

Planning
Application to
An Bord
Pleanála

Planning
Report &
Statement of
Consistency

Proposed Strategic
Housing Development

1,034no. Dwellings
and Ancillary Uses at
lands in the
Townlands of
Kilcarbery, Corkagh
Demesne, Deansrath,
and Nangor, Co.
Dublin

For Adwood Limited

AUGUST 2019

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1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, are instructed by our Client (the Applicant), Adwood Limited, 702 Kilshane Drive, Northwest Business Park, Ballycoolin, Dublin 15, to prepare this Strategic Housing Development (SHD) Planning Application Report.

This Planning Report accompanies an SHD Planning Application to An Bord Pleanála, made under Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016. It sets out how, in our opinion, the proposed scheme complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in: -

- National Planning Framework, Ireland 2040 (NPF).
- Eastern & Midlands Regional Spatial & Economic Strategy (RSES) and Dublin Metropolitan Area Spatial Plan (DMASP).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- South Dublin County Council Development Plan 2016 – 2022.
- Kilcarbery – Grange Masterplan (2017).
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.

The Planning Report & Statement of Consistency should be read in conjunction with the planning application plans and particulars submitted with this application.

In summary, the proposed (strategic housing) development broadly comprises: -

- 1,034no. residential units (578no. houses, 154no. duplex / apartments and 302no. apartments) in buildings ranging from 2 to 6-storeys.
- 2no. childcare facilities - including 1no. temporary creche (c. 557 sq. m gross floor area in lieu of 7no. ground floor apartment units in Block 7) pending construction of and ultimately to be replaced by 1no. permanent creche building at Grange Square (c. 909 sq. m gross floor area).
- 1no. retail unit (c. 178 sq. m gfa).
- 1no. community facility (c. 785 sq. m gfa).
- All associated and ancillary site development, infrastructure, public amenity open space, landscaping and boundary treatment works.

A Site Location Map outlining the lands subject of the proposed works (in red) and extent of land ownership (in blue) has been prepared by Burke Kennedy Doyle Architects, and is enclosed with this submission (Dwg. No. 6168-001 'Site Location Map' refers).

The proposed development is located on lands currently within the control of South Dublin County Council (SDCC), to be developed by Adwood Limited as part of a Joint Venture with the Local Authority.

A letter from SDCC (Strategic Housing Development), dated 29 July 2019, as a key stakeholder in the application proposal, separate to its role as the local planning authority in the SHD application process, is also enclosed for the information of the Board.

A letter from SDCC (Economic, Enterprise & Tourism Development Department), dated 26 June 2019, as the landowner consenting to the making of this application by Adwood is enclosed with this SHD Planning Application to An Bord Pleanála.

A letter from SDCC (Land Use, Planning & Transportation Department), dated 18 June 2019, confirming that the Applicant has engaged in Part V consultation is enclosed with this application. It has been agreed with the Planning Authority that, in accordance with Section 96 of the Planning Act, the Applicant's proposal to deliver 30% social housing on site as part of the proposed housing scheme satisfies its Part V obligations.

The possible effect of the proposed development on the environment has been examined through the process of an Environmental Impact Assessment Report (EIAR) which accompanies the SHD Planning Application. An Appropriate Assessment Screening (AA Screening) statement, examining the possible environmental effects on European sites, also accompanies the SHD Planning Application.

In accordance with the statutory regulations, we confirm that the sum of €80,000.00 as the appropriate fee in this instance. An Electronic Fund Transfer (EFT) to this amount was made to An Bord Pleanála (proof of payment enclosed herewith).

A complete list of application enclosures can be found at Section 15 of this Planning Report.

1.1 Definition of Strategic Housing Development

We are of the opinion that the proposed development is Strategic Housing Development as defined by the Section 3 of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended.

In respect of this proposed development, Section 3 of this Act confirms, *inter alia*, that: -

“strategic housing development” means—

(a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses,

... which may include other uses on the land, the zoning of which facilitates such use, but only if —

*i) the **cumulative gross floor area of the houses ...**, **comprises not less than 85 per cent**, or such other percentage as may be prescribed, **of the gross floor space of the proposed development ...**, and*

*ii) **the other uses cumulatively do not exceed —***

*I) **15 square metres gross floor space for each house ...**, in the proposed development ..., **subject to a maximum of 4,500 square metres gross floor space for such other uses in any development, or***

*II) **such other area as may be prescribed, by reference to the number of houses or bed spaces in student accommodation within the proposed development or to which the proposed alteration of a planning permission so granted relates, which other area shall be subject to such other maximum area in the development as may be prescribed;**” (* SLA bold text emphasis identifies qualifying criteria for the proposed development)*

1.1.1 Proposed Development

The proposed development exceeds the SHD threshold of 100no. dwellings, on lands zoned for residential development.

The proposed development includes 1,034no. dwellings, in a mix of house types, and other ancillary supporting uses and infrastructure, on lands in the townlands of Kilcarbery, Corkagh Demesne, Deansrath, and Nangor, Co. Dublin.

These lands are zoned *Objective RES-N* under the South Dublin County Council Development Plan 2016 – 2022, where it is an objective:

“Objective RES-N: To provide new residential communities in accordance with approved area plans.”

The Kilcarbery Grange Masterplan, prepared by South Dublin County Council, is the approved plan required in this case by Objective RES-N.

The proposed development also includes ancillary accommodation and additional infrastructure necessary to facilitate the development of the 1,034no. dwellings, including 1no. temporary childcare facility (c. 557 sq. m gfa), 1no. permanent purpose built creche (c. 909 sq. m gfa), 1no. retail unit (c. 178 sq. m gfa) and 1no. community facility (c. 785 sq. m gfa). The cumulative quantum of the other uses proposed falls below the maximum 4,500 sq. m gfa threshold for SHD applications to An Bord Pleanála.

Consequently, it is our professional planning opinion that the proposed development constitutes Strategic Housing Development, to be subject of an application for planning approval by An Bord Pleanála.

1.2 Life of Permission Sought

Section 41 of the Planning and Development Act 2000 (as amended): -

*“41.—Without prejudice to the powers conferred on them by this Part to grant a permission to develop land for a limited period only, in deciding to grant a permission under section 34, 37, 37G or 37N, a planning authority or the Board, as may be appropriate, may, **having regard to the nature and extent of the relevant development and any other material consideration, specify the period, being a period of more than 5 years, during which the permission is to have effect, and in case the planning authority or the Board exercises, or refuses to exercise, the power conferred on it by this section, the exercise or refusal shall be regarded as forming part of the relevant decision of the authority or the Board under section 34, 37, 37G or 37N.**”*

Permission with a life of **10 Years** is sought in this case.

Given the nature and scale of the proposed development, a 10 Year permission is considered necessary and reasonable on the basis that: -

- The scheme will be developed as a Joint Venture between SDCC and the Applicant, for timely delivery of an appropriate quantum of and quality of public and private housing in this area.
- The Development Agreement entered into by South Dublin County Council and the Developer has the option to extend to 10 years. It is considered appropriate to align the Planning Permission with the Development Agreement term.
- The site has been identified as a Major Urban Housing Delivery Site under the Government’s Rebuilding Ireland Strategy.
- The site is identified at a national and regional planning policy level as a strategic site for consolidation of development on the south western edge of the ‘Metropolitan Area’.
- The land is zoned for residential development (a significant new residential neighbourhood) under the South Dublin County Development Plan 2016 – 2022.
- The Kilcarbery – Grange Masterplan (2017) was prepared and approved by SDCC to guide the proposed development of lands, the majority of which is taken up by the application site.
- The proposed residential element will provide additional critical mass to support the development of adjoining uses as identified in the SDCC approved Kilcarbery – Grange Masterplan (2017) that also includes a future Neighbourhood Centre and Educational Site to the north of the application site.
- Local Infrastructure Housing Activation Funding (LIHAF) has been allocated to deliver the proposed spine road and the foul pumping station, which will ensure that the entire landbank is activated for the proposed and future development within the Masterplan area.
- The proposed phased development of the site will ensure the timely and sustainable development of this significant new residential neighbourhood, which will respond to current and future housing demand in the area identified in the Council’s housing strategy.
- The longer permission period allows for fluctuations in development output (i.e. construction of units) on a yearly basis to respond to potential changes in the construction market and the phased delivery of the necessary supporting infrastructure.
- On the basis that the SHD Planning Application is accompanied by an Environmental Impact Assessment Report, an Extension of Duration of the life of the permission may not be legally possible under amendment made (but not yet enacted) to the Planning and Development Act in 2018. This amendment will come into force on the commencement of Section 28(1) of the Planning and Development Act 2016. The enactment of this amendment to the Act could occur during the life of the permission. In the event that the permitted development was not fully implemented during the standard 5-year period, planning permission would need to be applied for again. This would give rise to unnecessary additional cost and delay to the completion of the housing scheme.

For the reasons set out above, it is considered that a 10 Year permission period is considered appropriate as a contingency measure to protect the timely delivery of a significant quantum of housing, that is supported by long range strategic national and regional planning policy and in a plan-led manner by the local statutory development plan and approved masterplan.

1.3 Circulation to Prescribed Bodies

We acknowledge receipt of the Board's Opinion, together with the list of Prescribed Bodies which the Bord have requested be circulated with a copy of the application.

We enclose herewith as part of this SHD Planning Application a copy of the Cover Letters to the relevant Prescribed Bodies in this case, being: -

- National Transport Authority.
- Transport Infrastructure Ireland.
- Minister for Culture, Heritage and Gaeltacht.
- Heritage Council.
- An Taisce – the National Trust for Ireland.
- Irish Water.
- Irish Aviation Authority.
- Department of Defence.
- South Dublin Childcare Committee.

2 SITE DESCRIPTION & CONTEXT

2.1 Site Description

The subject site (c. 28.6 ha gross site area) is contained within a larger land parcel (c. 35 Ha) that is subject of SDCC's Kilcarbery – Grange Masterplan (2017).

The lands are located approximately 2km west of Clondalkin village, and approximately 11km south west of Dublin City Centre.



Figure 1: Extract from Google Earth illustrating an indicative outline of the proposed development (in red) within with the extent of the Kilcarbery – Grange Masterplan (2017) (Overlay by SLA).

The application site (c. 28.6 ha) excludes those areas earmarked for education / community facilities (c. 2 ha) and a neighbourhood centre (c. 1 ha) to the north west, and the Public Private Partnership (PPP) site (c. 3 ha) to the south west, within the Masterplan area.

The site is otherwise generally bounded by the Outer Ring Road / Grange Castle Road (R136) to the west, the Old Nangor Road (L5254) and Scoil Mochua and Spina Bilfida Hydrocephalus Ireland immediately to the north, the New Nangor Road (R134) beyond to the north, existing residential estate development to the north east and east of the PPP site, and Corkagh Demesne (public park) to the south.

The site is currently accessible via the Nangor Road to the north. The site is also accessible by foot via Corkagh Park Demesne to the south.

The site is generally flat, with levels falling gently from its south western corner towards the north and eastern site boundaries. There is a significant quantum of existing mature trees and hedgerows, and a series of drainage ditches across the site.

Surrounding existing housing development to the north and east is generally of a low density, suburban character.

In terms of connectivity, the site is served by a limited number of public transport options, mainly in the form of local bus services which are available at the New Nangor Road (c. 400m from the subject site) and Cherrywood Park (c. 100m from the subject site). In terms of rail / Luas options the application site is: -

- Approximately 2.5km from the Clondalkin / Fonthill Commuter Rail Station.
- Approximately 2.4km from the Kishogue Commuter Rail Station (not yet operational).
- Approximately 4km from Cheeverstown Luas stop.

There are no direct bus connections with these train stations from the application site.



Figure 2: Extract from Google Earth showing the application site within its immediate context (Overlay by SLA).

2.2 Existing & Planned Uses

The application site comprises greenfield agricultural lands, with field boundaries defined by existing hedgerows and trees. The wider landscape opens towards Corkagh Park to the south.

The proposed land use is primarily residential. Ancillary local retail and community uses are proposed in the north eastern part of the site, near to the future neighbourhood centre and education campus sites.

Significant areas of public open space, green infrastructure networks and supporting physical infrastructure works are also proposed, connecting the site as a neighbourhood component of the wider Clondalkin settlement.

2.3 Recent Planning History

The following is an outline of the relevant planning history of the subject site based on a desktop planning search of SDCC's online planning register.

2.3.1 Subject Site

SDCC Reg. Ref. SD03A/0070

Permission sought by ESB on 7 February 2003 for the construction of 2no. 38kV 12m line termination masts under the Clondalkin Saggart / Tee to Cheeverstown 38kV line.

Permission was granted by South Dublin County Council on 10 July 2003 (final grant date).

These masts were required in order to route underground a section of the 38kV Overhead Line which was in conflict with the Outer Ring Road / N7 Interchange Roadworks. The line of the 38kV power line runs parallel to the western boundary of the subject site.

2.3.2 Adjoining Site

SDCC Reg. Ref. SD178/0002

A Part 8 application by South Dublin County Council Housing was made on 26 May 2017 for Public Private Partnership development comprising 109 no. residential (social housing) units, internal distributor road, relocation of existing bus stop on Old Nangor Road, ESB substation, signage temporary fencing around site perimeter and all associated site works.

This site is located immediately west of the application site, in the south western part of South Dublin County Council's overall Kilcarbery-Grange Masterplan area.

SDCC Reg. Ref. SD06A/1108

Permission was sought by Menolly Development on 20 December 2006 for a mixed-use development comprising a hotel, leisure centre, crèche, local shop, replacement golf clubhouse and 290 no. residential units on an overall site area of 15.2 hectares, located on the opposite (western) side of the R136 Outer Ring Road.

Permission for the proposed development was granted on 3 April 2007 (final grant date). The permitted development was not implemented, and the permission has since withered.

SDCC Reg. Ref. SD07A/0492

Permission was sought by the Association for Spina Bifida & Hydrocephalus on 25 June 2007 for a mixed use development to include the construction of a new national resource centre to provide for respite accommodation, social and recreational facilities, treatment rooms, ESB sub station and associated switchroom and crèche accommodation, located to the north of the subject site along the R134 New Nangor Road.

Permission was granted for the proposed development by the Planning Authority on 2 April 2008 and was subsequently appealed to An Bord Pleanála.

Permission was granted by An Bord Pleanála on 13 February 2009. The permitted development was not implemented and the permission has since withered.

3 THE APPLICANT

The Applicant in this case is Adwood Limited. The required applicant details are as follows: -

Name: Adwood Limited

Address: 702 Kilshane Road, Northwest Business Park, Ballycoolin, Dublin 15.

Telephone: 01 880 9009

Email: anthony@grandbrind.ie

4 APPLICANT'S LEGAL INTEREST

4.1 Ownership

The Applicant (Adwood Limited) is not the owner of the lands subject of the proposed development.

The application site outlined in red and the adjoining lands outlined in blue on the enclosed Site Location Map, prepared by Burke Kennedy Doyle Architects (Dwg. No. 6168-001 'Site Location Map – OS Map' refers) are in the control of South Dublin County Council (landowner).

4.2 Letters of Consent

Enclosed with this Planning Application is a Letter of Consent by South Dublin County Council, dated 26 June 2019, for Adwood Limited to make the SHD Planning Application to An Bord Pleanála.

5 AGENT

5.1 Planning Agent

This SHD Planning Application to An Bord Pleanála has been co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants, as part of a Design Team led by Burke Kennedy Doyle Architects.

For the purposes of this SHD Planning Application, details of the agent are set out below for the convenience of the Board: -

Name: Stephen Little & Associates, Chartered Town Planners & Development Consultants.
Address: 26/27 Upper Pembroke Street, Dublin 2, D02 X361.
Telephone: 01 676 65 07.
Email: info@sla-pdc.com.

5.2 Design Team

The following lists the expert design team consultants involved in the preparation of the planning design subject of this SHD application : -

Stephen Little & Associates Chartered Town Planners & Development Consultants – Preparation and co-ordination of the SHD Planning Application to An Bord Pleanála. Providing guidance from a Town Planning perspective, and consultation with SDCC (Architects and Planning Departments).

Burke Kennedy Doyle Architects – Preparation of the layout and design of the proposed scheme in compliance with the Kilcarbery – Grange Masterplan (2017) and in close consultation with SDCC (County Architect and Housing Departments).

DBFL Consulting Engineers – Preparation of road and drainage design, flood risk assessment and mitigation, and other infrastructural requirements for the proposed development, including liaising with Irish Water and SDCC (Roads and Water Services Department) as appropriate.

Ronan MacDiarmada & Associates Landscape Architects – Preparation of the Landscape Masterplan, and Landscape Design Report, including liaison with SDCC (Parks and Water Services Departments) as appropriate.

O'Connor Sutton Cronin Consulting Engineers – Preparation of the public lighting layout Energy & Sustainability Report and Building Life Cycle Report.

Arborists Associates Ltd. – Preparation of Tree Surveys and Arboriculture Assessment.

AWN Consulting – Preparation of a waste management plans.

Digital Dimensions Architectural Visualisation – Preparation of verified photomontage views and Computer Generated Images (CGI's).

5.3 EIAR Team

The following lists the expert consultants involved in the preparation of the Environmental Impact Assessment Report for the proposed development: -

Stephen Little & Associates Chartered Town Planners & Development Consultants – Preparation and Co-ordination of EIAR.

DBFL Consulting Engineers – Preparation of the EIAR Chapters relating to Land, Soil & Geology, Water, Transportation and Waste.

Ronan MacDiarmada & Associates Landscape Architects – Preparation of the EIAR Chapter relating to Landscape and Visual Impact Assessment.

Scott Cawley Ecological Consultants – Preparation of the EIAR Chapter relating to Biodiversity. Also preparation of Appropriate Assessment Screening to identify possible environmental impacts on European Sites, including liaising with the National Parks and Wildlife Service and Parks and SDCC Heritage Department.

O'Connor Sutton Cronin Consulting Engineers –Preparation of the EIAR Chapter relating to Climate (Daylight & Sunlight Assessments).

AWN Consulting – Preparation of the EIAR Chapters relating to Population & Human Health, Climate (Air Quality & Climate Change) and Air (Noise & Vibration).

Irish Archaeology Consultants Ltd. – Preparation of the EIAR Chapter relating to Cultural & Architectural Heritage, including liaising with the Department of Arts, Heritage and the Gaeltacht, National Monument Service and the SDCC County Archaeologist.

6 PRIOR CONSULTATION IN RESPECT OF PROPOSED STRATEGIC HOUSING DEVELOPMENT

6.1 Competitive Tender Design Stage

The proposed development of these lands was subject of a competitive tender design process following the preparation of an overall Masterplan by SDCC (titled 'Kilcarbery Grange Masterplan – 2017'). This involved an iterative design and consultation process, with the final design proposal being submitted to the Council in June 2018.

The tender was awarded to Adwood Limited (the Applicant) in August 2018. Further extensive consultation with the Council occurred following the awarding of the tender. This has culminated in a clear understanding between the Applicant and the Council (as joint venture partners) of the key planning and environmental issues to be addressed, and what is required in respect of the detailed planning design of the proposed development at this site (including quantum, design and layout of proposed residential and ancillary uses, supporting physical infrastructure and phasing), as a neighbourhood component of Clondalkin and as part of a wider settlement strategy for South Dublin Council.

We refer An Bord Pleanála to the Stakeholder Statement prepared by SDCC, accompanying this application, for further information on its overarching development strategy to deliver a sustainable, viable and timely mixed tenure residential neighbourhood at Kilcarbery-Grange, that is consistent with the provisions of the Government's Rebuilding Ireland programme and national and local residential planning and development policy.

6.2 SDCC Stakeholder Meeting

The formal Section 247 consultation held with the Planning Authority on the 13 November 2018 was preceded by a project meeting held with SDCC, as a stakeholder, on 16 October 2018.

That meeting was attended by the following officials of the Planning Authority: -

- Danial McLoughlin (Chief Executive).
- Laura Leonard (Director of Land Use, Planning and Transportation).
- Colm Ward (Director of Housing).
- Eddie Conroy (County Architect).
- Lorcan Grogan (Law Agent).
- Brian Kearney (Senior Planner).

The following is a broad outline of the issues discussed at the Pre-Planning meeting: -

- Interface with PPP site.
- Car parking provision and street design.
- Bicycle parking provision.
- Adequate waste facilities (bin stores etc.).
- Uniform architecture and aesthetic – buildability and quality.

6.3 SDCC Section 247 Consultation

The first formal Section 247 Pre-Planning Meeting was held with the Planning Authority on the 13 November 2018 as per the provisions of Section 5(2) of the Act.

The formal Section 247 Pre-Planning meeting was attended by the following officials of SDCC: -

- Laura Leonard, Acting Director of Services, Planning.

- Colm Ward, Director of Services, Housing.
- Brian Keaney, Senior Planner.
- Jason Frehill, A/Senior Planner.
- Siobhan Duff, Senior Executive Planner.
- Fergus Browne, Assistant Planner.
- Eddie Conroy, County Architect.
- Anne Lynch, Senior Architect.
- Adrian Barrett, Senior Executive Engineer.
- Laurence Colleran, Senior Executive Parks Superintendent.
- Suzanne Furlong, Senior Parks Superintendent.
- Rosaleen Dwyer, Heritage Officer.

At this meeting the Planning Authority and the Applicant's Design Team addressed the key planning and design issues to be refined in the preparation of the SHD application. A number of further localised design amendments to the proposed development, since the award of Tender in June 2018, were also outlined for agreement with the Planning Authority.

The Planning Authority's minutes from the Section 247 meeting states that *'[they] were supportive of the proposal and believe that the proposed development generally accords with National Policy and the requirements of the County Development Plan'*. The Planning Authority set out General Guidance to the applicant in the Section 247 meeting minutes, which are summarised below: -

Residential Design & Amenity

- An Urban Design Statement is required to accompany the application.
- Address connectivity and interface with the PPP from an urban design perspective.
- Design out potential for undue overshadowing and dominance through consideration of adequate separation distances between dwellings and design measures including building height transition, to protect residential and visual amenity.
- Demand analysis for school places likely to be generated by the proposed development should be undertaken. This to take account of existing and planned schools capacity in the area.
- Noting that the permanent creche facilities identified on the Masterplan lie within later phases of the proposed development, where necessary the option of providing a temporary childcare facility in lieu of ground floor apartments in the first phase of development could be considered as part of the phasing strategy.

Water & Drainage

- Consider the clear relationship between residential development phasing and surface water attenuation.
- The development should include proposals for green infrastructure and SUDS.

Roads & Landscaping

- Agreement on hard landscape / road design materials to be taken in charge.
- Parking courts behind residential blocks are generally discouraged, or otherwise require careful design.
- Natural play features should be incorporated into the design. Would welcome an emphasis away from formal equipment focused play. Design rationale required.
- Address any potential inward noise impacts within the EIAR.

Biodiversity / Natural Environment

- A Tree survey and impact assessment required.
- Tree cover is very important in the long term. Tree pits required.
- Lighting design needs to take account of best practice guidelines from the UK in terms of bat protection.
- Linkage to Corkagh Park is critical in order to maintain protected species.
- Significant populations of protected species in the canal. Maintaining water quality would be paramount.

The applicant had regard to the general guidance provided at the Section 247 Pre-Planning meeting and reiterated in the Section 247 meeting minutes, in making its pre-application consultation request submission to An Bord Pleanála in December 2018.

A copy of the Minutes of that Meeting provided by SDCC accompany this submission for the convenience of the Board.

Following the Pre-Planning Consultation meeting with An Bord Pleanála in February 2019, the Applicant's Design Team continued to consult with the Planning Authority (including Architecture, Planning, Transportation, Water Services and Parks Departments) in order to ensure the delivery a comprehensively considered and well-designed strategic housing development proposal to An Bord Pleanála. It was considered imperative that the development was one which has been designed to meet the requirements of South Dublin County Council as expressed in the Kilcarbery – Grange Masterplan (2017), the South Dublin County Development Plan 2016-2022 objectives, and the national and regional planning objectives expressed in the National Planning Framework, the Regional Spatial and Economic Strategy and Dublin Metropolitan Area Strategic Plan and statutory guidance contained in a range of Ministerial Guidelines on sustainable development in urban areas.

6.4 An Bord Pleanála Pre-Planning Consultation

A pre-application consultation meeting was held on the 11 February 2019 under Section 6 the Act. This was attended by representatives from An Bord Pleanála, SDCC, the Applicant and its Design Team.

