



PARKSIDE 4 SHD RESIDENTIAL DEVELOPMENT

CAIRN HOMES PROPERTIES LTD.

STATEMENT OF CONSISTENCY

OCTOBER 2019

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STATEMENT OF CONSISTENCY

FOR

PARKSIDE 4 RESIDENTIAL DEVELOPMENT

ON LANDS LOCATED AT

PARKSIDE 4, PARKSIDE, DUBLIN 13

ON BEHALF OF

CAIRN HOMES PROPERTIES LIMITED

BY

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1. INTRODUCTION & SITE LOCATION

This Statement of Consistency has been prepared by McGill Planning Ltd, Chartered Planning Consultants on behalf of Cairn Homes Properties Limited is seeking an SHD planning application for a residential development located at Parkside 4 (former Balgriffin Park Lands), Parkside, Dublin 13.

This Statement of Consistency with Planning Policy has been prepared in accordance with Section 8 (1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and in accordance with the requirements of the Planning and Development Regulations 2001-2017 (as amended by Planning and Development (Strategic Housing Development) Regulations 2017) and the 'Strategic Housing Development: Section 4 Applications to An Bord Pleanála – Guidance for Applicants' issued by An Bord Pleanála.

This Statement of Consistency demonstrates that the proposal is in accordance with the relevant national, regional and local planning policy, including guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended). It should be read in conjunction with the accompanying detailed documentation from MCORM Architects, AIT Landscaping, DBFL Engineering consultants, Traynor Environmental consultants, Modelworks and Openfield Ecological services.

For further details of compliance with the quantitative standards for residential units as set out in the "Sustainable Urban Housing: Design Standards for New Apartments" and the Dublin City Council Development Plan 2016-2022, please refer to the Housing Quality Assessments (Detailed Schedules of Accommodation) and Architectural Design Statements prepared by MCORM Architects included as part of the planning pack.

The site is located north of Parkside Boulevard and to the east of Balgriffin Park Road. It is currently a vacant brownfield site following the relocation of two temporary primary schools from this site to their permanent home off Belmayne Avenue, north of the greenway, in April 2019. As part of this move all of the temporary buildings, for which they have temporary planning permission, is currently being removed and this will then be a vacant site.

To the north of the subject site is Mayne River and further to the north is the Castlemoyne housing estate. To the east is Balgriffin Park road and further east the new 6 storey apartment development (ABP Reg Ref 304448-19 and DCC Reg Ref 2295/19). To the west is open space comprising the existing park.

The lands the subject of this application form part of a wider development area by Cairn Homes Properties Limited, these are located to the south of the application site. Much of this area has either been completed, is currently under construction or has extant permission for development. Please see figure 1 below and the planning report for further details on the planning history of this area.

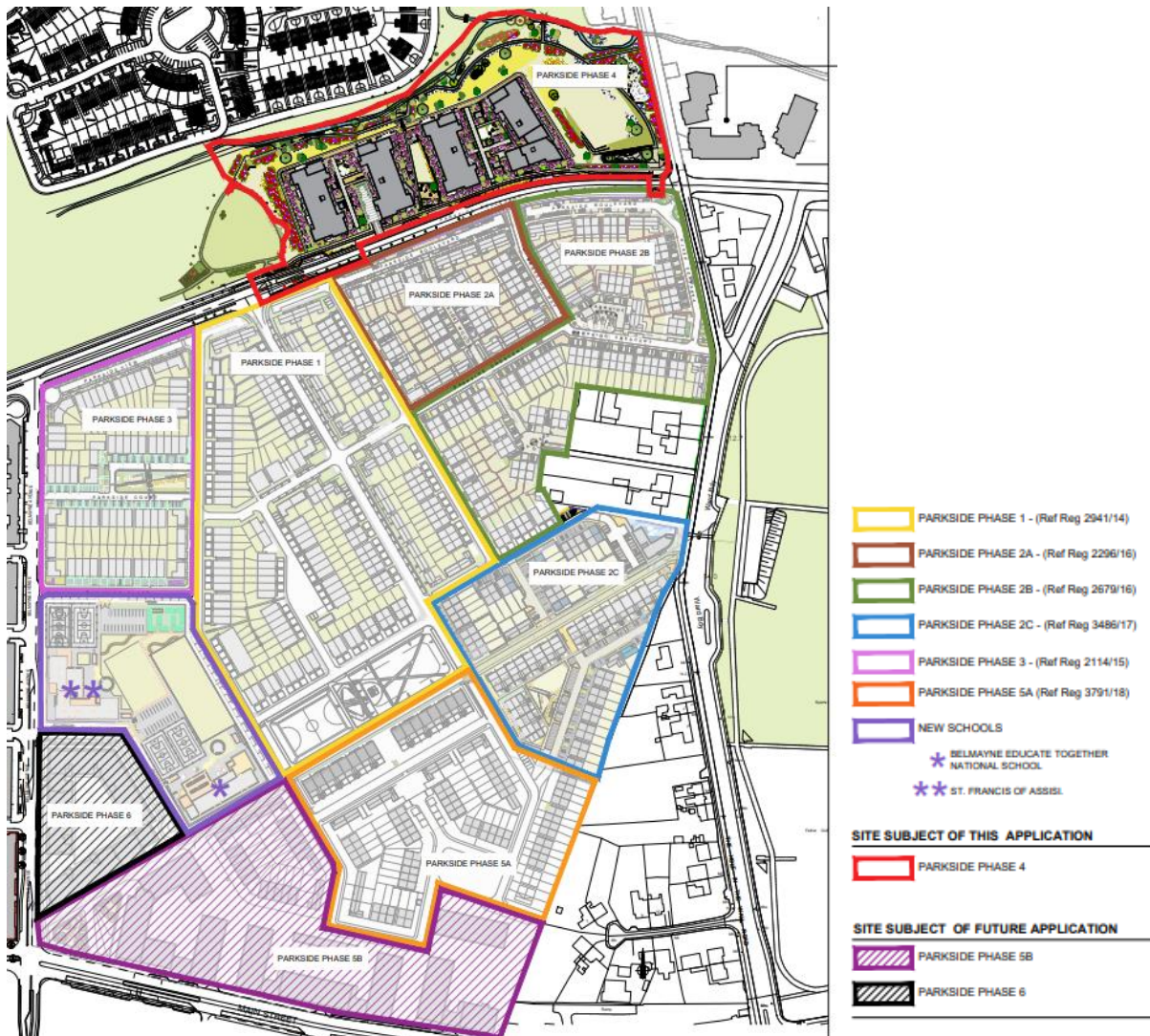


Figure 1 Phasing of the Parkside Development to date

2. DEVELOPMENT DESCRIPTION

The proposed development has been informed by multiple pre-planning consultations with Dublin City Council over a number of months as well as a pre-planning consultation with Fingal County Council and the pre-planning consultation with An Bord Pleanála.

