelines in relation to "Build to Rent" developments states :

"Larger scale apartment developments that typically include several hundred units, that are designed and constructed specifically for the needs of the rental sector are a prominent feature of house provision in many countries. These types of housing developments also have a potential role to play in providing choice and flexibility to people and in supporting economic growth and access to jobs in Ireland. They can provide a viable long term housing solution to households where home -ownership

may not be a priority, such people starting out on their careers and skills development in the modern knowledge-based economy”.

- 5.46. As such, the provision of “Built To Rent” accommodation provides for positive impacts on both the residential market increasing typologies and choice into the market and also creates significant economic benefits by providing accommodation for highly skilled workers at the beginning or careers where home ownership is not viable.
- 5.47. Section 5.9 of the Guidelines states that *“the promotion of BTR development by planning authorities is therefore strongly merited through specific BTR planning and design policies and standards”*. As such the provision of BTR development should be encouraged and supported by the planning authorities in appropriate locations such as the subject site.
- 5.48. Ownership and management of BTR development is usually carried out by a single entity that invests in the project as a long term commercial rental undertaking. Therefore individual residential units within the development are not sold off for private ownership or sub letting individually. The operator is therefore required to ensure that the proposed development remains owned and operated by an institutional entity, the status of which shall continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period.
- 5.49. SPPR 7 states the following:

BTR Development must be:

- a) *Described in the public notices associated with a planning application specifically as a “Build to Rent” housing development that unambiguously categorises the project (or part of thereof) as a long term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period.*
- 5.50. The proposed development in this instance will comply with the management structure for build to rent developments and will remain in operation for a minimum of 15 years. BTR accommodation must be supported by communal and recreational amenities to be provided. The applicant’s willing to enter into the 15 year covenant agreement subject to a grant of planning permission. A draft covenant is submitted as part of the planning application and is described in the public notices of this planning application.

(b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:

- (i) *Residential Support Facilities: comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/ repair services, waste management facilities etc.*
- 5.51. The proposed development will provide for a concierge and central management office for the residents. The proposed development will also provide for central waste

management facilities to serve the development. Laundry facilities are provided in each individual apartment. A series of bike storage areas are also proposed within the development to serve the residential users. The resident support facilities can be broken down as follows:

Resident Support Facilities	Floor Area
Refuse Store	89 sq.m.
Bike Store	293 sq.m.
Management Office	44 sq.m.
Post Room	32 sq.m.
Total	458 sq.m.

(ii) *Resident Services and Amenities: comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/ lounge areas, work/ study spaces, function rooms for use as private dining and kitchen facilities.*

- 5.52. The proposed development will provide for a range of communal spaces within the development including external and internal amenity spaces. The external spaces are provided through 4 no. courtyard areas between each block on the site. In addition external communal space will be provided at roof level to serve the future residents of the development.
- 5.53. The internal spaces will comprise of a concierge space, games room, co-working space, and multifunctional spaces that can accommodate, exercise classes, gym, meeting rooms, co- working, functions or larger spaces for entertaining, and cinema rooms. These spaces will be available to all residents through a booking system or will be managed by the BTR operator to facilitate movie nights / social gatherings for the residents.
- 5.54. The use of these multi-functional spaces will be based on the demand within the development once occupied. Full details of these spaces are set out in the Design Statement / Housing Quality Assessment by Reddy Architecture.

5.55. The proposed break down of the communal space is set out as follows:

Resident Services and Amenities	Floor Area
Internal	
Concierge	170 sq.m.
Games Room	170 sq.m.
Co – Working Space	60 sq.m.
Multi- Functional Space	215 sq.m.
Multi- functional Space	215 sq.m.
Communal Roof Terrace and Internal Amenity Space	100 sq.m.
External	
Roof Garden 1	30
Roof Garden 2	130
Roof Garden 3	130
Total	1,220 sq.m.
Residential Courtyards	3,702 sq.m.
Overall Residential Amenity	4,922 sq.m.

5.56. In addition, it should be noted that there are a number of uses within the development such as cafés, restaurants, convenience store, pharmacy, co-working space, medical centre, etc. which will all be utilised by the future residents. The proposed offering in terms of communal amenity space and in addition local support facilities ensures that the future residents within the scheme will be well served in terms of both designated residential areas and in the everyday support services proposed.

5.57. The proposed development is therefore considered to provide for a high level of amenity to serve the proposed future residents, in addition to the existing residents.

5.58. Specific Planning Policy Requirement 8 as set out in the apartment guidelines 2018 states the following:

For proposals that qualify as specific BTR development in accordance with SPPR 7:

(i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;

5.59. The proposed development provide for a total of 492 no. units, comprising of 104 no. studios (21.14%), 136 no. 1 beds (27.64%), and 251 no. 2 bed units (51.22%).

(ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;

5.60. Each of the proposed residential units contain storage space either in compliance or in excess of the apartment guidelines. The proposed development is considered to be compliant with the apartment guidelines in this regard.

- 5.61. The proposed development will provide for a variety in the provision of private amenity space within the scheme. A total of 240 no. units contain balconies, 130 no. of which are in excess of the requirements set out in the apartment guidelines for private amenity space. The total requirement of private amenity space for the 240 no. units with balconies is 1,449 sq.m. The total provision of private amenity space is 2,251 sq.m. which clearly indicates that the proposed development provides for generous private amenity spaces in excess of the requirements for the units which contain balconies.
- 5.62. In some cases balconies have been omitted in units fronting the Naas Road and in locations within the development where balconies would not be appropriate. It is considered that the level of amenity a balcony would provide at these particular locations would be minimal given the existing nature of the environment particularly fronting the Naas Road. In this regard compensatory measures have been included in these units to increase the level of the amenity obtained. The units where balconies have been omitted fronting the Naas Road have been increased in size to provide for larger and brighter residential units. In addition, large glazed windows have been provided to enable views to be obtained within these units to the north, east and west of the site. In this regard the unit will receive both morning and evening sunlight into the units providing for an enhanced level of amenity.
- 5.63. In addition, increased communal spaces have been provided in excess of the requirement to offset against some of the area lost in the omission of balconies. The total private amenity space omitted as part of the development amounts to 1,390 sq.m. To compensate further against this loss of private amenity space, the level of communal space has been increased. The total requirement of residential communal space is 2,839 sq.m.. The proposed development provides for 4,992 sq.m. (internal and external) which is significantly in excess of the total communal requirement and the shortfall area as set out in the apartment guidelines.
- 5.64. In addition, the proposed development provides for 2,981 sq.m. of public open space which is over 1,000 sq.m. in excess of the 10% public open space requirement (1,880 sq.m.). This public open space area will provide for cycle links and children's play facilities which will all be utilised by the residents. The public open space area although separate is designed as an extension to the courtyard areas and adds further amenity value to the future residents of the development.
- (iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*
- 5.65. The proposed development will provide for 200 no. car parking spaces to serve the proposed residential units and 43 no. car parking spaces to serve the commercial units on the site. In accordance with the apartment guidelines it is noted that car parking for BTR developments shall be a default of minimal or significantly reduced car parking provision.
- 5.66. The quantum of car parking has been informed by the surrounding characteristics, the demographics, the target age-group for the development, typical trends in BTR developments and the availability of public transport in the area.

- 5.67. A Traffic and Transport Assessment, Mobility Management Plan, and a parking strategy has been prepared by BM Consulting Engineers and is submitted with this pre-application request.
- 5.68. The proposed development is located adjacent to the Luas line and a number of Dublin Bus services to the City Centre. The proposed development is also located to a direct cycle route to the city centre. The proposed development also seeks to extend this cycle route through the site connecting into the adjacent Carriglea residential development, which further links through Lansdown Valley park and onto the Canal. As such it is considered that there are a variety of sustainable transport services available to the site which would promote the movement towards reduced car parking provision at this location.
- 5.69. The proposed development will also provide for Car Club spaces and will provide for blepper bikes to establish and operate shared mobility measures within the development.

(iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;

- 5.70. The proposed units within the development range in size between 38 sq.m. and 88 sq.m.. in accordance with the guidelines. Notwithstanding the BTR requirement, a total of 185 no. units are 10% larger than the minimum standards within the scheme.

(v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.

- 5.71. The proposed development provides for a range of unit number per core in compliance with the BTR requirements.

Operational Management of BTR Development

- 5.72. The management of BTR schemes is a relatively new process to the Irish Market. This type of management has been successful internationally in residential schemes and a similar model will be applied in this instance.
- 5.73. Staff and maintenance staff will be employed directly and managed by the operator of the development. The general management of the scheme will be broken into 3 no. phases, move in process, operational process and move out process. Each of the following are detailed below. A report is provided by Hooke and McDonald and is submitted with this planning application which outlines the general management arrangement for residential rentals.

Move In Process

- 5.74. Every resident will be required to complete an online application form in which the applicant will confirm a number of criterion based on previous occupancies, proof of ID, and employment confirmation. All of the data gathered during this process and during the tenancy will remain strictly confidential.
- 5.75. Following the application process, successful candidates will be invited to a viewing of the property. Following the viewing a move in date will be agreed. The move in date will correspond with the rental payments due each month.

- 5.76. On move in date, all residents will be greeted by the management team and shown around the unit and the ancillary resident services in the development.

Operational Process

- 5.77. The management team on site will be available to the residents between standard working hours of 9am to 5:30pm. The management team will be contactable through the concierge. Outside of these hours a security team will manage the concierge.
- 5.78. Access to the building, all communal areas will be controlled by a key fob or similar system. Key fobs will be assigned to registered residents and in the situation that a key fob is lost, it will be immediately deactivated and a replacement issued to the resident.
- 5.79. Maintenance will be monitored at regular intervals throughout the occupant's lease. All necessary repairs and maintenance will be carried out by the management team. Residents can also notify the management team if additional repairs are required.
- 5.80. Maintenance of the communal areas will also be carried out on a regular basis by the management team. Cleaning services will also be provided in the common areas.
- 5.81. Landscaping and external maintenance of the building will also be carried out by the management team.

Move Out Process

- 5.82. Tenancies will generally be managed on a yearly lease. Residents who wish to extend their lease for an additional year must submit all relevant details similar to the move in process to confirm ongoing up to date information is provided.
- 5.83. Residents will be required to notify management team of their scheduled departure date one month in advance. The management team will carry out unit inspection at the time of departure to ensure the unit is left in satisfactory order.

Urban Development and Building Height Guidelines 2018

- 5.84. The Urban Development and Building Height Guidelines 2018 recently published, are intended to set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040.
- 5.85. The guidelines in effect put in place a presumption in favour of high buildings at public transport nodes. The guidelines state that it is Government policy to promote increased building height in locations with good public transport services.
- 5.86. The Guidelines emphasise the policies of the NPF to greatly increase levels of residential development in urban centres and significantly increase building heights and overall density and to ensure that the transition towards increased heights and densities are not only facilitated but actively sought out and brought forward by the planning process and particularly at Local Authority level and An Bord Pleanála level.
- 5.87. Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála will be required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function.

- 5.88. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plans and strategic development zone planning schemes. Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirement of these guidelines and properly inform the public of the relevant SPPR requirements.
- 5.89. SPPR 1 states the following:
- “In accordance with Government policy to support increased building height in location with good public transport accessibility, particularly town / city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height”.*
- 5.90. The Development Plan currently states that a maximum building height of 24m is permissible on the subject site. However, in accordance with SPPR 1 of the Height Guidelines states that blanket restriction as set out in development plans should be avoided and a building height appropriate for the subject site and location be applied. The proposed development is 8 no. storeys (24m) in height which is in any event compliant with the Dublin City Development Plan height limits for residential development within 500m of a Luas line.
- 5.91. The guidelines also state that the implementation of the National Planning Framework requires increased density, scale and height of development in town and city cores with an appropriate mix of uses.
- 5.92. In relation redevelopment and enhancement of the city core, the guidelines state that *“to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation term on reusing previously developed “brownfield” land, building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements”.*
- 5.93. The guidelines also place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks.
- “In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors”.*
- 5.94. The Guidelines also states that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.*
- 5.95. The proposed development is located at a strategic location along an existing and public transport corridor. The location of the site and the urban context adjacent to the

Luas line provides for an appropriate scale and urban form to provide for building heights of 24m (8 no. storeys).

5.96. SPPR 3 notes that where the applicant sets out compliance with the criteria for assessing building height at the scale of the relevant town / city, at the scale of district / neighbourhood / street and at the scale of a site / building that the planning authority or An Bord Pleanála may approve such development even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.

5.97. SPPR 3 (A) states:

“It is specific planning policy requirement that where:

1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and

2. the assessment of the planning authority concurs, taking account of the wider strategic national policy parameters set out in the National Planning framework and these guidelines;

Then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise”.

5.98. The guidelines set out the criteria for developments at the scale of the relevant city / town, neighbourhood / street and site level. The proposed development complies with all of the relevant standards as set out in the guidelines. The proposed development is in accordance with the wider objectives of the guidelines to deliver high quality, high density residential developments in existing urban area and adjacent to public transport corridors.

5.99. The height proposed is in accordance with the height policies as set out in the Dublin City Development Plan 2016-2022 and therefore is also compliant with the Naas Road LAP. It is not therefore reliant on the provision on SRRP3 in terms of providing building heights in excess of the heights set out in the Development Plan. The proposed development delivers on these objectives significantly enhancing the urban design quality of the area through a high density residential and commercial development.

Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022)

- 5.100. The Regional Planning Guidelines (RPG) provide for the implementation of the National Spatial Strategy at a Regional level in the Greater Dublin Area (GDA). The Guidelines provide an overall strategic context for the Development Plans of each local authority in the Greater Dublin Area (GDA).
- 5.101. The subject lands are located in the Metropolitan Area of the GDA. The Dublin Metropolitan Area is targeted for increased development, particularly those lands that are readily acceptable by public transport and roads infrastructure. The Guidelines states that *‘development within the existing urban footprint of the Metropolitan Area will be consolidated to achieve a more compact urban form, allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.’* The proposed development provides a sustainable high quality apartment units on a strategically located site within an established residential urban area, along a Luas line and a number of Dublin Bus routes.
- 5.102. With regard to the Dublin City area, *“a core element of the RPG’s is the importance of integration of land use, employment and transport. Within the City, as the national hub of employment and transport, it is critical that the policy of encouraging high quality new housing within the core of the gateway continues. The City, with a large young population inflated by students, migration and a young mobile workforce, has lower occupancy rates, particularly in the inner City; which drives higher housing demand per head of new population. The importance of the detailed urban plans and guidelines in setting clearly the template for successful infill and regeneration development needs to continue, taking the long term perspective. New transport hubs at metro stations and along the interconnector route line give these locations high accessibility and mobility and this needs to be capitalised on where possible”*.
- 5.103. The proposed development will provide high quality residential development close to the city centre and within proximity to a range of employment and educational centre which attract the young mobile workforce. The subject site presents an opportunity to provide for infill residential development in an existing urban area which will increase the density of these key strategic lands in accordance with the Regional Planning Guidelines policy objectives for the area.
- 5.104. The subject lands occupy a key location on a Luas Line and adjacent to a number of Dublin Bus routes. The proposed development is consistent with the policy objectives of the Regional Planning Guidelines and in particular its emphasis on the consolidation of the urban area and the promotion of residential development close to existing services and transport links.
- 5.105. It is noted that under the Local Government Reform Act 2014 that the Regional Planning Framework was altered. The Act resulted in the eight Regional Authorities and the two Assemblies being replaced by three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region have been replaced by the Eastern and Midland Regional Assembly. One of the main functions of these new Assemblies will include the formulation of Regional Spatial and Economic Strategies, which will replace the RPG’s for 2010-2022. However, the current Guidelines will continue to have effect until a regional spatial and economic strategy is prepared and adopted by the regional assembly.

Eastern and Midlands Regional Assembly; Draft Regional Spatial and Economic Strategy 2019- 2031

- 5.106. The draft Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond. The Eastern and Midland Regional assembly (EMRA) was established in 2015 as part of the regional tier of governance in Ireland. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin. The principle function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all encompassing strategy.
- 5.107. The principle status of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the economic policies and objectives of the Government by providing a long term strategic planning and economic framework for the development of the region.
- 5.108. The RSES is required under the Planning and Development Act 2000 (as amended) to address employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change.
- 5.109. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.
- 5.110. The RSES supports the consolidation and re-intensification of infill, brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.
- 5.111. The subject development seeks to provides for residential development on a key urban infill site to increase densities, heights and urban consolidation in this inner suburban location. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.
- 5.112. The Metropolitan Area Strategic Plan (MASP) identifies the Naas Road as a significant landbank with long term potential to become a major district centre which would require significant investment and site assembly efforts to enable their activation. The MAPS highlights the need for re-intensification of underutilised lands including the Naas Road and older industrial estates.
- 5.113. The MASP states in relation to the strategic corridors within the M50 Ring that *“the proposed DART Underground and LUAS extensions to Finglas and Lucan will support the densification of site subject to appraisal and delivery post 2027, unlocking the long term capacity of strategic landbanks at Naas road”* and in relation to the provision of the south western corridor that *“there is further capacity for regeneration of major brownfield lands at Naas Road, Tallaght and to create new residential communities at Fortunestown near to the emerging town of Saggart / city west, served by LUAS redline”*.

5.114. The proposed development by regenerating the site will provide for a significant amount of residential units and will also provide for a range of mixed use activities. The proposed development is therefore consistent with the objectives of the RSES and the MASP.

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

5.115. The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;
- Provide a mix of land uses to minimise transport demand.

5.116. The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

5.117. These Guidelines support a plan-led approach to development as provided for in the Planning and Development Act 2000. Section 2.1 of the Guidelines note that *'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'*.

5.118. The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 and *'the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...'*

5.119. Having regard to the above, the subject site is zoned Z14. The proposed development is therefore making the most efficient use of the subject land increasing residential development in an existing urban area and providing for high density residential development in key location well served by existing public transport and local services. The proposed development is therefore compliant with the guidelines in terms of the sequential development approach.

5.120. Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The proposed development is located in close proximity to local services and will provide additional services such as retail, medical centre, shared office, café, restaurant, creche and employment generating uses within the development.

5.121. The subject lands are located adjacent to 'Public Transport Corridors' in the context of the densities required under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

5.122. Section 5.8 of the Guidelines recommends that *'in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes'*. The proposed development provides for a density of 262 no. units per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including public transport link, existing local facilities and education and employment centres that the proposed density on site is appropriate in this instance.

5.123. In addition to recommending appropriate densities, the Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- prioritise walking, cycling and public transport, and minimise car use;
- are easy to access for all users and to find one's way around;
- promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
- provide a mix of land uses to minimise transport demand.
- Reduce traffic speeds in housing developments

5.124. The layout is highly accessible for future occupants as well as the existing community with a permeable layout both internally and externally as new linkages are provided to surrounding land uses.

5.125. The Guidelines also provide advice on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines are accompanied by a Design Manual which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

5.126. The proposed development also has regard to the advice set down in the 'In Practice' section of the Urban Design Manual (2009), which recommends the following approach:

Development Brief: An analysis of the site has been carried out which includes reviewing the surrounding context of the development and identifying the requirement for a mix of uses on this site. The proposed scheme aims to deliver a significant proportion of residential development with ancillary commercial facilities and services capable of generating a significant amount of employment opportunities in line with the LAP objectives.

Site Analysis: The characteristics of the subject lands and surrounding context has been established and potential linkages and vistas to adjoining lands has been analysed.

Concept Proposals: This planning application is accompanied by a Design Statement which outlines the concept design proposal. The Design Statement outlines the progression of the scheme design in terms of land use and density range, boundary conditions and connections which is discussed in greater detail below.

Pre-planning: Pre – Planning discussions were held with Dublin City Council. Details of these meetings are detailed in appendix 2 of this Statement of Consistency.

- 5.127. The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 criteria are discussed in detail below.
- 5.128. This planning application is accompanied by a Design Statement, prepared by Reddy Architects which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design. The Design Statement should be read in conjunction with this Statement of Consistency and with the plans and particulars accompanying this submission.

Urban Design Manual – A Best Practice Guide (2009)

5.129. The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are assessed as follows:

Context: How does the development respond to its surroundings?

5.130. **Response:** The proposed development significantly improves the overall quality of the surrounding area. The proposed development has been designed to address the Naas Road to provide for an urban context and streetscape at this location. The proposed development has been designed to create a strong urban edge to the Naas Road and sets a high quality precedent for future development in the area.

5.131. To the south of the site the proposed development has been designed to integrate with the surrounding land uses particularly the permitted Carriglea residential development to the south east and the two no. key sites identified to the east and west. The proposed development will provide for pedestrian links and greenways through the site connecting into the wider area and enabling a high quality pedestrian and cycleway parallel to the Naas Road in a more residential / softer landscape environment.

5.132. It is considered that the proposed development responds appropriately to the surrounding context of the development and the future vision for the Naas Road as set out in the LAP. The development of the site is key in implementing the objectives and vision of the Naas Road SDRA and the LAP.

Connections: How well is the new neighbourhood / site connected?

5.133. **Response:** The proposed development is accessible from the Naas Road and will also provide for link to the south of the site enabling connection through the surrounding developments once complete. The proposed development also provides for pedestrian and cycle linkages to merge into the surrounding sites and surrounding the perimeter development on all site boundaries. The proposed development also sets out the indicate pedestrian connection across the Naas Road linking into the other key sites to the north. This is not part of the application but can be provided subject to agreement with TII and DCC.

5.134. The proposed development is located between two no. Luas stations as Bluebell and Kylemore. The site is also served by Dublin Bus routes and is in close proximity to a major cycle route along the Grand Canal.

Inclusivity: How easily can people use and access the development?

5.135. **Response:** The proposed development will provide for a mix of commercial and residential activities. The commercial elements will be accessible from the Naas Road and will be available to all members of the public. The proposed commercial spaces will provide for a range of activities such as retail, café, restaurant, creche, commercial, office and medical centre uses. These uses will serve both the future and the existing residents in the area. The commercial units will be designed to ensure accessibility is available to all.

5.136. The residential proportion of the development will be accessed mainly from the Naas Road. Secondary access points will be available to each courtyard area to the south

of the site. The access points to the development will provide safe and secure access to all.

- 5.137. Vehicular access is also provided to the site with access from the Naas Road. The proposed basement car park will be in a similar location to the existing entrance to the subject site. The proposed basement car park will be for resident use only. Additional car parking facilities are provided to the north of the site fronting the commercial units.

Variety: How does the development promote a good mix of activities?

- 5.138. **Response:** The proposed development will provide for a mix of both residential and commercial uses on the site. The proposed commercial uses will be located at ground and first floor fronting the Naas Road and will comprise of 3,347 sq.m. including retail, café, restaurant, creche, office, medical centre, car showroom and other compatible commercial uses.

- 5.139. **The proposed development will also provide for a range of supporting residential amenities such as games room, concierge, meeting rooms, shared works spaces, communal roof terraces, cinema rooms, multi-function spaces, exercise spaces etc.** The proposed uses on the site will cater to the demand of both the existing residential and commercial developments and the proposed future residents on the site.

Efficiency: How does the development make appropriate use of resources, including land?

- 5.140. **Response:** The proposed development is located on a brownfield site in an existing urban area. The proposed density makes efficient use of these valuable mixed use residential zoned lands along to a quality Dublin bus route.

- 5.141. The layout and orientation of the scheme has been designed to have regard to aspect and views and ensure dwellings and areas of open space achieve light throughout the day.

Distinctiveness: How do the proposals create a sense of place?

- 5.142. **Response:** The proposed development has been designed with a distinctive character to create a strong urban edge to the Naas Road and a softer landscaped environment to the south connecting into the surrounding green spaces at Driminagh Castle and Lansdown Park.

- 5.143. The proposed development forms a strong presence on the Naas Road and presents itself as destination point between the two Luas stations. The provision of commercial uses at ground and first floor levels also create a gathering place for the surrounding community to enjoy as well as the proposed future residents.

- 5.144. The high quality materials proposed also enhance the overall quality of the area, which softens the environment and creates a more residential sense of place to the area.

Layout: How does the proposal create people-friendly streets and spaces?

- 5.145. **Response:** The proposed development provides for significant improvements to the public realm and pedestrian accessibility to the site, therefore create a people friendly environment of streets and spaces. The proposed development will also provide for

high quality active uses fronting the Naas Road which will invite and attract people to the development thereby creating attractive and friendly spaces.

Public Realm: How safe, secure and enjoyable are the public areas?

- 5.146. **Response:** The proposed development has been designed to ensure appropriate level of passive surveillance is provided for within the development. The ground floor uses fronting the Naas Road will ensure an appropriate level of activity s provided at street level as to create a safe, secure and enjoyable public areas.
- 5.147. The provision of communal areas surrounding the courtyard areas will ensure a safe and secure environment is maintained within the outdoor space. In addition, the communal areas will be separated from the public open space area. This will ensure a safe and enjoyable environment for the future residents.
- 5.148. It is therefore considered that the proposed design and layout of the overall development provides for a high quality safe and enjoyable area to reside.

Adaptability: How will the buildings cope with change?

- 5.149. **Response:** The proposed residential units meet or exceed the minimum standards for residential unit size. The development provides a mix of studio, 1 and 2 no. bed units that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident.
- 5.150. A life cycle report is submitted with the application which demonstrates how the proposed development will adopt to changes life cycles and tenures.

Privacy / Amenity: How do the buildings provide a high quality amenity?

- 5.151. **Response:** The proposed development provides for a significant level of amenity within the development. The proposed development will provide for public open space of c. 3,024 sq.m. which will create a green link and cycle way through the site. The area of public open space will also provide for a children's play space and area of passive recreation for passing pedestrians.
- 5.152. The proposed development also provides for high quality amenity spaces for the future residents both internal and external. The internal spaces will comprise of a series of games rooms, meeting rooms, shared work spaces, multi-function rooms, exercise spaces, cinema rooms and kitchenette facilities for catering for larger events. The external spaces include residential courtyards, and roof terraces for both passive recreation and for a range of community events at roof level such out outdoor cinema, meetings and various gatherings and events.
- 5.153. The residential units themselves will be of a high quality design and contain a range of different unit types. The units are all of an adequate size with some units being provided with additional features such as bay windows, increased glazing and larger balconies to enhance the overall amenity obtained throughout the development.

Parking: How will the parking be secure and attractive?

- 5.154. **Response:** A total of 200 no. car parking spaces will be provided at basement level to serve the proposed development and 43 no. at surface level to serve the commercial development. The proposed car parking will be secure as to ensure a safe and

accessible basement car park is achieved. Car club spaces are also provided within the development.

- 5.155. 572 no. bicycle parking spaces will also be provided to cater for the development. The bike storage spaces will be sheltered and secured for the future residents.

Detailed Design: How well thought through is the building and landscape design?