Broadly, the following issues were discussed: -

- **Density Calculations Clarifications** – Basis of net residential density calculations based on exclusions from the site area to be clarified. Notably, public open space may only be excluded where it serves a wider community
- **Project Background** – Clarification of South Dublin County Council as a key stakeholder in a Joint Venture project that has included a competitive tender process and extensive consultation with SDCC in relation to the approved masterplan requirements and the proposed development of these lands. Clarification of the role of the project in the Council's housing strategy for South Dublin County and its delivery of public and private housing based on local needs, having regard to national and regional planning strategy in addition to the requirements of the approved masterplan.
- **Creation of Robust Urban Edge to the Orbital Outer Ring Road and Corkagh Park** – Further justification / design amendments, relating to building height and unit mix along the western and southern edges of the application site .
- **Distinctiveness of Character Areas** – Further clarification of how distinctive character areas are being created within the overall scheme, through variation in house type design, materials, landscaping, etc.
- **Proposed Unit Mix** – Provide rationale for the proposed unit mix and consider the inclusion of 2-bed houses.

- **Public Open Space and connectivity to wider area (including Corkagh Park)** – Provide clearer illustration of proposed pedestrian, bicycle and vehicular connections to Corkagh Park, the PPP site, and from the community facilities and standalone creche to the education / school site, etc.
- **Phasing Drawings** – Provide clearly labelled Phasing Drawings for buildings and associated infrastructure works (including attenuation phasing).
- **Childcare Facilities** – Temporary creche to be provided in Phase 1 with option to revert to residential once ultimate solution provided. A permanent purpose built creche to be developed in Phase 3 of the proposed development.

We refer the Board to the plans and particulars submitted with the application. A Summary Booklet, Architects Design Statement and Character Areas Booklet, provide easy reference to the information sought above, and to the design amendments made to address the recommendations set out in the Board's Opinion following Pre-Planning consultation. We further refer to the Enclosures list at the end of this Report (Section 15) which details all relevant material submitted with this SHD Planning Application.

A record of the meeting has been provided to the Applicant by An Bord Pleanála.

6.5 SDCC Consultation Subsequent to An Bord Pleanála Pre-Application Consultation

Following on from the Pre-Planning Consultation with An Bord Pleanála, the Applicant sought additional Pre-Planning meetings with SDCC to outline the proposed response to the issues raised by An Bord Pleanála and to agree any final alterations that would address any remaining concerns expressed by SDCC.

A meeting was held with the Planning Authority on 11 March 2019. Broadly, the following issues were discussed: -

- SDCC, as a stakeholder, to provide a summary document on the background to the Joint Venture.
- **Density Calculations & Design Alterations** – To agree on exclusion areas for net density calculation and justification for same. Excluded areas generally being part of significant infrastructure corridors, non-residential development and significant public amenity open space and green links serving the wider community. Increase in unit numbers to ensure minimum net residential density not less than 40 units per hectare.
- **Urban Edge Treatment** – Building height and design alterations fronting Orbital Road, Corkagh Park and Grange Avenue to accommodate increase in unit numbers and illustrate strengthening of urban edge. Additional CGI 3D vistas to be prepared to further demonstrate urban design effect.
- **Phasing including SuDSs** – To provide clear rationale for the phasing of infrastructure that is linked with housing development and is functional.

A subsequent meeting was held with the Planning Authority on 1 May 2019. Broadly, the following issues were discussed: -

- SDCC agreed in principle to the increase in dwelling unit numbers and rationale supporting net density calculation.
- Further emphasis required in respect of how the proposed development sits within the context of the general Clondalkin area.
- Ensure that consideration is given to service connection with the PPP site located to the south east of the proposed development.
- Taking in Charge area to be clearly set out.
- Part V provision to be re-addressed based on increased number of units proposed.

6.6 Other Consultation with SDCC Departments

Further to the aforementioned formal Pre-Planning meetings, there were a number of inter-departmental planning workshop meetings held with the relevant Council Departments, prior to the submission of this SHD Planning Application.

This included various meetings with the County Architect, Planning, Roads, Water Services and Parks Departments to discuss a broad range of design related issues, including quantum, design and phasing of housing units, building height, landscape design, SuDs, site access, car parking strategy, road design, public lighting, and site boundary interfaces, throughout the planning design process.

A technical workshop took place with representative from South Dublin County Council on 13 November 2018 with Colm Ward (Director of Housing), Eddie Conroy (County Architect), Marguerite Staunton (Housing Provision and Financial Management), Anne Lynch (Senior Architect), Brian Kearney (Senior Planner) to discuss the proposed link road, interface with adjoining lands, construction compounds, car parking and ground investigations.

A services design co-ordination meeting also took place on 8 May 2019, between SDCC Architects, Parks and Water Services Departments and DBFL Consulting Engineers / Ronan MacDiarmada Landscape Architects to discuss the coordination of services including SuDs features and integration with the landscaping proposals.

6.7 SDCC Housing Department – Part V Consultation

Without prejudice, the Applicant has entered into an agreement with the Planning Authority to transfer 30% of the total proposed residential units on site, for social housing purposes, to meet its Part V obligations.

SDCC has in turn issued a Part V validation letter, dated 18 June 2019, which confirms that: -

‘In accordance with Section 96 of the Planning and Development Act 2000 (as amended), and subject to execution and exchange of the Development Agreement, I am writing to confirm that the proposed 30% social housing as part of the Kilcarbery housing scheme fully satisfies the Part V requirements.’

Cost estimates relating to this proposal, to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015, have been provided to the Board with this submission.

We acknowledge that, under the provisions of the Amendment to the Act and its accompanying Regulations, the ultimate agreement with regard to Part V is dependent a) upon receipt of a final grant of permission and b) upon a site value at the time the Permission is granted; neither of which can be confirmed at this time.

6.8 Prescribed Bodies

In addition to discussions with the Planning Authority, consultation with other authorities took place as necessary.

6.8.1 Irish Water

DBFL Consulting Engineers held a number of meetings with Irish Water. Meetings with Irish Water were also supplemented by email and telephone communications.

In addition, DBFL Consulting Engineers submitted a Pre-Connection Enquiry to Irish Water. A Confirmation of Feasibility Statement from Irish Water, dated 22 November 2018, was submitted to An Bord Pleanála at pre-application consultation stage.

We refer the Board further to the subsequent Irish Water Confirmation of Feasibility, dated 4 July 2019, and the Statement of Design Acceptant, dated 22 July 2019, in respect of the proposed development of 1,034no. residential dwellings and ancillary facilities.

6.8.2 Other Prescribed Bodies

We note that the Prescribed Bodies identified in the Board's Opinion, dated 21 February 2019, and in Section 1.2 of this Report, will otherwise be notified of the SHD Planning Application and invited to make submissions.

7 MASTERPLAN

7.1 Proposed Masterplan – Planning Design

The application site (c. 28.6 Ha) is part of an overall landholding in the ownership of SDCC (c. 35 Ha), which is the subject of the Kilcarbery – Grange Masterplan (2017) prepared by SDCC. The Council's vision for the Masterplan lands is stated as: -

'The vision for the masterplan is to realise a distinct high quality sustainable place with a local sense of character and community, which is closely connected to its own and its surrounding landscape and provides for a range of community needs, within an attractive, permeable and connected urban structure.'

The Applicant has engaged in ongoing consultation with SDCC in testing the design and layout of the proposed development against the Council's core settlement and housing strategy and the plan-led requirements of the Kilcarbery – Grange Masterplan (2017), from competitive tender stage and through the Section 247 Pre-Planning consultation stage. It has also had regard to the issues raised in the Board's Opinion, dated 21 February 2019, following the Pre-Application consultation meeting.

The Planning Application drawings, schedules of accommodation and Architect's Design Statement, prepared by Burke Kennedy Doyle Architects, illustrating the scheme details, are enclosed with this SHD Planning Application. A Character Areas Booklet highlighting the distinct characteristics of the three housing areas (Oak, Lime, Sycamore), Grange Square and other significant urban identifiers, is provided to further assist the Board in assessing the scheme against the design principle of 'distinctiveness'. Also, an Summary Booklet, prepared by Burke Kennedy Doyle Architects of the key planning design issues particular to this scheme has been prepared for ease of reference by the Board.

The proposed development comprises 1,034no. units in a mix of apartment, duplex and house typologies to deliver a wide tenure mix, as agreed to meet the housing strategy requirements of SDCC within its administrative boundaries. A net residential density of 42no. units per Ha has been achieved in this context. The net density is based on a net site area of 24.4 Ha, excluding significant infrastructure corridors, non-residential buildings and public amenity and green infrastructure networks serving the wider community, as agreed with the Planning Authority and as per the recommendations of 'Sustainable Residential Development in Urban Areas' Guidelines 2009 (For further illustration of the net site area calculation, see Section 11 of Summary Booklet, prepared by Burke Kennedy Doyle Architects).

It is worth noting that other green spaces and links within the proposed scheme will provide links to planned community facilities to the north of the application site, to serve the wider community in the future. Taking a conservative approach, we have not excluded these areas in arriving at a net site area and residential density calculation. However, should the Board be minded to consider their exclusion as space that serves a significant new neighbourhood that will become even more integrated with the wider settlement in the future, this would result in a net density of approximately 45no. units per Ha (see Section 11 of Summary Booklet, prepared by Burke Kennedy Doyle Architects).

7.2 Phasing Proposals

We refer An Bord Pleanála to the Stakeholder Statement, prepared by SDCC which sets out that Local Infrastructure Housing Activation Fund (LIHAF) is in place to support the timely and efficient delivery of housing (see Section 7.3 of this Report for further detail on LIHAF).

The proposed layout / masterplan as illustrated and described in this application requires the phased implementation of identified infrastructural works (see below), to facilitate the future full implementation of the Council's Kilcarbery – Grange Masterplan (2017).

We refer the Board to the phasing Dwg. No. 6168-003 'Phasing & Tenure Mix Plan' prepared by Burke Kennedy Doyle Architects as part of this submission.

7.2.1 Infrastructure Development

As part of the enabling phase of the development and in advance of any housing construction the core waste water infrastructure will be installed. This will include the following main elements: -

- The sewer connection with the exiting Irish Water Sewer and Gravity section up to lowest outfall point.
- The Rising Main and Discharge Manholes including connection to the gravity section.
- The Pumping Station and inlet pipes.

The developing network will then be taken from these key points ensuring that all elements are maintained to accommodate the short to medium term reduced flow levels.

As part of the enabling phase of the development and in advance of any housing construction the core spine road and access points are also to be constructed. It is intended that the access will be taken initially from the R136 then onto the spine road and into individual development plots.

Details of the phasing of foul and surface water drainage is set out in Section 9.2 of this Report in response to An Bord Pleanála Opinion issued 25 February 2019.

7.2.2 Housing Delivery

The phasing proposals for the proposed development are set out on Dwg. No. 6168-003 'Phasing & Tenure Mix Plan', prepared by Burke Kennedy Doyle Architects.

The residential phasing proposal has been the subject of consultation and agreement with SDCC Housing Department. Four phases of housing development are envisaged, with each phase divided further to provide for appropriate sequential development. Each sub phase / development block will provide a mix of social and private units, as agreed in principle with SDCC.

The following table provides a breakdown of the quantum and type of housing units in each phase and development block of the proposed development: -

Phase	Social Units (Apartments & Houses) to be delivered	Total Apartments (social & private)	Total Houses (social & private)	Total Units per Phase
1A	66	67	94	161
1B	38	73	55	128
2A	34	21	81	102
2B	33	73	71	144
3A	57	81	63	144
3B	47	105	42	147
4A	10	4	97	101
4B	25	32	75	107
Total	310	456	578	1,034

7.2.3 Amenity Provision

Public Open Space

A commensurate portion of public realm (local streets and associated facilities and public open space) will be delivered with each housing development phase.

- **Phase 1 & 2** will see the provision of Oak Green space and the linear green buffers which extend towards the R136 including associated links to Corkagh Park.
- **Phase 3** will see the provision of Lime Green space and the linear green buffers which connects to the 'Spine Road' including associated links to Corkagh Park.
- **Phase 4** will see the provision of Grange Square and the green linear buffer which connects to Oak Green space.

For clarity, the Sycamore Green space does not form part of this SHD Planning Application and is being delivered as part of the PPP housing scheme located in the southeast of the Kilcarbery – Grange Masterplan (2017) lands.

7.2.4 Ancillary Facilities

Creche

A temporary childcare facility (c.557 sq. m gfa / 90no. childcare spaces) will be developed in **Phase 1**. This will be accommodated temporarily in lieu of the 7no. proposed apartments at ground floor of Apartment Block 7. Pending the delivery of the purpose built permanent creche building in Phase 3, the temporary creche can accommodate the initial phases of development in terms of childcare provision.

A purpose built childcare facility (c.909 sq. m gfa / 160no. childcare spaces) will ultimately be provided, as a more viable long term prospect for a commercial operator seeking to deliver a range of childcare services. The purpose built creche will be developed in **Phase 3** of the proposed development.

The Applicant would accept a condition of permission that the conversion of the temporary creche to 7no. residential apartments may not take place until such time as the permanent creche is constructed as part of Phase 3.

Community Building

The community building will be developed in **Phase 3**. It is anticipated that there will be positive synergy in the proximity of the community building and creche building for events / community gatherings at Grange Square, making this an active community hub.

Retail / Commercial

The retail unit will be developed in **Phase 4**. This is to ensure that there is sufficient local demand for a neighbourhood shop to be considered viable by a potential operator.

7.3 Local Infrastructure Housing Activation Fund (LIHAF)

LIHAF has approved funding of €4.39 million for public infrastructure works in relation to the overall Kilcarbery Development Site which includes the application site, the PPP site, the Link Access Road (from Nangor Road to R136), the Educational Campus and the Village Centre.

The element of the LIHAF approved works that relate to the application site, is identified as the 'Infrastructure Enabling Works' and consists of: -

- A spine access road ('Grange Avenue') including a junction upgrade.
- A pumping station and rising foul main to existing foul sewer network.
- A foul sewer outfall.

The Applicant submitted a tender for the delivery of the Infrastructure Enabling Works separately and on a design-build basis including design development, all environmental and statutory consents (including liaison and approval by Irish Water), construction / completion and all testing and commissioning including completion/commissioning certification.

The Infrastructure Enabling Works must be completed in strict compliance with the requirements of the Department of Housing, Planning and Local Government and the Development Agreement. The terms of the Department's funding require full completion of the Infrastructure Enabling Works elements before end December 2021.

The Applicant must incorporate sufficient time in their overall development programme and phasing sequence to allow design and construction of the Infrastructure Enabling Works without impacting on the early and ongoing delivery of housing on the Development Site.

8 PARTICULARS OF THE PROPOSED STRATEGIC HOUSING DEVELOPMENT

The proposed development subject of this SHD Planning Application will generally comprise: -

- 1,034no. units (578no. houses, 154no. duplex / apartments and 302no. apartments) ranging from 2 to 6 storeys, comprising the following: -
 - 578 no. own door houses, ranging from 2 – 3 storeys, including: -
 - 449no. 3 bed 2 storey houses (House Type A, A1, A2 B, C, D, G & H).
 - 31no. 4 bed 2 storey houses (House Type E & J).
 - 98no. 4 bed 3 storey houses (House Type F & F1).
 - 154no. own door duplex / apartment, in 3 to 4 storey buildings, including: -
 - 41no. 1 bed duplex / apartments (Type M1 & M2).
 - 49no. 2 bed duplex / apartments (Type K, N1 & N2).
 - 64no. 3 bed duplex / apartments (Type L, L1, L2 & L3).
 - 302no. apartment units accommodated in 9no. 4 to 6 storey buildings (with own door access ground floor apartments), including: -
 - Block 1 accommodating 29no. apartments (6no. 1-beds, 18no. 2-beds and 5no. 3 beds).
 - Block 2 accommodating 24no. apartments (4no. 1-beds, 15no. 2-beds and 5no. 3 beds).
 - Block 3 accommodating 30no. apartments (13no. 1-beds and 17no. 2-beds).
 - Block 4 accommodating 30no. apartments (13no. 1-beds and 17no. 2-beds).
 - Block 5 accommodating 45no. apartments (12no. 1-beds, 22no. 2-beds and 11no. 3-beds).
 - Block 6 accommodating 37no. apartments (16 no. 1-beds and 21 no. 2-beds).
 - Block 7 accommodating 37no. apartments (16no. 1-beds and 21no. 2-beds).
 - Block 8 accommodating 33no. apartments (5no. 1-beds, 23no. 2-beds and 5no. 3-beds).
 - Block 9 accommodating 37no. apartments (16no. 1-beds and 21no. 2-beds).
- Ancillary uses including the provision of 1no. ground floor retail unit (c. 178 sq. m gfa) and community facility (c. 785 sq. m gfa).
- Provision of 2no. childcare facilities – 1no. temporary and 1no. permanent. This includes the adaptation of 7no. proposed ground floor apartment units in Block 7, Phase 1, for use as temporary childcare facility (c. 557 sq. m gfa) pending construction of a permanent childcare facility in Phase 3 (c. 909 sq. m gfa).
- New vehicular access from Outer Ring Road / Grange Castle Road (R136) to the west using 'left in and left out' layout and 2no. new vehicular access points onto Old Nangor Road (L5254) to the north and associated re-alignment of existing roadways.
- New street network, including spine road (c.6 m in width) extending from Outer Ring Road / Grange Castle Road (R136) to the west onto Old Nangor Road (L5254) to the north.
- New pedestrian and cycle path network.
- Provision of Public Open Space (c. 4.6 Ha) including: -
 - Oak Green Space (c. 7,453 sq. m).
 - Lime Green Space (c. 6,646 sq. m).

- Grange Square (c. 2,606 sq. m).
- Provision of surface water attenuation measures (SuDs).
- Provision of wastewater pumping station including 18hr storage tank and associated infrastructure.
- 1,510no. car parking spaces.
- 1,105no. covered bicycle parking spaces.
- Communal bin storage for all terraced houses, duplex / apartment and apartment blocks.
- All associated and ancillary site development, infrastructural, landscaping and boundary treatment works including bin storage.

8.1 Key Site Statistics

In summary, the key statistics for the proposed developments are outlined below: -

Key Site Statistics	
Total Number of Units	1,034
Gross Floor Area (Residential only)	110,752 sq m
Gross Floor Area (Residential and ancillary uses)	114,206 sq m
Gross Site Area	28.61 Ha
Net Site Area	24.47 Ha
Gross Density	36no. units per Ha
Nett Density *	42no. unit per Ha
Unit Mix	1 Bed: 142 (14% of total units) 2 Bed: 224 (21.5% of total units) 3 Bed: 539 (52% of total units) 4 Bed: 129 (12.5% of total units)
Part V	30% (310 no. Units)
Plot Ratio	0.4:1
Site Coverage (Gross Site Area)	18.5%
Site Coverage (Net Site Area)	21.6%

* The rationale for the calculation of net density is set out in Section 9.2 of this Report in response to An Bord Pleanála's Pre-Planning Consultation Opinion. See also Burke Kennedy Doyle Architects Summary Booklet.

8.2 Proposed Residential Development

1,034no. residential units are proposed in this case, including a mix of 24no. different unit types. These range from apartments, duplexes and houses.

The housing design typology ranges from deep plan to wide frontage semi-detached and terraced houses, of two to three storeys, and accommodating 3 & 4 bed units.

The apartment design typology is reflected in 9no. apartment buildings, ranging from 5 to 6 storeys, and accommodating a range of 1, 2 and 3 bed apartment units with own door access ground floor apartments.

The duplex / apartment design typology is reflected in 10no. blocks, ranging from 3 to 4 storeys, and accommodating a range of 1, 2 and 3 bed apartment and duplex units.

The following tables identifies the range of housing and apartment accommodation proposed within the scheme. For clarity, the proposed duplex units are considered under the apartment design standards and are included in that table as a result.

Houses			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2007
House Type A: 3-bed 5 person 2 storey	156	114	92
House Type A1: 3-bed 5 person 2 storey	2	116	92
House Type A2: 3-bed 5 person 2 storey + Dormer Attic	44	114	92
House Type B: 3-bed 5 person 2 storey	47	111	92
House Type C: 3-bed 4 person 2 storey	114	94	83
House Type D: 3-bed 5 person 2 storey	32	107	92
House Type E: 4-bed 7 person 2 storey	20	130	110
House Type F: 4-bed 6 person 3 storey	84	150	120
House Type F1: 4-bed 7 person 3 storey	17	156	120
House Type G: 3-bed 5 person 2 storey wide	35	108	92
House Type H: 3-bed 5 person 2 storey wide corner	19	122	92
House Type J: 4-bed 7 person 2 storey wide corner	11	134	110
Total	578	67,363	
Apartments / Duplexes			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	101	50 – 55	45
2 Bed Apartment	175	82 – 93	73
3 Bed Apartment	26	104 – 111	90
House Type K – 2 bed, 4 person apartment	8	88	73
House Type L – 3 bed, 5 person duplex	8	107	90
House Type L1 – 3 bed, 5 person duplex	8	114	90
House Type L2 – 3 bed, 5 person duplex	24	107	90
House Type L3 – 3 bed, 5 person duplex	24	141	90
House Type M1 – 1 bed, 2 person apartment	23	55	45
House Type M2 – 1 bed, 2 person apartment	18	54.5	45
House Type N1 – 2 bed, 3 person duplex	23	96	73
House Type N2 – 2 bed, 3 person apartment	18	95	76
Total	456	43,389	
Overall Total	1,034	110,752	

All of the proposed units comfortably exceed the minimum floor area requirements, as confirmed in the tables below.

These details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the House Type drawings prepared by Burke Kennedy Doyle Architects enclosed with this SHD Planning Application.

8.3 Proposed Ancillary Development

The following table identifies the extent of ancillary accommodation proposed within the scheme.

Class of Development	Gross Floor Space in m ²
Community Facility	c. 785 sq. m gfa
Retail Unit	c. 178 sq. m gfa
Purpose Built Childcare Facility (Grange Square) Note: Temporary Childcare Facility (Ground Floor Apt. Block 7) - c. 557 sq. m gfa in lieu of 7no. apartments.	c. 909 sq. m gfa

8.4 Proposals to Integrate with Surrounding Land Uses

8.4.1 Site Context

The application site is generally bounded by the Outer Ring Road / Grange Castle Road (R136) to the west, the Old Nangor Road (L5254) and Scoil Mochua and Spina Bilfida Hydrocephalus Ireland immediately to the north, the New Nangor Road (R134) beyond to the north, existing residential estate development to the north east and east of the Public Private Partnership (PPP) site, and Corkagh Demesne (public park) to the south.

8.4.2 Green Links with Corkagh Public Park and the Wider Area

The layout and design of the proposed development seeks to retain as much of the existing network of hedgerows and mature trees as practically possible throughout the site. This will also assist in providing natural landscape boundary along the southern edge of the application site with Corkagh Park. The natural edge to the southern boundary will be augmented by a proposed green landscape buffer that sets the built edge back from the existing natural boundary.

A key facet of the overall development proposal is its connectivity strategy. This seeks to ensure there are appropriate green infrastructure links, facilitating pedestrian and cycle permeability, ecological and drainage connections, between the proposed new residential neighbourhood and the significant Corkagh Park public amenity. Linkages are provided at the natural breaks along the boundary with Corkagh Park to avoid any unnecessary tree/hedge removal.

The proposed links further facilitate wider connections between existing pedestrian and cycle facilities along the Orbital Route to the west and existing housing areas to the east, via the proposed development and Corkagh Park. They also facilitate green connections to planned community facilities (education / neighbourhood centre) to the north of the proposed scheme.

8.4.3 Urban Edges

To Established Housing (North and East)

The scheme will generally seek to respect and integrate with the established character of the existing neighbouring residential areas to the north and east and to the PPP housing development (under construction) to the east.

Similar house typologies (i.e. 2 / 3 storey housing) are deployed towards the more sensitive eastern and northern ends of the site, so as not to present an overbearing or discordant relationship with existing neighbouring housing.

Elsewhere apartment buildings of 4 to 6 storeys and duplex blocks of 3 to 4 storeys seek to provide more robust urban edges along significant road edges and gateways to the site and at Grange Square, while at the same time managing height transitions to the lower height buildings within the scheme that deliver the required tenure mix and transition to established low rise housing to the east and north of the site.

At Grange Square

The Grange Square area, at the northern end of the main Spine Road, will form the focal point of this new residential neighbourhood. It will set its own design context, while ensuring that this also facilitates an easy transition in scale and character to the established residential areas to the north and northeast.

Grange Square is flanked by a cluster of ancillary community uses and services. This includes the notable community building and creche building, and 5-6 storey apartment buildings (one with a retail unit at ground floor), which give it visual presence as a focal point within the scheme.