The proposed development will comprise a residential scheme of 282 residential units in 4 apartment blocks ranging in height from 3 to 7 storeys. The development will include 94 no. 1-bed apartments, 8 no. 2-bed (3 person) apartments, 167 no. 2-bed (4 person) apartments and 13 no. 3-bed apartments. Apartments will have north/south/east/west facing balconies/terraces. The proposed development also includes residential amenity facilities (530 sq.m) incorporating concierge, media centre, and gymnasium. 277 no. car parking and 289 no. cycle parking spaces will be provided in the basement along with basement stores, plant, waste management areas, motor bike spaces and EV charging points. There will be an additional 134 no. surface cycle parking spaces for visitors along with 9 no. surface car parking spaces. The proposed development provides for the continuation and completion of the Mayne River Linear Park as well as public open space and communal open spaces between the

buildings. Vehicular access is from Parkside Boulevard. Pedestrian and cycle access are from Mayne River linear Park, Balgriffin Road and Parkside Boulevard. All associated site development works (including site re-profiling), landscaping, boundary treatments and services provision including ESB substations. The development description is set out in full in the statutory planning notices.

For clarity with regard to this application it is important to note that a small area to the north of this proposal is located within the administrative area of Fingal County Council. This area will not be the subject of any built development. The area within Fingal County Council is proposed to form part of the Mayne River Linear Park and will be landscaped accordingly.



Figure 2 Extract of the Site Layout Plan indicating the area to the north that is within Fingal County Council boundary

3. NATIONAL PLANNING POLICY

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Project Ireland 2040: National Development Plan (2018-2027)*
- *Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)*
- *Regional Spatial and Economic Strategy (2019- 2031);*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*

- *Smarter Travel – A New Transport Policy for Ireland (2009-2020)*;
- *The Planning System and Flood Risk Management (2009)*;
- *Climate Action Plan (2019)*

IRELAND 2040 OUR PLAN - NATIONAL PLANNING FRAMEWORK (2018)

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following aims:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

This major new policy emphasis on renewing and developing existing settlements aims to prevent the continual expansion and sprawl of our cities. This aim for Compact Growth promotes *"Making better use of under-utilised land and buildings, ... with higher housing and jobs densities, better serviced by existing facilities and public transport."* This approach not only makes better use of land but it can also have a *"transformational difference"* to towns and villages bringing new life and footfall to an area and contributing to the viability of services, shops and public transport, and by increasing the housing supply, enables more people *"to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less"* (section 2.6NPF).

As a result of this new policy approach, and as set out in section 4.5 of the NPF, there is a recognition that infill, and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. As a result, to enable development a flexible approach to planning policies and standards needs to be *"focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes."* In particular Section 4.5 highlights that *"general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc."* It highlights that there *"should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five."*

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

In terms of Dublin City and the Metropolitan Area, the NPF focuses “on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.” Furthermore, one of the key future growth enablers for Dublin specifically mentions Clongriffin for development: “progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin”. The proposed development, while outside Clongriffin is part of the Belmayne Clongriffin LAP and will deliver a key element of the LAP which is the completion of the Mayne River Linear Park.

Key National Policy Objectives which relate to this site are set out below:

National Policy Objective 4

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 11

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

National Policy Objective 13

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

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.

National Policy Objective 35

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

EVALUATION OF CONSISTENCY

The subject site is located within the metropolitan area of Dublin City which is identified for significant residential growth over the next two decades. The development accords with a range of National Policy Objectives including NPOs 4, 11, 13, 27, 33, and 35.

The proposed development seeks to deliver an appropriate form and scale of residential development at a site that is located close to Clongriffin Train station, and also to multiple bus routes close to the site. This area has, and is still, undergoing significant change as part of the Belmayne-Clongriffin Local Area Plan. There are a wide range of local service centres and large public open spaces all within walking/cycling distance of the site. One of the Key Growth Enablers for Dublin includes progressing the sustainable development of brownfield sites for housing, especially those on or near public transport corridors. This proposal of 3 to 7 storey apartment development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced urban area.

The site forms part of, and will deliver, the central part of the Mayne River Linear Park, which is a high-quality natural amenity. It is also close to other natural amenity areas such as Fr Collins Park and Dublin Bay.

The proposed development will provide for a high-quality residential scheme through the design and the materials and finishes proposed. In addition, the proposed units are meet and exceed the minimum apartment size requirement as stated in the Apartment Guidelines. The proposed development of apartments in this location will provide greater variety in the type of house types in this location as well as providing an increased density, while enabling the delivery of the aims of the NPF to meet the demand for housing.

It is clear that there is a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height is in line with government guidance and emerging trends for sustainable residential developments.

Development of these lands is considered to be fully in accordance with the recommendations of the NPF.

PROJECT IRELAND 2040: NATIONAL DEVELOPMENT PLAN (2018-2027)

The National Development Plan sets out the investment priorities as per the National Planning Framework (NPF). This will further guide national, regional and local planning and investment decisions in Ireland. Resolving the systematic factors that has led to the current housing crisis is at the heart of the NPF and therefore housing and sustainable development is a priority for the NDP. Developments are encouraged to target brownfield sites that have fallen into disuse. It identifies the *“need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.”*

Furthermore, the NDP states that *“the continuation of existing patterns of development accentuates the serious risk of economic, social and environmental unsustainability through, for example, placing more distance between where people work and where people live, and increasing energy demand. The*

NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse”.

National Strategic Outcome 1: Compact Growth

*“This outcome aims to secure the **sustainable growth of more compact urban** and rural settlements **supported by jobs, houses, services and amenities**, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and coordinated investment in urban, rural and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This **will give scope for greater densities that are centrally located** and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. **Creating critical mass and scale in urban areas with enabling infrastructure**, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in **creating more attractive places for people** to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility

*“A step change is required under the NPF in **putting in place environmentally sustainable public transport systems** in order to secure Ireland’s climate action goals. These must represent a decisive shift away from polluting and carbon-intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and other alternatively fuelled systems for public transport fleets.*

*The **expansion of attractive and sustainable public transport alternatives to private based car** transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision **of safe alternative active travel options such as segregated cycling and walking facilities** can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure.*

EVALUATION OF CONSISTENCY

The proposed development brings forward a vacant brownfield site within Dublin City. It is within an LAP area which is close to public transport, parks and amenities, schools and shops. It is consistent with the National Development Plan and NSO 1 for Compact Growth.

Parkside 4 will deliver 282 no. apartments. This will improve the variety of unit types available in the locality and increase demand within a much broader demographic.

The proposed site location is within 15 minutes’ walk of Clongriffin Dart station which was developed as part of the Northern Fringe Development Plan and has been in operation since April 2010. This site is also well connected by means of high frequency bus transit corridors.

REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS 2016

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

EVALUATION OF CONSISTENCY

The proposed development is consistent with Pillar 3 to build more housing at strategic locations. The site is located within North Fringe, one of four key DCC located development areas identified in Rebuilding Ireland, and which is to provide c.7,000 units. The provision of the 282 no. apartments will help achieve this target and will create a better and more sustainable overall mix of units to cater to the increasing demand from a broad demographic.

URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are **required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.**

The Guidelines emphasise the policies of the NPF to **increase levels of residential development in urban centres and increase building heights and overall density** by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála. It identifies the need to focus planning policy on *“reusing previously developed “brownfield” land, building up urban infill sites”*.

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. *“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors”*. It goes on to highlight that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”*.

POLICY	EVALUATION OF CONSISTENCY
<p>SPPR 1 <i>Support increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and RSES and shall not provide for blanket numerical limitations on building height</i></p>	<p>✓ The site is within 15mins (1.3km) walktime of Clongriffin DART Station to the south-east and therefore represents an “Intermediate Urban Location” as defined in Section 2.4 of the <i>Sustainable Urban Housing: Design Standards for New Apartments</i> (2018) and is suitable for higher density apartment development.</p>
<p>Development Management Criteria Section 3.2:</p>	
<p>At the scale of relevant city/town: <i>-The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i></p>	<p>✓ The site is also within 10-15 minutes’ walk of frequent Dublin Bus services (Nos. 15 and 27) which operate to and from the city centre.</p>
<p>At the scale of district/ neighbourhood/ street; <i>- The proposal responds to its overall natural and built environment and makes a positive contribution</i> <i>- The proposal is not monolithic and avoids long, uninterrupted walls of building</i> <i>- The proposal enhances the urban design context for public spaces and key thoroughfares</i> <i>- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies</i></p>	<p>✓ The proposed development makes use of a vacant site (formerly temporary schools) and brings into residential use at an attractive riverside location.</p> <p>✓ The character of the area is a mix of apartments (e.g. Balgriffin Park/The Hermitage) and houses (e.g. Parkside). Along the Mayne Linear Park, the precedent has been for apartments and duplexes fronting onto the park on one side and road (Marsfield Ave./Parkside Boulevard) on the other. The apartment scheme under construction to the east will establish a scale of 6 storeys which mirrors that already existing further east along Marsfield Avenue.</p> <p>✓ The current proposal seeks to continue this urban edge to the park with a scheme ranging from 3-7 storeys, but with the buildings oriented east-west so that the massing along the road and across from the existing 2-3 storey houses is not overbearing and to allow views and access through the scheme to the park and beyond.</p> <p>✓ A series of public and communal open spaces are created within the scheme and the proposal includes completion of the linear river park west of Balgriffin Park. The proposed development establishes an attractive urban edge to the park providing for passive surveillance and security. It will also act as a local nodal development at the junction of Parkside Boulevard and Balgriffin Park.</p> <p>✓ The scheme contributes to an overall sustainable mix of residential types in the Belmayne area.</p>

<p>SPPR 2 <i>In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</i></p>	<ul style="list-style-type: none"> ✓ The proposed development seeks to provide for a mixed tenure type development with private and social housing. Furthermore, there will be a mix of residential uses within the development itself such as residential amenity facilities, such as gyms and meeting rooms. This will all add to the variety and mix of the development as well as creating active frontage and animation. ✓ The proposal will also include the provision of the central piece of the linear park which is a vital part of the community infrastructure and is a key part for of the leisure facilities in the area.
<p>At the scale of the site/building: <i>- Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i></p>	<ul style="list-style-type: none"> ✓ The proposed development is set out in four residential blocks which run parallel to each other in a north south direction taking advantage of the site's orientation, ensuring all units have access to high quality daylight and sunlight and also that all of the open spaces between blocks are not excessively shadowed. A daylight/sunlight analysis confirming this is submitted with the application.
<p>Specific Assessments: <i>-Specific impact assessment of the micro-climatic effects such measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. -Development locations in proximity to sensitive bird/bat areas need to consider the potential interaction of the building location, materials and artificial lighting. -Relevant environmental assessment requirements.</i></p>	<ul style="list-style-type: none"> ✓ The flat, low lying nature of the existing site, and the height and orientation of the proposed blocks indicates that the development is unlikely to create negative local wind microclimate impacts. ✓ The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites. We refer to the submitted EIAR and NIS in this regard. We note that the site is considered of low sensitivity in relation to bats and protected bird species.

<p>SPPR 3 <i>It is a specific planning policy requirement that where;</i></p> <ol style="list-style-type: none"> <i>1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and</i> <i>2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.</i> 	<ul style="list-style-type: none"> ✓ The above analysis sets out how the proposed development complies with the range of criteria from site to city scale. ✓ DCC planning department also concurred, during pre-planning consultations, that the site was appropriate for additional height above the LAP stipulation having regard to its specific locational context and the assessment criteria now established in national guidance.
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EVALUATION OF CONSISTENCY

It is considered that the subject site is an appropriate site for a building which is up to 7 storeys as proposed as part of this pre-application consultation. The proposal responds to its overall natural and built environment and it makes a positive contribution to the urban context.

The proposed development is set out in four residential blocks which run parallel to each other in a north south direction taking advantage of the sites orientation, ensuring all units have access to high quality day and sunlight and also that all of the open spaces between blocks also benefit from high quality light.

The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material pallet in the locality. It is considered that the proposed development is in keeping with the character and building fabric of the area as is now emerging with the adjoining riverside apartment developments to the east.

The proposed development provides for significant public open spaces broken into a number of areas including the River Mayne Linear Park which measures c.16,900sqm

It is respectfully submitted that the proposed development has had regard to the planning policy framework as set out in the building height guidelines and National Planning Framework. The provision of residential development at this location between 6 no. and 7 no. storeys is supported by the height guidelines which encourages increased density and building heights. The proposed development complies with such objectives therefore is considered to be in accordance with the provisions of national policy guidelines.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2018

The Apartment Guidelines 2018 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes,

including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

POLICY	EVALUATION OF CONSISTENCY
<p>Specific Planning Policy Requirement 1</p> <p><i>Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</i></p>	<p>The permitted apartment mix is 94 no. 1-bed (c. 33.3%), 8 no. 2-bed, three person (c. 2.8%), 167 no. 2 bed, four persons (59.3%) and 13 no. 3-bed (c. 4.6%) apartments. The mix accords with SPPR1.</p>
<p>Specific Planning Policy Requirement 2</p> <p><i>For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</i></p> <ul style="list-style-type: none"> • <i>Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;</i> • <i>Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;</i> • <i>For schemes of 50 or more units, SPPR 1 shall apply to the entire development.</i> 	<p>The proposal is for a development consisting of 282 no. apartments with a mix as shown in SPPR1.</p>
<p>Specific Planning Policy Requirement 3</p> <p><i>Minimum Apartment Floor Areas:</i></p> <p><i>Studio apartment (1 person) 37 sq.m</i></p>	