- 5.156. **Response:** The design, form and massing of the building has been carefully considered in response to the Naas Road and the surrounding existing and future development potential. The proposed massing creates an urban frontage to the Naas Road and provides for a strong and well-proportioned urban edge at this location. The rear of the development to the south has been modulated in a series of stepped features to enhance the quality of the daylight and sunlight received into the courtyard and to protect any future developments to the south in terms of separation distances and overbearing impact.
- 5.157. The design and form of the building has responded to a variety of existing site characteristics and is considered to be the most appropriate solution at creating an appropriately scaled development to the north and a scaled back development respectful of the future development potential to the south.
- 5.158. The landscaping design of the development has evolved with the overall layout of the scheme and has successfully responded to the strong urban environment to the north and the softer landscaping to the south. The proposed landscaping will provide for a series of green links through the site and will significantly enhance and improve the quality of life and green nature of the development. The landscaping treatment to the front of the site adjoining the Naas Road has created an environment that is much more responsive to pedestrians by providing a landscaped strip shielding noise and the visual impact of the highly dominated car environment from the development, thereby creating an attractive location for future commercial uses and pedestrians to frequent.

Delivering Homes, Sustaining Communities (2008)

- 5.159. The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community.
- 5.160. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.
- 5.161. The Delivering Homes, Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled '**Quality Housing for Sustainable Communities**'. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes. The guidelines encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote

higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

5.162. This pre planning application is accompanied by a Housing Quality Assessment document prepared by Reddy Architects which demonstrates the consistency of the proposed development with the relevant standards in the Quality Housing for Sustainable Communities document and the City Development Plan where relevant.

5.163. Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

5.164. The Government has committed in '*Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020*' to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase. The key targets are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

5.165. Key to the achievement of these targets is better alignment between land-use and transport to minimise travel demand. The subject site is located adjacent to the red line luas. Thus, the principle of a residential development at a density in excess of 50 units per hectare in this location would be in accordance with the principles set down in Smarter Travel.

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

5.166. The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The Engineering Services Report and Traffic Impact Assessment, prepared by BM Consulting Engineers provides further detail in respect of the compliance of the proposed development with DMURS, which is discussed below also.

5.167. DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The principle design guidance of DMURS has been considered in the design of this development. As demonstrated in the accompanying DMURS statement accompanying this planning report (Appendix 2), the proposed development seeks to prioritise pedestrian and

cyclists throughout and around the site in accordance with the policies set out in DMURS.

Guidelines for Planning Authorities on Childcare Facilities (2001)

5.168. Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

5.169. *"In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines."*

5.170. The Section 28 Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2018 states that:

5.171. *"Notwithstanding the Department's Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area"*.

5.172. The Sustainable Urban Housing; Design Standards for New Apartments; Guidelines for Planning Authorities 2018 states that *"One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms"*.

5.173. Discounting the number of studio / one bed units, the proposed development comprises of 251 no. two beds which is above the threshold to provide for a creche facility. The proposed development would therefore generate the requirement for 66 no. childcare spaces.

5.174. A creche facility is proposed as part of this application of c.382 sq.m. which is capable of facilitating between 76 no. to 127 no. childcare spaces based on a minimum requirement of 3 sq.m. and a maximum of 5 sq.m.

5.175. The proposed development is therefore compliant with the creche requirement on the site.

Transport Strategy for the Greater Dublin Area 2016 - 2035

- 5.176. This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.
- 5.177. The Strategy includes five overarching objectives to achieve the vision which are as follows:
- Build and strengthen communities
 - Improve economic competitiveness
 - Improve the built environment
 - Respect and sustain the natural environment
 - Reduce personal stress
- 5.178. The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.
- 5.179. The Strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government's Transport 21 investment framework are included in all of the strategy options.
- 5.180. The proposed residential development, which provides for a density in excess of 55 units per hectare, adjacent to existing good quality public transport, in particular the Dublin Bus is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

Guidelines for Planning Authorities on 'The Planning System and Flood Risk Management (November 2009)'

- 5.181. *The Planning System and Flood Risk Management* Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.
- 5.182. The SSFRA was prepared to comply with current planning legislation, in particular the recommendations of "The Planning System & Flood Risk Management - Guidelines for Planning Authorities". In order to comply with these Guidelines a Flood Risk Assessment and a Site Specific Flood Risk Assessment has been prepared by BM Consulting Engineers.
- 5.183. In line with the Planning Guidelines the detailed FRA has applied and passed the Justification Test. As a result, it is concluded that the site is in compliance with the core principles of the Planning System and Flood Risk Management Guidelines and has been subject to a commensurate assessment of risk.

Birds and Habitats Directive – Appropriate Assessment

- 5.184. Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2010).
- 5.185. An Appropriate Assessment Screening Report, prepared by Openfield Ecological Consultants, is submitted with this pre-application consultation request to the Board. The report establishes that none of the habitats and species listed as ‘qualifying features’ in the Natura 2000 site designations will be affected by the proposed development and it has been assessed that the development of the project will ‘not result in any likely significant effects’ on Natura 2000 sites. The Report concludes that there will be no risk of significant negative effects on any Natura2000 site, as a result of the proposed development, either alone or in combination with other plans or projects, and therefore, Stage 2 of the Appropriate Assessment Process , a Natura Impact Statement , is not required. The conclusion notes that *“this project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to any SAC or SPA”*.
- 5.186. In addition, an EIAR has been prepared to accompany this planning application.

6.0 LOCAL PLANNING POLICY

6.1. The subject site is located within the administrative boundary of Dublin City Council and is therefore subject to the policies and objectives of the Dublin City Development Plan 2016-2022.

Dublin City Development Plan 2016-2022

6.2. The application site is located within the administrative boundary of Dublin City Council and is subject to the policies and objectives of the 2016 - 2022 Dublin City Development Plan.

6.3. The following sets out and assesses the proposed development in relation to policies, objectives and standards of the Dublin City Development Plan.

Land Use Zoning

6.4. The site is zoned Z14 with the objective “to seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and “Z6” would be the predominant uses”.

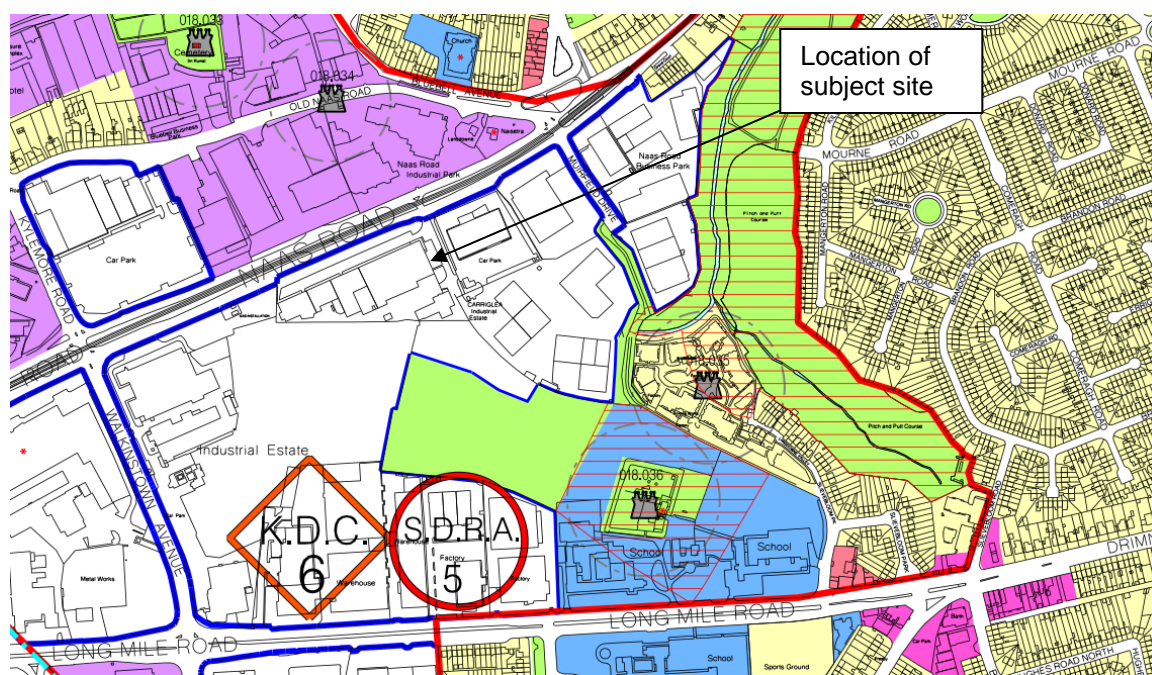


Figure 2: Extract from Dublin City Council land use zoning map G with the subject site outlined in red

6.5. Z14 areas are capable of accommodating significant mixed use development, therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same. Residential development is listed as a permissible use within this zone. The proposed development contains a mix of residential and commercial uses such as retail, shared office, café, restaurant, medical centre, creche, and car showroom. The proposed mix of uses is compatible with the zoning objective on the site.

6.6. The subject site is located to the north west of a zone of archaeological constraint for the recorded monument DU018-035 (Watermill Site) and Duo18-036 Drimnigh Castle,

which is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994. An Archaeological assessment has been prepared as part of this planning application. The results of the archaeological assessment is submitted as part of the EIAR.

Strategic Development and Regeneration Area (SDRA)

- 6.7. The subject site is located within a Strategic Development and Regeneration Area. The Development Plan states that:

“The city contains a number of Strategic and Regeneration Areas (SDRAs) capable of delivering significant quanta of homes and employment for the city, either through the development of greenfield sites or through the regeneration of the existing built city. Many, though not all, of these sites are zoned Z14 within the Development Plan, where the overall focus is to seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and “Z6” [enterprise and employment use] would be the predominant use.

- 6.8. The site is located within SDRA 5 – Naas Road. The SDRA boundary corresponds with the Local Area Plan prepared for the Naas Road lands adopted in 2013. The policies and objectives of the LAP will be discussed later in the report.

Key District Centre (KDC)

- 6.9. The subject site is also located within the Naas Road, Key District Centre 6 which forms part of the proposed gateways to the city. The Development Plan identifies key district centres as top tier urban centres outside the city centre and capable of providing a comprehensive range of commercial and community services. The development plan states:

“To maintain their role as district centres, new development should enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening. In this regard, opportunity should be taken to use the levels above ground level for additional commercial/retail/services or residential use with appropriate social facilities. Higher densities will be permitted in district centres, particularly where they are well served by public transport. The district centre can provide a focal point for the delivery of integrated services and the designated key district centres have, or will have in the future, the capacity to deliver on a range of requirements, the most important of which are:

- *An increases density of development,*
- *A viable retail and commercial core.*
- *A comprehensive range of high quality community and social series*
- *A distinctive spatial identity with a high quality physical environment.”*

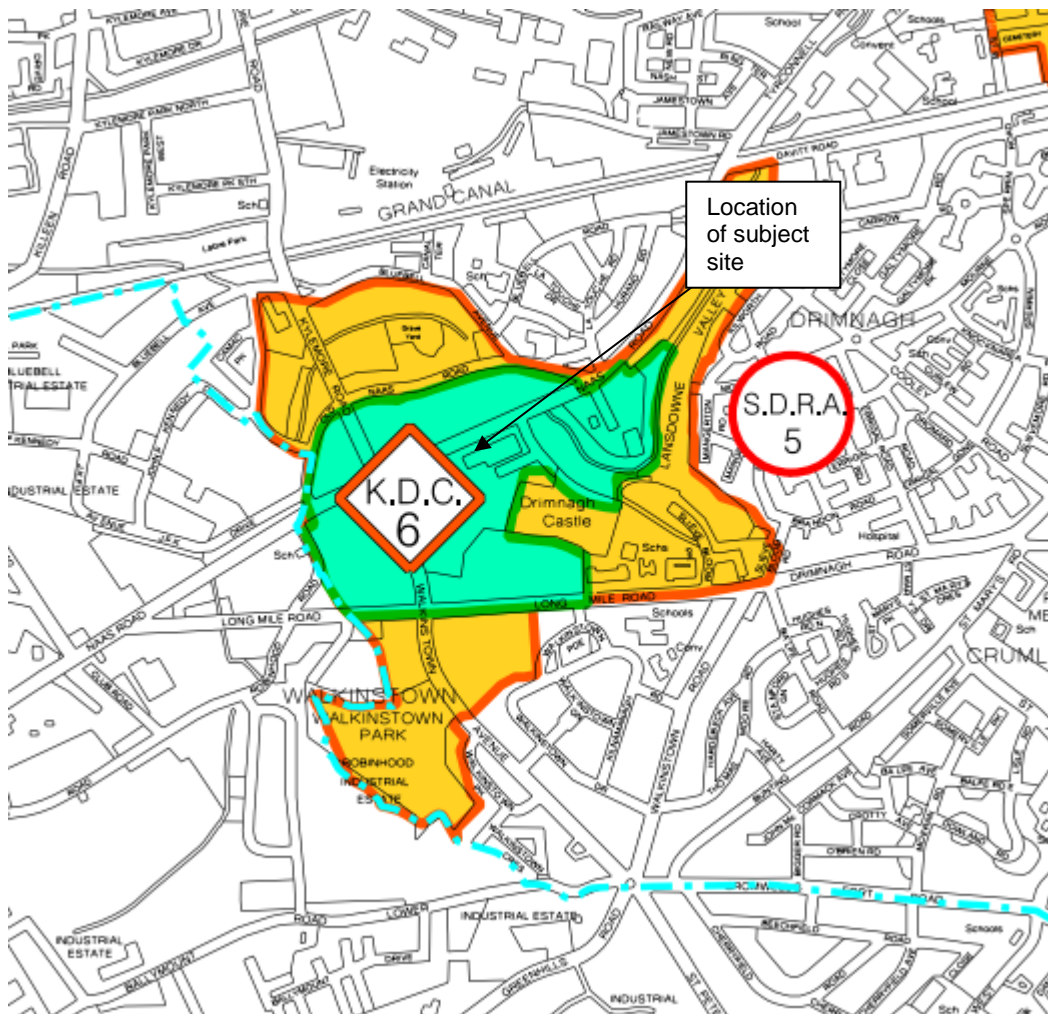


Figure 3: Extract from Map K of the Dublin City Development Plan 2016-2022 indicating the subject site located within the SDRA 5 and KDC 6 development boundary

6.10. The following general development principles shall apply to development within the KDC boundary:

- Population: Establish significant residential population bases with diversity in unit types and tenures capable of establishing long term integrated communities. Density: ensure the establishment of high density development capable of sustaining quality public transport systems and supporting local services and activities. Account should be taken in any such development of any district or valuable architectural or historical features that influence the urban form, character and scale of the existing area.
- Transport: Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow.
- Commercial/Retail: The creation of a vibrant retail and commercial core with animated streetscapes.
- Community and Social Services: The centres will be encouraged to become the focal point for the integrated delivery of community and social services.
- Employment: Encourage the provision of mixed use developments incorporating retail, office, residential and live work units, and the creation of small start-up units. (The floor area limitations in respect of offices given in the

land use zoning objective Z4 shall not apply in the case of identified key district centres, and applications including office development in these areas shall be assessed on their merits, taking account of the overall objective to provide for a mixed use environment). The site is not located within the identified key district centre in the LAP.