Grange Square also facilitates integration with the planned neighbourhood centre and education campus to be developed by others to the north.

To Orbital Road (West)

Elsewhere, apartment buildings of 4 to 6 storeys define focal points, gateways and the more robust western edge of the scheme.

The western edge to the scheme fronting the Orbital Road (R136) also comprises 3 to 4 storey duplex blocks, forming a suitably robust urban identity along this edge and with the higher apartment buildings announcing outer corners and gateways to the scheme.

A new vehicular access point to the proposed main spine road (Grange Avenue) through the scheme is proposed from the R136 Outer Ring Road. The site entrance at this location is flanked by two 6-storey apartment blocks, acting as local landmarks signalling the gateway to the scheme and providing urban character and sense of identity.

Appropriate height transitions are necessarily made between the proposed 5-6 storey apartment buildings, 3-4 storey duplex blocks and the lower rise housing typologies required to deliver the necessary tenure mix through the scheme.

To Corkagh Park (South)

The southern edge to the scheme fronting Corkagh Park is softer with a generous landscape buffer providing opportunities for integration of green links with the park and surrounding areas.

The built edge along the southern boundary steps down to 4 and 3-storey buildings to reflect this greener edge and provide a suitable transition to established low rise houses to the east. However, it also accommodates 5 and 6-storey apartment buildings that define the outer western corner and the green links between the proposed development and Corkagh Park.

We refer the Bord to the Contextual Elevation, prepared by Burke Kennedy Doyle Architects which shows the proposed development in the context of the site boundaries and transition to adjoining areas.

8.5 Landscape Proposals

The proposed Landscape Masterplan has been designed by Ronan MacDiarmada & Associates Landscape Architects having regard to the provisions of the SDCC Kildarby – Grange Masterplan (2017).

The integration of the proposed development with the landscape is premised on the concept of 'Biophilic Design' in which our built environment endeavours to protect and integrate with existing natural features (trees, hedges etc.).

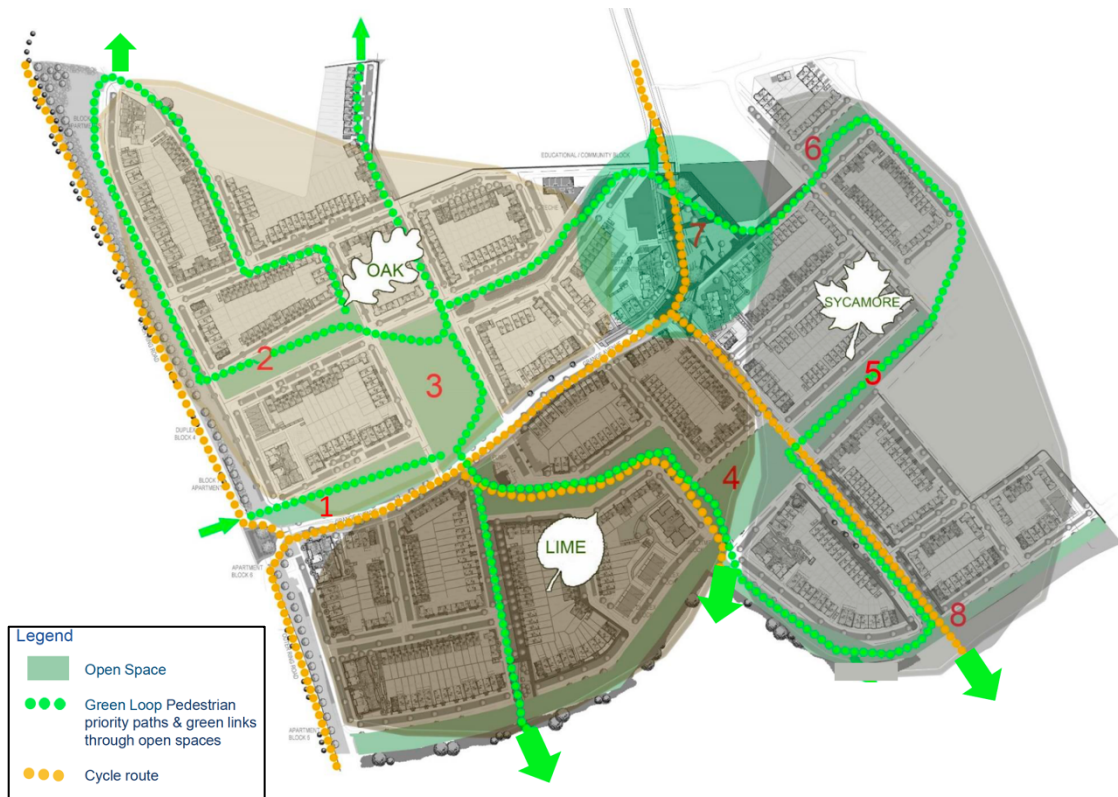


Figure 3: Extract from the Landscape Masterplan, prepared by Ronan MacDiarmada Landscape Architects showing connections within the scheme and to the surrounding areas.

The landscape proposal seeks to connect not only the proposed new residential neighbourhood internally through a series of internal pedestrian and cycle path, but also to connect pedestrian and bicycle facilities on the Orbital Road through the scheme and Corkagh Park to the existing settlement to the east. The facilitation of such green links ensures that the proposed development also addresses human health, by facilitating healthier movement options and access to nature on a day-to-day basis.

The proposed primary public open spaces include: -

- **Oak Green Space**

This space will include the retention of existing tree and hedgerow where possible to supplement the proposed landscape layout.

The space will include a 'amphitheatre' arrangement to for a space to encourage congregation of residents / visitors and allow for the potential to sit out thus creating a focal point. This space will also include natural play spaces.

- **Lime Green Space**

This space will include the retention of existing tree and hedgerow where possible to supplement the proposed landscape layout.

The space will include the potential for 'kick-about' for local children. This space will link to Oak Green space with a linear buffer link which form part of the wider green network to facilitate greater connectivity with Corkagh Park to the south.

- **Grange Square**

This space will be landscaped using a combination of hard and soft features. The space will include a number of feature trees to create a distinctive space. Seating and other street furniture will be utilised to encourage people to use the space. The plaza will be considered the key meeting / focal point for the fully completed development. The plaza will interact with the community building, retail unit and future neighbourhood centre (located outside the application site to the north of the plaza) to ensure that the space generate activity and footfall.

For clarity, the Sycamore Green space does not form part of this SHD Planning Application and is being delivered as part of the PPP housing scheme located in the southeast of the Kilcarbery – Grange Masterplan (2017) lands. This green space will form part of the wider green network of the site and will generally serve as the open space on the western edge of the new residential neighbourhood.

In terms of connectivity, greater access is facilitated through the proposed development via the network of green links and pedestrian and cycle paths. The layout of the proposed development will create new links to Corkagh Park along its northern boundary via 3no. new formal connections which will provide additional pedestrian connectivity to the wider surrounding areas.

We refer the Board to the Landscape Drawings and Landscape Design Statement by Ronan MacDiarmada & Associates Landscape Architects for further detail.

Key to the successful integration of the development into the existing landscape, to promote the concept of ‘Biophilic Design’, is the retention of existing trees and hedgerow where possible. We refer the Board to the Tree Survey Drawings and Arboricultural Assessment Report, prepared by Arborists Associates Ltd. which provides a rationale for the retention and removal of trees to facilitate the layout of the proposed development.

The Character Areas and their associated treatments are set out in detail under Section 9.3 of this Report.

8.6 Water Services

In the first instance, we refer the Board to the enclosed Infrastructure Design Report, prepared by DBFL Consulting Engineers which provides a more detailed discussion of water and drainage infrastructure requirements and design proposals.

Irish Water Confirmation of Feasibility & Statement of Design Acceptance

On foot of a pre-connection enquiry, we enclose the Irish Water Confirmation of Feasibility dated 4 July 2019 and Statement of Design Acceptance dated 22 July 2019. This confirms that the proposed connection of the proposed development to the Irish Water networks (water and waste water) can be facilitated in this case.

Wastewater

The proposed foul pumping station is to be located on the south side of the proposed spine road alongside a greenspace (in accordance with the requirements of Irish Water Code of Practice for Wastewater Infrastructure) and constructed in accordance with Irish Water Standard Details.

The pumping station will service the northern portion of the site and will accommodate 18 hours of emergency storage. The rising main discharge manhole will then combine downstream with the remaining gravity network for the southern portion of the site before discharging to the existing public sewer in Corkagh Park.

The proposed foul drainage network comprises a series of 225mm and 300mm diameter pipes, discharging to the pumping station described above. Each residential unit is serviced by individual 100mm diameter connections.

As part of the enabling phase of the development and in advance of any housing construction the core waste water infrastructure will be installed. This will include the following main elements: -

- A sewer connection with the exiting Irish Water Sewer to the south of the subject site.
- Installation of the main gravity collector section up to the proposed outfall point from the rising main.
- The installation of the rising main and discharge manhole including connection to the gravity section.
- The installation of the pumping station and inlet pipes extending to development phase 1.
- Wastewater drainage networks will also be constructed as part of the access road construction for the phase 1 housing building.

We refer the Board to the enclosed Infrastructure Design Report, prepared by DBFL Consulting Engineers which provides a more detailed breakdown of the phasing of the foul drainage.

Surface Water

Although the site will be managed as a whole, there are two proposed discharge points from the site. Lands generally to the north of the site, together with a portion of the run-off from the main spine road, will be directed to an existing 450mm diameter drain within the Old Nangor Road at the junction of Kilcarbery Avenue. The remainder of the site will be directed to an agreed outfall drain in Cherrywood Crescent that ultimately discharges to the Camac River downstream. Each catchment is subdivided into manageable sections with SuDS elements, controls, final treatment and attenuation measures provided on route and in advance of ultimate discharge to the proposed outfall locations. Further detail is provided subsequently.

We refer the Board to the Infrastructure Design Report and Drainage Drawings, prepared by DBFL Consulting Engineers which outlines the surface water strategy for the proposal.



Figure 4: Extract from the Infrastructure Design Report, prepared by DBFL Consulting Engineers showing the surface water catchment areas across the site.

A key facet of this is to ensure that the landscaping proposals and SuDs measures are co-ordinated and that a sustainable approach to surface water management is applied. The strategy of progressive infiltration and attenuation within rain gardens, conveyancing progressive infiltration trenches, swales, open depressions and bioretention areas was agreed with the SDCC to reduce the need for large sub surface tanks within the large open green space. We refer the Board to the Infrastructure Design Report and Surface Water Drainage Drawings, prepared by DBFL Consulting Engineers and Landscape Drawings, prepared by Ronan MacDiarmada Landscape Architects which shows the attenuation areas have been integrated with the general landscape layout.

Surface water runoff from the development will be attenuated to greenfield runoff rates (QBar) in accordance with best practice and recommendations made in the Greater Dublin Strategic Drainage Study (GSDSDS). The SuDs elements which were found applicable to the proposed scheme design and layout include the following: -

- At Source (housing and apartment blocks): -
 - Rainfall gathered in rain gardens for cleansing, controlled infiltration, attenuation and plant take up (individual houses and apartment blocks).
 - Rainfall gathered in harvesting tanks for irrigation of local planting and ground level cleaning such as around bin stores. (apartment blocks only).
 - Biofilter planting (within housing unit boundaries and landscaped areas in apartment blocks).
- At Source (road network/parking): -
 - Tree pits and planted areas generally, for cleansing of run off and management of drainage volumes from footpath and hard paved areas.
 - Conveyance 'progressive infiltration' trenches below car parking bays in combination with low maintenance controls at street/ block level for the management of run off from road pavements and parking areas. This will also provide for interception and attenuation volumes.
 - Swales/depressions in linear green space for drainage of boundary roads. This again will assist with interception and attenuation volumes in extreme event.
- Site Wide: -
 - Bioretention areas (in strategic locations to provide further cleansing, attenuation and interception volumes. These spaces will be allowed to receive rainwater run-off in all events and will be wet for the most part). The landscape strategy in these areas will assist with management of the run-off volumes by plant take up and proposed build ups.
 - Strategic flow controls at exit from site (in line with limited greenfield discharge rates).
 - Light liquid interceptors at exit from site as further measure in the treatment train.
 - Sub surface attenuation systems (Stormtec) will be used to supplement at source management of volumes at key locations for events up to 3%AEP for functional spaces and to compliment above ground bioretention areas for all events up to 1% AEP. The use of the at source attenuation and bioretention areas will ensure these are kept to a minimum.
 - Above ground detention areas for site wide management of surface water run-off in extreme events above 3%AEP. These systems will be designed to promote natural soakage to the underlying geology.

To manage surface water in the interim, and while the development is being progressed, temporary attenuation areas will be established in the permanent locations as part of the overall earthworks plan for the site. This will involve the creation of a temporary drainage network of ditches and land drains that will be directed to the attenuations areas where the additional volumes can be managed until the permanent system is fully operational developed.

There will be no uncontrolled discharge to any watercourse during construction. Any surface water collecting in excavations will be directed to onsite sedimentation ponds to settle solids, where it will be filtered of possible pollutants prior to discharge to the receiving surface water course at a controlled rate. The attenuation depressions, that are to form part of the permanent works, will be created as temporary holding lagoons for the management of construction runoff. The construction of the development is to be progressed in phases. Each phase will create a temporary holding pond at exit for discharge of waters that will be connected to the permanent systems as works progress (See Dwg. No. 170191-1010-01 'Phasing Plan Drainage (Surface Water & SuDs)' and Infrastructure Design Report, prepared by DBFL Consulting Engineers for further detail).

Flood Risk Assessment

A Site Specific Flood Risk Assessment, prepared by DBFL Consulting Engineers accompanies this SHD Planning Application. The Report generally concludes that that all proposed dwellings are located in Flood Zone C as defined by the Guidelines (i.e. where probability of flooding from rivers is low).

The Report confirms that: -

- The proposed residential development is appropriate for the site's flood zone category.
- The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.
- The proposed development is considered to have the required level of flood protection up to and including the 100 year return event.

8.7 Transportation

In the first instance, we refer the Board to the enclosed Traffic and Transport Assessment Report, prepared by DBFL Consulting Engineers. This Report addresses traffic and transportation issues, including road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity in the context of the proposed strategic housing development subject of this submission.

Access / Layout

New access points will be taken directly from the R136 (Outer Ring Road) and the L5254 (Old Nangor Road) to service the site from a vehicular perspective. Additional pedestrian access points to the proposed development will be provided along the site's perimeter in order to maximise permeability.

A proposed central spine road (Grange Avenue) will link to junctions with the Old Nangor Road and the R136. The spine road will be 6m wide with verges, cycle and pedestrian infrastructure on each side.

Subsidiary local roads and streets follow the principles of the Design Manual for Urban Roads and Streets (DMURS) using the following core dimensions: -

- Local Streets – 4.8m wide.
- Perpendicular and parallel parking.
- Footpaths – 2.4 metres wide (either side).

As part of the enabling phase of the development and in advance of any housing construction the core spine road and access points are to be constructed. It is intended that the access will be taken initially from the R136, then onto the spine road and into individual development plots.

Car Parking

In total, 1,510no. car parking spaces are proposed as part of the overall development (residential and other uses). We refer to the Traffic and Transport Assessment Report, prepared by DBFL Consulting Engineers which sets out the rationale for the proposed quantum of car parking.

In terms of car parking for both the houses and apartments proposed, which amounts to 1,478no. spaces, this is approximately 14% below the maximum standard for residential units, as set out in the South Dublin County Development Plan and therefore compliant. Furthermore, the New Apartment Guidelines 2018 support the reduction of car parking standards where appropriate, in the interests of sustainable development.

The remainder of car parking spaces are allocated to the ancillary uses proposed as part of the scheme, including the temporary and permanent creche, retail unit and community building, in accordance with the maximum car parking standards of the County Development Plan.

Bicycle Parking

We refer to the Traffic and Transport Assessment Report, prepared by DBFL Consulting Engineers which sets out the rationale for the proposed quantum of bicycle parking. In total, 1,105no. bicycle parking spaces are proposed as part of the overall development to serve apartments / duplexes. Bicycle parking for house can be readily accommodated in the associated private gardens.

8.8 Part V

We can confirm that the Applicant is prepared to enter into an agreement under a condition of planning permission to comply with the requirements of Part V in a manner that is acceptable to the Council.

Our clients proposal, without prejudice, is to transfer to the ownership of the Council units on site, of such number and description to be specified in the agreement, as provided for under Section 96(3)(b)(iv) of the Act.

We can confirm that as part of a Development Agreement with South Dublin County Council, the Applicant is proposing to deliver 30% of the overall residential units for social housing purposes, as part of the tenure mix for the proposed development. The social units will be transferred to the ownership of South Dublin County Council.

There has been extensive dialogue between the Applicant and South Dublin County Council Housing Department on the delivery of social housing within this scheme, as part of the tender process and in the period prior to making this Planning Application.

30% amounts to 310no. social units to be delivered to meet the Applicant's Part V obligations. These will include a mix of 3 and 4 bed houses, 1 and 2 bed duplexes and 2 bed apartments.

We refer the Board to the following enclosures with this submission: -

- Letter from SDCC confirming without prejudice agreement to the Part V proposal, dated 18 June 2019.
- Part V proposal Site Plan, prepared by Burke Kennedy Doyle Architects, showing the proposed location of the Part V units on site (Refer to Dwg. No. 6168-003 entitled 'Site Plan – Phasing and Tenure Mix').

The estimated costs associated with the Part V proposal, as set out in letter prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, on behalf of the Applicant, dated 3 July 2019.

9 RESPONSE TO AN BORD PLEANÁLA OPINION

The following sets out a response to the Board's Pre-Planning Application Consultation Opinion dated 25 February 2019.

In accordance with Section 6(7) of the Planning and Development (Housing) and Residential Tenancies Act 2016 the Board has set out in its Pre-Planning Consultation Opinion issues which require further consideration / justification. Section 9.2 (below) sets out how the applicant has responded to each of the issues raised by the Board, cross referencing the appropriate supporting application material where necessary.

Pursuant to Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 the Board has set out in its Opinion the specific information necessary to accompany the Planning Application. Section 9.3 (below) sets out how the Applicant has responded to the specific information requested.

9.1 Amendment to Proposed Scheme Following An Bord Pleanála Pre-Planning Consultation

We refer the Board in the first instance to the Summary Booklet, prepared by the project architects. This clearly identifies the key changes to the proposed scheme made following the Pre-Application Consultation (11 February 2019) and in response to the design issues raised in the Board's Opinion.

The Summary Booklet outlines the holistic response to the planning design issues raised by the Board. It has been prepared by Burke Kennedy Doyle Architects, with input from the core design team including DBFL Consulting Engineers, Ronan MacDiarmada Landscape Architects and Stephen Little & Associates Chartered Planners & Development Consultants, and in consultation with South Dublin County Council (as a Stakeholder in the delivery of housing at these lands).

In broad terms, the key change is an increase in the number of units proposed: -

ABP Pre-Planning Submission	Post ABP Opinion	Change
Proposal: 978 no. Units	Proposal: 1,034no. units	Additional 56no. units

The increase in the number of units proposed is achieved by the following: -

Phase	Units Lost	Units Gained	Difference
1A/1	2no. apartments	4no. duplex units	+2no. units
1A/3	10no. houses	12no. duplex units 2no. apartments	+4no. units
2A/1	-	6no. apartment (Additional floor on Apartment Block No.8)	+6no. units
3A/2	5no. houses	4no. duplex units 2no. apartments	+1no. units
3A/3	6no. houses	3no. duplex units 8no. apartments	+5no. units
4A/1	4no. duplexes 2no. apartments	2no. houses	-4no. units
1B/1	6no. houses	8no. duplex units	+2no. units
1B/3	10no. houses	16no. duplex units	+6no. units
2B/1	-	1no. apartment (Additional unit Block No.5)	+1no. units
2B/2	11no. houses	37no. apartment	+26no. units

		(Additional of Apartment Block No.9)	
2B/4	-	1no. house	+1no. units
3B/1	-	7no. apartment (Creche replaced with apartments at ground floor of Block No.4)	+7no. units
3B/3	1no. house	-	-1no. units
Total			+56no. units



Figure 5: Extract from Summary Booklet, prepared by Burke Kennedy Doyle showing the changes to the layout of the scheme post An Bord Pleanála Opinion.

9.2 Response to Issue Raised

9.2.1 Issue 1 – Design, Layout & Unit Mix

Further consideration / justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the **Urban Design Manual** which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and the Design Manual for Urban Roads and Streets. In addition to the density which is addressed below, the matters of **unit mix and design**, the configuration of the layout and the creation of **distinct character areas** within the proposed development, **connections** to existing and proposed residential development and public open spaces should all be given further consideration and / or justification. Further justification / consideration of the development strategy as it relates to the **interface** of the site with the R136 to the west and Corkagh Park to the south. Further consideration of these issues may require an amendment to the documents and / or design proposals submitted.

(SLA bold font emphasis)

Applicant's Response

We refer the Board in the first instance to the Summary Booklet, prepared by Burke Kennedy Doyle Architects, which sets out in detail the key changes made on foot of Pre-Application Consultation with An Bord Pleanála. This illustrates the general design response to the issues raised by the Board with regard to layout and design (as highlighted in bold above). We provide a summary description of the proposed changes and how this addresses the issues raised by the Board also below.

We refer the Board also to the full Design Statement and to the Character Areas Booklet, prepared by Burke Kennedy Doyle, with input from the multi-disciplinary design team, for further illustration of the key urban design and character considerations that informed the proposed development.

Unit Mix

1,034no. residential units are proposed in this case, including a mix of 24no. different unit types. These range from apartments, duplexes and houses, ranging in size and layout to accommodate a variety of household needs and a wide tenure mix of public and private dwellings.

The following breakdown of unit size is proposed: -

- 1 Bed: 142no. units (14% of total units).
- 2 Bed: 224no. units (21.5% of total units).
- 3 Bed: 539no. units (52% of total units).
- 4 Bed: 129no. units (12.5% of total units).

The housing design typology ranges from deep plan to wide frontage semi-detached and terraced houses, of two to three storeys, and accommodating 3 & 4 bed units.

The apartment design typology is reflected in 9no. apartment buildings, ranging from 4 to 6 storeys, and accommodating a range of 1, 2 and 3 bed apartment units with own door access ground floor apartments.

The duplex / apartment design typology is reflected in 10no. blocks, ranging from 3 to 4 storeys, and accommodating a range of 1, 2 and 3 bed apartment and duplex units.

The following tables identifies the range of housing and apartment accommodation proposed within the scheme. For clarity, the proposed duplex units are considered under the apartment design standards and are included in that table as a result.

In respect of the Board's request to examine the potential to deliver 2-bed houses as part of the housing mix, we would highlight that proposed House Type C (94 sq m gfa) is comparable in size to a '2-bed 4-person house' (min. 80 sq m) identified in the '*Quality Housing for Sustainable Communities Guidelines*' (2007).

Furthermore, external 'own door' access have been provided to all ground floor apartment in each apartment Block (i.e. 20no. 2-person apartments (1-bed) and 34no. 4-person apartments (2-beds)). This has been achieved through a design alteration to the access to the private amenity spaces of these apartment units. Access to the apartment units is now proposed from both the amenity space and/or the internal core.

There is generous provision of 3-bed 4-person houses (House Type C: 114no. in total) proposed as part of the overall housing mix to accommodate families.

In considering the overall mix of units, delivering conventional and more contemporary house type design formats, we would respectfully submit that a good variety of house types and sizes (including bed spaces) that offer choice to a range of different household sizes is proposed in the revised scheme. Prospective residents are expected to include public and private tenants and private homeowners, in a range of household formats from families to individuals, as part of this integrated housing scheme and a dynamic community.

Character & Distinctiveness

We refer the Board to the Character Area Booklet which should be read in conjunction with the Architectural Design Statement, prepared by Burke Kennedy Doyle Architects with detailed input by Ronan MacDiarmada Landscape Architects. These documents describe and illustrate how the proposed development has been carefully designed to integrate with the site characteristics and surrounding context, whilst displaying its own unique design character, identity and sense of place as a significant new neighbourhood. Given the scale of development, detailed architectural and landscape design consideration has also been given to the creation of recognisable Character Areas within the scheme.

Place-making, variety and distinctiveness are achieved through a range of urban street and space typologies, and the creation of three distinct housing character areas. Each character area reflects and responds to the natural qualities of the found landscape, its particular ecology, social structure, boundary condition and / or adjoining environment.