<p>1-bedroom apartment (2 persons) 45 sq.m 2-bedroom apartment (4 persons) 73 sq.m 3-bedroom apartment (5 persons) 90 sq.m</p>	<p>As per the Housing Quality Assessment submitted the proposed unit sizes accord with SPPR3.</p>
<p>Specific Planning Policy Requirement 4</p> <p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p>(i) <i>A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.</i></p> <p>(ii) <i>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.</i></p> <p>(iii) <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i></p>	<p>50% of the units are dual aspect and 50% are single aspect apartments and accord with SPPR4. None of the single aspect units face north.</p>
<p>Specific Planning Policy Requirement 5</p> <p><i>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of</i></p>	<p>The permitted ground floor apartments have 2.7m floor to ceiling height in accordance with SPPR5.</p>

<p>any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p>	
<p>Specific Planning Policy Requirement 6</p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.</p>	<p>Each apartment core has less than 12 apartments per floor in accordance with SPPR6.</p>
<p>Specific Planning Policy Requirements 7 to 9 relate to Build to Rent (BTR) and Shared Accommodation are not relevant to the current proposal.</p>	<p>N/A</p>

POLICY	EVALUATION OF CONSISTENCY
<p>A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and town that may be suitable for apartment development as follows:</p> <ul style="list-style-type: none"> • Central and/ or Assessible Urban Locations • Intermediate Urban Locations • Peripheral and/ or Less Accessible Urban Locations 	<p>The subject site is located within an Intermediate Urban Locality due to its proximity to high capacity urban public transport stop in the form of the train station (within 15 minutes' walk) along with its accessibility to a high frequency bus routes within a 10 minute walk of the site. The Apartment Guidelines note that these locations are generally suitable for smaller scale (will vary subject to location) higher density development that may wholly comprise apartments.</p>
<p>Section 4.16 identifies that cycling “provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.”</p>	<p>In line with this ambition over 423 secure, readily accessible cycle parking spaces have been provided and designed into this scheme at basement and surface level.</p>
<p>Section 4.19 identifies that in Intermediate Urban Locations such as this one, in “suburban/ urban locations served by public transport or close to town centres or employment areas and particularly for</p>	<p>This scheme has an appropriate level of car parking in this development in line with this policy to provide 286 no. car parking spaces, 9 of which are on street visitor parking spaces. The accessibility of this site due to the public</p>

<p><i>housing schemes with more than 45 dwellings per hectare net, planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard."</i></p>	<p>transport systems including the train and bus located in close proximity enable this scheme to have this parking level.</p>
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The apartment guidelines states that all apartments should include private and communal open space.

EVALUATION OF CONSISTENCY

Each of the proposed units will contain private open space in excess of the requirements. The quantum of private open space is set out in the Housing Quality Assessment prepared by McCrossan O'Rourke Manning Architects.

In terms of quantum of public open space, the proposed development provides over 16,900 sqm (1.69ha or 53% of the gross area) of public open space along the Mayne River Linear park as well as access routes between and around the buildings from Parkside Boulevard.

In addition to the delivery of a large quantum of public open space there are two large areas of communal open space between blocks 1 and 2; and blocks 3 and 4, which measure in total 1,950 sqm (0.195ha or 6%) in size.

This high quality, car free landscaped open space around the apartment buildings with multiple character areas creates a very pleasant environment for future occupants. The proposed public and communal open spaces exceed the requirements of the apartment guidelines. It is considered that the location of the public areas allows for free movement within the site and to the surrounding lands which increases permeability and connectivity through the site. The communal open spaces are located within the centre of the scheme and form more privatised spaces for residential use only.

The proposed density on the subject site is c. 89 no. units per hectare (gross). It is considered that the proposed density is appropriate given the National Policy objective to increase residential density in existing urban infill locations. This planning application is accompanied by a Housing Quality Assessment document prepared by McCrossan O'Rourke Manning Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the 2018 Apartment Guidelines.

The proposed apartment buildings and units are considered to be suitably located on the subject site, integrated within the landscape and well connected to adjacent facilities including public transport, and will provide a high quality development on the subject site.

QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES, 2007

Quality Housing for Sustainable Communities (2007) is a guidance document that promotes quality sustainable residential development in urban areas having regard to the following:

- *promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *encourage best use of building land and optimal of services and infrastructure in the provision of new housing;*
- *point the way to cost effective options for housing design that go beyond minimum codes and standards;*
- *promote higher standards of environmental performance and durability in housing construction;*
- *seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *provide homes and communities that may be easily managed and maintained.*

The following criteria indicate the 7 no. essential requirements for new residential developments:

POLICY	EVALUATION OF CONSISTENCY
<p>Socially & Environmentally Appropriate “The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces.”</p>	<p>✓ The proposal provides 282 no. units comprising a range of apartment types including 94 no. 1 beds, 175 no. 2 beds (3 and 4 person), and 13 no. 3 bed units. Residential amenities are also provided through the provision of a concierge, a media centre and a gym along with high quality communal open space. Play and recreation spaces are provided by the linear park to the north and it is also in very close proximity to both the Parkside neighbourhood park and Father Collins Park.</p>
<p>Architecturally Appropriate “The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.”</p>	<p>✓ The subject site is an extension of the Parkside scheme. The linear park to the north of the site will connect it and the surrounding areas by the provision of an attractive pedestrian and cycle link. The central open space between blocks 2 and 3 the scheme, the linear park, and Castlemoyne to Parkside Boulevard and the Main Street further to the south. The scheme is of a scale which provide enclosure to an otherwise very wide road, Parkside Boulevard, while also providing surveillance and security to the area.</p> <p>✓ The heights proposed reflect the existing heights along Marsfield Avenue.</p>
<p>Accessible & Adaptable “There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings</p>	<p>✓ Major roads connecting the site have been constructed as part of permission granted under DCC Reg. Refs.: 2941/14, 2296/16, 2679/16. The subject proposal will facilitate pedestrian access to Father Collins Park via Parkside Boulevard and along the River Mayne Linear Park. The scheme accommodates a</p>

<p>should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”</p>	<p>pedestrian and cyclist route parallel to Parkside Boulevard. The development, due to the location of the parking in the basement is largely car free and is therefore a safe, quiet and peaceful environment for residents and cyclists to be in.</p> <ul style="list-style-type: none"> ✓ All of the apartments are wholly accessible to all. The internal layout of each apartment can be adjusted to accommodate the needs of the residents. ✓ The emphasis of development is directed towards the street and open spaces, and the quality of the streetscape creating pedestrian and cycle friendly environment through the elimination of parking but with active ground floors. ✓ The scheme provides 3 links in a north-south direction between the main road and the linear park to the north, which would be key attractors in this area.
<p>Safe, Secure & Healthy “The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.”</p>	
<p>Affordable “The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”</p>	<ul style="list-style-type: none"> ✓ The mix of unit types and sizes will offer a range of housing options making the scheme affordable to future homeowners and to the developer. Areas of public open space and the roads shall be taken in charge by the local authority, please see MCORM Taking in Charge drawing. A management company will be established to maintain and manage the areas of communal open space, parking and bin storage associated with the apartments.
<p>Durable “The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.</p>	<ul style="list-style-type: none"> ✓ The development will be constructed using the best available construction techniques, ensuring the longevity of the scheme. Please see the Design Statement by MCORM.
<p>Resource Efficient “Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable</p>	<ul style="list-style-type: none"> ✓ The provision of services such as transport infrastructure, and community facilities, and new roads have been delivered in previous phases of development. This proposal will provide for a central section of the linear park. The site is relatively flat and is rectangular in shape. As a result, the apartments are oriented in a north south direction, so they have maximum solar gain with residential