- **Built Environment:** the creation of high-quality, mixed use urban districts with a distinctive spatial identity and coherent urban structure of interconnected streets and child friendly public spaces and urban parks. Development should have regard to the existing urban form, scale and character and be consistent with the built heritage of the area.
- **Capacity** for development: Encourage the development/ re-development of under utilised sites.

- 6.11. The proposed development for a built to rent residential and commercial development is in accordance with the objectives as set out for the SDRA.

Quality Housing and Sustainable Neighbourhoods

- 6.12. Section 2.3.3 of the Dublin City Development Plan 2016-2022 states that it is an objective of the council to create a quality compact city of mixed – tenure neighbourhoods, catering for a wide range of family types. The development also states that:

“Requiring apartment schemes to have good local facilities, and that large schemes are phased to ensure support infrastructure is provided in tandem with residential development, will assist in achieving this key strategy. An emphasis on effective property management for both apartment and housing complexes will also improve the quality of residential development”

- 6.13. The proposed development provides for a mix of residential and commercial development. The proposed development therefore supports the needs and requirements of the future residents by providing the services and facilities required in residential schemes.

- 6.14. Section 5.5.2 of the Dublin City Development Plan 2016-2022 encourages sustainable residential areas. The plan states that *“building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure”*.

- 6.15. The proposed development provides for a density of 262 no. units per hectare. The density proposed will create the critical mass needed to develop compact urban neighbourhoods that contribute to the economic, social and transport infrastructure.

- 6.16. It is the policy of Dublin City Council:

QH12: To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set out in the Development Plan.

- 6.17. The proposed development provides for a range of sustainable energy facilities. A sustainability report is submitted with this planning application outlining the compliance with green infrastructure.

Building Height

- 6.18. Section 16.7.2 of the Development Plan sets out 3 no. height category limits for the city, Low -rise, Mid- rise and High Rise. The subject site is located within the Naas Road LAP which is an area listed within the Mid- rise height category. However, the development plan states that:

“Planning applications will be assessed against the building heights and development principles established in a relevant LAP/SDZ/SDRA. Proposals for high buildings should be in accordance with the provisions of the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards. Chapter 15 provides guiding principles for the design of potential high buildings in SDRAs, where appropriate. All areas outlined in the table above are considered to be in the low-rise category unless the provisions of a LAP/SDZ/SDRA indicate otherwise.”

- 6.19. The Dublin City Development Plan 2016-2022 states that building heights up to 24m are permitted on sites within 500m of an existing or proposed Luas stations. The subject site is located within 500m (c. 180 metres walking distance from site entrance and all of site within c.400 metres walking distance) of the Bluebell red line Luas station, therefore a building height of up to 24m is permissible.
- 6.20. The proposed development is 8 no. storeys, with a maximum height of 24 m. The proposed height is therefore consistent with the Development Plan, and also considered appropriate for this location having regard to the Urban Development and Building Height Guidelines and the overall density on the site.
- 6.21. The height of the building steps down to 6 no. storeys (18m) and 4 no. storeys (12m) to the south of the site. The proposed height of the development has been carefully modulated as to provide the best daylight /sunlight arrangement and to protect the future development potential of the adjoining site to the south.

Plot Ratio and Site Coverage

- 6.22. The Dublin City Council Development Plan 2016-2022 sets out an indicative plot ratio of 1.0 -3.0 for lands with a Z14 zoning objective. The indicative site coverage for Z14 is 50%. These figures are indicative only; higher plot ratios and site coverage may be acceptable under the following circumstances:
- *Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed*
 - *To facilitate comprehensive re-development in areas in need of urban renewal*
 - *To maintain existing streetscape profiles*
 - *Where a site already has the benefit of a higher site coverage*
- 6.23. The plot ratio of the proposed development is 2.4 and a site coverage of 31%. The proposed plot ratio is therefore considered to be consistent with the guidelines as set out in the development plan. In relation to site coverage, given the size of the site and the requirements for communal and public open space, a lower site coverage is proposed.

Residential Quality Standards – Apartments and Houses

6.24. *The plan sets out specific standards for all residential units both apartments and houses which include*

- *Public Open Space*
- *Safety and Security*
- *Acoustic Privacy*

Public Open Space

6.25. The Development Plan standards specify that in new residential developments, 10% of the site area shall be reserved as public open space. The Development Plan standards also include a number of detailed recommendations in terms of the design and layout of open spaces including a requirement that a landscaping plan will be required for all development identifying all public, communal (semi-private) and private open space.

6.26. The proposed development provides for 3,300 sq.m. of public open space, which amounts to 17.5% of the total site area (in addition to communal open space). The public open space provided facilitates a greenway through the site linking the proposed development with the adjacent residential schemes currently under construction and the other adjoining key sites which are designated for future mixed use development.

6.27. The public open space area also includes a children’s playground that can be utilised by both the future residents and the surrounding residents. The location of the play space has been carefully considered as to ensure a high level of passive surveillance is maintained. The public open space area also includes pedestrian pathways and bicycle lanes for movement through the site. Passive seating and recreational space is also provided within this area of public open space.

Safety and Security

6.28. *The Development Plan states that “The design of all residential proposals should have regard to the safety and security measures outlined in the ‘Safety Design Guidelines’ Appendix and the ‘Design for Safety and Security’ guidance contained in the DEHLG ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007)”.The proposed development has been designed in compliance with the Safety Design Guidance in accordance with the Development Plan standards. In addition, the proposed development has been laid out to ensure that passive surveillance is achieved and the appropriate boundary treatments and lighting throughout the site.*

6.29. Table 12 below sets out how the scheme has been designed to consider safety and security.

Table 2: Design for Safety

Criteria	
Maximising passive surveillance of streets, open spaces, play areas and surface parking	YES
Avoiding the creation of blank facades, dark or secluded areas, or enclosed public areas	YES

Eliminating left-over pockets of land with no clear purpose	YES
Providing adequate lighting;	YES
Providing a clear distinction between private and communal or public open space, including robust boundary treatment;	YES
Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead	YES
The use of materials in public areas which are sufficiently robust to discourage vandalism	YES
Avoiding the planting of fast growing shrubs and trees where they would obscure lighting or pedestrian routes. Shrubs should be set back from the edge of paths	YES

Acoustic Privacy

6.30. Acoustic privacy is a measure of sound insulation between dwellings and between external and internal spaces. Development should have regard to the guidance on sound insulation and noise reduction for buildings contained in BS 8233:2014. The following principles are recommended for minimising disruption from noise in dwellings:

- Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and from neighbouring buildings and noise sources.
- Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas.
- Keep stairs, lifts, and service and circulation areas away from noise-sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room

6.31. The proposed development has been designed with regard to the stated guidance on sound insulation and noise reduction.

6.32. In addition, this planning application is accompanied by an Environmental Report which sets out the baseline noise levels on the site and the impact for the future residents.

6.33. An inward noise assessment has been carried out and is submitted as part of the EIAR included with this application. The inward noise assessment addresses the noise impact of the Naas Road onto the future uses on the site. It is recommended that high quality double glazing is provided as part of the final design to mitigate against the noise levels generated by the Naas Road. The proposed design has incorporated the recommended design features to ensure the noise impact is reduced.

The Neighbourhood - Making Sustainable Neighbourhoods

6.34. The final set of residential standards contained in Section 16.10.4 of the Development Plan relate to the making of sustainable neighbourhoods. In general, the standards specify that proposals should have regard to the DEHLG’s Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design

Manual, 2009. The proposed development has been designed in accordance with this guidance.

- 6.35. In summary, it is submitted that the proposed development of the lands is fully compliant with all relevant residential development standards as specified by the Dublin City Development Plan 2016 – 2022.

NAAS ROAD LOCAL AREA PLAN

- 6.36. The subject site is located with the administrative boundary of the Naas Road Local Area Plan 2013-2019. The LAP sets out 4 no. key sites within the LAP boundary:

- Royal Liver Retail Park
- Motor Distributors Ltd site (Volkswagen Factory)
- Nissan Plant Site and
- Site at Muirfield Drive / Naas Road

- 6.37. The subject site is not located within one of the key sites within the LAP. However, the site adjoins 2 no. of the key sites Muirfield Drive / Naas Road and the former Nissan Plant. The proposed development however has been influenced by the surrounding key site in terms of building form, layout and particularly key linkages through the site and to the surrounding sites. The proposed development is considered to successfully integrate in with the surrounding future forms of development in the area.

- 6.38. The vision for the Naas Road lands is *“to create a great place to work and live, and create a new urban identity for the Naas Road lands area plan by regenerating existing developed lands as a sustainable mixed use area, capitalising on the area’s locations advantages and improving the relationship of the lands to their immediate surroundings though improved linkages, green infrastructure and permeability. As part of this transformation there will be an increase in the range of land uses, and improvements in the visual environment, resulting in an increase in street level activity and the general revitalisation the area”*.

- 6.39. The proposed development will bring forward a significant proportion of residential units to this highly accessible and well served location. The proposed development will also provide for a significant proportion of commercial development on the site providing for a range of uses that will serve both the existing and future residents and that will generate a significant proportion of employment opportunities.

Land Use

- 6.40. The subject lands are zoned Z14 in the Dublin City Development Plan and are indicated as residential with part commercial along the Naas Road frontage in the Naas Road LAP.

- 6.41. The proposed development provides for a mix of residential and commercial development within the site. The commercial proportion of the development (c. 3,347 sq.m.) is located fronting the Naas Road. The residential element of the development is located throughout the remainder of the site and from 2nd floor fronting the Naas Road.

- 6.42. The commercial uses are located at ground and first floor level fronting the Naas Road providing for increased activity and animation at street level.

- 6.43. The overall mix of residential and commercial development is considered appropriate for the subject site.
- 6.44. Nonetheless it should also be noted that the nature of the residential development proposed as a “Build To Rent” operation in itself is somewhat a commercial development and will generate a number of employment opportunities for ongoing management.
- 6.45. A report has been prepared by CBRE and is submitted with this application which sets out the demand for commercial development at this location and also compares the existing and proposed employment numbers on the site in order to comply with the land use mix as set out in the LAP.
- 6.46. Currently, the site comprises of a range of industrial / warehouse buildings. the uses of which have ceased. However if all of the buildings were occupied at their former use, there would have been a potential to provide for c. 60 no. jobs.
- 6.47. The proposed development comprising of build to rent residential and commercial development has the potential to create 150 no. jobs which is double the maximum former values on the site. The significant increase in the potential number of jobs on the site clearly demonstrates that the proposed use of the site is a substantial increase in employment numbers on the site and also is an improvement to the overall site quality and vitality and as such satisfies the land use mix as set out in the LAP. Please see attached indicative employment figures prepared by CBRE attached as Appendix 3.
- 6.48. The demand for office use at this location according to CBRA is very low. The CBRE Report states that there is a high proportion of office stock in the western suburbs is obsolete, with c. 56,000 sq.m. of the existing office accommodation vacant.
- 6.49. In addition, demand for office accommodation in the western suburbs is lower than other locations in the city with only 1% of the current office requirements specifically identifying the western suburbs as a preferred location. This indicates little interest in commercial office development at this location.
- 6.50. As such it is respectfully submitted that the range of local uses such as creche, medical centre, convenience retail, and café / restaurants is more appropriate at this location given the low demand for office and the high proportion of residential development in need of local support services. The proposed development therefore facilitates this local demand in the area.
- 6.51. The site is very well located to provide the much needed residential accommodation for the significant number of new employees in the city centre, Docklands area and also at St. James Hospital campus, Tallaght and Citywest, all of which are served by the red line LUAS which adjoins the site. Dublin has been very successful in recent years in creating significant new employment opportunities. However, this has given rise to a significant shortfall in new housing which the proposed development will help address in a sustainable manner.