The integration of the proposed development with the landscape is anchored to the concept of 'Biophilic Design'. In this respect, the proposed built environment endeavours to protect and integrate with existing natural features (trees, hedges etc.), in the following respect: -

- Retain existing mature trees and hedgerows where possible, as they are a notable feature and integral to maintaining the existing habitats. These existing trees and hedgerow form a strong landscape characteristic that shall be part of the green infrastructure that connects the open spaces through the scheme.
- The introduction of Greenways throughout the development, as a beneficial and functional means of connecting residents to nature and protecting the local ecology. Activities such as biking , walking and running are facilitated in a green and natural environment, with obvious sustainability and health benefits.
- Green links to Corkagh Park will serve the proposed new residential neighbourhood but also connect it with and benefit the established neighbouring residential areas and wider community.
- Public lighting is carefully considered within the public realm so as not to upset natural habitats and biodiversity (flora and fauna).
- A biophilic approach to SUDs and drainage design is proposed to work sympathetically with the natural ecological environment, including Corkagh Park.

This biophilic design philosophy is carried through the various character areas that can be identified within the overall scheme. These character areas include: -

- **Oak Housing Character Area**

The Oak Housing Area is characterised by the primary public open space which includes a significant play and congregation space. Houses are proposed along local street generally ranging from 2 – 3 storeys with higher apartment and duplex blocks ranging from 4 – 6 storeys fronting onto the R136 to the west.

- **Lime Housing Character Area**

The Lime Housing is character by its relationship with the boundary to Corkagh Park to the south. The areas include a green buffer link which provides connection through to Corkagh Park to increase pedestrian and cyclist permeability. The green links include the retention of existing trees and hedgerows where practically possible to increase possible biodiversity and integrate the natural aesthetic of the landscape. Apartment and duplex blocks ranging from 4 – 6 storeys front onto Corkagh Park to mark a clear transition between the new residential neighbourhood and the public amenity.

- **Sycamore Housing Character Area**

The Sycamore Housing Area is character by its relationship with the existing residential areas to the east and the PPP site located to the southeast. The scale of the proposed buildings in this area is predominantly 2 – 3 storeys in height to appropriately transition to the surrounding context (2 storey suburban housing).

Particular landscape design qualities also distinguish between **local and formal streets and spaces** within the public realm areas of the scheme, as follows: -

- **Local streets**

The local streets within the housing character areas are generally characterised 4.8m road widths, fronted by 2 – 3 storey buildings. These roads serve local traffic rather than function as through routes. These streets augment permeability within the scheme by breaking up the larger blocks of development, and prioritise pedestrian and cycle movement and activity. As part of the housing areas they are more intimate and quiet in character, facilitating neighbourly interaction between residents.

- **Green streets (Biophilic Streets)**

These street draw their distinction from the retention of existing trees and hedgerow in the design of the walking and cycling routes as green routes enhancing permeability within the scheme and connectivity to the wider local area. In particular the green routes creating connections between existing pedestrian and cycle facilities on the Orbital Road (R136), through the proposed scheme, to Corkagh Park and the wider surrounding area, benefiting both the prospective and established local communities.

- **Grange Avenue ('Spine Road') & Gateway**

This major road through the scheme provides the primary vehicular link to and from New Nangor Road (to the north) and the Orbital R136 (to the west). It also forms part of the pedestrian and cycle route network, with the provision of segregated paths.

The 'Spine Road' is identified by the 6-storey gateway apartment buildings located at the western site entrance and 'Grange Square' at its north eastern end. The spine road is otherwise characterised by a mix of 3 and 4-storey buildings providing a distinct urban frontage and legibility to the formal avenue environment.

- **Grange Square**

This space will be landscaped using a combination of hard and soft features. The space will include a number of feature trees to create a distinctive space. Seating and other street furniture will be utilised to encourage people to use the space. The plaza will be considered the key meeting / focal point for the fully completed development. The plaza will interact with the community building, retail unit and future neighbourhood centre (located outside the application site to the north of the plaza) to ensure that the space generate activity and footfall.

- **Residential Green Squares (Oak, Lime and Sycamore)**

The green spaces are distributed throughout the development and form part of the green network which are interconnected. Each space will have a different function which will add to the variety and distinctiveness of the proposed development.

Note: Sycamore green space is permitted as part of the PPP site located to the southeast of the proposed development. The proposed extension of the green links through Sycamore also ensure connectivity to this public open space to the proposed scheme and wider area.

We refer to the Character Area Booklet and Landscape Design Rationale, prepared by Ronan MacDiarmada Landscape Architects for further detail on the characteristics of each housing area. Furthermore, we refer to the Infrastructure Design Report, prepared by DBFL Consulting Engineers which sets out the SuDs measure which are integrated with the landscape proposals.

In response to the Board's concern that the western and southern site boundaries are characterised by a robust urban edge, to the Orbital Road (R136) and Corkagh Park respectively, we refer the Board to Site Section Drawings, prepared by Burke Kennedy Doyle Architects, Photomontages, prepared by Digital Dimensions Architectural Visualisation and the Landscape and Visual Impact Assessment EIAR Chapter, prepared by Ronan MacDiarmada Landscape Architects. In summary these areas have been subject of design alteration, as outlined below: -

- **Significant Urban Edge & Gateways – frontage to Outer Ring Road R136 (west)**

The building line along the R136 of the proposed development has not been altered. The lands between the R136 and the residential building line contain services and surface water attenuation for the roadway, which result in the area being undevelopable (this area has since been removed from the red line boundary). The set back from the R136 is considered appropriate in this context. It also then provides a reasonable residential amenity buffer from the building line to the edge of a heavily trafficked distributor road linking to the M50.

In response to the issues raised by the Board in respect of density and height, additional building height (one additional floor) is proposed to apartment Block 1 (Grange Square) and Block 8 (outer north west corner to R136), increasing their height to 6-storeys.

A robust road frontage along the western boundary is then delivered by the 5 to 6-storey gateway apartment buildings located at the outer edges (north and south west corners) identifying the extent of and containing the scheme along the major road corridor. Further 6-storey gateway buildings identify the junction with the Spine Road (Grange Avenue).

To further strengthen the urban edge all originally proposed 2-storey housing along the R136 edge and entering onto Grange Avenue ('Spine Road') have been replaced by buildings reading as 3-storeys (House Type A2, F & F1) and 4-storeys (Duplex Type L, L1, L2, L3 & K) in the western contextual site elevation. This variation in house type creates a greater vertical emphasis and a stronger elevational presence along the road corridor, whilst avoiding abrupt height transitions between the adjacent residential building types required to deliver the required mix of tenure within the scheme.

The scale of development proposed generally increases the prevailing residential building height in this area from two storeys to heights of 3 to 6-storeys generally in accordance with the Building Height Guidelines. Higher buildings are focussed along the urban edges to the west and south, to facilitate an appropriate height transition across the site and suitably robust urban edges, away from prevailing established 2-storey housing to the east and north.

In views in both directions along the R136, the 5 – 6 storey gateway buildings (Blocks 5, 6, 7 and 8) in combination with a mix of 3 to 4-storey dormer and duplex buildings, create a strong, articulated urban presence onto the road and significantly increase the prevailing residential building height in this general area.

Block 1 (increased to 6-storeys at Grange Square, signals a visual connection between this node and the gateway buildings at the junction of the Spine Road and R136.

We refer the Board to the Site Section Drawings, prepared by Burke Kennedy Doyle Architects which show the relationship between the proposed development and the interface with the R136. We also refer the Board to the Design Statement, prepared by Burke Kennedy Doyle Architects which illustrates the building height across the scheme.

We further refer the Board to the verified photomontages, prepared by Digital Dimensions which illustrate the scale and sense of urban edge created by the buildings fronting onto R136.

- **Significant Urban Edge & Gateways – frontage to Corkagh Park (south)**

An additional 6-storey apartment block (Block 9) is now proposed fronting onto Corkagh Park in response to An Bord Pleanála's Opinion as part of Pre-Planning consultation. This building, together with the 5-storey Apartment Blocks 3 and 4 announce the green link gateways (pedestrian / bicycle / environmental links) to Corkagh Park to the south. They enhance the legibility of the new neighbourhood for pedestrians and cyclists in particular, who may be prospective residents, established local residents in existing neighbouring housing, or commuters and visitors to the area.

In addition all 2-storey housing along the southern edge of the proposed development has been replaced by the dormer house typology (House Type A2) reading as a 3 storey frontage to the park. 4-storeys duplex blocks (Type L, L1, L2 & L3) have also been included to provide a transition in scale between the apartment other House Types.

The park edge should be read as a distinct element to the R136 edge, being a softer open environment reminiscent of the past agricultural character of these lands. The variation in building height and rooflines ensure that the park edge is suitably robust without dominating the green boundaries and connections to the park. The urban edge typology at this location seeks make an appropriate transition from significant new residential neighbourhood to open space amenity, nature and tranquillity, in a now otherwise urban environment.

We refer the Board to the Site Section Drawings, prepared by Burke Kennedy Doyle Architects which show the relationship between the proposed development and the interface with the park.

Furthermore, we refer the Board to the Photomontages, prepared by Digital Dimensions Architectural Visualisation which illustrate the scale and sense of urban edge created by the buildings fronting onto Corkagh Park.

- **Neighbouring Educational Quarter and Neighbourhood Centre**

The intention is that the proposed creche building and community building at Grange Square will create synergies with future character areas to the north. The sites (within the Masterplan area but outside this application site) immediately to the north of Grange Square are earmarked for the development of a primary school. This will enhance the creation of a nodal community character area at the north eastern gateway to the site at the Old and New Nangor Road junctions.

The Stakeholder Statement, prepared by South Dublin County Council sets out broadly in relation to the issues raised with regard unit mix and design that these are addressed insofar as: -

- 40% of the proposed units comprise of smaller multi-units typologies including own door apartments and duplex units.
- Typologies for a wide range of needs are provided including 1 and 2 bedroom apartments, 3 bed 4 person houses (which complies with requirement for 2 bed units to address gender overcrowding in starter units along with the need for smaller family units) and independently accessed level access apartment for social provision.
- A number of apartments will be managed by Approved Housing Bodies for social provision of smaller occupancy requirements (i.e. 'empty nesters'), further increasing diversity of choice.
- The overall strategy includes three overarching character areas organised along generous spine avenue with each area differing in building material, colour palette, paving and planting to create distinction.
- The scheme faces outwards with a strong built edge and a reinforced central avenue with non-residential uses gathered around the formal square.
- The provision of 4 to 6 storey buildings at key focal points to provide a strong urban presence.

9.2.2 Issue 2 – Density

Further consideration / justification of the documents as they relate to the density in the proposed development and in particular that the proposed development is at a **sustainable density** to provide an acceptable efficiency in serviceable land usage balanced with the requirement to respect the context within which the site is located. Particular regard should be had to the **calculation of the net density area** within the site boundary and compliance with Appendix A of the Guidelines for Planning Authorities on Sustainable residential Development in Urban Areas, 2009 shall be submitted. Where it is proposed to exclude certain areas within the site from the calculation of net density, a clear justification and rationale for same shall be submitted. The proposed development shall have regard to inter alia, **national policy** including the National Planning Framework, Urban Development and Building Height Guidelines for Planning Authorities 2018, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009, Sustainable Urban Housing: Design Standards for New Apartments March 2018, local planning policy and the **site's context and locational attributes and context**. The further consideration of this issue may require an amendment to the documents and / or design proposal submitted relating to density and layout of the proposed development.

(SLA bold font emphasis)

Applicant's Response

Proposed Residential Density (Revised)

On foot of consultation with the Board at Pre-Application Consultation, the Applicant in consultation with South Dublin County Council (as a Stakeholder and separately as the local planning authority), has carefully considered the advice of the Board to further consider the density of the proposed scheme.

In the first instance we can confirm that the design and layout of the proposed scheme has been revised to increase the number of units by 56no. to a total of 1,034no. units. This results in a net residential density of 42no. units per Ha based on a net site area of 24.4 Ha.

It may be noted that the R136 Orbital Route road and services corridor has been excluded from the site area, being non-developable land. The red line site boundary identifying the area of proposed works has also been generally tidied. Having more clearly established the gross site area, we refer further to the Schedule of Accommodation, prepared by BKD Architects, that identifies the areas within the red line that are excluded for the purpose of calculating the net residential density.

As per the methodology identified in the Sustainable Residential Development Guidelines (2009), the excluded areas for the purposes of calculating net residential area include: -

- *“Major and local distributor roads [i.e. Spine Road / Grange Avenue].*
- *Primary Schools, Churches, Local Shopping etc. [i.e. community and creche buildings at Grange Square].*
- *Open spaces serving a wider area [i.e. Grange Square and Public Open Space serving the wider area].*
- *Significant landscape buffer strips” [i.e. significant hedgerows retained within green links and open spaces to the south of the ‘Spine Road’, connecting the R136 to Corkagh Park and serving the wider area].*

There are other green spaces, green links and landscape buffers to the north of the ‘Spine Road’ that have not been excluded from the site area for the purpose of calculating net residential density, on the basis that they would not currently connect with existing planned community facilities to the north of the site that will serve the wider community. Were the Board minded to consider these as significant public amenities that would serve not only the proposed significant new residential neighbourhood / community, but also the wider surrounding community to the north and west, this would arguably increase the net residential density achieved at the site to approximately 45no. units per Ha.

We examine further below how a net density of 42no. units per Ha complies with national planning policy and guidance, having regard to the site attributes and locational context.

Net Residential Density Calculation Methodology

It is our professional planning opinion that it is reasonable to omit the following areas of the proposed scheme for the purposes of calculating net residential density at the application site, having regard to Appendix A of the Sustainable Residential Development Guidelines (2009): -

- **The proposed 'Spine Road' / Grange Avenue (Figure 6 – Area 1).**

The 'Spine Road' is the major vehicular distributor road which links the site between Old Nangor Road to the north and the R136 to the west. The delivery of this road will unlock the development potential for the remainder of the masterplan area and the creation of an integrated new residential neighbourhood at Kilcarbery-Grange. The 'Spine Road' will be developed with the support of LIHAF funding to ensure its timely delivery.

On the basis of the above, the 'Spine Road' as a significant distributor road can be reasonably omitted in the calculation of net density.

- **Main Public Open Spaces – Grange Square (Figure 6 – Area 2)**

Grange Square will create a focal point for the new residential neighbourhood. The space will be activated by the proposed community building and retail unit when operational. This will be further enhanced by the implementation of the Neighbourhood centre and Educational Quarter in the northern extent of the masterplan area, by others, in the future.

The plaza will not only serve the new residential neighbourhood, it will provide a destination for the wider community residing in the established residential areas to the north and east of the proposed new residential neighbourhood.

- **Main Public Open Spaces (Figure 6 – Area 5c, d, e, f, g, h, j, k & l).**

The proposed open spaces (Figure 6 – 5c, d, e, f, g, h, j, k & l) to the south of the Spine Road will connect with existing pedestrian and bicycle facilities at the R136 and Corkagh Park and serve the proposed new residential neighbourhood, the adjoining social housing scheme (PPP site) and the existing wider community residing to the east in a sustainable integrated manner. They are not reasonably identified as incidental spaces benefitting only a limited number of private residents within the proposed scheme, to the exclusion of the wider scheme or existing surrounding housing areas.

We refer the Board to the Landscape Design & Green Infrastructure Report, prepared by Ronan MacDiarmada Landscape Architects which demonstrates connectivity within the site and permeability to the wider surrounding area. This clearly demonstrates that the network of green space provide additional connectivity to Corkagh park which ultimately connect with the Corkagh Park greenway.

This is a significant community gain for residents in the surrounding areas who will be afforded a new opportunity to more conveniently avail of pedestrian and bicycle facilities at the R136, via Corkagh Park and the sustainable green links within the proposed scheme.

- **Significant Landscape Buffers (Figure 6 – Area 5a & b).**

The landscape buffer to the south and varies between approximately 10 – 15m in width and is approximately 0.85 Ha in area. It marks the boundary and the effective transition from new residential neighbourhood into the public park.

Key to the successful integration of the development into the existing landscape is to promote the concept of 'Biophilic Design' retaining the existing trees and hedgerow within the design and layout of the proposed scheme wherever possible.

We refer the Board to the Site Section Drawings, prepared by Burke Kennedy Doyle Architects which show the relationship between the proposed development and the interface with Corkagh Park.

We refer the Board also to the Tree Survey Drawings and Arboricultural Assessment Report, prepared by Arborists Associates Ltd. and to the Landscape Drawings and Landscape Design Statement by Ronan MacDiarmada & Associates Landscape Architects. These set out the detail of tree retention and removal along the southern boundary to Corkagh Park and in other areas of the site where green links and open spaces are proposed. Mature trees are retained where possible to maintain the integrity of these natural site features.

On the basis of the above, the significant buffer strip along the southern boundary can be reasonably omitted for the calculation of net density.

Arguably further areas (5(g), (h), (j), (k) and (l)) could also be reasonably excluded for the purpose of calculating net site area and residential density.

- **Proposed Creche & Community Building (Figure 6 – Area 3 & 4).**

The proposed purpose built creche and community building are non-residential uses. These will also serve a function for the wider surrounding areas as the new residential development matures when fully completed.

On the basis of the above, the non-residential uses can be reasonably omitted for the calculation of net density.



Figure 6: Extract from the Summary Document, prepared by Burke Kennedy Doyle Architects showing the areas proposed to be excluded for the purposes of net density calculation.

Site Attributes, Location & Connectivity

Clondalkin is located on the western edge of the existing built up area of Dublin City & Suburbs, in South Dublin County. The site lies at the western edge of the Clondalkin settlement, approximately 2km from the urban village centre. Established existing residential development to the north and east of the application site is generally of a low density, suburban character comprising 2-storey houses.

In terms of connectivity the site is served by a limited number of public transport options, mainly in the form of local bus services which are available at the New Nangor Road (c. 400m from the subject site) and Cherrywood Park (c. 100m from the subject site).

In terms of Commuter Rail / Luas options the application site is: -

- Approximately 2.5km from the Clondalkin / Fonthill Commuter Rail Station.
- Approximately 2.4km from the Kishogue Commuter Rail Station (not yet operational).
- Approximately 4km from Cheeverstown Luas stop.

There are no direct bus connections with these train stations from the application site. The site is approximately 2km from M7 Interchange to the south.

The currently undeveloped application site lies between existing housing to the north and east and pedestrian and cycle facilities on the R136 Orbital Road to the west. There would be potential to enhance sustainable local pedestrian and bicycle connectivity between the R136, Corkagh Park and the existing neighbouring housing areas, through the proposed development of the application site. Connections to the New Nangor Road via the proposed development would also serve future education and neighbourhood centre facilities within the masterplan area to the north of the site (to be developed by others).

South Dublin County Development Plan 2016 – 2022 & Kilcarbery Masterplan (November 2017)

In respect of new residential development proposals, H8 Objective 6 of the South Dublin County Development Plan 2016 – 2022 states the Council's intention: -

"H8 Objective 6:

To apply the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) relating to Outer Suburban locations, including a density range of 35-50 units per hectare, to greenfield sites that are zoned residential (RES or RES-N) and are not subject to a SDZ designation, a Local Area Plan and/or an approved plan, excluding lands within the M50 and lands on the edge or within the Small Towns/ Villages in the County."

Clondalkin is outside the M50 ring, where densities higher than 35 – 50 no. units per hectare might be more favourably considered by the Planning Authority. Clondalkin is neither appropriately categorised as a small town/village where densities lower than 30no. units per Ha might be favourably considered.

Having regard to the above, and considering the provisions of the Sustainable Residential Development Guidelines (see below), the Kilcarbery – Grange Masterplan reasonably seeks to achieve the following net residential development density at the application site: -

"The net development density will range from 35 – 50 units per hectare."

We are of the opinion, shared with South Dublin County Council, that the application site may be categorised as 'outer suburban' in the context of its location at the outer western edge of Clondalkin. While within the outer edge of Dublin City & Suburbs, it lies outside the M50 ring and is at a remove from sustainable high capacity/frequency public transport such as rail, light rail or quality bus corridor (QBC).

The site is also a 'greenfield' site which was in use most recently for agricultural purposes. It requires significant investment in public infrastructure, including roads, sewers and local community facilities to support the development of an integrated new residential neighbourhood at this location.

Sustainable Residential Development Guidelines (2009)

The Guidelines state that 'outer suburban / greenfield' sites: -

*"... may be defined as open lands on **the periphery of cities or larger towns** whose development **will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities.**"*

And: -

*“Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing **net residential densities in the general range of 35 – 50 dwellings per hectare** and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.”*

A net residential density of 42no. units per Ha comfortably falls within the acceptable range of net residential densities for outer suburban sites, such as the subject site, in accordance with these Guidelines.

Where such sites are proximate to quality public transport corridors, residential density in excess of 50 units per hectare is encouraged. As noted above, the site is not immediately proximate to quality rail or bus corridors.

The Guidelines further advocate a design-led approach to formulating development proposals and informing density, rather than a rigid, numbers based approach. The Kilcarbery-Grange Masterplan represents the plan-led approach to the sustainable urban design and residential density at the application site.

Further ‘design safeguards’ are identified in the County Development Plan to ensure the protection of residential amenity from the adverse effects of overdevelopment that might arise from the achievement of high density in the absence of all other considerations. Compliance with residential design standards is addressed in Section 10 & 11 of this Report.

In terms of the calculation methodology for gross versus net density, Appendix A of the Guidelines sets out the methodology for the calculation of Gross and Net density which are set out as follows: -

Gross Density

“A gross density measure is best applied to estimating overall land areas required for mixed use developments”.

Net Density

“A net site density measure is a more refined estimate than a gross site density measure and includes only those areas which will be developed for housing and directly associated uses. These will include: -

- *Access roads within the site.*
- *Private garden space.*
- *Car parking areas.*
- *Incidental open space and landscaping.*
- *Children’s play areas where these are to be provided.*

It therefore excludes: -

- **Major and local distributor roads.**
- **Primary Schools, Churches, Local Shopping etc.**
- **Open spaces serving a wider area.**
- **Significant landscape buffer strips.”**

From this it is reasonable to conclude that the proposed spine road, green loops / significant landscape buffer strips and the public open spaces serving the local / wider community (i.e. not incidental spaces) can be excluded for the purposes of calculating net residential density. We refer to the section above and Section 12 of the Design Statement prepared by BKD Architects for net density calculation details.

Sustainable Urban Housing: Design Standards for New Apartments (2018)

In its recommendations in respect of the achievement of sustainable higher densities through the promotion of apartment development in urban areas, these Guidelines, prepared since the approval of the Kilcarbery Masterplan, also refer to 'net' residential densities.

Residential density greater than (>) 45 dwellings per hectare (net) are identified as being appropriate for 'Intermediate Urban Locations' where the site is: -

- Within 1,000m (10 mins. walking) distance of a principal town or suburban centre or employment location [N/A - Clondalkin Village is located c.2km to the west].
- Within 1,500m (15 mins walking) distance of high capacity urban public transport stops (commuter rail/light rail) [N/A – Nearest commuter rail/light rail station located at least 2.5km away].
- Within 1,000m (10 mins. walking) distance of existing or planned high frequency urban bus service [Potential for improvements to bus commuting service under Bus Connects].
- Within 500m (5 mins. walking) distance of reasonably frequent urban bus service (min 15 minute peak hour frequency) [Potential for improvements to bus commuting service under Bus Connects].

Densities of less than (<) 45 dwellings per Ha net are considered appropriate for 'Peripheral and/or Less Accessible Urban Locations', including suburban development areas, that do not meet the proximity or accessibility criteria set out above.

In support of the proposed net density of 42no. units per Ha, the following site context is notable: -

- The subject site lies on the western edge of Clondalkin, on the outskirts of Dublin & Suburbs built up area.
- The site is c. 2.5km from the nearest existing commuter rail station (Clondalkin / Fonthill).
- The site is c. 2.4km from the proposed train station at Kishogue (not operational to date) located close to Adamstown (part of the Kildare route)
- The subject site is c. 4km from the nearest LUAS stop (Cheeverstown).
- The site is served by c. 7no. existing Dublin bus routes serving New Nangor Road and St Cuthbert's Road generally to the north of the site. A number of these route will be revised as part of the BusConnects scheme with some increase in frequency.
- The site is greenfield and most recently used for agricultural purposes.

As noted previously, a conservative approach to the calculation of net residential density has been taken in arriving at 42no. units per Ha. However, were the Board minded to also consider that the exclusion of other green spaces, green links and landscape buffers to the north of the 'Spine Road', which will serve this significant new residential community and would link to future facilities to the north serving the wider surrounding community, a net residential density of approximately 45no. units per Ha is achieved.