<p>sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”</p>	<p>units generally facing east or west. This ensures that the units and their associated private open space benefit from sunlight throughout the day. Please see the Sunlight/Daylight report from IES. Solar panels/photovoltaic panels will be fitted to roofs to enable solar gain.</p>
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GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS 2009

The following guidelines set out qualitative standards that ensure residential developments create sustainable living environments:

POLICY	EVALUATION OF CONSISTENCY
<p><i>Section 2.1-2 Plan led approach</i></p> <ul style="list-style-type: none"> -The amount and type of new housing required to meet the needs of the wider area -Adequate existing public transport capacity available -The relationship and linkages between the area to be (re)developed and established neighbourhoods -The scale, location and type of public open space -Appropriate density levels within the area -Protection and enhancement of biodiversity and the green infrastructure -Adaptation to impacts of climate change -Avoidance of natural hazards such as flood risk 	<ul style="list-style-type: none"> ✓ The proposed development is on a zoned, serviced site identified for housing. The proposed apartments will provide for an increase in the mix of housing types throughout the Parkside Development. It will also meet the existing housing need in the area. ✓ The design, form and scale of development is cognisant of the existing Parkside scheme to the south and Castlemoyne estate to the north as well as the new development to the east which is delivering 6 storey apartment blocks on the other side of Balgriffin Park Road. ✓ The area is within 15 minutes walking distance of the DART and within 10-15 minutes’ walk of a range of frequent bus services. ✓ The proposed density of development is considered appropriate given the highly sustainable location of the site, and the nature of the surrounding developments both existing and proposed. ✓ The proposed development will deliver the central section of the River Mayne Linear Park. This park follows the river linking the Malahide Road to Clongriffin. It is to the north of the proposed apartment buildings providing a buffer for the riparian way. The linear park has several smaller areas which are highly landscaped. ✓ The proposal will enhance biodiversity the site through appropriate landscaping of the riparian

	<p>route. The linear park facilitates the development of green infrastructure in the area by connecting Father Collins Park with the River Mayne. The linear park will support biodiversity by creating a green route for animals from Malahide Road to Baldoyle Racecourse.</p> <p>✓ The proposed development will re-profile the land in this area to ensure that all appropriate mitigation measures are in place to prevent flooding of the development or adjoining areas. The linear park also acts as a natural flood plain should the need arise.</p>
<i>Section 2.3 Sequential approach</i>	
<p><i>-the development plan should identify where practicable the sequential and co-ordinated manner in which zoned lands will be developed</i></p> <p><i>-The provision of water and sewerage investment programmes by planning authorities must also be related to the sequencing of residential lands</i></p>	<p>✓ The site is subject to a Local Area Plan which outlines a phasing strategy for the area. Parkside to date has been carried out in general accordance with the LAP phasing and with significant physical and social infrastructure provided in advance or in tandem.</p>
<i>Chapter 3 The role of design</i>	
<i>Does the proposed development give due consideration to the 12 Best Practice Design Manual Criteria?</i>	✓ The response to 12 criteria is discussed in detail as part of evaluation of consistency with Urban design Manual.
<i>Have designers of urban housing schemes carried out a site appraisal prior to preparing a layout?</i>	✓ Yes, the layout was derived from a site appraisal conducted for the site which considered alternative options.
<i>Is the standard of design of a sufficiently high standard?</i>	✓ Yes, the proposed development is of a very high design standard.
<i>Does the design of residential streets strike the right balance between the different functions of the street, including a "sense of place"?</i>	✓ The proposed development is arranged in 4 blocks with 2 communal amenity areas of 1950sqm and a public open area of 1110sqm located in between the blocks 2 and 3. These areas are entirely pedestrianised and the public open space between blocks creates a pleasant, car free access between the linear park and Parkside Boulevard. The height proposed, in line with other apartment developments to the east, creates a strong urban edge to an otherwise wide open road to the south, while also providing an attractive feature on the edge of the linear park. The layout provides a clear sense of location within the surrounding area and also ensures maximise visual

	surveillance creating safer spaces to be in. The proposed layout and design of the spaces ensures that each space will have an identity and will contribute to the sense of place for the development.
<i>Chapter 4 Planning for Sustainable neighbourhoods</i>	
<i>Has an assessment of the capacity of existing schools or the need for new school facilities been carried in connection with proposals for substantial residential developments?</i>	✓ The school going population that will be generated from the development in time was assessed against the capacity of existing schools within the site catchment as part of the EIAR and this was found to be satisfactorily accommodated.
<i>Is there an appropriate range of community and support facilities?</i>	✓ A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site. These are set out in the EIAR and the Social Infrastructure Audit. Additional community facilities such as media centre, concierge and gyms are provided within the development also.
<i>Ensure accessibility for everyone</i>	✓ The apartment scheme has a lift within each block making all apartments to be suitable for older people or people with reduced mobility
<i>Encourage more efficient use of energy and a reduction in greenhouse gas emissions?</i>	✓ The orientation and layout of units provides a density that promotes the efficient use of land. Greenhouse gas emissions will be minimised through the use of efficient heating systems, modern insulation techniques and use of glazing to maximise solar penetration throughout each house
<i>Include the right quality and quantity of public open space</i>	✓ The proposed development provides for significant public open spaces broken into a number of areas including the River Mayne Linear Park.
<i>Include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?</i>	✓ The layout and design of the scheme will provide a high quality living environment where safety and convenience are of the utmost importance. All units overlook existing streets and parklands, therefore contributing to passive surveillance of this neighbourhood. The layout offers a high level of amenity and privacy for balconies and within apartments.