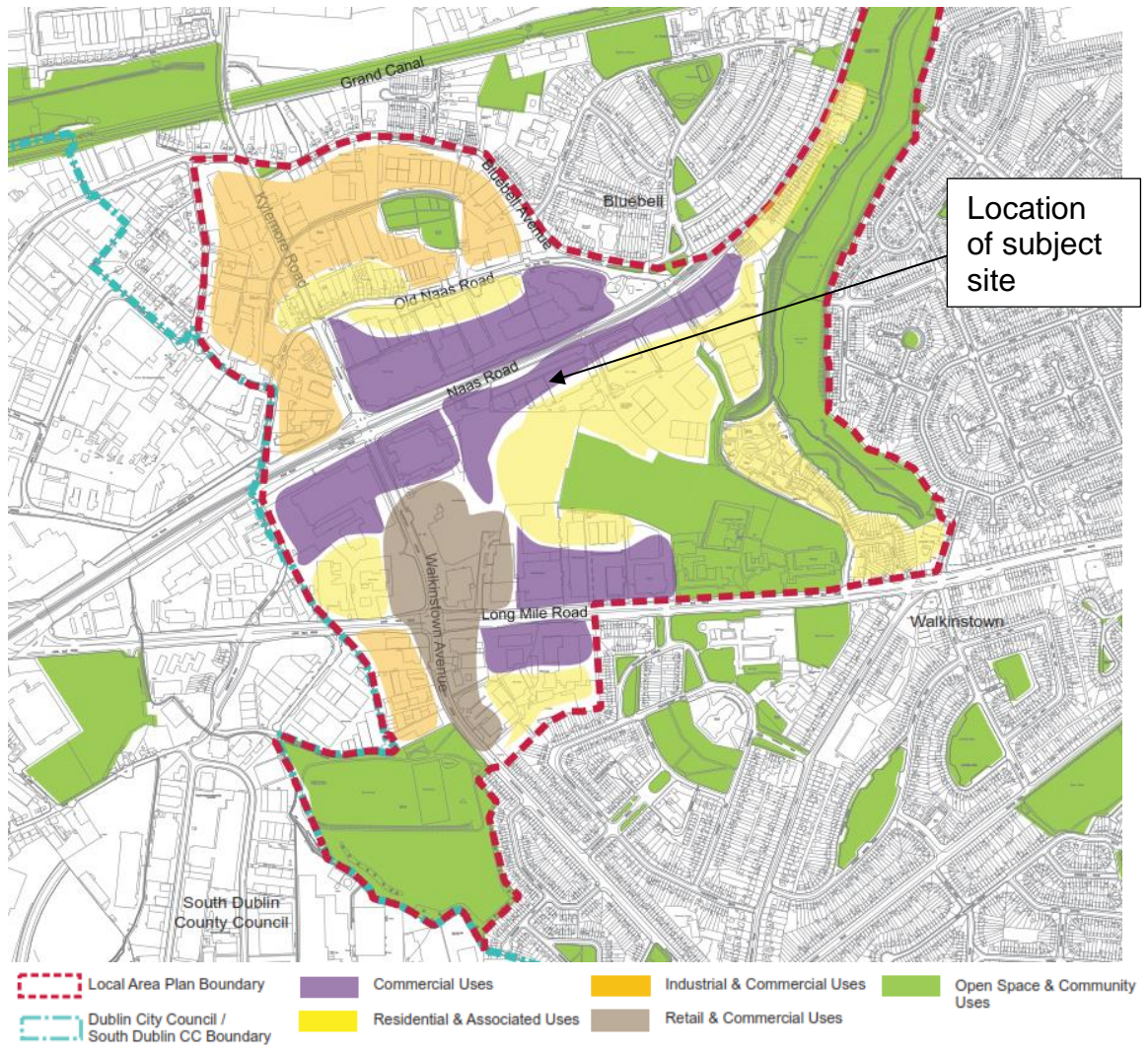


Figure 4: Land Use zoning extract from the Naas Road LAP

- 6.52. The LAP states that it is an objective of the LAP “to promote regeneration of this SDRA through the creation of a quality mixed use environment. This shall be focused primarily on Z14 (regeneration) zoned lands and extending to adjoining Z6 (employment) lands.
- 6.53. The LAP sets out the form of development in relation to the various land uses designed to the site as follows:

Mixed uses and active streets

KDC lands are considered suitable to the delivery of mixed uses and services. Particularly suitable is the KDC core area – focused in between the Naas Road and Long Mile Road. Hence this area can accommodate higher intensity uses framing new public spaces. Within all mixed use area, the inter-relationship of different uses is an important consideration.

Ground floor uses onto public area should be active uses which assist in revitalising the area, contributes positively to public realm and designed to a fine urban grain. Examples include shops, cafes, restaurants, and cultural uses, and main entrances to employment uses. Improved connectivity through large key sites will encourage the development of quality thoroughfares.

Employment Uses

The plan area has considerable capacity to develop the existing range of employment uses. Z6 lands remain a significant zoning, and employment uses will also be an integral part of the redevelopment of the KDC area – which can accommodate new employment uses such as retail, office and high tech research/lab/enterprise buildings. The LAP seeks to create an attractive environment for employers and their staff, through attractive settings for employment locations and a range of local services available to staff alongside high quality connectivity.

Residential Uses

The location and design of residential elements within mixed use schemes should be thought through in planning terms, such that residential amenity is given due consideration and dis amenity from adjoining uses minimised. Residential uses at ground level onto busy streets shall be discouraged due to dis amenity associates with noise and poor air quality. Dublin City Council shall however encourage residential development on more secluded areas of sites and on upper floors. A good variety of house types will be encouraged to create choice and diversity. Schemes should be designed to address their future management and provide access routes that can be taken in charge”.

- 6.54. The subject site is designated for a mix of residential and commercial uses therefore should have regard to all of the above in any development of the site with commercial uses along the Naas Road. The LAP sets out the following policies and objectives for land use:

LUS1: To establish new and appropriate land -uses that support a thriving employment and residential hub in recognition of the strategic nature of the plan area as a key developing area, key district centre, Strategic Development and Regeneration Area, a gateway to the city and its location along the Naas Road / rail trans-boundary innovation corridor.

LUS2: To develop a vibrant mixed use core between the Old Naas Road and Long Mile Road, along Walkinstown Avenue and Kylemore Road and adjoining sites. This shall reinforce this location as a key district centre, with retail, commercial and residential as the dominant land -uses.

LUS01 In support of the KDC, to encourage a core of mixed uses including higher order retailing in the specified KDC core positioned between Naas Road and Long Mile Road incorporating quality public realm along new access routes

LUS02 .To promote investment, economic and employment growth in the area through the attraction of commercial office development within the KDC along the main transport routes, whilst supporting existing industrial enterprise and employment uses on Z6 lands

LUS03. To develop a new sustainable neighbourhood inclusive of residential development at sustainable densities, underpinned by quality social infrastructure all within a high quality public domain

Retail and Commercial

- 6.55. The LAP states in relation to retail and commercial uses that within the lifetime of the LAP is it considered that 15,000 sq.m. net retail floor space, 40,000 sq.m. net commercial floor space and 12,500 sq.m. light industrial floorspace could be provided.
- 6.56. The proposed development will provide for 3,347 sq.m. of commercial uses which can be provided as retail, restaurant, café and other uses depending on the tenant requirements of the area. A detailed analysis has been carried out to identify the most appropriate uses for the site based on the existing characteristics and the general requirement in the area. A report prepared by CBRE is submitted with this application.
- 6.57. The architectural design statement also sets out a number of potential commercial uses for the development and demonstrates how these uses can fit into the proposed design of the building.
- 6.58. Key policies and objectives in the LAP are as follows:

ED1 . To promote the economic renewal and revitalisation of the Naas Road Lands plan area as a dynamic and sustainable employment cluster in a vibrant mixed-use quarter with a distinct spatial identity .

ED3. To promote and enhance the Naas Road Key District Centre as a significant employment centre with a compact mixed-use core by facilitating the required quality and quantity of commercial, retail and enterprise floorspace and encouraging the development of the necessary support facilities such as business services, cafes, shops and leisure facilities within a high amenity environment with permeable grain. The greatest concentration of employment floorspace will be in the core of the Key District Centre.

ED5 . To promote and facilitate the sustainable development of smaller-scale, neighbourhood retail facilities in locations that are locally accessible and conveniently serve businesses and local residential communities on foot or by bicycle. These retail services should provide choice and be in a quality environment to cater for the regular needs of the local communities

Movement and Access

- 6.59. It is an objective of the LAP “to deliver a quality movement and access infrastructure that prioritises public transport, cyclists and pedestrians while managing an appropriate role for the car”.
- 6.60. The LAP notes a pedestrian proposed pedestrian link through the site to connect with the surrounding lands and existing public park. The proposed development has incorporated the requirement to provide for a pedestrian link through the site and has facilitated a number of connections and walkways linking to the surrounding development.
- 6.61. The proposed development also seeks to reduce the reliance on car dominated trips by encouraging more cycle facilities and the use of public transport thereby reducing the number of car parking spaces provided on the site. The proposed development will provide for c. 0.41 no. spaces per unit. The proposed development will also provide for car club facilities on the site which will therefore help to discourage high rates of car storage within the development.

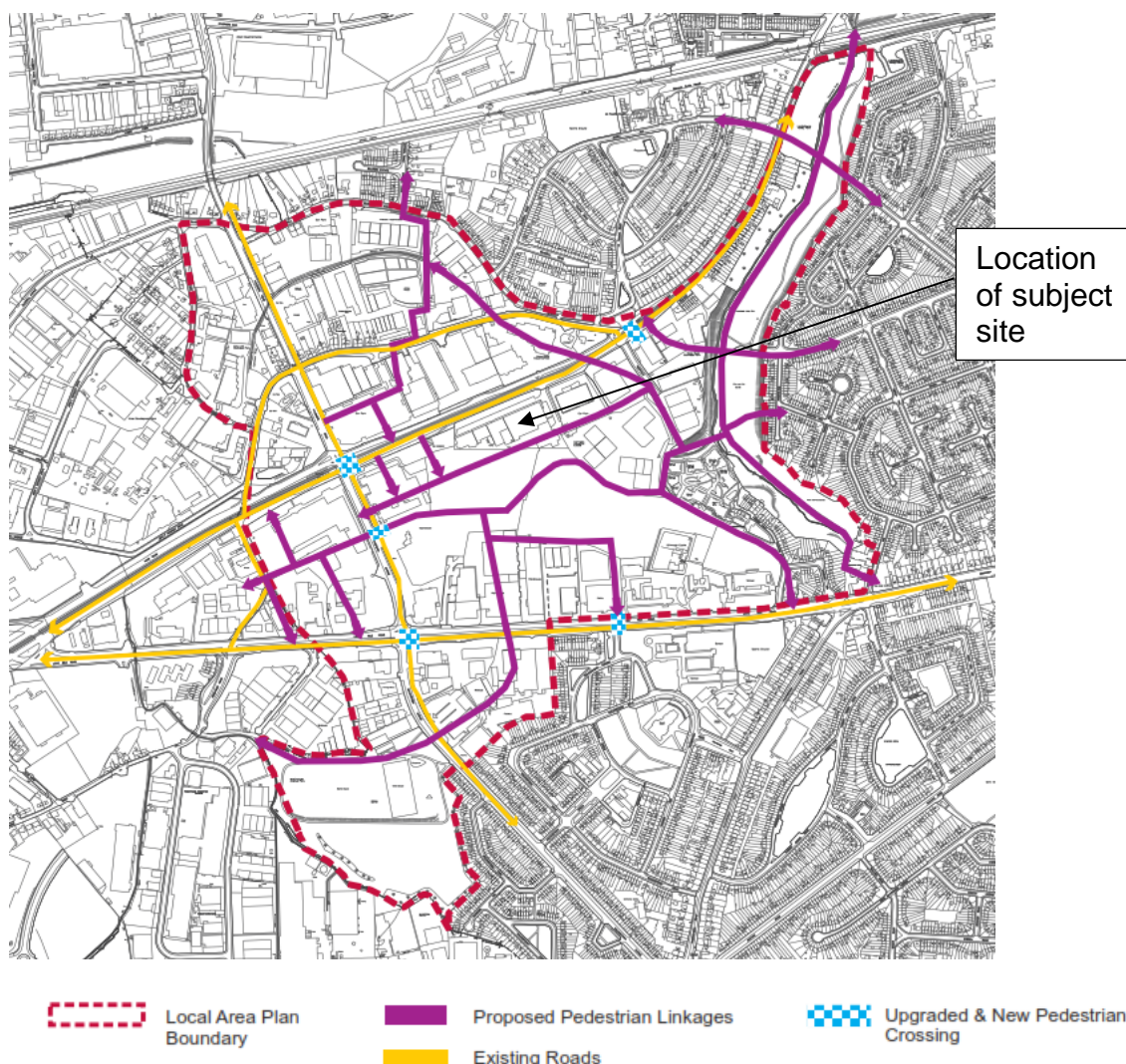


Figure 5: Connectivity and linkages plan from the Naas Road LAP

6.62. Key policies and objectives of the LAP include:

MA1 . To provide for a new high quality pedestrian and cycle network within the LAP area which will connect existing and new communities and redefine the character of the LAP area; including (i) creation of new segregated green routes within the LAP area; (ii) improvement and upgrading of existing routes; (iii) improvement and increased number of pedestrian/cycle crossings on main roads; and (iv) connect into existing and planned networks surrounding the LAP area

MAO1. To create a south-east/north-west linkages from Long Mile Road and Landsdowne V alley Park to the Naas Road and to the Grand Canal to provide cycling connections to the Canal Way and to provide direct links through the LAP area to the Luas and bus services on the Naas Road.