Regional Spatial & Economic Strategy – Eastern & Midlands Regional Strategy

The RSES identifies Kilcarbery as one of a number of strategic sites, including the Clonburris and Adamstown SDZ new towns, located along the strategic South Western Corridor that will benefit from increased capacity on the Kildare rail corridor planned by 2027 and additional bus connections to employment lands at Grangeacastle: -

South western Corridor (Kildare line and DART expansion programme, N81 and Luas redline)

*“The consolidation and western expansion of the city can be achieved through the development of strategically located sites at Clonburris, **Kilcarbery** and Adamstown SDZ, linked to increased capacity and electrified services on the Kildare rail corridor, to be delivered by 2027, with employment lands at Grangecastle supported by additional bus connections. 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/Citywest, served by the LUAS redline.”*

We refer the Board to the Stakeholder Statement, prepared by South Dublin County Council. This provides further detail with regard to where the new residential neighbourhood at Kilcarbery-Grange / Clondalkin sits within the settlement hierarchy and housing strategy for South Dublin County. Higher residential density is focused on the SDZ areas of Clonburris and Adamstown, served by high quality commuter rail based public transport.

The Stakeholder Statement, prepared by South Dublin County Council sets broadly that the hierarchy of residential development in the county is that high density and increased building heights in line with Building Height Guidelines/ SPPR 4 should in the first instance be linked to mass-transit infrastructure particularly rail/light-rail or enhanced-service bus corridors. Areas identified by South Dublin County Council’s policy and planning, for delivering both density and height as early as possible include: -

- Adamstown - approved SDZ.
- Clonburris - approved SDZ (SDCC owns a lands within the SDZ with capacity for in excess of 2,000 homes).
- Cookstown /Tallaght- core - Regeneration Zone included in current Development.
- N7 Corridor inside M50 (subject of joint planning study with Dublin City Council under Urban Regeneration Development Fund).

Areas not as well-served by public-transport will be evaluated balancing their location within the metropolitan area against issues of access and environment. Larger sites of this nature owned by SDCC and now targeted for earliest delivery of housing under the Joint-Venture approach will include: -

- Kilcarbery (1,034no. units).
- Killinarden (approximately 500no. units).
- Rathcoole (approximately 250no. units).

The Clonburris Strategic Development Zone, in particular, represents the major expansion of the Clondalkin settlement along the south west rail corridor. Kilcarbery-Grange is less accessible, and average net densities in the range of 35 – 50no. units per Ha have been identified by South Dublin County Council as a more sustainable target in the delivery of its county housing strategy.

Sustainable Residential Density Conclusion

Given the peripheral location of this greenfield site, removed from frequent public transport options, and so not intended to fulfil the same residential development objectives as Clonburris SDZ in the significant expansion of the Clondalkin settlement along the south western rail corridor, the achievement of net residential density between 35 – 50no. units per hectare is considered reasonable.

Based on the conservative calculation of net site area and residential density, the proposed scheme achieves a net density of **42no. units per Ha**. This generally omits the proposed Grange Avenue (‘Spine Road’), the Grange Square public plaza, the community building and purpose built creche, and significant areas of public open space with green link, ecological and sustainable drainage connections benefitting the wider community.

Were the further omission of other significant open spaces and green links to the north of the Spine Road, serving this significant proposed new residential community and future community facilities to the north serving the wider community, to be considered appropriate by the Board, the net residential density calculation would be in the order of **45no. units per Ha**.

The Stakeholder Statement, prepared by South Dublin County Council sets out with regard density achieved that the proposed development is at the mid-point of the 35 – 50no. units per Ha deemed appropriate in the South Dublin County Development Plan 2016 – 2022 and the Sustainable Developments in urban Areas (2009) Guidelines balancing density targets against an opportunity to retain and revitalise green corridors.

9.2.3 Issue 3 – Surface Water Management & Flooding

Further consideration of the documents as they relate to **surface water management** for the site. This further consideration should seek to maximise the **SuDs measures** proposed within the design of the proposed surface water management strategy. Further consideration of these issues may require an amendment to the documentation and / or design proposal as submitted.

(SLA bold font emphasis)

Applicant's Response

We refer the Board in the first instance to the Infrastructure Design Report, Drainage Drawings and Flood Risk Assessment, prepared by DBFL Consulting Engineers.

There has been extensive dialogue and co-ordination between DBFL Consulting Engineers / Ronan MacDiarmada Landscape Architects and SDCC Drainage and Landscape Department to ensure that an effective SuDs strategy will be implemented to ensure best practice manage of surface water.

The Stakeholder Statement, prepared by South Dublin County Council sets out that the SuDs strategy for the proposed scheme has been developed with input from Environmental, Engineering, Ecology and Parks Departments. The SuDs proposal provide an attenuation 'train' to maximise infiltration to ground along the progressive conveyance route.

A key facet of this is to ensure that the landscaping proposals and SuDs measures are co-ordinated and that a sustainable approach to surface water management is applied. The strategy of progressive infiltration and attenuation within rain gardens, conveyancing progressive infiltration trenches, swales, open depressions and bioretention areas was agreed with the SDCC to reduce the need for large sub surface tanks within the large open green space. We refer the Board to the Infrastructure Design Report and Surface Water Drainage Drawings, prepared by DBFL Consulting Engineers and Landscape Drawings, prepared by Ronan MacDiarmada Landscape Architects which shows the attenuation areas have been integrated with the general landscape layout.

Surface water runoff from the development will be attenuated to greenfield runoff rates (QBar) in accordance with best practice and recommendations made in the Greater Dublin Strategic Drainage Study (GSDSDS). The SuDs elements which were found applicable to the proposed scheme design and layout include the following: -

- At Source (housing and apartment blocks): -
 - Rainfall gathered in rain gardens for cleansing, controlled infiltration, attenuation and plant take up (individual houses and apartment blocks).
 - Rainfall gathered in harvesting tanks for irrigation of local planting and ground level cleaning such as around bin stores. (apartment blocks only).
 - Biofilter planting (within housing unit boundaries and landscaped areas in apartment blocks).
- At Source (road network/parking): -
 - Tree pits and planted areas generally, for cleansing of run off and management of drainage volumes from footpath and hard paved areas.
 - Conveyance 'progressive infiltration' trenches below car parking bays in combination with low maintenance controls at street/ block level for the management of run off from road

- pavements and parking areas. This will also provide for interception and attenuation volumes.
- Swales/depressions in linear green space for drainage of boundary roads. This again will assist with interception and attenuation volumes in extreme event.
- Site Wide: -
 - Bioretention areas (in strategic locations to provide further cleansing, attenuation and interception volumes. These spaces will be allowed to receive rainwater run-off in all events and will be wet for the most part). The landscape strategy in these areas will assist with management of the run-off volumes by plant take up and proposed build ups.
 - Strategic flow controls at exit from site (in line with limited greenfield discharge rates).
 - Light liquid interceptors at exit from site as further measure in the treatment train.
 - Sub surface attenuation systems (Stormtec) will be used to supplement at source management of volumes at key locations for events up to 3%AEP for functional spaces and to compliment above ground bioretention areas for all events up to 1% AEP. The use of the at source attenuation and bioretention areas will ensure these are kept to a minimum.
 - Above ground detention areas for site wide management of surface water run-off in extreme events above 3%AEP. These systems will be designed to promote natural soakage to the underlying geology.

The implementation of the above SuDs measures will ensure that a greenfield surface water run-off rate is maintained. We refer the Board to the Surface Water Drainage Drawings prepared by DBFL Consulting Engineers which set out the detail of the surface water infrastructure proposed.

To manage surface water in the interim, and while the development is being progressed, temporary attenuation areas will be established in the permanent locations as part of the overall earthworks plan for the site. This will involve the creation of a temporary drainage network of ditches and land drains that will be directed to the attenuation areas where the additional volumes can be managed until the permanent system is fully operational developed.

There will be no uncontrolled discharge to any watercourse during construction. Any surface water collecting in excavations will be directed to onsite sedimentation ponds to settle solids, where it will be filtered of possible pollutants prior to discharge to the receiving surface water course at a controlled rate. The attenuation depressions, that are to form part of the permanent works, will be created as temporary holding lagoons for the management of construction runoff. The construction of the development is to be progressed in phases. Each phase will create a temporary holding pond at exit for discharge of waters that will be connected to the permanent systems as works progress. Generally, the phasing of the surface water is set out as follows: -

- **Enabling Phase**

The initial phase of the works includes the installation of the main spine road and access roads into each of the phase 1 development plots. The permanent elements of the surface water drainage network will be installed within these roads. To accommodate construction of the phase 1 of house building a temporary attenuation area will be provided in the 'Oak' open green space and the open green space in the north east corner of the site.

- **Phase 1**

As house building progresses in phase 1, the road accesses required to accommodate phase 2 will be commenced along with the associated permanent surface water drainage network. Additional temporary attenuation facilities will also be provided in the 'Lime' open green space and to the southern area of the site. The permanent surface water attenuation in the 'Oak' open green space will be created as part of this phase.

- **Phase 2**

As house building progresses in phase 2, the road accesses required to accommodate phase 3 will be commenced along with the associated permanent surface water drawing network. Temporary attenuation facilities will be retained at the 'Lime' open green space the southern area of the site and the north eastern area of the site in advance of the ultimate discharge points.

- **Phase 3**

As house building progresses in phase 3, the road accesses required to accommodate phase 4 will be commenced along with the associated permanent surface water drawing network. The temporary attenuation facilities at the 'Lime' open green space and the north eastern area of the site will be made permanent. Temporary attenuation will be retained just upstream of the southern discharge point.

- **Phase 4**

The final phase of house building will see completion of the permanent attenuation at the southern discharge point the surface water managed in the permanent scenario.

We refer the Board to Dwg. No. 170191-1010-01 'Phasing Plan Drainage (Surface Water & SuDs)' and Infrastructure Design Report, prepared by DBFL Consulting Engineers for further detail.

9.3 Response to Specific Information Requested

9.3.1 Item 1 – Character Areas

A Report that specifically addresses the proposed material and finishes of the proposed structures including specific detailing of finishes, openings and privacy screening, the treatment of private amenity areas, commercial facades, landscaped areas, pathways, entrance and boundary / treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seeks to create distinctive character for the development, avoiding blank facades and creating active frontages and corners. The document should also have regard to the long terms management and maintenance of the proposed development.

Applicant's Response

We refer the Board to the Character Area Booklet which should be read in conjunction with the Architectural Design Statement, prepared by Burke Kennedy Doyle Architects with detailed input provided by Ronan MacDiarmada Landscape Architects which sets out how the proposed development sits within the context of the Kilcabery site and how it integrates with the surrounding context.

The range of Urban Character Typologies sits within a larger structure of three Character Areas; Oak, Lime and Sycamore. Each of these Character Area draws its quality from the found landscape and each responds differently to its adjoining environment, boundary conditions and its connectivity to the different adjoining areas.

9.3.2 Item 2 – Mobility Management

A mobility management framework and car parking rationale for the proposed development which should have regard to existing public transport which serves the area.

Applicant's Response

We refer the Board to the Mobility Management Plan, prepared by DBFL Consulting Engineers which provides the rational for the provision of car parking and its management having regard to the proximity of the application site to existing public transport.

The Traffic & Transport Assessment, prepared by DBFL Consulting Engineers sets out the parking proposal for the proposed development which has regard for existing public transport in proximity to the application site.

9.3.3 Item 3 – Public Realm & Permeability

A public realm and permeability strategy which addresses connections to and from the site and in particular the proposed interface with Corkagh Park to the south.

Applicant's Response

We refer the Board to the Landscape Rationale, prepared by Ronan MacDiarmada Landscape Architects which demonstrates connectivity within the site and permeability to the wider surrounding area. The Landscape Masterplan identifies the 3no. new connections provided to Corkagh Park from the proposed development which support connection to the wider residential areas for both pedestrians and cyclists.

Furthermore, the Summary Booklet, prepared by Burke Kennedy Doyle sets out the context and connectivity in terms of the various modes of transport (Section 10).

9.3.4 Item 4 – Site Sections

A report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units, public pathways and interfaces with the public realm.

Applicant's Response

We refer the Board to the Contextual Elevations Drawings, prepared by Burke Kennedy Doyle Architects which shows how the proposed development relates to the surrounding context including the residential area to the east and Corkagh Park to the south.

9.3.5 Item 5 – Housing Quality Assessment

A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities March 2018.

Applicant's Response

We refer the Board to the Housing Quality Assessment, prepared by Burke Kennedy Doyle Architects which demonstrates how the proposed apartment complies with the relevant standards.

9.3.6 Item 6 – Building Lifecycle Report

A lifecycle report shall be submitted in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities March 2018.

Applicant's Response

We refer the Board to the Building Lifecycle Report, prepared by O'Connor Sutton Cronin Consulting Engineers which demonstrates how the proposed apartment will be managed and maintained over their lifetime.

9.3.7 Item 7 – Taking in Charge

A site layout that details any areas to be taken in charge by the Local Authority.

Applicant's Response

We refer the Board to Dwg. No. 6168-010 'Taking in Charge', prepared by Burke Kennedy Doyle Architects which illustrates the areas to be taken in charge by the Local Authority.

10 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

10.1 Rebuilding Ireland – Action Plan for Housing & Homeless

The stated aim of the Action Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs. Key to this is delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change. There are a number of pillars set out in the Action Plan, including: -

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.”

The Kilcarbery site was identified as a Major Urban Housing Delivery Site (MUHDS) under the Action Plan. The proposed development will provide housing under both of the above stated pillars of the Action Plan by providing private residential development and 30% social and affordable housing as part of the Joint Venture agreement between SDCC and the Applicant.

We refer the Board to the Stakeholders Statement, prepared by SDCC which provides an overview of the context and the rationale for the development of the Kilcarbery site as part of the Joint Venture with the Applicant.

10.2 National Planning Framework – Ireland 2040

The National Planning Framework (NPF) recommends the consolidation of City’s development and growth within the M50 and canals to create a more compact urban form. The NPF sees 40% of all new homes nationally being located within the existing built up area of existing settlements.

The NPF also sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered. In the context of this proposal, it is considered that the following particular NPOs are worthy of mention: -

National Policy Objective 2a

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

National Policy Objective 3b

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford within their existing built-up footprints.”

National Policy Objective 11

“In meeting urban development requirements, there will be a presumption in favour of development that encourages more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

National Policy Objective 27

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

National Policy Objective 33

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

The proposed development will deliver a new plan-led residential neighbourhood at the edge of the Clondalkin Village on land zoned for residential use. As set out under Section 10.1 above, the Kilcarbery

site has been identified under 'Rebuilding Ireland' as a MUHDS to facilitate the development of a significant residential scheme which is consistent with the aspirations of the NPF.

The proposed development will provide additional amenities including a dedicated creche and a significant quantum of public open spaces which will support greater connectivity to the surrounding areas in particular to Corkagh Park. The development when fully realised will be self-sufficient extension of the existing urban area within Clondalkin creating its own distinct character as part of an innovative approach to development mix tenured residential development.

10.3 Eastern and Midlands Regional Spatial & Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the East and Midlands (including the Dublin Metropolitan Area Strategic Plan – MASP) came into effect on 28 June 2019. This provides regional level strategic planning policy for the eastern and midland region, and Dublin, in line with the NPF. Dublin comprises Dublin City and Metropolitan Area.

Section 5.4 of the RSES sets out an overview of the MASP area which identifies a number of key corridors for future development which identifies the Kilcarbery site, noting: -

South western Corridor (Kildare line and DART expansion programme, N81 and Luas redline)

*"The consolidation and western expansion of the city can be achieved through the development of strategically located sites at Clonburris, **Kilcarbery** and Adamstown SDZ, linked to increased capacity and electrified services on the Kildare rail corridor, to be delivered by 2027, with employment lands at Grangecastle supported by additional bus connections. 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/Citywest, served by the LUAS redline."*

As set out in Section 9.2 of this Report the strategic context of the Kilcarbery site is addressed in terms of the appropriate density for the site being achieved.

The proposed development is located at the strategic lands at Kilcarbery identified in the RSES for a new residential community, at the edge of Clondalkin. At this location the proposed scheme is representative of plan-led development, that delivers significant additional public and private housing in a range of house types in a consolidated, accessible urban neighbourhood. Proposed housing development will be supported by ancillary and associated community facilities, public open space.

10.4 Section 28 Ministerial Guidelines

The following Statements of Consistency sets out how the proposed development is consistent with the Section 28 Ministerial Guidelines.

10.4.1 Sustainable Residential Guidelines in Urban Areas (Cities, Towns, Villages) (2009)

Chapter 5 of the Guidelines generally sets out that that planning authorities should promote increased residential densities in appropriate locations and the objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

Applicant's Response

The proposed development seeks to provide 1,034 no. units on a net site area of 24.4 Ha, resulting in a net density of 42 no. units per Ha.

A detailed response in relation to the density achieved and the method in which this was calculated is set out in Section 9.2 of this Report.

10.4.2 Urban Design Manual – A Best Practice Guide (2009)

The following table provides an overview of the ‘12 Design Criteria’ contained within the Urban Design Manual (2009), which are relevant to the proposed development. A response as to how the proposed development adheres to each of the criteria is also set out.

Criteria	Applicant’s Response
1. Context	<ul style="list-style-type: none"> • The design proposes developing the SDCC structure of open spaces and green loops into a hierarchy of streetscapes: formal avenues, side-streets and biophilic streets, expanding on the network of existing hedgerows, tree lines and water courses. • A network of health and amenity routes in naturalised planted surroundings is proposed, promoting walking, jogging, cycling, exercise, play and enjoyment. • Architectural massing and treatment is intended to form a contrast between formal building lines with strongly defined edges, parapets and corners and the organic landscape setting. • The building treatment in the different character areas derives from the natural characteristics of the tree species, interpreted through the use of a range of subtly different material and façade treatments. • A holistic design process has informed the design, including architecture, landscaping, servicing, drainage, sustainable transportation, energy management and NZEB design, with the intention of delivering a healthy, integrated and natural urban environment, fostering a sense of community and promoting the physical and mental well-being of all the residents.
2. Connections	<ul style="list-style-type: none"> • The street layout is designed to provide a well-defined urban building block layout, while respecting the existing natural tree and hedgerow lines. This block layout provides a grid of simple and legible secondary streets, promoting connectivity through the scheme and into the surrounding areas. • The proposed main spine avenue connecting the Old Nangor Road and the Outer Ring Road will provide a clear legible “spine” route running through the site, providing new access and connection points. • Important points of connectivity, such as the gateway to the scheme from the Outer Ring Road, the opening from the Lime Green open space to Corkagh Park and the entrance to the central square are signalled by strong and significant building forms.
3. Inclusivity	<ul style="list-style-type: none"> • The street grid is designed to seamlessly extend outwards from the existing residential streets to the northeast of the site, and to link directly into the street pattern of the approved PPP residential development to the east. • The three green open spaces, Oak, Lime and Sycamore (which is part of the adjoining PPP site – not part of the proposed development), will form the core of three character areas, promoting a sense of inclusion and community in the adjoining blocks. The central square, Grange Square, will form a carefully landscaped “green” heart to the scheme, addressed by the social and commercial activities including the community building, the proposed commercial centre (not part of this application), apartments and shops.
4. Variety	<ul style="list-style-type: none"> • While the proposed scheme is primary a residential development, it will form part of a larger integrated scheme including school facilities and a commercial centre which are outside of the subject site. • Within the subject site, two childcare facilities and a purpose-designed community facility building along with a retail shop unit are proposed. These facilities are carefully located to integrate with proposed street and transportation network, and to co-locate with the proposed school and commercial centre outside of the subject site. • A wide mix of dwelling unit types is proposed, with a carefully integrated mix of social and private housing throughout the scheme, delivered consistently through each construction phase. The large range of dwelling types across the tenure mix is intended to foster a sense of community within each of the neighbourhoods in the development. • The network of health and amenity routes is intended to encourage a wide range of outdoor activities for all ages, and to promote the maximum of enjoyment of the natural environment within the site and in the surrounding area.

5. Efficiency	<ul style="list-style-type: none"> • The proposed layout incorporates existing natural features into the new network of green spaces and green loops, in order to make efficient use of existing landscape features in achieving the required open space provision. • Within this proposed structure of open spaces and green loops, the planning layout has been designed to make the most efficient use of the land resource. The block layouts have been designed with efficient dimensions for privacy zones in front of the street building lines. The block layouts have been configured to maximise the back-to-back separation between residential units. • While maintaining a variety of building types and heights, and conforming to the SDCC specific requirements for social house types, the scheme has been designed to achieve a net density (excluding the green spaces, green loops and main spine road), of 42no. units per hectare.
6. Distinctiveness	<ul style="list-style-type: none"> • As identified in the Kilcarbery - Grange Masterplan (2017), the scheme is arranged in three character areas, each linked to the existing found landscape; Oak, Lime and Sycamore. Place-making is based on focusing the housing around green open spaces within each character area. • While maintaining a common architectural language to the entire scheme, the proposed buildings within each character area will be differentiated by the use of different materials and different elevational treatments. The material selection and detail treatment for each character area has been selected to reflect the natural characteristics of the oak, lime and sycamore trees that define the area. • The street hierarchy of formal avenues, side streets and biophilic streets will further enhance the sense of place within each character area.
7. Layout	<ul style="list-style-type: none"> • The proposed layout is arranged as a series of well-defined urban blocks and streets set into a structure of green open spaces and green loops. The streets are arranged in a hierarchy of street types, formal avenues, side streets and biophilic streets, with no dead-end cul-de sacs. The building types are arranged to create an organised hierarchy of scales appropriate to their particular locations. A large range of dwelling types is proposed, with a well-integrated tenure mix. • This structure is intended to create a range of spaces and streets which will encourage a sense of belonging. The naturalised environment, with its close connections to the site's existing landscape features and the wider landscape beyond, is intended to promote a sense of physical and mental well-being. • The proposed apartment blocks are carefully sited at significant points to form gateways and points of focus at important locations. The larger three-storey house and duplex types are located primarily along the frontage of the new spine road (Grange Avenue) and along the frontage to Corkagh Park in order to form strong urban frontages at these key edges.
8. Public Realm	<ul style="list-style-type: none"> • All public open spaces are designed to ensure that they are clear and legible spaces, addressed by street frontages to ensure passive overlooking. • The landscape design of the green open spaces is based on simple layouts with high-quality materials and seating and open lines of sight, allowing residents to engage with the landscape and encouraging a sense of shared ownership. • A network of active amenity routes is proposed, including footpaths, running and cycling routes. These routes incorporate the existing landscape features, maintaining bio-diversity and encouraging both active and passive recreational enjoyment of the public areas. • The central square (Grange Square) is addressed by a range of public functions, including the proposed commercial centre (not part of the subject site), the community facility building and shops. • The proposed childcare facilities are located to address the natural landscape features.
9. Adaptability	<ul style="list-style-type: none"> • Traditional load-bearing solid construction methods are proposed for the buildings, using high levels of air-tightness, insulation and energy systems to ensure NZEB levels of sustainable construction. • These construction methods are proven to allow the maximum flexibility for future internal re-arrangement, allowing for the buildings to develop and change over time in line with residents and family needs.