<p><i>Present an attractive and well-maintained appearance?</i></p>	<p>✓ The layout of the proposed development is determined by the broadly rectangular shape of the site, and its position between Parkside Boulevard and the Linear Park. The creation of links between these locations is a key consideration, resulting in parallel north-south routes through the site. As part of the landscaping proposal, trees and shrubbery will line the parkland and road to enhance the quality of the public realm.</p>
<p><i>Promote social integration and provide for a diverse range of household types, age groups and mix of housing tenures?</i></p>	<p>✓ The scheme provides a mix of apartment sizes within the apartment blocks. This mix will cater to the needs of first time buyers, starter homes for small families, couples and the elderly.</p>
<p><i>Protect, and where possible enhance, the built and natural heritage?</i></p>	<p>✓ There is no built heritage on site. The natural heritage of the river has been carefully assessed as part of the built and landscape design and in terms of mitigation of any ecological impacts as set out in the EIAR.</p>
<p><i>Provide for Sustainable Drainage Systems?</i></p>	<p>✓ The design includes provision for SUDs. Please refer drawings and reports by DBFL consulting furnished with this application.</p>
<p><i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i></p>	<p>✓ Roads and footpaths have been aligned with existing networks to promote permeability for all road users. Pedestrian connections are provided along Parkside Boulevard and the Mayne River Linear Park to Malahide Road to Clongriffin Town Centre.</p> <p>✓ Please see DBFL's Transport Statement enclosed with this pre-application consultation.</p>
<p><i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i></p>	<p>✓ The layout and design of the scheme will provide a high quality living environment where safety and convenience are of the utmost importance. All units overlook existing streets and parklands, therefore contributing to passive surveillance of this neighbourhood. The layout offers a high level of amenity and privacy for balconies and within apartments.</p>
<p><i>Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;</i></p>	<p>✓ A range of community facilities such as schools, public parks, amenity areas and retail services in the area have been developed (or are under</p>

	construction). New connections to these services will be provided as part of this proposal.
<i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i>	✓ The layout of the proposed development is determined by the broadly rectangular shape of the site, and its position between Parkside Boulevard and the Linear Park. The creation of links between these locations is a key consideration, resulting in parallel north-south routes through the site. As part of the landscaping proposal, trees and shrubbery will line the parkland and road to enhance the quality of the public realm.
<i>Are easy to access for all and to find one's way around;</i>	✓ The layout is conducive to wayfinding and provides pedestrian and cycle links through the area. The use of height and the punctuation of spaces between buildings enhance legibility of the area and denote the hierarchy of spaces within the scheme.
<i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i>	✓ The orientation and layout of units provides a density that promotes the efficient use of land. Greenhouse gas emissions will be minimised through the use of efficient heating systems, modern insulation techniques and use of glazing to maximise solar penetration throughout each apartment.
<i>Provide a mix of land uses to minimise transport demand;</i>	✓ The proposal is for a residential scheme only. Neighbourhood services are provided through earlier phases of development such as the creche in phase 2C and also the developments at Belmayne and Clongriffin (which will be accessible via the Green link) and also at Clarehall Shopping Centre and Northern Cross.
<i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i>	✓ The scheme provides a mix of apartment sizes within the apartment blocks. This mix will cater to the needs of first time buyers, starter homes for small families, couples and the elderly.
<i>Enhance and protect the green infrastructure and biodiversity; and</i>	✓ The proposal will enhance biodiversity of this vacant and bare site through tree and shrub planting. The linear park facilitates the development of green infrastructure in the area by connecting Father Collins Park with the River Mayne. The linear park will act as a green route

	for animals supporting the biodiversity in the area.
<i>Enhance and protect the built and natural heritage.</i>	✓ There is no built heritage on site. The natural environment will be retained and improved upon within the proposed landscape strategy.

URBAN DESIGN MANUAL: A BEST PRACTICE GUIDE – A COMPANION DOCUMENT TO THE GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
<i>The development seems to have evolved naturally as part of its surroundings.</i>	✓ The form and scale of units respect the existing built environment with own door housing comprising 2-3 storey, semi-detached and terraced units as well as development which is currently under construction in the form of 6 storey apartment blocks. The proposal endeavours to consolidate development in a sustainable and efficient manner as advocated by the Clongriffin – Belmayne LAP.
<i>Appropriate increases in density respect the form of buildings and landscape around the site’s edges and the amenity enjoyed by neighbouring users.</i>	✓ The proposed net density of c.89 uph (gross) is in accordance with National Planning Policy which encourages sites to make the best use of zoned land and it is in line with the residential density standards of the LAP.
<i>Form, architecture and landscaping have been informed by the development’s place and time.</i>	<p>✓ The design of units and palette of materials proposed will architecturally unite the existing and proposed built form.</p> <p>✓ The proposed development, due to the location of the majority of car parking in the basement is car free (there is some car parking along Parkside Boulevard) and will expand the existing and proposed network of cycle and pedestrian links in the area. The timely delivery of dwelling units proposed in this application is considered appropriate given the implementation of open space and service infrastructure in the area.</p>

<p><i>The development positively contributes to the character and identity of the neighbourhood.</i></p>	<ul style="list-style-type: none"> ✓ The subject site has four blocks of development that runs in a north south direction, with a centralised park between blocks 2 and 3 linking Parkside Boulevard to the south to the linear park to the north. Throughout the development there is pedestrian and cycle priority route running from the linear park to the north. This is well landscaped and provides a visual link between the spaces in this area creating a clearly identifiable location. This in conjunction with the varying building heights, particularly at the south east corner, ensures a sense of place. ✓ The layout promotes permeability between the site and surrounding pedestrian and cyclist network. Emphasis is on the linear park and the central open space with units overlooking the space. The link will operate as a shared space for pedestrians and cyclists to create a living/recreation space that promotes social interactions among residents.
<p><i>Appropriate responses are made to the nature of specific boundary conditions.</i></p>	<ul style="list-style-type: none"> ✓ This development seeks to physically integrate with and continue the urban edge created by apartment developments (existing and under construction) to the east along the riverside. The design and layout of it will provide access and views through the site to the linear park from the main road and from the rest of the Parkside Development. ✓ The height of the building is consistent with other permitted development on the north side of Parkside Boulevard/ Marrsfield Avenue. It has been laid out to ensure that the height is not domineering to the existing residential houses located to the north and south of the site. Its mass will be broken up by a variety of materials providing an interesting and attractive design while also introducing a higher density in an appropriate location. ✓ The height and density of development in this location will provide a strong urban edge, while also ensure that there is passive surveillance to the surrounding areas.

	✓ Landscaping treatments will be responsive to specific boundary conditions. We refer to Áit Urbanism drawings and report for more information.
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2. Connections – How well connected is the new development

<i>There are attractive routes in and out for pedestrians and cyclists.</i>	✓ The designated cycle and footpath to the south along with the linear park to the north provides an attractive, landscaped and functional route for pedestrians and cyclists. ✓ The development, due to the location of parking in the basement is predominantly car free at surface level, making a peaceful, enjoyable and safe environment for pedestrians and cyclists.
<i>The development is located in or close to a mixed-use centre.</i>	✓ The development forms part of the overall Parkside development lands. Mixed use services including retail are located to the south west of the site on Main Street Belmayne and further west at Northern Cross.
<i>The development's layout makes it easy for a bus to serve the scheme.</i>	✓ The site is located close to the 15, 27 and 27X Dublin Bus services which operate on the R139 to the south of the site. The 42 and 43 bus services operate to the west on the Malahide Road. All bus services are within walking distance from the site. Clongriffin DART station is located c.1.5km from the site via Father Collins Park. The site is therefore served by a range of transport options.
<i>The layout links to existing movement routes and the places people will want to get to.</i>	✓ The block layout allows for ease of movement across the site and connects to existing services and facilities.
<i>Appropriate density, dependent on location, helps support efficient public transport.</i>	✓ The density is in accordance with national policy and makes an effective use of land, public transportation, recreational, retail and educational services in the wider area.