MAO2. To create new pedestrian and cycle linkages on an east west axis connecting Robinhood Road through the key sites to Landsdowne Valley , Naas Road and Drimnagh.

MAO10. To facilitate works along the Naas Road that will reduce traffic impact and improve safety for pedestrian and cycle users and facilitate improved linkages. This may comprise landscaping works, public realm enhancement, reconfiguration of the carriageway and provision of a direct pedestrian crossing across the Naas Road.

Urban Form, Design and Public Realm

6.63. It is an objective of the LAP *“to create a lively and definable city quarter through an attractive formation of streets, public spaces and buildings”*.

6.64. The LAP sets out a height strategy for new developments. The indicative height for developments addressing the Naas Road is 4-6 storeys (20-24m).

6.65. In accordance with the LAP the height on the subject site is 24m fronting the Naas Road. It is noted that the number of storeys proposed is greater than those stated in the LAP, however due to changes in design standards, an increased number of storeys is achievable within the same numerical height parameter (24m).

6.66. The LAP refers back to the height standards of the City Development Plan and notes that *“all proposals shall be required to comply with the detailed requirement for buildings with height as set out in the city development plan”*. The proposed height of the development is in line with the Dublin City Height Policy in the Dublin City Development Plan 2016-2022 which states that buildings up to 24m will be permitted in locations within 500m of an existing or proposed Luas station. The proposed development is located adjacent to the Bluebell and Kylemore Luas station, therefore is consistent with the building height policy for the area. This interpretation of the development plan heights has been accepted by the City Council in granting planning permission for up to 8 no. storeys (24m) in the adjoining site at Carriglea Industrial Estate.

6.67. It is considered that the proposed height at 24m is consistent with the surrounding pattern of emerging development in the area and is appropriate for setting a strong urban edge and design to the Naas Road. The proposed height is compatible with the height strategy as set out in the development plan and the local area plan and also delivers on the objectives of the Urban Development and Building Height Guidelines 2018.

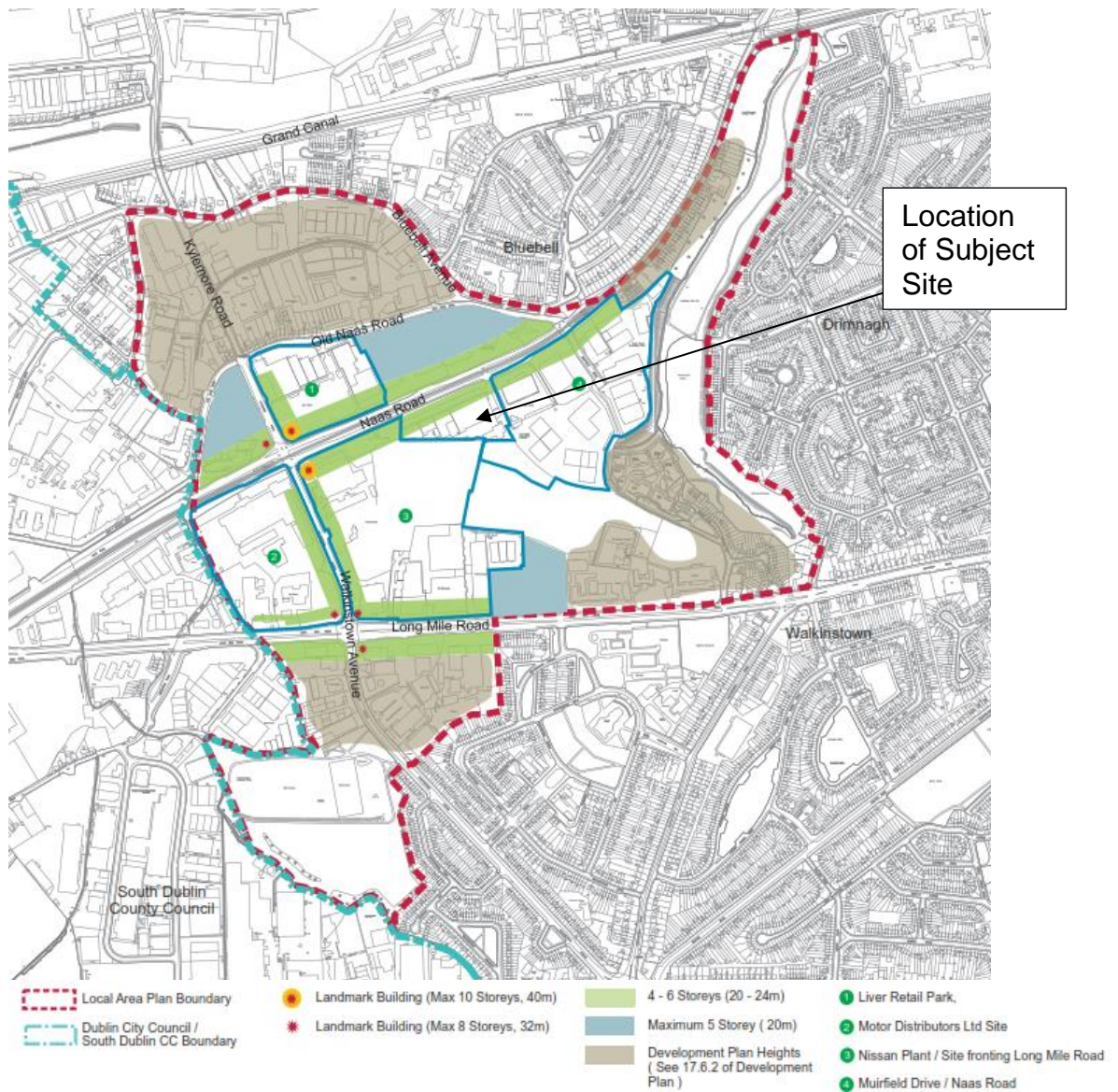


Figure 6: Building Height Strategy extract from the LAP

- 6.68. The LAP sets out a net density of between 45 and 50 no. residential dwellings per hectare together with a variety of dwelling typologies will be encouraged. The LAP promotes an indicative plot ratio of 1.0 -3.0 and an indicative site coverage figure of 50%. The changes in height policy in the 2016-2022 Development Plan allow for higher densities. The LAP however pre-dates the density policies of the NPF , the Apartment Guidelines 2018 and the Urban Development and Building Height Guidelines 2018.
- 6.69. The proposed development will provide for a density of 262 no. units per hectare, a plot ratio of 2.45 and a site coverage percentage of 31%. It is considered that the proposed density is appropriate given the surrounding context and the focus to regenerate and enhance this area as a new residential and commercial neighbourhood of the city.
- 6.70. The relatively low site coverage percentage responds to the level of open space provided on the site. The proposed development is set in a very generous green environment which aids to the quality of the development and sets a interesting contrast to the strong urban environment along the Naas road.

6.71. Key objectives and policies in this regard include

UF1. To redefine, through the progressive creation of smaller plot layouts and implementation of appropriate urban design measures, the existing built fabric of large impermeable sites centred on the Naas Road, and to develop an urban structure that is distinctive and effectively integrated into the wider urban context in terms of street layout and permeability

UF2. To promote active and diverse land-uses at selected locations particularly at ground floor level in the vicinity of the KDC, and to ensure day long activity by encouraging convenient pedestrian access to these uses via new links

Infrastructure and Water Management

6.72. It is an objective of the LAP *“to deliver the necessary infrastructure to ensure adequate capacity to accommodate the quantum of development envisaged by the local area plan, and to ensure that the delivery of this infrastructure enhances the quality of the city’s environment and facilitates the sustainable economic growth and co-ordinated development of the Naas Road area”*.

6.73. The proposed development have undergone a series of detailed discussion with Irish Water to ensure that the proposed development can be accommodated within the existing network. A letter confirming the capacity in infrastructure has been received from Irish Water and is submitted with this application.

6.74. The subject site is located within Flood Zone C as set out in the LAP. The proposed development has carried out a site specific flood risk assessment for the site and is submitted as part of this planning application.

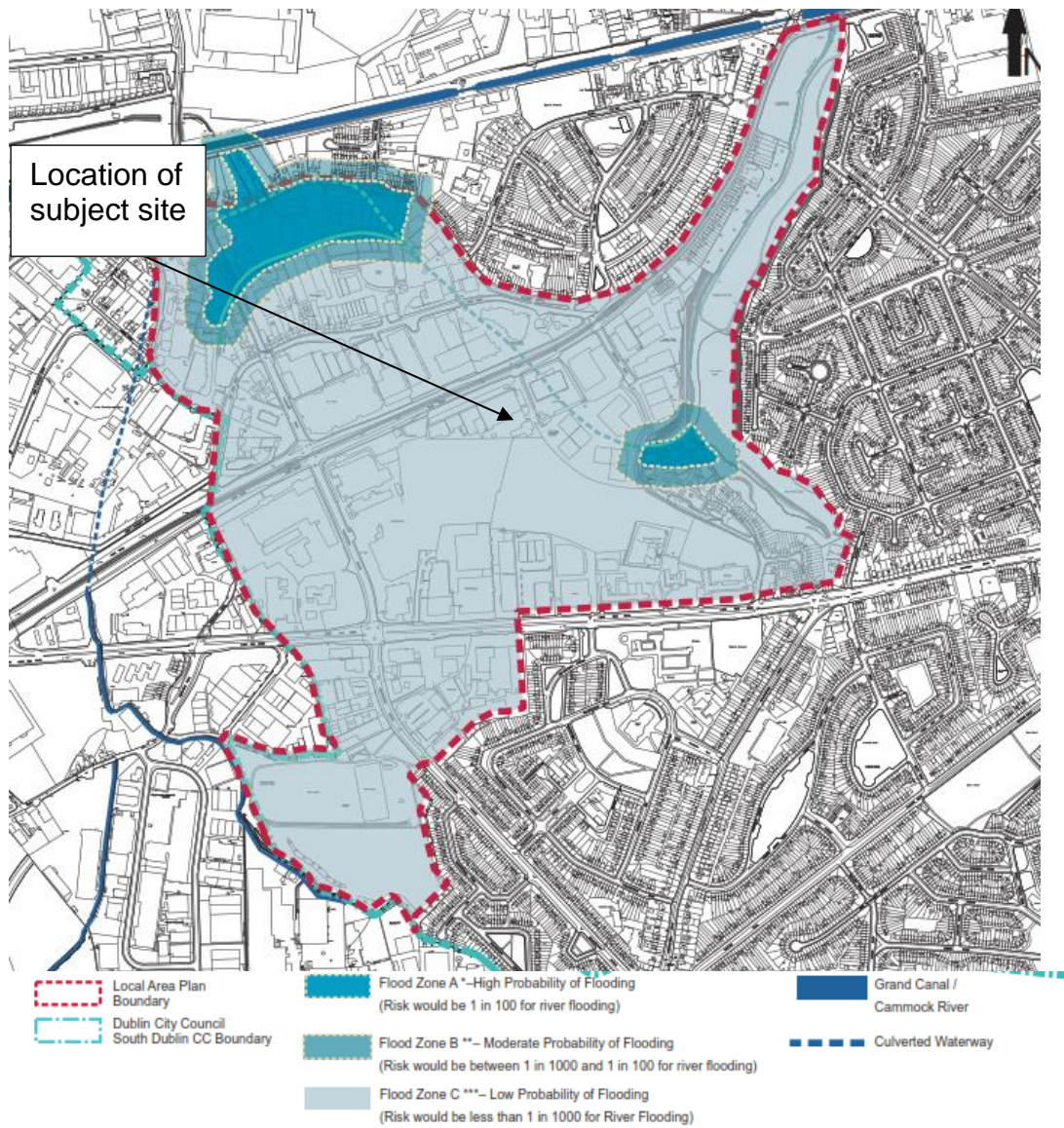


Figure 7: Flood Zone map extract from LAP

6.75. There are existing utilities and services which adjoin and cut through the subject including a trunk pipe, watermain, 110KV line and 38KV line. The proposed development has been design to take account of the existing infrastructure surrounding the site. A strategy for the diversion of these lines is submitted as part of this planning application.