	<ul style="list-style-type: none"> • The apartment blocks are designed so that internal layouts can be readily rearranged over time, subject to the restrictions imposed by vertical service drops. • External materials have been selected to ensure longevity and minimal maintenance, the selected materials allow for future additions or changes to be readily constructible.
10. Privacy & Amenity	<ul style="list-style-type: none"> • The layout is arranged so that all green open spaces and green loops are fully addressed by residential frontages, thus ensuring that the public realm is secured and animated through passive overlooking. • Each street corner has been designed to ensure passive overlooking to both sides of the corner, through the use of corner windows, side windows, bay window features and building plan form. The design ensures that no street corner is presented with a blank side elevation. • All house, duplex and apartment units are provided with at least the minimum private open space and shared open space as applicable, and are designed to ensure that back-to-back overlooking is limited, all in accordance with the requirements of the SDCC Development Plan. • The apartments are oriented to minimise overlooking of adjoining lower-scale residential terraces, by facing onto the gable ends of the adjoining terraces. • The apartment blocks are arranged in a predominantly north-south orientation, in order to maximise east-west orientation to the units and to eliminate north-facing single aspect units. • While maintaining an efficient density of land use, every unit is provided with a landscaped privacy strip to the public frontage of at least 2.1m width, to provide a separation from the edge of the public realm. • The public realm includes an extensive network of green open spaces and green loops, green corridors adjoining the Corkagh Park and the Outer Ring Road, and the central Grange Square. These public open spaces combine to deliver a generous level of amenity for social and recreational uses.
11. Parking	<ul style="list-style-type: none"> • Parking provision is generally delivered on-street, arranged either in-line or head on to the carriageway, with no in-curtilage parking. This arrangement ensures that in all cases, parking is passively overlooked by street housing or apartments. In a small number of blocks, parking is provided off-street within the block. In these cases, the parking is passively overlooked by apartments. • On-street parking has been designed to ensure that blocks of parking are broken up by landscaping or tree planting to ensure a maximum of six spaces per block.
12. Detailed Design	<ul style="list-style-type: none"> • The overall scheme design is informed by the existing landscape structure of hedgerows and trees, which are developed to create a network of green open spaces and green loops. Three green spaces Oak, Lime and Sycamore (which is part of the adjoining PPP site – not part of the proposed development), define the heart of the three character areas within the scheme. • The arrangement of blocks and streets sits within this landscape structure. A hierarchy of three street types is proposed: - <ul style="list-style-type: none"> ○ The formal avenue formed by the spine road (Grange Avenue). ○ The side streets. ○ The biophilic streetscapes. • Each street type is defined by its particular landscape treatment. A high-quality landscape treatment is proposed, using a range of materials and textures for pathways and street furniture, incorporating the existing landscape into the design. • A detailed landscape design proposal forms part of this application. Impact on existing trees is minimised by the use of no-dig path solutions along existing root zones and the selection of sustainable planting, encouraging bio-diversity and promoting both active and passive amenity value. Walking, running and cycle routes are integrated into the design. • The philosophy of setting a new urban environment into a naturalised landscape setting is carried through in the design of the central open space (Grange Square). This space is intended to become the “green heart” of the scheme. • The road and path treatment and range of materials, the use of green walls and natural features to contrast with the formal lines of the hard landscape and built are intended to create a biophilic city environment.

	<ul style="list-style-type: none"> • The detailed design of landscaped boundary walls and railings is based on the language of rustic brick and simple open-type railings found in the adjoining Corkagh Park House demesne. • The building forms are designed to create clear, legible and well-defined street blocks. Street corners are designed with windows onto both sides of each corner, ensuring good levels of passive overlooking consistently throughout the development. • To maintain a strong sense of urban enclosure, building lines are typically set back by 2.1m from the back of pavement to provide soft landscaped privacy zones, while the pavements are typically 3m in width. • Cycle parking and segregated bin storage is provided in roofed and fully enclosed common stores, each located within a maximum of 50m from the furthest residential entrance doorway, and finished in high-quality external materials to match the adjoining buildings. Electric car charge points are provided in accordance with SDCC requirements. • A wide range of house, duplex and apartment types is proposed to deliver an urban mix based on the widest range of tenure types. Each unit type has been carefully designed to achieve the unit and individual room dimension requirements within an efficient plan form. • All of the apartment blocks have been oriented to maximise east-west orientation and eliminate single-aspect north facing units. The majority of apartment units are dual-aspect • The blocks are located to form gateways and focal points at significant locations, with corner living-room windows providing good passive supervision of the main street corners and street entrances. • The selection of materials and the elevational treatments are designed to deliver a sense of urban quality, and particular care has been taken to ensure a consistency of elevation treatment across the range of private and social units in the scheme. • A dedicated childcare facility building and a dedicated community building are proposed to be located adjacent to the central square (Grange Square). • The community building addresses Grange Square across Grange Avenue, with a linear high-profile space facing the square, allowing for a community café, community functions and exhibitions and other visible uses. Multi-functional spaces are located behind, providing for family, children's events, clubs and social uses. • The childcare facility building is located alongside a landscaped green corridor to allow for children's nature exploration and is provided with hard and soft landscaped areas. Ample safe drop-off parking is provided, and the internal central gathering space looks out directly onto the green loop to form a close link to nature.
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Furthermore, we refer the Board to the Design Statement, prepared by Burke Kennedy Doyle which sets out how the scheme adheres to the principle of the Urban Design Manual.

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

The Guidelines contain a number of '*Specific Planning Policy Requirements*' (SPPR). These specific planning policy requirements contained in these new Guidelines take precedence over policies and objectives of development plans, local area plans and strategic development zone planning schemes.

Apartment Floor Area

Specific Planning Policy Requirement 3 that the following minimum floor areas are achieved for apartments: -

Minimum Apartment Floor Areas	
Studio	37 sq m
One bedroom	45 sq m
Two bedroom	73 sq m
Three bedroom	90 sq m

Applicant's Response

All apartments in the proposed development will meet the minimum floor area requirements set out the Guidelines. A Housing Quality Assessment (HQA), prepared by Burke Kennedy Doyle Architects, confirms this. The Table below highlights the difference in size of the units when compared to the minimum standards.

Apartments / Duplexes			
Unit Type	No. of Units	GFA (m ²) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	101	50 – 55	45
2 Bed Apartment	175	82 – 93	73
3 Bed Apartment	26	104 – 111	90
House Type K – 2 bed, 4 person apartment	8	88	73
House Type L – 3 bed, 5 person duplex	8	107	90
House Type L1 – 3 bed, 5 person duplex	8	114	90
House Type L2 – 3 bed, 5 person duplex	24	107	90
House Type L3 – 3 bed, 5 person duplex	24	141	90
House Type M1 – 1 bed, 2 person apartment	23	55	45
House Type M2 – 1 bed, 2 person apartment	18	54.5	45
House Type N1– 2 bed, 3 person duplex	23	96	73
House Type N2 – 2 bed, 3 person apartment	18	95	76
Total	456	43,389	

Safeguarding Higher Standards

It is a policy requirement of the Guidelines that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

Applicant's Response

All apartments in the proposed development will meet the floor area requirements set out the Guidelines. We refer the Board to the HQA, prepared by Burke Kennedy Doyle Architects which shows the vast majority of the units are 10% of greater than the minimum size required.

Dual Aspect

Specific Planning Policy Requirement 4 sets out that the minimum number of dual aspect apartments that may be provided in any single apartment scheme. In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

Applicant's Response

The site is considered a suburban or intermediate location in the context of the Guidelines. Of the 206 no. apartments, approximately 59% are either dual or triple aspect. A HQA, prepared by Burke Kennedy Doyle Architects, shows the proportion of dual aspect apartments.

This SHD Planning Application is accompanied by and EIAR which includes a Daylight & Sunlight Chapter, prepared by the O'Connor Sutton Cronin Consulting Engineers which assesses the impact of the proposed development in terms of daylight and sunlight within the development and on surrounding existing development.

Lift and Stair Core

As per the Guidelines, up to 12no. apartments per floor per individual stair / lift core may be provided in apartment schemes.

Applicant's Response

The apartment blocks are serviced generally by 2no. stair and lift cores. On each floor there are between 2 – 8no. apartments accessing the stair and lift core, complying with the above standard.

We refer the Planning Authority to the apartment Floor Plans prepared by Burke Kennedy Doyle Architects for further details.

Floor to Ceiling Height

The Guidelines advise that the minimum floor to ceiling height must accord with the Building Regulations requirement of 2.4m. However, *Specific Planning Policy Requirement 5* sets out that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.

Applicant's Response

As illustrated on the enclosed Section drawings prepared by Burke Kennedy Doyle Architects, the ground floor apartments have a general floor to ceiling height of 2.725m at ground floor level and a floor to ceiling height of 2.425m on the remaining levels, thus complying with the above standard.

Private & Communal Open Space

As per the Guidelines, the minimum requirement for private amenity space is as follows: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Applicant's Response

Each apartment is provided with a private balcony / terrace which exceeds the above requirements, as demonstrated in the apartment Floor Plans and HQA prepared by Burke Kennedy Doyle Architects that accompany this Planning Application.

As per the Guidelines, the minimum requirement for communal amenity space is as follows: -

Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Applicant's Response

Based on the above, the 456no. apartments proposed requires c. 3,088 sq. m of communal amenity space.

The communal amenity space provided as part of the proposed development provided in a number of courtyards associated with each apartment / duplex block. The total amount of communal open space provided as part of the proposed development amounts to 6,157 sq. m which comfortably exceeds the standards set out in the Guidelines.

We refer the Board to the Site Layout Plans, prepared by Burke Kennedy Doyle Architects and the Landscape Plans prepared by Ronan MacDiarmada Landscape Architects for further details on the layout and treatment of these spaces.

Car Parking

The Guidelines set out the following broad proximity and accessibility considerations for Apartments are generally defined under the following categories: -

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

In the context of car parking provision, it is considered that the subject lands fall in to the 'Intermediate Urban Location' category which is defined as: -

"Intermediate Urban Locations: In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard."

Applicant's Response

We refer the Board to the Traffic & Transport Assessment, prepared by DBFL Consulting Engineers which notes that 1,478no. spaces are provided for both houses and apartment / duplexes proposed. This amounts to a ratio of 1.4no. car parking spaces per unit. It is noted that this is approximately 14% below the maximum standard set out in the South Dublin County Development Plan in accordance with the New Apartment Guidelines 2018 which supports the reduction of car parking standards where appropriate.

Bicycle Parking

The Guidelines set out with regard to bicycle parking that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.

Generally, 1no. dedicated bicycle space per bedroom and 1no. visitor bicycle space per 2no. units is required. Bicycle parking should be easily accessible and provided within a dedicated facility.

Applicant's Response

We refer to the Traffic and Transport Assessment Report, prepared by DBFL Consulting Engineers which sets out the rationale for the proposed quantum of bicycle parking.

In total, 1,105no. cycle parking spaces are proposed as part of the overall development which is in accordance with the New Apartment Guidelines 2018. Covered bicycle parking is provided for apartment and duplexes units.

10.4.4 Quality Housing for Sustainable Communities (2007)

In the case of these Guidelines, there are no specific objectives, or policies set out in which to refer to. As a result, we have identified the aspects of the Guidelines we feel are most relevant and identified a response.

Typical Dwelling Sizes

Having regard for Table 5.1 of the Guidelines (below) with regard the space provision and room sizes for typical dwellings, all houses within a proposed development must adhere to these standards.

Table 5.1: Space provision and room sizes for typical dwellings

DWELLING TYPE	TARGET GROSS FLOOR AREA	MINIMUM - MAIN LIVING ROOM	AGGREGATE LIVING AREA	AGGREGATE BEDROOM AREA	STORAGE
	(m ²)	(m ²)	(m ²)	(m ²)	(m ²)
Family Dwellings - 3 or more persons					
4BED/7P House (3 storey)	120	15	40	43	6
4BED/7P House (2 storey)	110	15	40	43	6
4BED/7P House (1 storey)	100	15	40	43	6
4BED/7P Apartment	105	15	40	43	11
3BED/6P House (3 storey)	110	15	37	36	6
3BED/6P House (2 storey)	100	15	37	36	6
3BED/6P House (1 storey)	90	15	37	36	6
3BED/6P Apartment	94	15	37	36	10
3BED/5P House (3 storey)	102	13	34	32	5
3BED/5P House (2 storey)	92	13	34	32	5
3BED/5P House (1 storey)	82	13	34	32	5
3BED/5P Apartment	86	13	34	32	9
3BED/4P House (2 storey)	83	13	30	28	4
3BED/4P House (1 storey)	73	13	30	28	4
3BED/4P Apartment	76	13	30	28	7
2BED/4P House (2 storey)	80	13	30	25	4
2BED/4P House (1 storey)	70	13	30	25	4
2BED/4P Apartment	73	13	30	25	7
2BED/3P House (2 storey)	70	13	28	20	3
2BED/3P House (1 storey)	60	13	28	20	3
2BED/3P Apartment	63	13	28	20	5
1BED/2P House (1 storey)	44	11	23	11	2
1BED/2P Apartment	45	11	23	11	3

Applicant's Response

All houses in the proposed development will meet the minimum floor area requirements set out the Guidelines. The Table below highlights the difference in size of the units when compared to the minimum standards.

Houses			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2007
House Type A: 3-bed 5 person 2 storey	156	114	92
House Type A1: 3-bed 5 person 2 storey	2	116	92
House Type A2: 3-bed 5 person 2 storey + Dormer Attic	44	114	92
House Type B: 3-bed 5 person 2 storey	47	111	92
House Type C: 3-bed 4 person 2 storey	114	94	83
House Type D: 3-bed 5 person 2 storey	32	107	92
House Type E: 4-bed 7 person 2 storey	20	130	110
House Type F: 4-bed 6 person 3 storey	84	150	120
House Type F1: 4-bed 7 person 3 storey	17	156	120
House Type G: 3-bed 5 person 2 storey wide	35	108	92
House Type H: 3-bed 5 person 2 storey wide corner	19	122	92
House Type J: 4-bed 7 person 2 storey wide corner	11	134	110
Total	578	67,363	

All of the houses proposed are significantly in excess of the minimum size requirements of the Housing Guidelines (2007). A HQA, prepared by Burke Kennedy Doyle Architects, further confirms this.

10.4.5 Urban Development & Building Heights Guidelines for Planning Authorities (2018)

These Guidelines include 'Specific Planning Policy Requirements' (SPPR) that are intended to take precedence over any conflicting policies and objectives of development plans, local area plan and strategic development zone planning schemes.

The Guidelines are prepared in order to achieve the objective of the National Planning Framework (NPF) which amongst other things, identifies building height as an important measure for urban areas to deliver and achieve compact growth. NPO 13 states: -

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

Specific Planning Policy Requirement 1 of the Building Height Guidelines explicitly states that the Planning Authority shall identify, through their statutory plans, areas where increased building height will be actively pursued, and shall not place blanket numerical limitations on building height.

The South Dublin County Development Plan does not place a blanket limitation on building height. It includes Housing Policy 9 Objectives 2 and 3 that seek to ensure that new building height respects the existing surrounding context and transitions appropriately from established lower rise housing. It allows for ‘tall buildings’ that exceed five storeys to be considered at areas of strategic planning importance such as key nodes, along the main street network and along principal open spaces in Town Centres, Regeneration zones and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

In suburban/edge locations in Cities and Towns, *Specific Planning Policy Requirement 4* of the Guidelines recognise that housing development including town-houses, duplexes and apartments can deliver medium densities in a range of 35 – 50no. dwellings per hectare net. This mix addresses the need for more 1 and 2 bedroom units in line the wider demographic and household formation trends. The Guidelines note that this form of development, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment. In this context, the Guidelines consider that development should include an effective mix of 2, 3 and 4-storey development which integrates into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets.

SPPR 4

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. *the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
2. *a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

Applicant’s Response

The proposed development is strategically located within the built-up footprint of Dublin’s Metropolitan Area. It is earmarked for strategic housing development in the Regional Spatial and Economic Strategy for the East and Midlands and Dublin Metropolitan Area Strategic Plan.

The proposed development will deliver a new plan-led residential neighbourhood at the edge of the Clondalkin Village on land zoned for residential use. The land is well connected to road transport networks, with the potential to deliver public transport and cycle facilities to this area.

The proposed development comprises housing, duplex and apartments in buildings ranging from 2 – 4 storeys. Gateway apartment buildings range from 5 – 6 storeys.

Proposed development raises the prevailing height, while also seeking to ensure that new building height respects the existing surrounding context and transitions appropriately from established low rise housing. It achieves a density of c. 42no. units per hectare.

The proposed development is considered to be compliant with the Building Height Guidelines recommendations for suburban/edge locations, and with *Specific Planning Policy Requirement 4* in respect of appropriate density, mix of units for this type of location and the established surrounding character of the area.

10.4.6 The Planning System and Flood Risk Management (2009)

A Site Specific Flood Risk Assessment, prepared by DBFL Consulting Engineers has been set out in accordance with the Planning System and Flood Risk Management Guidelines for Local Government (2009) and accompanies this Pre-Planning Consultation submission.

The Flood Risk Assessment generally concludes that the development is not vulnerable to flooding.

10.4.7 Design Manual for Urban Roads and Streets (2013)

The proposed residential scheme is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The scheme proposals are the outcome of an integrated design approach that seeks to implement a sustainable community connected by well-designed streets which deliver safe, convenient and attractive networks.

The Traffic and Transport Assessment Report, prepared by DBFL Consulting Engineers sets out the rationale for the proposed road design of the scheme.

10.4.8 Childcare Facilities, Guidelines for Planning Authorities (2001)

Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland. In relation to 'New Communities / Larger New Housing Developments', it is noted that: -

'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments.'

The Guidelines outline that crèche provision should be made on the basis of 20 no. childcare spaces for every 75no. dwellings permitted in a scheme.

Applicant's Response

The proposed development will include the provision of 2no. creche facilities and these will be developed at various phases of the proposed residential development as follows: -

- A temporary childcare facility (557 sq. m) will be developed in **Phase 1** within the ground floor of Apartment Block 7 to accommodate the initial phases of development in terms of childcare provision.
- As discussed as part of the An Bord Pleanála Pre-Planning Consultation it was identified that a purpose built childcare facility (909 sq. m) to accommodate the future development would be provided so as to be able to meet operator demands. The purpose built creche will be developed in **Phase 3** of the proposed development.

It is intended that the purpose built childcare facility will serve the future needs of the entirety of the proposed development, in a permanent capacity, once fully completed. Once the permanent childcare facility becomes operational the temporary childcare facility will cease to be used and it will revert to a residential use. The ground floor of Block 7 is designed to accommodate 7 no. residential units.

The Applicant would accept a condition of permission that the conversion of the temporary childcare facility to 7no. residential apartments may not take place until such time as the permanent childcare facility is constructed as part of Phase 3.

Notwithstanding, we refer the Board to the Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants. In general, it is concluded that the proposed phased development of childcare facilities in combination with existing and projected childcare facility demands within the area that there is sufficient capacity proposed by providing a temporary childcare facility in Phase 1 (c. 557 sq. m) to be replaced by a purpose built childcare facility in Phase 3 (c. 909 sq. m) to cater for the needs of the new residential neighbourhood.

11 STATUTORY PLANNING CONTEXT – STATEMENT OF CONSISTENCY

11.1 South Dublin County Development Plan 2016 – 2022

The South Dublin County Development Plan 2016 – 2022 came into effect on 21 October 2016 and is the statutory land-use plan governing the subject site at this time.

11.1.1 Core Strategy

CS2 – Metropolitan Consolidation Area – Objective 2

To provide sufficient zoned lands to accommodate future population growth in Metropolitan Consolidation Towns.

Applicant's Response

The Core Strategy sets out that a key element of the overall Settlement Strategy is to promote the consolidation and sustainable intensification of the existing urban/suburban built form. The proposed development is on lands zoned 'RES-N' (new residential) which is consistent with the objective to accommodate future development within Metropolitan Consolidation Towns (i.e. Clondalkin).

11.1.2 Land Use Zoning

Under the Development Plan the subject site has primarily been zoned Objective 'RES-N', the objective of which is: -

'To provide new residential communities in accordance with approved area plans.'

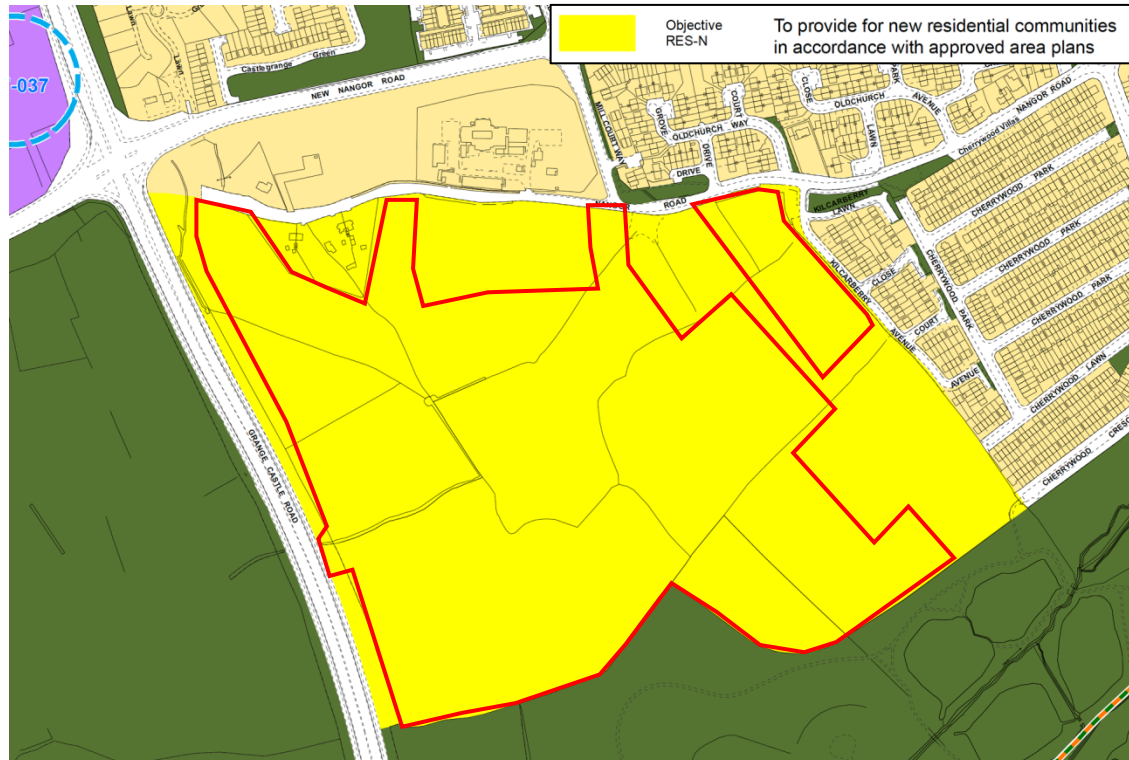


Figure 7: Extract from Development Plan Zoning Map 4 of the Development Plan showing the subject site outlined in red (Overlay by SLA).

Applicant's Response

The type of uses proposed (residential, childcare, ground floor commercial or community uses and amenity spaces) are either 'Permitted in Principle' or 'Open for Consideration' under the 'RES-N' zoning objective. The residential and ancillary uses proposed are fully compliant with the over-arching zoning objective for the subject lands.

11.1.3 Housing

H8 – Residential Densities – Objective 1

To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

Applicant's Response

A Masterplan has been prepared by the Applicant which has regard to the provisions of the Sustainable Residential Development in Urban Areas (2009). This recommends that residential density ranging between 35 – 50no. units per Ha should be achieved on the type and location of lands subject of this application.

The proposed development provides for 1,034no. units in a mix of apartments, duplexes and houses and results in a net density of c. 42no. units per Ha.

For further detail we refer to Section 9.2 of this Report which sets out in detail the rationale for the appropriate density achieved as part of this development give the context of the site.

H10 – Mix of Dwelling Types – Objective 1

To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the Interim South Dublin County Council Housing Strategy 2016 – 2022.

Applicant's Response

1,034no. residential units are proposed in this case, including a mix of 25no. different house types. These range from apartments, duplexes and houses, ranging in size and layout to accommodate a variety of household needs and a wide tenure mix of public and private dwellings. The development includes 578 no. houses (semi-detached and terraced), 302 no. apartment units and 154 no. duplex / apartment units.

The following breakdown of unit size is proposed: -

- 1 Bed: 142no. units (14% of total units).
- 2 Bed: 224no. units (21.5% of total units).
- 3 Bed: 539no. units (52% of total units).
- 4 Bed: 129no. units (12.5% of total units).

We refer the Board to the Summary Booklet, prepared by Burke Kennedy Doyle Architects which provide additional breakdown of bedsapce across the different typologies.

TYPOLOGY	QUANTITY		BEDROOMS			BEDSPACES		
	No. of Units	%	Type	No. of Units	%	Type	No. of Units	%
Apartment	351	34 %	1 Bed	142	14%	2 Person	142	14 %
			2 Bed	183	18%	4 Person	183	18 %
			3 Bed	26	3%	5 Person	26	3 %
Duplex	105	10 %	2 Bed	41	4%	4 Person	41	4 %
			3 Bed	64	6%	5 Person	64	6 %
Houses	578	56 %	3 Bed	449	43%	4 Person	114	11 %
						5 Person	335	32 %
			4 Bed	129	12%	6 Person	81	8 %
						7 Person	48	5 %
TOTAL	1034	100%		1034	100%		1034	100%

Figure 8: Extract from Summary booklet, prepared by Burke Kennedy Doyle Architects showing breakdown of bedspaces across the various typologies.

Overall, the housing typologies proposed, and the associated mix of unit sizes is consistent with the Development Plans objective to encourage a wide variety of housing types, sizes and tenures which will support the establishment of sustainable residential community.