3. Inclusivity – How easily can people use and access the development?	
<i>New homes meet the aspirations of a range of people and households.</i>	<ul style="list-style-type: none"> ✓ New apartments will meet the needs of a wide range of future occupants from first time buyers, families with children and downsizers. The range of housing typologies and quality of internal spaces and private open space and communal spaces will fulfil the requirements of all future residents.
<i>Design and layout enable easy access by all.</i>	<ul style="list-style-type: none"> ✓ The layout of the buildings results in the streets, public open spaces and communal open spaces all being overlooked and provide a presence on all public areas. The overall site is subdivided by the public open space and pedestrian/ cycle priority route. There are 4 blocks of apartments, and the spaces between the blocks provide views through the site and break up the development. The development is largely car free. All of the public and communal spaces are at grade and will be accessible to all with easy links to the wider area.
<i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i>	<ul style="list-style-type: none"> ✓ The wider area provides adequate public open space in the form of Father Collins Park, linear park, the neighbourhood park and the green link. There are also two large areas of communal open space between blocks ✓ Private open space will be facilitated through balconies/terraces for the apartments.
<i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i>	<ul style="list-style-type: none"> ✓ The public realm will be accessible to all. Public, private and semi-private areas will be defined by soft and hard landscaping treatments. We refer to Áit Urbanism landscape drawings for more information.
<i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i>	<ul style="list-style-type: none"> ✓ All dwellings are oriented towards the public spaces contributing to the passive surveillance and overall security of the scheme. ✓ The building line created by each unit clearly defines the blocks' edges to ensure there are no physical barriers to views to and from the site.

4. Variety – How does the development promote a good mix of activities?

<p><i>Activities generated by the development contribute to the quality of life in its locality.</i></p>	<p>✓ The proposal will aid the consolidation of the Parkside lands particularly Phase 1, 2A and 2B. The scheme will provide additional physical and social connections.</p> <p>✓ The provision of this section of the linear park will enable connectivity to Fingal County Council and the wider area. It will also improve the biodiversity in the area.</p>
<p><i>Uses that attract the most people are in the most accessible places.</i></p>	<p>✓ The continuation of the Linear Park, enabling the central section of the park to be completed, which will connect to the Malahide Road to Clongriffin and the Castlemoyne Estate to Parkside. It will enable cycle and pedestrian traffic to travel easily to the east and west promoting sustainable travel, as well as along the car free north sites in the centre of the site, and to the east and west. This ensure residents in this scheme will have a reduced need to travel by car given the excellent pedestrian permeability of the overall Parkside development. Proposed paths will connect with surrounding recreational, retail and educational services in the area.</p>
<p><i>Neighbouring uses and activities are compatible with each other.</i></p>	<p>✓ Neighbouring residential uses to the north, north west, south and east will be compatible with the proposal.</p>
<p><i>Housing types and tenure add to the choice available in the area.</i></p>	<p>✓ A mix of apartments contribute to the existing choice of housing types in the area.</p>
<p>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</p>	<p>✓ Given the proximity of the site from shops and facilities and taking into consideration the overall masterplanning of the area, the scheme will complement these uses.</p>

5. Efficiency - How does the development make appropriate use of resources, including land?

<p>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</p>	<p>✓ The proposal achieves the optimum density on site having regard to the standards of national and local policy as well as existing services and transport options.</p>
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Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.	✓ The public realm will be planted with a diverse mix of plants and tree species to create tree lined avenues. We refer to Áit Urbanism landscape drawings for more information.
Buildings, gardens and public spaces are laid out to exploit the best solar orientation.	✓ The four blocks are laid out in a north south direction, ensuring all units have access to either east or west light, this is considered to be one of the best solar orientations for site layouts. The fingers of space between the blocks will all benefit from southern light. 50% of the units have multiple aspect.
The scheme brings a redundant building or derelict site back into productive use.	✓ This is a vacant site following the removal of the two temporary schools to a new site
Appropriate recycling facilities are provided.	✓ Dedicated bin stores will serve the apartment units.

6. Distinctiveness - How do the proposals create a sense of place?

The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.	✓ The apartment blocks vary in height and all address the public open space between them. The corner block to the south east is 7 storeys providing definition to the development. There is a hierarchy of spaces between blocks in the form of communal and public open space. All of the spaces, in line with the Ait landscape plan, will be designed to have its own character.
The scheme is a positive addition to the identity of the locality.	✓ The design of units and landscaping proposed including the centralised public open space and the linear park running through the site, is an extension of the existing Parkside development.
The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	✓ The natural landscaping of the linear park reflects the winding nature of the River Mayne. The more formal setting of the public open spaces between blocks reflects the Parkside development to the south incorporating and blending the architectural language of both areas.
The proposal successfully exploits views into and out of the site.	✓ The spaces between the blocks create fingers of open space, and views through the site,

	creating an open and visual permeable development. This maintains views to, through and from the site. The proposed building height and number of storeys is cognisant of this.
There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.	✓ The central public open space between blocks B and C along with the linear park to the north provide two key focal points for the development. The central open space provides a car free connection between the linear park and the wider area including Father Collins Park and the neighbourhood park. The corner building to the south east creates a landmark adding to the overall legibility and identity of the scheme.

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

Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.	✓ The scheme has the majority of the car and cycle parking underground creating a car free environment which increase the safety, and permeability for pedestrians and cyclists travelling in an east-west and north south direction.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	✓ All apartments overlook public open spaces. The linear park is the northern boundary of the scheme and is an important physical, social and recreation link for the scheme and the surrounding areas. ✓ This is a car free development with all cars accessing directly into the basement from Parkside Boulevard. This results in the rest of the development being entirely free from cars and a pleasant, tranquil place to be in.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	
Traffic speeds are controlled by design and layout rather than by speed humps.	✓ This is a largely car free development with traffic direct into basement from Parkside Boulevard.