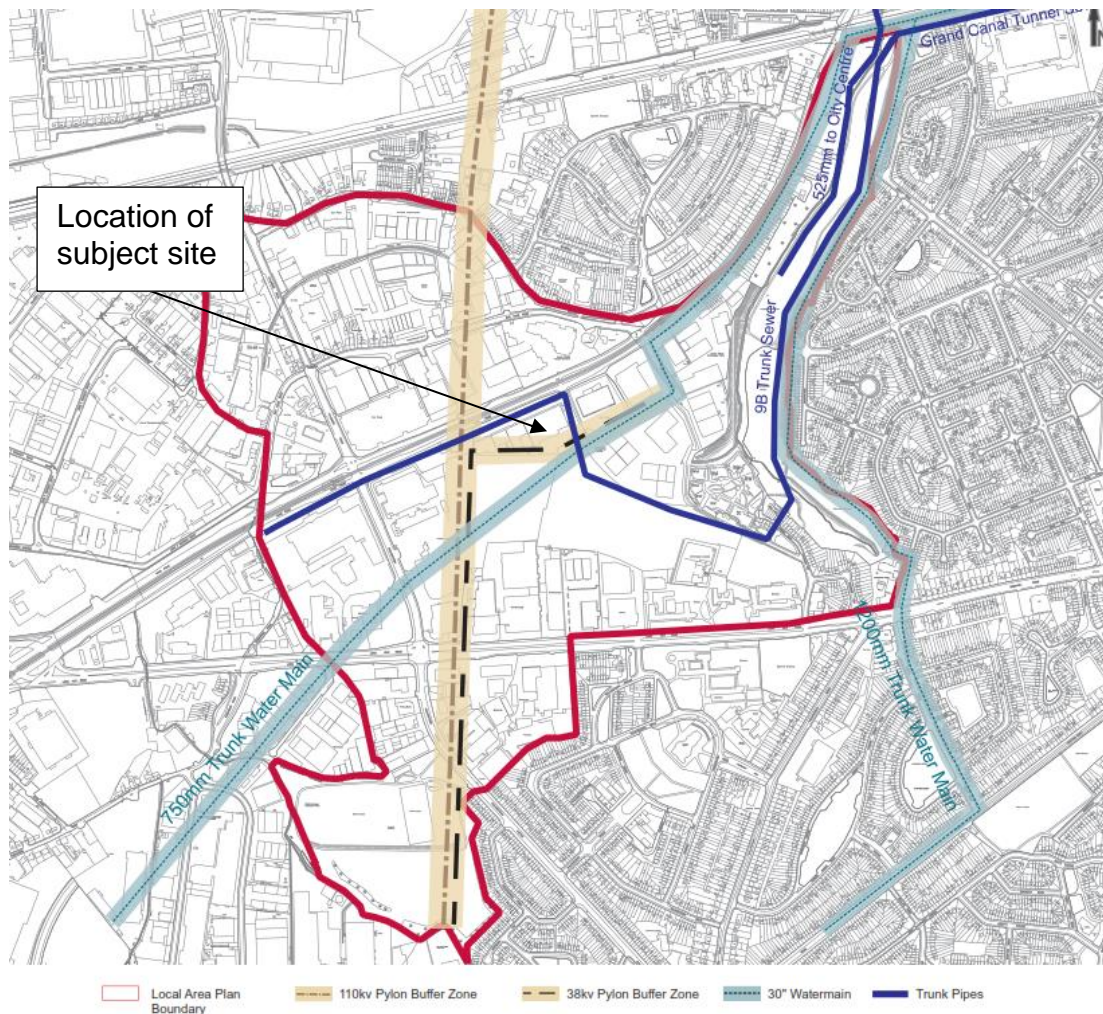


Figure 8: Existing Services and Utilities

Green Infrastructure

6.76. The LAP sets out a green infrastructure strategy. The subject site is identified to provide for a new city wide green route along the eastern boundary and through the southern portion of the site to connect with the surrounding key sites and existing green spaces. There is also provision in the LAP to provide for green space to the south east corner of the site.

6.77. The proposed development is fully compliant with the green infrastructure requirements as set out in the LAP.

6.78. Key policies and objectives include:

G11. To seek opportunities to increase the provision of tree planting on streets within the LAP and to improve amenity, increase opportunities for wildlife and contribute to improvements in air and water quality and water attenuation

G15. To provide for publicly accessible open spaces and green infrastructure which contribute to the amenities of the area and the green network

G18. To recognise the importance of Drimnagh Castle and protect views and vistas, and to improve linkages to the Landsdowne Valley park

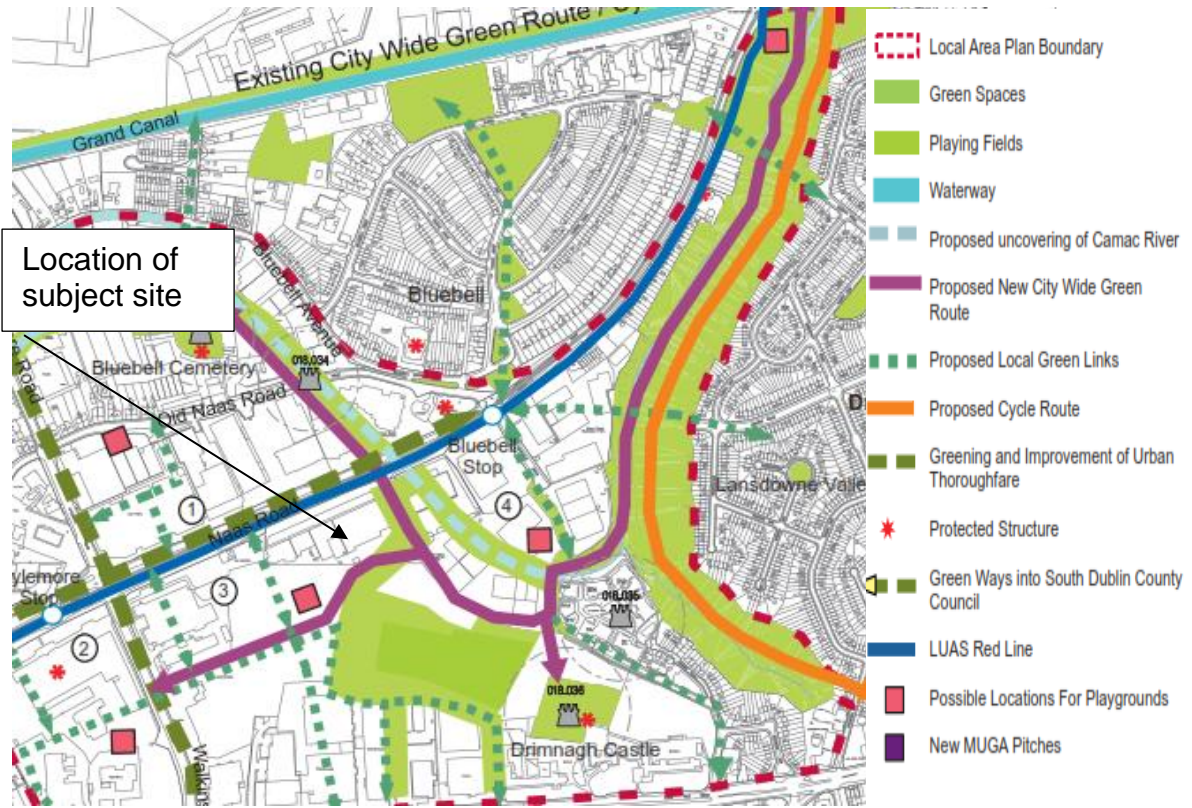


Figure 9: Green Infrastructure Map extract from the LAP

Seveso Sites

6.79. There are 3 no. Seveso Sites in the vicinity of the LAP area. these sites are within the South Dublin county Council administrative area. The sites are as follows:

1. Irish Distillers Robinhood Road, Clondalkin, Dublin 22
2. BOC, Bluebell Industrial Estate, Dublin 12
3. Keyfoam Woolfson, Bluebell industrial Estate, Dublin 12.

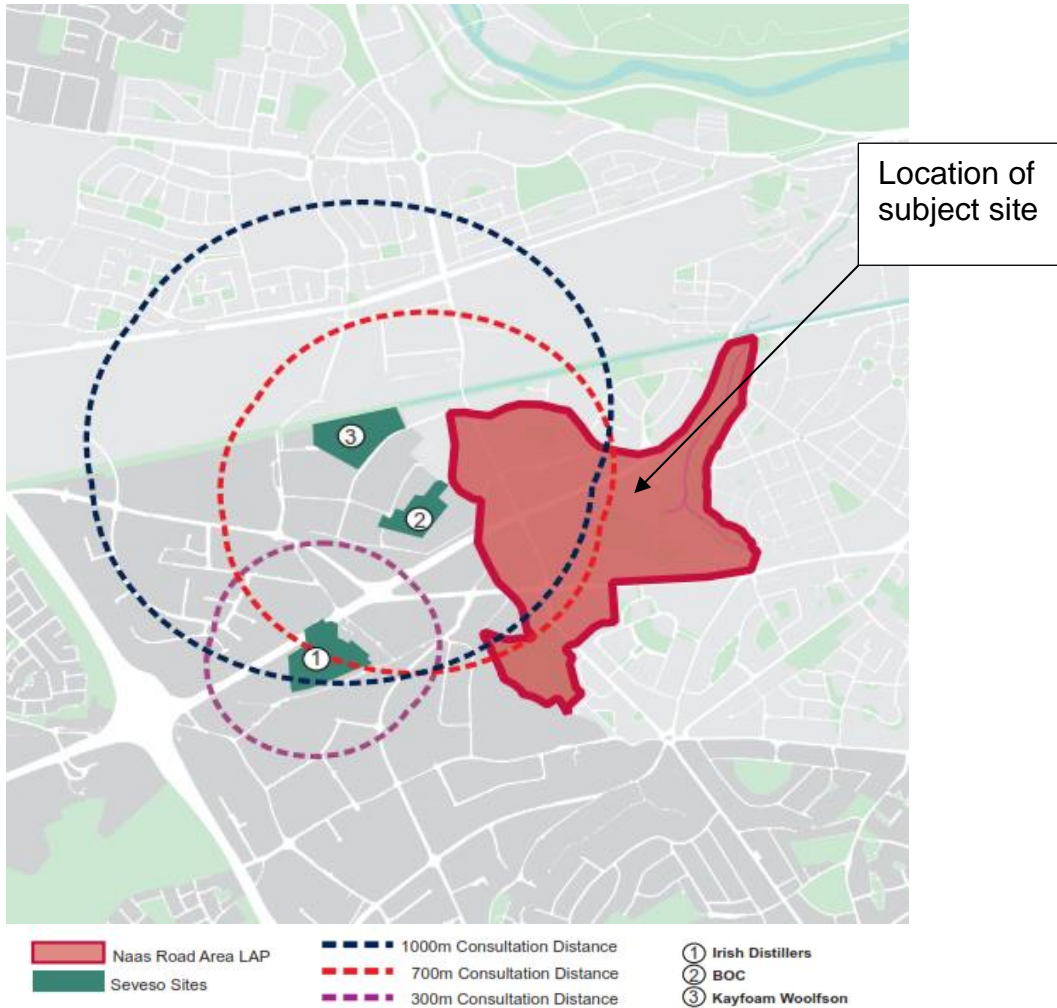


Figure 10: Seveso Sites within the vicinity of the LAP

6.80. The subject site is located outside of the SEVESO zones. A land use planning assessment of the potential impact of the SEVESO sites has been prepared by AWN Consulting. The assessment notes that the proposed development is located within the Consultation Distances surrounding the BOC Gases Ireland Upper Tier COMAH establishment and the Kayfoam Woolfson Lower Tier COMAH establishment.

6.81. The assessment was completed in accordance with the Policy and Approach of the Health and Safety Authority to COMAH Risk – based Land use Planning (HAS, 2010).

6.82. BOC Gases Ireland is located approximately 600m from the proposed development and Kayfoam Woolfson located approximately 960m from the development. The assessment analysed both the individual and cumulative effect of the SEVESO sites on the proposed development.

- 6.83. The assessment concluded that the outer land use planning zone does not extent to the proposed development. Therefore, on the basis of individual risk, the BOC Gases Ireland Ltd and Kayfoam Woolfson Ltd. Sites doe not pose a constraint to the development of the former Concord site.
- 6.84. Full details of the assessment are set out in the EIAR submitted with this application.

Car Parking Standards

- 6.85. The subject site is included in Category Zone 3 in relation to car parking which requires the following spaces for the land uses listed below (Source Table 16.1 Dublin City Development Plan 2016-2022; See table for full list of land uses and maximum parking provision):

Use	Car Parking Requirement (Maximum)
Retail	1 per 75 sq.m GFA
Restaurant café and takeaway	1 per 150 sq.m seating area
Residential	1.5 per dwelling

Table 1: Car Parking Requirements

- 6.86. The proposed development will provide for 200 no. basement car parking spaces to serve the residential development and 43 no. surface level car parking spaces to the serve the commercial element of the development. The car parking provision is below that stated in the development plan, however as set out in the apartment guidelines, SPPR 7 states that:

“There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and / or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures”.

- 6.87. The proposed development is a build to rent development and therefore it is considered that the proposed car parking ratio of 0.4 no. spaces per unit is considered reasonable in this regard. The proposed development is also located within a highly accessible location directly adjacent to the red line Luas as set out in the apartment guidelines which promotes minimal car parking also.
- 6.88. In addition, recent decisions issued by An Bord Pleanála for *“Build To Rent”* accommodation provided for car parking rates of 0.3 spaces per unit and was considered to be acceptable, ABP Ref- 302605-18.
- 6.89. In terms of bicycle parking, Table 16.2 of the Dublin City Development Plan 2016-2022 sets out the following cycle parking standards in accordance with the different land uses (See Table 16.2 for full list of land uses and cycle parking requirements):

Use	Cycle Spaces
Retail	1 per 200 sq.m
Restaurant café and takeaway	1 per 200 sq.m
Residential	1 per dwelling

Table 1: Cycle Parking Requirements

- 6.90. The proposed development provides for 572 no. cycle parking spaces which is in line with the development plan provision. The apartment guidelines set out additional requirements for cycle parking stating that 1 no. space should be provided per bedroom and 1 no. visitor space should be provided per every 2 units. This requirement is

excessive and is considered to be unreasonable in this regard. The proposed 540 no. spaces is therefore considered acceptable.

7.0 COMPLIANCE WITH PART V OF THE PLANNING AND DEVELOPMENT ACT REGARDING SOCIAL HOUSING

- 7.1. The applicant has entered into initial discussions with the Housing Department of Dublin City Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the Planning Authority is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Dublin City Council as per their requirements prior to the commencement of development. A validation letter from Dublin City Council is submitted as part of this application.
- 7.2. The applicant's Part V proposals are described and mapped in the design brochure accompanying this planning application. The proposal is to provide 49 no. of the residential apartments i.e. 10% of the total 492 no. units proposed.
- 7.3. The 49 no. units are provided as a mix of studio / 1 bed units, distributed throughout the ground floor of the scheme. Please refer to the accompanying drawings, schedule of accommodation and costings for full details.