11.1.4 Residential Standards

Public Open Space

Section 11.3.1 of the Development Plan states that on lands zoned RES-N, all new residential development shall be required to incorporate a minimum of 14% of the total site area as public open space.

The proposed development includes the provision of Public Open Space c. 4.55 Ha including the following primary open spaces: -

- Oak Green Space (c. 7,453 sq. m).
- Lime Green Space (c. 6,646 sq. m).
- Grange Square (c. 2,606 sq. m).

The provision of c. 4.55 Ha of Public Open Space is in excess of the requirements of the Development Plan.

Please refer to Section 9.2 of this Report which sets out in detail the treatment of individual character areas in response to An Bord Pleanála Opinion issued 25 February 2019.

Separation Distances

Section 11.3.1 of the Development Plan states that a separation distance of 22m should generally be provided between directly opposing above ground floor windows to maintain privacy.

We refer to the Site Layout Plans, prepared by Burke Kennedy Doyle which demonstrate that directly opposing units have achieved sufficient separation distances.

11.1.5 Community Infrastructure

C8 – Childcare Facilities – Objective 2

To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.

Applicant's Response

The proposed development will include the provision of 2no. creche facilities and these will be developed at various phases of the proposed residential development as follows: -

- A temporary childcare facility (557 sq. m) will be developed in **Phase 1** within the ground floor of Apartment Block 7 to accommodate the initial phases of development in terms of childcare provision.
- As discussed as part of the An Bord Pleanála Pre-Planning Consultation it was identified that a purpose built childcare facility (909 sq. m) to accommodate the future development would be provided so as to be able to meet operator demands. The purpose built creche will be developed in **Phase 3** of the proposed development.

The temporary childcare facility will absorb demand at an early phase of housing development, to subsequently be replaced by permanent purpose built childcare facility in Phase 3 of the proposed development.

Once the permanent childcare facility becomes operational the temporary childcare facility will cease to be used and it will revert to a residential use. The ground floor of Block 7 is designed to accommodate 7 no. residential units.

The Applicant would accept a condition of permission that the conversion of the temporary childcare facility to 7no. residential apartments may not take place until such time as the permanent childcare facility is constructed as part of Phase 3.

For further detail we refer to Section 10.4.8 of this Report which sets out how the proposed development is consistent with the Childcare Guidelines (2001).

C9 – Primary & Post Primary Facilities – Objective 4

To require schools to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.

Applicant's Response

We refer the Board to the Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants. In general, it is concluded that the proposed development will not create additional demand on existing primary and Post-Primary within the Dublin 22 catchment area having regard for the phasing of the development over time and the cycle of students enrolling on a yearly basis. Furthermore, the educational site located to the north of the application site within the Kilcarbery – Grange Masterplan (2017) lands has been earmarked for development to provide a Primary School by the Department of Education. This will cater further for the demand created by the new residential neighbourhood.

11.1.6 Green Infrastructure

G2 – Green Infrastructure Network – Objective 5

To integrate Green Infrastructure as an essential component of all new developments.

Applicant's Response

The integration of the proposed development with the landscape is aligned with the concept of 'Biophilic Design'. In this respect, the proposed built environment endeavours to protect and integrate existing natural features (trees, hedges etc.), in the following respect: -

- Retain existing mature trees and hedgerows where possible, as they are a notable feature and integral to maintaining the existing habitats. These existing trees and hedgerow form a strong landscape characteristic that shall be part of the green infrastructure that connects the open spaces through the scheme.
- The introduction of Greenways throughout the development, as a beneficial and functional means of connecting residents to nature and protecting the local ecology. Activities such as biking, walking and running are facilitated in a green and natural environment, with obvious sustainability and health benefits.
- Green links to Corkagh Park will serve the proposed new residential neighbourhood but also connect it with and benefit the established neighbouring residential areas and wider community.
- Public lighting is carefully considered within the public realm so as not to upset natural habitats and biodiversity (flora and fauna).
- A biophilic approach to SUDs and drainage design is proposed to work sympathetically with the natural ecological environment, including Corkagh Park.

The proposed site layout further develops the Council's Kilcarbery – Grange Masterplan (2017) principle of structuring open spaces and green loops linking into a hierarchy of streetscapes: formal avenues, side-streets and biophilic streets. This sets up a network of health and amenity routes in naturalised surroundings, promoting exercise and enjoyment for the local community.

We refer the Board to the Character Area Booklet and Landscape Design Rationale, prepared by Ronan MacDiarmada Landscape Architects for further detail on the characteristics of each housing area. Furthermore, we refer to the Infrastructure Design Report, prepared by DBFL Consulting Engineers which sets out the SuDs measure which are integrated with the landscape proposals.

G2 – Green Infrastructure Network – Objective 10

To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.

Applicant's Response

We refer the Board to the Landscape Rationale & Green Infrastructure Report, prepared by Ronan MacDiarmada which illustrates the how the proposed development ensure that both walking and cycling is prioritised through the provision integrated paths and cycletracks. Furthermore, the scheme in itself will support wider connectivity to the surrounding residential areas with increase accessibility to Corkagh Park in particular to the south.

The cycling network is integrated with the proposed public open spaces which incorporates existing landscape into the overall design to encourage use through streets and open spaces. Existing hedgerow are to be retained, where practically possible, to provide engagement with natural landscape.

G6 – New Development in Urban Areas – Objective 3

To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management.

Applicant's Response

There are 3no. primary public open spaces proposed as part of the scheme: Oak and Lime and Grange Square. These will form the core of the three character areas within the proposed development. The central square, Grange Square, will be carefully landscaped to form the 'green' heart of the scheme, and will be addressed by the proposed community building.

A biophilic approach to SUDs and drainage design is proposed to work sympathetically with the natural ecological environment, including Corkagh Park. The primary open spaces will include the retention of existing hedgerows, where practically possible, and the integration of appropriate SuDs measures to ensure appropriate provision of ecological protection measure and protection of biodiversity.

We refer the Board to the Character Area Booklet and Landscape Design Rationale, prepared by Ronan MacDiarmada Landscape Architects for further detail on the characteristics of each housing area. Furthermore, we refer to the Infrastructure Design Report, prepared by DBFL Consulting Engineers which sets out the SuDs measure which are integrated with the landscape proposals.

11.1.7 Transport & Mobility**TM1- Overarching – Objective 4**

To prioritise new road construction that provides access to new communities and development areas and supports the economic development of the County.

Applicant's Response

The proposed development will include the development of a new 'Spine Road' which will form a connection from Old Nangor Road to the north to the R136 Outer Ring Road to the east of the application site. Further internal streets will extend from the 'Spine Road' to serve the proposed development and connect the new communities with the wider area.

The development of the 'Spine Road' as part of the enabling works package will ensure that the lands can be fully developed in the future and in turn support future economic development within the SDCC Masterplan area, with knock on benefits for the local economy of Clondalkin and South Dublin County.

LIHAF funding is available to develop the 'Spine Road' to ensure the timely delivery of housing across the application site on a phased basis.

TM3 – Walking & Cycling – Objective 2

To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities.

Applicant's Response

The layout of the proposed development ensures that pedestrian and cyclist connectivity is prioritised. The main public spaces are connected to each other by dedicated walking and cycling routes. This permeability within a pleasant landscaped setting improves the overall walkability and residential amenity of this area for the new community.

Regard is also had for connectivity with the wider context, in particular, Corkagh Park to the south of the proposed development. Linkages and connections have been integrated into the overall design of the Applicant's masterplan to ensure appropriate connectivity with this substantial public amenity. This will not only benefit residents of the new community but also those within adjoining existing communities, by offering attractive and safe future connections to the park.

We refer the Board to the Landscape and Green Infrastructure Report, prepared by Ronan MacDiarmada which illustrates the how the proposed development ensure that both walking and cycling is prioritised through the provision integrated paths and cycletracks. Furthermore, the scheme in itself will support wider connectivity to the surrounding residential areas with increase accessibility to Corkagh Park in particular to the south.

11.1.8 Infrastructure and Environmental Quality

IE2 – Surface Water & Groundwater – Objective 3

To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

Applicant's Response

The proposed development will incorporate a range of SuDs measures to ensure that surface water runoff which match existing condition (i.e. green filed run-off rates).

For further detail we refer to Section 9.2 of this Report which sets out in detail the SuDs strategy for the proposed development including phasing of the SuDs during the lifetime of the development until the ultimate solution is provided.

IE5 – Waste Management – Objective 8

To secure appropriate provision for the sustainable management of waste within developments, including the provision of facilities for the storage, separation and collection of such waste.

Applicant's Response

Dedicated communal Waste Storage Areas (WSAs) have been allocated within the development design for all terraced house, duplex / apartments and apartment blocks. The bin stores are identified on the Site Layout Plans prepared by Burke Kennedy Doyle Architects.

Waste storage has also been considered for the proposed ancillary uses including the creches and retail unit.

We refer the Planning Authority to the Operational Waste Management Plan, prepared by AWN Consulting for further detail in relation to the management of waste.

IE7 – Infrastructure & Environmental Quality – Objective 5

To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas.

Applicant's Response

We refer the Board to the Public Lighting Layout and Public Lighting Report, prepared by O'Connor Sutton Cronin Consulting Engineers which sets out the lighting layout of the proposed development.

The public lighting has been carefully considered and co-ordinated with Ronan MacDiarmada Consulting Engineers as part of the overall landscaping proposal. This landscape layout has been subject to detailed discussions with the SDCC Parks Department in terms of general layout and taking in charge requirements prior to submission of this SDH Planning Application.

Policy IE8 – Casement Aerodrome – Objective 4

'To prohibit and restrict development in the environs of Casement Aerodrome in the following ways:

- a) By prohibiting development within the immediately adjacent approach areas to reduce the slight risk to persons on the ground and the increased risk to occupants of an aircraft in the event of the aircraft accidentally touching down outside the aerodrome boundary while taking off or approaching to land, except where development could not reasonably expect to increase the number of people working or congregating in or at the property (this may include development such as the extension of an existing dwelling or a change of building use). In general, no development shall be permitted within the Public Safety Zones.
- b) By applying height restrictions to development in the environs of the Aerodrome.
- c) By eliminating potential sources of interference with the operation of electronic navigation aids.
- d) By obviating possible hazards to aircraft through the generation of smoke, dust or fumes which may reduce visibility.
- e) By controlling and assessing the locations of any activities which may be an attraction to birds.
- f) By limiting the extent, height and type of external lighting to avoid confusing pilots in the interpretation of aeronautical lights or cause dazzle or glare.

The extent of the restriction necessary in any particular instance depends on its purpose. In some cases, more than one purpose may have to be served in which case a combination of the restrictions to satisfy all the purposes to be served will be necessary.'

Objective 6

'To limit residential development and other land uses impacted by noise, such as nursing homes, schools, hospitals and conference centres within the Noise Significant Area Boundary delineated for Casement Aerodrome, subject to an appropriate noise assessment and mitigation measures to protect residential amenity.'

Applicant's Response

The subject site is situated just outside the Dublin Airport Outer Safeguarding Boundary, the Department of Defence Inner Zone and the Inner Approach Area of the Casement Aerodrome. The subject site is located within the Noise Significant Boundary for Casement Aerodrome.

We refer the Board to the Aviation Compliance Report, prepared by DBFL Consulting Engineers in the first instance. The Report generally sets out that the lowest building should not extend above 140m OD at the development's southern extent. The maximum elevation within the proposed development is 94.65m OD, and therefore significantly below the relevant height threshold for the aerodrome operations and Obstacle Free Zone. It therefore also meets the SDCC planning requirements.

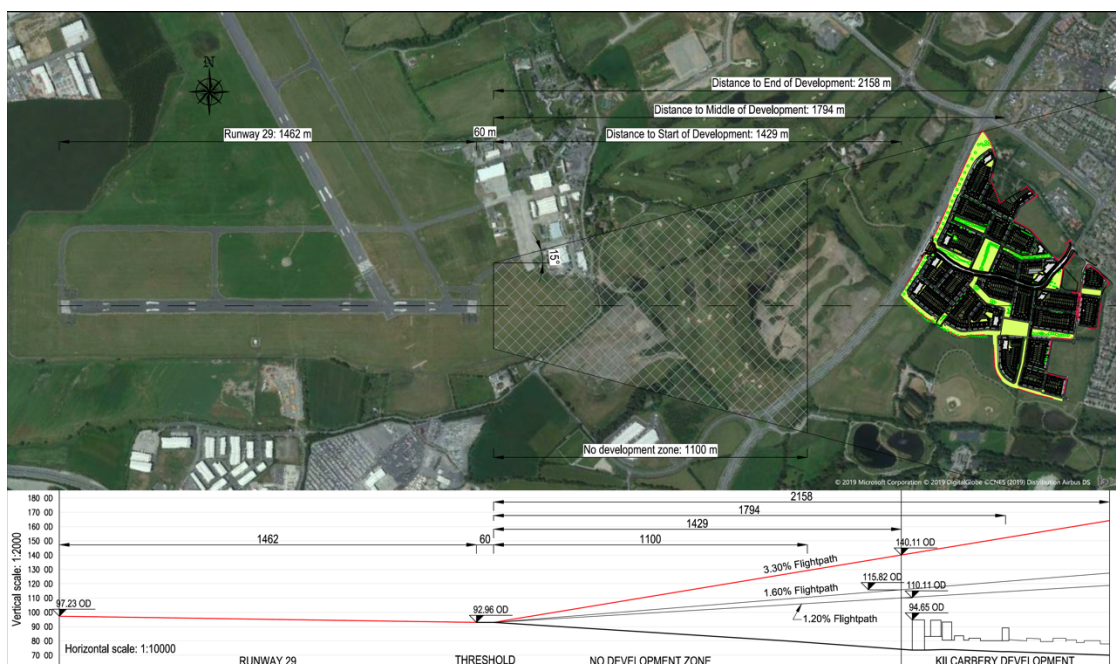


Figure 9: Extract from the Aviation Compliance Report, prepared by DBFL Consulting Engineers which illustrates the Obstacle Free Zone for Baldonnel / Casement Aerodrome Runway 29 Approach Flightpath.

This SHD Planning Application is accompanied by and EIAR which includes a Noise (Air & Vibration) Chapter, prepared by the AWN Consulting which assesses the noise impact for the proposed development.

With regard inward noise impact from the aerodrome it was noted that standard building constructions would provide adequate sound insulation to the intrusion of any aircraft noise, without the need for mitigation measures.

11.1.9 Heritage, Conservation and Landscapes

HCL1 – Heritage, Conservation & Landscapes – Objective 1

To protect, conserve and enhance natural, built and cultural heritage features and restrict development that would have a significant negative impact on these assets.

Applicant's Response

A Desk Based Archaeological Impact Assessment informed the preparation of the Council's Kilcarbery – Grange Masterplan (2017) prepared by Dermot Nelis Archaeologist. This assessment concludes that there is a medium to high risk possibility of extensive, previously unrecorded archaeological remains surviving below-ground within the proposed development area. Archaeological mitigation measures were proposed in the Assessment which included undertaking a licensed pre-development geophysical survey and a programme of licensed pre-development archaeological test trenching.

Subsequently, extensive archaeological investigations were carried out within the proposed development area by Dermot Nelis, including a programme of detailed geophysical survey and archaeological testing. No large scale archaeological sites have been identified within the site. During testing a number of isolated features of archaeological potential were identified, which were subject to preservation by record (excavation) in June 2018. Several of the features did not contain any datable material. One isolated pit returned a middle to late Bronze Age date, indicating transient prehistoric activity within the area.

This SHD Planning Application proposal is subject of an EIAR, which includes an Archaeology, Architectural & Cultural Heritage Chapter, prepared by the Irish Archaeology Company Ltd.. This provides further assessment of the impact of the proposed development on archaeology.

With regard archaeology it is noted that it is possible that ground disturbances associated with the proposed development will have potential for a negative impact on isolated archaeological features or deposits that have may survive beneath the current ground level and outside of the footprint of the excavated test trenches. In order to mitigate any potential impacts, all topsoil stripping that is associated with the proposed development will be monitored by a suitably qualified archaeologist.

If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record.

With regard architectural heritage it is noted that it is possible that the operation of the proposed development may result in a slight negative impact on the demesne landscape associated with Corkagh House. This will be due to visual impact of the development on the former demesne landscape, which is now in use as a park. In order to mitigate this impact, the boundary between the south-eastern section of the proposed development and Corkagh Park will be augmented with appropriate planting in order to minimise the visual disturbance of the former demesne. However, the proposed development is plan-led and consistent with emerging development trends in this area.

HCL8 – Views & Prospects – Objective 1

To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places.

Applicant's Response

The proposed development consists generally of 2 / 3 storey dwellings with additional height beyond this associated with the proposed duplex and apartment blocks (between 4 to 6 storeys).

The proposed development, while representing an increase to the prevailing height of surrounding residential development, is sensitively integrated with existing natural landscape (hedgerows and trees) and considers height transitions to more sensitive edges, to avoid negative impact on the surrounding landscape and neighbouring residential properties.

It is noted that as part of Pre-Planning Consultation, An Bord Pleanála identified that the interface with both the R136 outer ring road to the west of the site and Corkagh Park to the south of the site merited further consideration in terms of building height and the creating a more robust urban edge. This aspect of the proposed scheme has been reconsidered, with increased building height introduced along these edges. The Applicant's design response to the Board's Opinion in this respect, is set out in greater detail in Section 9.1 of this Report.

This SHD Planning Application is accompanied by an EIAR, which includes a Landscape & Visual Impact Assessment, prepared by the Ronan MacDiarmada Landscape Architects. This assesses the visual impact of the proposed development within the landscape. The assessment generally concludes that, although the character of the environment will change, it is in accordance with planning policy and consistent with emerging patterns of development in Kilcarbery and Clondalkin. The proposal is generally considered to be sympathetic to the surrounding landscape and shall present a positive visual impact in the long term.

The increased tree cover will enhance and increase the biodiversity of the existing landscape and tie it in with the existing hedgerows and trees. The visual impact upon the nature of the landscape shall be moderate in the short term, with slight effects in the medium term. The overall proposed housing in its interaction with surrounding development will result in neutral visual impact in the medium term, as a new residential neighbourhood emerges with associated landscape development and forms a positive visual impact in the long term.

11.1.10 Energy

E4 – Energy Performance in New Buildings – Objective 1

To ensure that medium to large scale residential and commercial developments are designed to take account of the impacts of climate change, including the installation of rainwater harvesting systems, and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidelines.

Applicant’s Response

An Energy & Sustainability Report, prepared by O’Connor Sutton Cronin Consulting Engineers provides an overview of the energy efficient features incorporated in the scheme. The proposed development will comply with Part L 2019 (NZEB) of the Building Regulations, as well as achieving an A2 / A3 Building Energy Rating. Generally, the following measures will be included: -

- For the new build elements, the façade performance specification has been optimised to limit heat loss, improve air tightness and thermal transmittance and to maximise natural daylight.
- High efficiency central plant will be specified where applicable to take advantage of the optimised façade design measures that have been introduced;
- A low energy lighting design will be utilised to further reduce energy consumption and increase occupant thermal comfort.
- Renewable energy technologies such as Air Source Heat Pumps, Exhaust Air Heat Pumps, and Variable Refrigeration Flow systems will be considered for implementation.

11.2 Kilcartery – Grange Masterplan 2017

The design and layout of the proposed development on the subject lands has been guided by the Masterplan prepared by South Dublin County Council entitled the Kilcartery – Grange Masterplan (2017).

11.2.1 Overall Vision

The vision of the Kilcartery – Grange Masterplan (2017) is stated as: -

“The vision for the masterplan is to realise a distinct high quality sustainable place with a local sense of character and community, which is closely connected to its own and its surrounding landscape and provides for a range of community needs, within an attractive, permeable and connected urban structure.”

This vision to be realised through the implementation of the following key Masterplan principles: -

- To harness the existing positive aspects of character of the lands and the surrounding and larger landscape.
- To ensure a permeable and legible network of streets and spaces, with strong connections with surrounding areas and developments.
- To achieve an appropriate level of continuity and enclosure of streets and spaces.
- To develop a high-quality network of green and urban spaces, which are connected to surround green spaces and features
- To ensure the physical adaptability of the layout by providing a range of flexible and appropriately shaped and sized urban blocks.
- To ensure that opportunities for local business and services are accommodated in a new local centre.

- To provide for new educational uses in conjunction with existing and planned community and leisure facilities.
- To require a high quality of design and finish in all commercial and residential buildings.

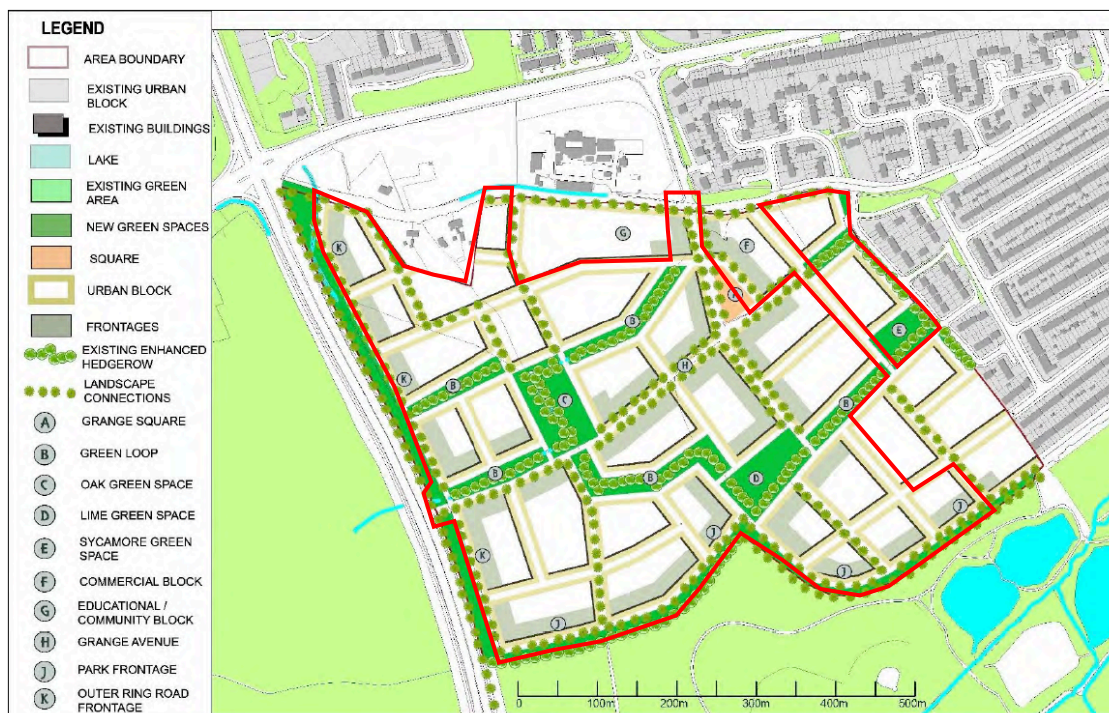


Figure 10: Extract from the Kilcarbery – Grange Masterplan (2017) illustrating the envisioned layout with application site outlines indicatively in red (Overlay by SLA).

Applicant's Response

The Site Layout Plans, prepared by Burke Kennedy Doyle Architects provide a fully compliant layout which has regard for: -

- Integration with site context and landscape features.
- Permeability and legibility of streets and spaces, and connectivity to facilities and amenities in the surrounding area.
- Green network of landscape corridors and spaces, that benefit from appropriate passive supervision, and biophilic design to promote human health and well-being.
- Careful consideration of continuity, enclosure, scale, visual interest, identity, character and boundary conditions.
- To provide primarily residential units, but with potential for non-residential ground floor uses in ground floor units where appropriate.
- Good mix of dwellings and high quality residential design standards.

11.2.2 Land Use

The Kilcarbery – Grange Masterplan (2017) identifies residential development as the primary land use zoning within the plan lands with associated ancillary uses including commercial, neighbourhood centre, childcare and public open space.

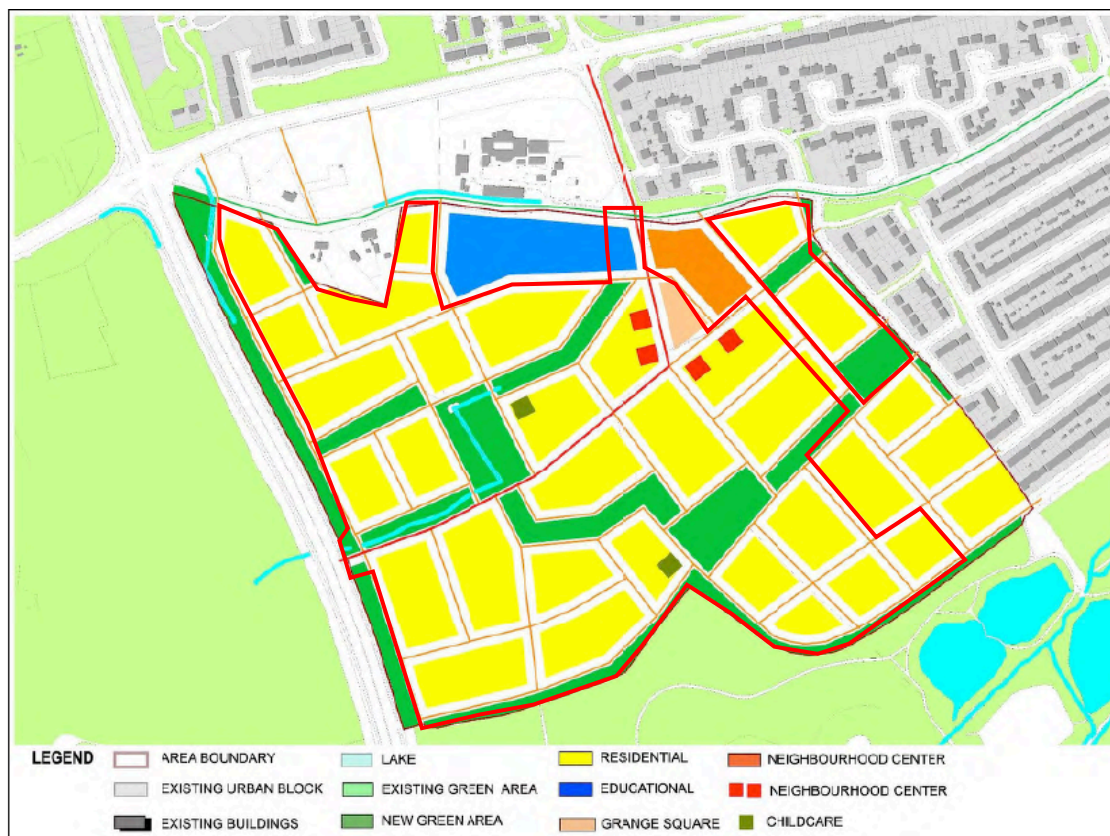


Figure 11: Extract from the Kilcarbery – Grange Masterplan (2017) illustrating the various lands uses within the plan area with application site outlines indicatively in red (Overlay by SLA).

Applicant's Response

The primarily residential use proposed complies with the land use provisions of the Kilcarbery – Grange Masterplan (2017), which have been carefully considered in the context of the Council's sustainable settlement and housing strategy for the County, the growth and consolidation of the south western suburbs, LIHAF infrastructure investment and the timely delivery of mixed tenure housing. We refer the Board to the supporting stakeholder statement prepared by South Dublin County Council that accompanies this application.

Supporting community facilities including: 2no. childcare facilities (1no. temporary to absorb demand at an early phase of housing development, to subsequently be replaced by permanent purpose built childcare facility in Phase 3 of the proposed development), 1no. community building and 1no. retail unit. These are proposed at suitable locations and at a suitable scale to support the proposed residential development, without detracting from the planned local neighbourhood centre at lands immediately to the north (which is outside of the application boundary and not part of this proposed development).

The proposed scheme does not prejudice the development potential of the adjoining educational / community site, neighbourhood centre site or PPP site. The proposed design and layout will ensure that integrated plan led development can be realised at the Masterplan lands. The proposals have been prepared in close consultation with South Dublin County Council, following a competitive tender for joint venture development.

11.2.3 Function – Place

The Kilcarbery – Grange Masterplan (2017) identifies the formation of three separate residential areas linked to the existing found landscape; Oak and Lime and the provision of Grange Square.

Applicant's Response

There are 3no. primary public open spaces proposed as part of the scheme: Oak and Lime and the provision of Grange Square. They will form the core of the three character areas within the proposed development. The central square, Grange Square, will be carefully landscaped to form the 'green' heart of the scheme, and will be addressed by the proposed community building. All the public spaces will be linked by green corridors to promote overall connectivity and walkability.

The primary open spaces will include the retention of existing hedgerows, where practically possible, and the integration of appropriate SuDs measures to ensure appropriate provision of ecological protection measures and protection of biodiversity.

The character areas will be reflected in the architectural quality of each area also, through the use of various material pallets and variation in built form and streetscape treatment.

We refer the Board to the Character Area Booklet, including input by Ronan MacDiarmada Landscape Architects, which demonstrates the distinction, landscaping and materiality between the character areas.

11.2.4 Public Domain – Routes & Spaces

The Kilcarbery – Grange Masterplan (2017) sets out that the public domain includes routes and spaces and comprises all roads, footpaths, open spaces and urban spaces. The new route hierarchy, will focus on pedestrian and cyclist permeability and comfort, within a shared movement network.

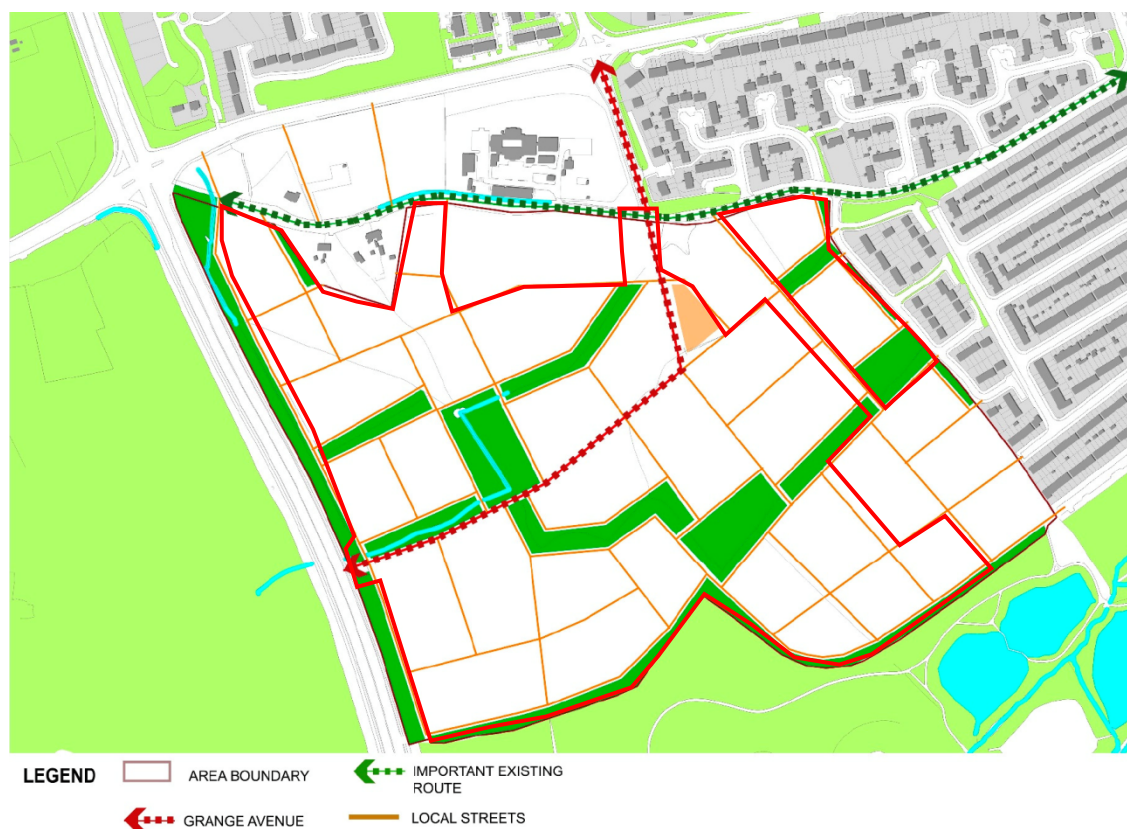


Figure 12: Extract from the Kilcarbery – Grange Masterplan (2017) showing layout of public open space with application site outlines indicatively in red (Overlay by SLA).

Applicant's Response

The layout of the proposed development ensures that pedestrian and cyclist connectivity is prioritised. The main public spaces are connected to each other by dedicated walking and cycling routes which improves the overall walkability of the new community. In compliance with the Masterplan, the proposed development delivers: -

- New spine road and pedestrian crossings traversing the centre of the site forming a new connection from the Outer Ring Road (R136) to the west and the Old Nangor Road to the north.
- Hierarchy of key streets, spaces and urban blocks providing a high degree of permeability, based on DMURS principles.
- Appropriate frontage to boundary conditions at the Grange Avenue (spine road), the Outer Ring Road, Corkagh Park, the Green Loops. More intimate conditions to local streets and spaces.
- Linkage to the Corkagh Demesne Park to the south.

The local street hierarchy incorporates three distinct levels in accordance with the function of each specific link. The existing R136 corridor and Old Nangor Road corridor can be classified as strategic 'arterial' connections. 'Grange Avenue' will function as a 'link' street and provide a spine through the development connecting the two arterial routes, but predominately providing access to the proposed development within the application site. Radiating from Grange Avenue will be a network of connected 'local' streets. Whilst these internal local streets accommodate vehicle access throughout the subject lands, their design, alignment and connectivity seek to prioritise permeability along attractive legible linkages for pedestrians, cyclists and public transport users (e.g. onwards connectivity to neighbouring lands including Corkagh Park).

We refer the Board to the Traffic & Transport Assessment and Roads Drawings, prepared by DBFL Consulting Engineers for further detail in relation to design and layout.

11.2.5 Public Domain – Landscape

The Kilcarbery – Grange Masterplan (2017) sets out that the landscaping concept is based around the retention remodelling and reinforcement of the existing natural landscape.



Figure 13: Extract from the Kilcarbery – Grange Masterplan (2017) showing landscape and public domain with application site outlines indicatively in red (Overlay by SLA).

Applicant's Response

The proposed landscape scheme is a key component of the integration of the new built environment with the existing and proposed landscape conditions.

At a basic level, in compliance with the Kilcarbery – Grange Masterplan (2017) three focal green spaces are provided, one serving each of the three residential character areas – Lime, Oak and Sycamore (which is proposed within the PPP site, not part of the proposed development). A landscaped space (Grange Square) is also proposed at the interface with the Neighbourhood Centre site to the north east. The neighbourhood centre to the east of Grange Square is not part of the proposed development, and is to be developed by others.

The spaces are linked by the Green Infrastructure loop, that integrates the existing mature trees and hedgerows currently defining the existing field boundaries. A green buffer is also envisaged along the southern boundary with Corkagh Park. A more formal condition is envisaged along the Outer Ring Road boundary to the west.

We refer the Board to the Landscape Rationale and Character Area Booklet, prepared by Ronan MacDiarmada Landscape Architects which provides further detail with regard the approach to the landscaping.

11.2.6 Built Form – Buildings

The Kilcarbery – Grange Masterplan (2017) set out the following key features to be addressed: -

Key features of Statutory Masterplan with regard Buildings	Applicants Response
The net development density will range from 35 – 50no. units per hectare.	The proposed development achieves an average net residential density of c. 42no. units per Ha which is consistent with the requirement of the Council’s Masterplan.
Higher scale and density typologies (apartments, duplex, townhouses, 3 – 5 storeys) will be provided at Outer Ring Road, Corkagh Park, Grange Avenue and Grange Square.	The proposed apartment blocks are carefully sited at significant points to form gateways and points of focus at important locations ranging from 4 – 6 storeys. The larger three-storey house and duplex types are located primarily along the axis of the new Grange Avenue and along the frontage to Corkagh Park in order to form strong urban frontages at these key edges to the site.
Medium and lower scale density and typologies (townhouses, terraces, 2 – 3 storeys) will be located in local streets and spaces.	The lower-scale two-storey buildings form the more intimate infill street blocks across the site (generally 2 – 3 storeys).
Building scale will be increased where appropriate to aid local legibility.	The proposed apartment blocks are carefully sited to form gateways and focal points at strategic locations throughout the site, to create distinctiveness and support legibility.
Double aspect units will be provided as required by regulation and best practice.	All the proposed house will be dual aspect. All apartments and duplexes proposed are designed in accordance with the standards set out in the Sustainable Urban Housing: Design Standards for New Apartment (2018) with regard layout aspect.
Active building frontage will be provided to all street and space frontages avoiding gable-ended frontage, except where abutting the gables of existing developments.	The layout of the proposed scheme provide active frontage onto all streets and public spaces.
Urban blocks will be arranged to provide passive oversight of public domain at street corners.	The layout of the proposed scheme ensures that all streets and public open spaces are actively overlooked which support passive surveillance.

11.2.7 Infrastructure

Sustainable Urban Drainage Systems (SuDs)

The overall approach to water management on the lands will be based on the principles of SuDs. The aim will be to mimic insofar as possible natural or existing water drainage processes on the lands.

Applicant’s Response

In accordance with the design requirements of the Kilcarbery – Grange Masterplan (2017), the Applicant proposes to include a range of SuDs measures. The applicant has further sought to ensure that the proposed SuDs strategy is integrated with the landscape proposals.

We refer the Board to Section 9.4 of this Report which sets out in detail the response to surface water management and integration with the overall landscaping proposal in response to An Bord Pleanála Opinion issued 25 February 2019.

Foul Drainage

The foul water drainage system will be designed to maximise gravity flows and to integrate with the existing system.

Applicant's Response

The proposed foul pumping station is to be located on the south side of the proposed spine road alongside a greenspace (in accordance with the requirements of Irish Water Code of Practice for Wastewater Infrastructure) and constructed in accordance with Irish Water Standard Details.

The pumping station will service the northern portion of the site and will accommodate 18 hours of emergency storage. The rising main discharge manhole will then combine downstream with the remaining gravity network for the southern portion of the site before discharging to the existing public sewer in Corkagh Park.

We refer to the Infrastructure Design Report and Drainage Drawings, prepared by DBFL Consulting Engineers which provides further detail in relation to the proposed wastewater drainage system proposed.

11.2.8 Social & Environmental Measures

Social Measures

The Kilcarbery – Grange Masterplan (2017) provides the condition for the delivery of new social capital, social interaction and social cohesion.

Applicant's Response

The proposed development includes the development of 1no. community building (c. 785 sq. m) which will provide flexible spaces for use by the existing and future local community. Furthermore, the development also provide for 1no. retail unit (178 sq. m) which will be suitable for a local shop to server local needs.

The development will also provide for the development of 2no. childcare facilities (1no. temporary childcare facility c. 557 sq. m and 1no. permanent purpose built childcare facility c. 909 sq. m) on a phased basis to ensure that adequate childcare facilities are available at early housing phases and as the population increases. The temporary childcare facility is proposed in lieu of ground floor residential units at Apartment Block 7 within Phase 1 of the proposed development. The permanent purposed built childcare facility will replace the temporary childcare facility when built in Phase 3 of the proposed development.

Furthermore, the proposed development sets out a clear network of connected open spaces that can encourage social interaction to support the development of a sense of community. The provision of a civic square which in will be augmented by the provision of a commercial block (not subject of the proposed development) can become the focal point of this emerging community.

We refer the Board to the Landscape Rationale and Character Area Booklet, prepared by Ronan MacDiarmada Landscape Architects which provides further detail with regard the approach to the landscaping.

Environmental Measures

The Kilcarbery – Grange Masterplan (2017) provides an environmental dimension to the development of sustainable communities through the protection and enhancement of the local biodiversity. The approach to energy on the lands will be guided by the County Development Plan and will be based largely on better building performance, with reduced heating requirements.

Applicant's Response

The design of the proposed development premised on the concept of 'biophilic design', where buildings are carefully fitted into the existing landscape, promoting a sense of health and well-being. A primary component of this is the retention, where practically possible, of existing trees and hedgerows.

We refer the Board to the Landscape Rationale and Character Area Booklet, prepared by Ronan MacDiarmada Landscape Architects which provides further detail with regard the approach to the landscaping.

With regard energy efficiency, the proposed development will utilise appropriate construction methodologies and suitable mechanical plant to achieve an NZEB standards.

We refer the Board to the Energy & Sustainability Report, prepared by O'Connor Sutton Cronin Consulting Engineers which provides an overview of the energy efficient features incorporated in the scheme

12 SCREENING FOR APPROPRIATE ASSESSMENT

The SHD Planning Application is accompanied by an Appropriate Assessment Screening Report prepared by Scott Cawley Ecological Consultants.

The conclusion of the Screening Report is that there would be no significant impacts on the Qualifying Interests or Conservation Objectives of the Natura 2000 sites considered in this assessment as a result of the proposed development. Therefore, a Stage 2 Appropriate Assessment is not required in this case.

13 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The revised 2014 EIA Directive (Directive 2014/52/EU amending Directive 2011/92/EU) uses the term environmental impact assessment report (EIAR) rather than the previous environmental impact statement (EIS). Where current national guidelines and regulations refer to an Environmental Impact Statement or EIS, this can be taken to mean an Environmental Impact Assessment Report (EIAR).

Projects requiring environmental impact assessment are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended). Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class above which EIAR is required. Sub-sections 10(b) (i) and 10(b) (iv) addresses 'infrastructure projects' referring to housing and urban developments, and require that the following classes of project, relevant to this project, be subject to EIAR: -

*"Class 10(b) (i). Construction of **more than 500 dwelling units.**"*

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

The proposed development involves the construction of 1,034no. residential units and other ancillary uses on a site of 28.61 Ha (Net development area of 24.47 Ha).

As such, an Environmental Impact Assessment Report (EIAR) is submitted to An Bord Pleanála with this SHD Planning Application.

14 CONCLUSION

It is our considered professional planning opinion that the proposed development which is the subject of this SHD Planning Application complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in: -

- National Planning Framework, Ireland 2040.
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan.
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- South Dublin County Council Development Plan 2016 – 2022.
- Kilcarbery – Grange Masterplan (2017).
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.
- The site has been identified as a Major Urban Housing Delivery Site under the Government’s Rebuilding Ireland Strategy.

The proposed development which is the subject of this SHD Planning Application should be supported by the Board as an appropriate proposal for Strategic Housing Development, on the grounds that: -

- The land is zoned for residential development (a significant new residential neighbourhood) under the South Dublin County Development Plan 2016 – 2022, and this is reflected also in the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and Dublin Metropolitan Area Strategic Plan.
- The scheme represents a well designed and thought out development which achieves a sustainable density of residential development, having regard to the Council’s settlement and housing strategy for the County, and the urgency of implementing the Kilcarbery – Grange Masterplan to deliver a broad mix of housing and tenure, at a reasonably accessible outer suburban location, supported by community and open space amenities, and accessible to neighbouring residential development and adjacent employment lands.
- The proposed development will provide additional amenities including a dedicated creche and a significant quantum of public open spaces which will support greater connectivity to the surrounding areas in particular to Corkagh Park and other housing development to the east. The development when fully realised will be an innovative, mixed tenure residential neighbourhood, supported by a commensurate level of community and open space amenities, contributing to the sustainable growth and consolidation of Clondalkin and environs.
- The phased development of the site will ensure the timely and sustainable development of this significant new residential neighbourhood, which will respond to current and future housing demand in the area identified in the Council’s housing strategy.
- The proposed residential element will provide additional critical mass to support the development of adjoining uses as identified in the SDCC approved Kilcarbery – Grange Masterplan (2017) that also includes a future Neighbourhood Centre and Educational Site to the north of the application site.
- The integration of the proposed development with the landscape is based on the concept of ‘Biophilic Design’ in which we seek to harmonise our built environment with the protection and integration of existing natural features (trees, hedges etc.) and sustainable drainage solutions, in the interests of human health and environmental sustainability.

- There has been extensive dialogue and co-ordination between DBFL Consulting Engineers / Ronan MacDiarmada Landscape Architects and SDCC Drainage and Landscape Department to ensure that an effective SuDs strategy will be implemented to ensure best practice manage of surface water and integration with the landscape to ensure tree and hedgerows are retained where practically possible.
- The Applicant has engaged with South Dublin County Council (as the Stakeholder) in an iterative competitive tender design and pre-planning consultation stage to ensure that the key planning, housing, community, infrastructure and environmental requirements of the Council's Kilcarbery-Grange Masterplan are fully reflected in the joint venture development agreement.
- At planning design stage, the Applicant has engaged in further extensive S.247 pre-planning consultation with South Dublin County Council (as the Planning Authority) on these key matters, including the sustainable quantum, design and layout of proposed residential and ancillary uses, supporting physical and environmental infrastructure and development phasing for these lands.
- Section 5 pre-application consultation with An Bord Pleanála, indicated that further design alternations would be required to the Board's Opinion regarding density, urban design and environmental sustainability. All taken on board by the Applicant and culminating in the making of this SHD Planning Application to An Bord Pleanála.
- The proposed development has been subject of comprehensive design and environmental assessment, including an Environmental Impact Assessment Report, to ensure that it is representative of sustainable residential development that meets the needs of existing and future generations for good quality housing at this location, and without detracting from the sustainable expansion or consolidation of other settlements in South Dublin County.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

15 ENCLOSURES

The following are enclosed with this SHD Planning Application: -

1. Planning Fee €80,000.00 (Max Fee) – Paid via 2no. Electronic Fund Transfers (€40,000.00 each) on 15 August 2019 (Proof of payment enclosed).
2. Planning Application Form.
3. Newspaper Notice.
4. Site Notice.
5. Letter of Consent from South Dublin County Council dated 26 June 2019.
6. Confirmation of Feasibility Statement from Irish Water dated 4 July 2019.
7. Statement of Design Acceptance from Irish Water dated 22 July 2019.
8. Confirmation from Environmental Impact Assessment Portal.
9. Part V Proposal, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants (on behalf of Adwood Limited).
10. Part V Validation Letter from South Dublin County Council dated 18 June 2019.
11. South Dublin County Council Stakeholder Letter.
12. South Dublin County Council Kilcarbery Grange Masterplan (and Appendices).
13. Planning Report & Statement of Consistency (including Statement of Response), prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
14. Architect's Drawings, prepared by Burke Kennedy Doyle Architects (see schedule of drawings attached with each bundle).
15. Schedules of Accommodation and Quality Assessments Booklet, prepared by Burke Kennedy Doyle Architects.
16. Architectural Design Statement, prepared by Burke Kennedy Doyle Architects (Uploaded in 4no. parts to website).
17. Summary Booklet, prepared by Burke Kennedy Doyle Architects.
18. Character Area Booklet, prepared by Burke Kennedy Doyle Architects.
19. Photomontages and Computer Generated Images (CGI's), prepared by Digital Dimensions.
20. Landscape Drawings, prepared by Ronan MacDiarmada & Associates Landscape Architects (see schedule of drawings attached with each bundle).
21. Landscape Rationale, prepared by Ronan MacDiarmada & Associates Landscape Architects.
22. Arboricultural Assessment Report & Tree Survey Drawing, prepared by Arborists Associates Ltd, Consulting Arborists (see schedule of drawings attached with each bundle).
23. Engineering Drawings, prepared by DBFL Consulting Engineers (see schedule of drawings attached with each bundle).
24. Infrastructure Design Report, prepared by DBFL Consulting Engineers.
25. Site Specific Flood Risk Assessment, prepared by DBFL Consulting Engineers.
26. Traffic & Transport Assessment, prepared by DBFL Consulting Engineers.
27. Mobility Management Plan, prepared by DBFL Consulting Engineers.
28. Environmental Impact Assessment Report, co-ordinated by Stephen Little & Associates Chartered Town Planners & Development Consultants.
29. Screening for Appropriate Assessment Report, prepared by Scott Cawley Ecological Consultants.

30. Public Lighting Layout & Report, prepared by O'Connor Sutton Cronin Consulting Engineers (see schedule of drawings attached with each bundle).
31. Construction & Environmental Waste Management Plan, prepared by DBFL Consulting Engineers.
32. Operational Waste Management Plan, prepared by Awn Consulting.
33. Energy & Sustainability Report, prepared by O'Connor Sutton Cronin Consulting Engineers.
34. Building Lifecycle Report, prepared by O'Connor Sutton Cronin Consulting Engineers.
35. Aviation Compliance, prepared by DBFL Consulting Engineers.
36. Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
37. Educational Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
38. Copy of Cover Letter sent to Prescribed Bodies with copy of Strategic Housing Development Planning Application.
39. Copy of Cover Letter sent to South Dublin County Council with copy of Strategic Housing Development Planning Application.

Stephen Little & Associates are committed to progressing and achieving sustainable development goals.

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