8.0 Conclusion

- 8.1. The statement set out herein demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy context.
- 8.2. At a national and regional level, this statement has demonstrated consistency with the following:
- National Planning Framework 2040;
 - Rebuilding Ireland – Action Plan for Housing and Homelessness;
 - Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2018;
 - Draft Urban Development and Building Height Guidelines 2018;
 - Eastern and Midlands Regional Assembly; Draft Regional Spatial and Economic Strategy 2019- 2031;
 - Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022);
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
 - Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
 - Quality Housing for Sustainable Communities (2007);
 - Design Standards for New Apartments (2017);
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Smarter Travel – A New Transport Policy for Ireland (2009-2020);
 - The Planning System and Flood Risk Management (2009);
 - Birds and Habitats Directive – Appropriate Assessment;
- 8.3. Consistency is also demonstrated with the policies and provisions of the Dublin City Development Plan 2016-2022.
- 8.4. It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential and commercial development for this site. This consistency statement accompanying this planning application demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and that the proposal will provide for an effective and efficient use of this under-utilised site which is highly accessible and well served by public transport.
- 8.5. The proposed development and accompanying documentation and reports have been prepared following pre-planning consultation with Dublin City Council and having regard to the opinion from An Bord Pleanála.
- 8.6. In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines and that the proposal as presented is considered to be a reasonable basis for making an application.

APPENDIX 1 - PRE-PLANNING APPLICATION DISCUSSIONS

Pre Application Meeting with Dublin City Council

A total of 3 no. pre application meetings were held with Dublin City Council to discuss the proposed development. A summary of the meetings are set out as follows:

18th June 2018 – Meeting No. 1

The proposed development was presented to DCC Planners. The main points to note were as follows:

Quantum of commercial space provided – Proposal is to consider additional commercial uses on the site

KV Lines – Confirmation on how the KV lines would be addressed

Adjoining Sites – further consideration on the connectivity to the adjacent sites as set out in the LAP

Green Route – Provision of a Green route should be further considered in the context of the LAP and the function of this space

Ground floor units – the treatment of the ground floor units to be defined in terms of residential amenity and privacy

27th August 2018 – Meeting No. 2

A second meeting was held with DCC to respond to the main items arising from the first pre application meeting. The following points were of relevance.

Commercial Use – The applicant presented an increase in the level of commercial uses on the site. DCC requested that a report be prepared based on the commercial activity in the area and the level of demand in the area.

Public Open Space – The applicant presented a further increase and detail on the provision of open space to the south of the site. DCC requested further information on how the open space would be treated in terms of detail and overlooking.

Site Layout – DCC queried the layout of the site with regard to the north facing apartments to the Naas Road

Contextual Elevation – DCC requested to see the additional “pavilion” building in the context of the wider scheme along the eastern elevation.

Car Parking- DCC queried the level of car parking provided on the site.

10th October 2018 – Meeting No. 3

A third meeting was held with DCC to finalise the proposed development. The applicant responded to the main items as follows:

Commercial Use – the applicant prepared a report based on the trends in Dublin and the level of activity in the area. DCC acknowledged the contents of the report and suggested perhaps a more innovative solution that could benefit both the future residents and satisfy the commercial land use on the site such as shared office space.

The proposed development provides for a shared office space on first floor level of the development, therefor addressing the Planning Authority’s concerns.

Landscaping – DCC requested that the public open space be increased and merged into the communal space more generously. DCC also requested details of the playground in relation to the surrounding units and the treatment of the ground floor unit that front the area of public open space.

The proposed development has increased the level of public open space within the development and has integrated more appropriately with the communal space. The proposed development also provides for a high quality landscape finish to the ground floor units to provide for a level of privacy while at the same time allowing passive surveillance of the area. The playground has been relocated on the site to make more accessible and more open within the space.

Dual Aspect / north facing units – DCC queried the level of north facing units on the site fronting the Naas Road and the quality of amenity that would be obtained in these units.

The proposed development has carefully considered the north elevation of the development and has provided for a design solution that both addresses the scale and mass of the Naas Road providing for a strong urban edge while at the same time increasing the level of amenity provided to these units. The proposed units along the Naas Road will be larger in size and will be provided with a bay window gaining access to wider views, east and west of the site enabling the subject units to receive morning and afternoon sun.

Car Parking- Car parking provision was acknowledged, however it was requested that a mobility management plan be submitted to demonstrate how the proposed transportation on the site will be managed.

The proposed development is accompanied by a detailed traffic assessment and mobility management plan to set out the transport requirements of the development and how these will be accommodated on the site.

Appendix 2: DMURS Statement

Table 2.1: Design Manual for Urban Roads and Streets (DMURS)
Key Design Provisions Statement of Consistency

Key Design Principles	Provisions	Statement of Consistency
<p>Integrated Street Networks</p>	<ul style="list-style-type: none"> ▪ Does the development create connected centres that prioritise pedestrian movement and access to public transport? 	<p>Presently, there is no/very poor provision for pedestrian/cyclist movement around and through the site. In accordance with the objectives of local area plan, the development scheme incorporates a significant number of cycle and pedestrian paths within the development to provide connectivity to future developments and continuation of the Citywide Green Route. As agreed in principal with DCC traffic department, two additional pedestrian crossings are proposed at the main junction with the Naas Road to increase accessibility to both Luas and Bus services.</p> <p>✓ Pedestrians making the journey to the site will generally be comfortable doing so provided the journey time does not exceed 30 minutes (approximate distance 3 km). Walking becomes highly desirable if the journey time does not exceed 15 minutes (approximate distance 1.5 km).</p> <p>✓ Local amenities are available within c. 15-minute walk-time of the subject site.</p> <p>✓ Public transport links (LUAS and Bus) are available within 5 minutes' walk and less of</p>

Key Design Principles	Provisions	Statement of Consistency
Movement and Place	<ul style="list-style-type: none"> ▪ Does the development create a legible street hierarchy that is appropriate to its context? ▪ Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)? 	<p>the candidate site.</p> <ul style="list-style-type: none"> ✓ The design incorporates a permeable and legible street network that offers route choice and flexibility for managing movement within it. ✓ There is a fully integrated pedestrian network with all the main landscape spaces connected to a universally accessible route. ✓ In line with best practice the design incorporates an orthogonal street layout thus promoting legibility as well as connectivity. ✓ Perimeter walking and cycle paths are incorporated into the design.
Permeability and Legibility	<ul style="list-style-type: none"> ▪ Has the street layout been well considered to maximise permeability for pedestrians and cyclists? ▪ Are the streets legible with maximum connection opportunities? ▪ Are blocks of a reasonable size and permeability, with consideration to the site constraints? 	<ul style="list-style-type: none"> ✓ Above ground, pedestrian and cyclist movement is prioritised by providing a layout that restricts vehicular access to the north end of the site. ✓ A high degree of pedestrian permeability throughout the site is created by providing footways that connect the spaces between each block. ✓ In accordance with the objectives of the LAP, pedestrian and cycle paths have been provided for connection with future developments and extension of the Citywide Green Route. ✓ Additionally, 2 new pedestrian crossings are

Key Design Principles	Provisions	Statement of Consistency
Management	<ul style="list-style-type: none"> ▪ Is the layout designed to self-regulate vehicle speeds and traffic congestion? ▪ Does the proposed layout minimise noise / air pollution wherever possible? 	<p>proposed at the junction with the Naas Road to promote the use of both Luas and Bus services.</p> <p>✓ By assigning the majority of car parking to the basement car park, pedestrian movement is prioritised above ground.</p> <p>✓ By assigning narrow carriageway widths in line with the recommendations for Local Streets, along with variations in the horizontal alignment at the main entrance junction, a natural traffic calming effect is provided in both a physical and psychological sense, which will assist in self-regulating vehicular speeds.</p> <p>✓ Gradients proposed minimise the need for revving of engines and associated noise and emissions, while the road surface will absorb sound.</p> <p>✓ Pedestrian priority will be provided at the internal pedestrian crossing in the form of raised entry treatment which also serve as a traffic calming measure.</p> <p>✓ The location of the site will promote the use of public transport thus contributing to reduced air emissions.</p>
Movement, Place and Speed	<ul style="list-style-type: none"> ▪ Does the proposed development balance speed management with the values 	<p>See previous section.</p> <p>✓ High levels of pedestrian movement are</p>

Key Design Principles	Provisions	Statement of Consistency
	<p>of place and reasonable expectations of appropriate speed?</p> <ul style="list-style-type: none"> ▪ Does the design promote a reasonable balance of both physical and psychological measures to regulate speed? 	<p>catered for which supports vibrant and sustainable places. The segregation and exclusion of vehicular traffic within the development also supports the sense of place.</p>
Streetscape	<ul style="list-style-type: none"> ▪ Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure? ▪ Have street trees and areas of planting been provided where appropriate? ▪ Have active street edges been provided where appropriate? ▪ Is a palette of high quality surface materials and finishes provided? 	<p>Yes - See landscape architects report for full details</p>
Pedestrian and Cyclist Environment	<ul style="list-style-type: none"> ▪ Are footways of appropriate width provided so as to ensure pedestrian safety? ▪ Are verges provided adjacent to larger roadways so as to provide a buffer between vehicular routes and pedestrian paths? ▪ Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations? ▪ Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required? ▪ Have cycle facilities been factored into the design? 	<p>✓ The typical footway width provided is minimum 1.8m which is in accordance with Section 4.3.1 of DMURS. ✓ A verge have been incorporated along the full extent of the eastern boundary adjacent the access road off the Naas Road. As pedestrians progress into the development, the pedestrian routes are segregated further from vehicular traffic by incorporating footways through the landscaped gardens. ✓ Large car free areas shelter pedestrians and cyclists from traffic. A car free area is also effectively provided on the fire tender and</p>

Key Design Principles	Provisions	Statement of Consistency
		<p>access route to the south of the main building blocks. It is anticipated that this road be primarily pedestrianised except for the rare occasion that fire truck access is required.</p> <p>✓ Pedestrian priority will be provided at the main entrance junction in the form of a flat top ramp crossing which also serves as a traffic calming measure.</p> <p>✓ Two new pedestrian crossings are proposed at the junction with the Naas Road to promote pedestrian movement and public transport use.</p> <p>✓ Secure covered resident cycle parking is provided at basement level, accessed from the surface podium level via a dedicated path next to the main vehicle ramp. Surface level bicycle parking spaces are provided along the Naas Road frontage and in the landscaped areas between each of the residential blocks.</p>
<p>Carriageway Conditions</p>	<ul style="list-style-type: none"> ▪ Are vehicular carriageways sized appropriately for their function / location? ▪ Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions? ▪ Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists? 	<p>✓ Section 4.4.1 of DMURS specifies a carriageway width of 5.5m for local streets. A slightly larger carriageway width of 6m has been provided to the road along the north of the development, to cater for occasional delivery vehicles.</p> <p>✓ The road carriageway will be surfaced in Stone Mastic Asphalt demonstrating a clear</p>

Key Design Principles	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> ▪ Have adequate parking / loading areas been provided? 	<p>and obvious vehicular route into the development which will contrast visually with the finishes on pedestrian footways.</p> <p>✓ Junctions have been designed so as to minimise corner radii in line with Section 4.3.3 of DMURS.</p> <p>✓ A total of 243No. parking spaces are proposed. The majority of parking is provided at basement level. This provision has been assessed as appropriate in the parking and mobility study for the development.</p> <p>✓ A vehicle set-down area is provided along the access road to the south east corner of the development where a refuse collection vehicle can set-down and handle the communal waste receptacles brought up from basement-level bin stores.</p>

Appendix 3 – CBRE Employment Figures

Retail Unit Schedule:	Rent 11 - Commercial
Job No.	P18-062
Job Title	Residential Development
Job Location	Concorde Industrial Estate, Dublin
Date:	26/11/2018
Issue:	Information
Revision:	100



Level	Name	Department	Sq m	Sq ft	Rent Per Sq ft	Rent	Projected Employment	Comment
Level 0	0.Retail Unit 01	Creche	178	1920	20	38,400		
Level 0	0.Retail Unit 02	Car Showroom	372	4000	12.5	50,000		
Level 0	0.Retail Unit 03	Pharmacy	144	1550	40	62,000		
Level 0	0.Retail Unit 04	Convenience Store	446	4800	20	96,000		
Level 0	0.Retail Unit 05	Casual Dining	123	1320	30	39,600		
Level 0	0.Retail Unit 06	Casual Dining	46	500	40	20,000		
Level 0	0.Retail Unit 07	Casual Dining	121	1300	30	39,000		
Level 0	0.Retail Unit 08	Coffee Shop	181	1950	35	68,250		
Level 1	1.Retail Unit 01	Creche	169	1820	10	18,200		
Level 1	1.Retail Unit 02	Medical Centre	519	5590	10	55,900		
Level 1	1.Retail Unit 03	Shared Office	566	6090	10	60,900		
Level 1	1.Retail Unit 04	Shared Office	160	1720	15	25,800		
							6	too small for a creche even with 6 upstairs
							8	
							5	
							12	
							6	
							3	
							6	
							10	
							6	
							16	
							56	
							16	
							150	

These figures are for discussion purposes only and do not form any part of a red book valuation