<p>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</p>	<p>✓ The public realm surrounds the development, with one significant element between Blocks B and C which links the wider area to the linear park. There are also two areas of communal space between blocks A and B and C and D which are designed by Ait landscape Architecture to provide high quality space. These fingers of space all have a southern orientation providing high quality, pleasant space to be in year round.</p>
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8. Public Realm - How safe, secure and enjoyable are the public areas?	
<p>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</p>	<p>✓Overlooking of streets, communal and public spaces is achieved throughout.</p>
<p>The public realm is considered as a usable integrated element in the design of the development.</p>	<p>✓The public realm has been designed to integrate with the design of apartments. While the principal objective is the movement of people from place to place it is also an integral part of the overall scheme facilitating social interaction, recreation and play.</p>
<p>Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</p>	<p>✓Recreational areas will be provided in the linear park, neighbourhood park, and Father Collins Park nearby. The linear park is overlooked by these apartments while the other spaces are well surveyed by the surrounding development</p>
<p><i>There is a clear definition between public, semiprivate, and private space.</i></p>	<p>✓Landscaping strips will subtly separate the public, semi-private and private areas. Landscaping and species mix will denote these changing spaces.</p>
<p>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</p>	<p>✓Parking for individual apartments and for visitors will be provided in the basement with some surface level on street parking along Parkside Boulevard that are full integrated into the landscape proposal.</p>

9. Adaptability - How will the buildings cope with change?	
<i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i>	✓The proposal is relating to apartments.
<i>The homes are energy-efficient and equipped for challenges anticipates from a changing climate.</i>	✓The new apartments will be constructed in accordance with the energy efficiency standards in place.
<i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i>	✓The proposal is for apartments.
<i>The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.</i>	
<i>Space in the roof or garage can be easily converted into living accommodation.</i>	

10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?	
<i>Each home has access to an area of useable private outdoor space.</i>	✓ Each unit is provided with private balcony/terrace to standard.
<i>The design maximises the number of homes enjoying dual aspect.</i>	✓ 50% of units are dual aspect, some corner units have triple aspect.
<i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i>	✓ All units will be designed to prevent sound transmission in accordance with current building standards.
<i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i>	<p>✓ All units have been oriented to minimise overlooking. This has been achieved by ensuring the distance between blocks is appropriate between the blocks.</p> <p>✓ Landscaping strips and boundary treatments at ground floor level ensure that ground floor areas will have an adequate level of privacy.</p>
<i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables</i>	✓ All units are provided with storage space in line with relevant National Planning Policy requirements.

11. Parking – How will the parking be secure and attractive?	
Appropriate car parking is on-street or within easy reach of the home's front door.	✓ On-street and in the basement will provide safe parking within easy reach of the apartments. ✓ On street parking is overlooked by the apartments
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.	
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	
Materials used for parking areas are of similar quality to the rest of the development.	✓ Parking areas will comprise quality surface treatments that promote sustainable drainage and are in keeping with palette and quality of building materials used elsewhere in the development.
Adequate secure facilities are provided for bicycle storage.	✓ Bicycle parking will be accommodated in the basement and at surface level

12. Detailed Design – How well thought through is the building and landscape design?	
The materials and external design make a positive contribution to the locality.	✓The overall choice of materials and elevations will reflect the development in the surrounding area and will be an attractive feature in the landscape
The landscape design facilitates the use of the public spaces from the outset.	✓The public realm has been designed to ensure spaces are easily accessible, safe and secure and aesthetically complement the built form.
Design of the buildings and public space will facilitate easy and regular maintenance.	✓The layout of the blocks and the landscaped areas will be accessible for easy and regular maintenance.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	✓Parking areas are designed into the landscaping scheme. On-street and basement parking are provided. Visitor car parking will also be provided on site.
Care has been taken over the siting of flues, vents and bin stores	✓This objective is adhered to.

We consider the proposal in accordance with the above departmental guidelines. Based on the above, we predict the development will create a high-quality residential environment in Parkside.

DESIGN MANUAL FOR URBAN ROADS AND STREETS, 2019

In order to achieve a balanced approach to development, the following four core principles of good design for urban roads and streets have been adhered to in the design proposal:

Design Manual for Urban Roads and Streets	
Design Principle 1	Connected Networks
“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”	<p>The shape of the site combined with the existing road network to the south and the linear park to the north has guided the layout for this development. The scheme therefore employs a regular linear layout. The site is served by the Parkside Boulevard vehicular access to the south. This vehicular access is into a basement resulting in a car free development.</p> <p>A new cycle and pedestrian route is also proposed along Parkside Boulevard</p>
Design Principle 2	Multi-Functional Streets
“The promotion of multi-functional, place based streets that balance the needs of all users within a self-regulating environment.”	<p>The public realm is self-regulated as all dwelling units overlook and front streets/public realm. The quality and efficiency of the proposed street network prioritises pedestrians and cyclist by restricting the number of cars at surface level. This reflects the prioritising pedestrian and cyclist movement in the wider development area as a whole.</p>
Design Principle 3	Pedestrian Priority
“The quality of the street is measured by the quality of the pedestrian environment.”	<p>Pedestrian priority is of the utmost importance. To the north and south of the scheme are dedicated pedestrian and cyclist route which will provide safe access within and through the site.</p> <p>The clearly defined path network on the other streets will ensure the development is fully accessible to pedestrian/cyclists. Pedestrian/cyclist entrances will connect the site with Parkside Phase 1, 3 (P13, P15), 2A, 2B, 2C and 5A.</p>

Design Principle 4	Multi-Disciplinary Approach
<p><i>“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”</i></p>	<p>The proposed design results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers, landscape architects and Dublin City Council Planners.</p>

GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments, 2018* states the following:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”*

EVALUATION OF CONSISTENCY

A review of the need for a creche in this location has been included with the planning application documents. This has been carried out in line with Section 4.7 of the Guidelines for New Apartments and determined that a creche is not required as part of this predominantly 1 and 2 bed apartment development. The proposal is for 282 apartments, of which 175 are 2 beds and 13 are 3 beds, the rest are all 1 bed. In line with the Sustainable Urban Housing Design Standards for New Apartments 2018, one-bedroom apartments and studios can be excluded from the calculation.

A demographic analysis of expected creche demand arising from the scheme (extrapolated from existing Census data for the area) has been undertaken and estimates that the number of families requiring private childcare at any one time in the development will be low (c. 1 to 12 no. children), and that this demand can be met within existing/planned facilities in the vicinity without the need for an additional dedicated creche facility in this development. In particular the permitted Parkside creche as part of Phase 2c to the immediate south is noted which is a purpose built facility to serve all of Parkside including this Phase 4, and which is due to be carried out presently, with completion of that phase of development.

SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE: A NEW TRANSPORT POLICY FOR IRELAND 2009-2020

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.
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EVALUATION OF CONSISTENCY

The proposed development is in line with this overall vision for better integration between land-use and transport. The car parking provision along with the site's proximity to high quality public transport – the Clongriffin Train Station and numerous bus stops ensure that there will be a modal shift amongst residents in this scheme to alternative modes of transport and reduced reliance on the private car.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

EVALUATION OF CONSISTENCY

Full details of this assessment are in the Site Specific Floodrisk Assessment by DBFL Engineers submitted with this application. This identified that the majority of the development is located in the pre-development Flood Zone C as defined by the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices. Following modification of the flood plain no development will be located in Flood Zone A or B.

Following the Flood Risk Assessment Stage 2 (Initial Flood Risk Assessment), it was determined that a Justification Test was required. The completed Justification Test concluded that the sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and based on proposed mitigation measures (“level for level” compensation) and following the Justification Test, the proposed residential development is appropriate.

The development was concluded as having a robust level of flood protection up to the 100 year return event and a design complying with the GSDSDS design requirements. We note that additional enhancements have been provided in terms of attenuation provisions / volumes, SUDs etc over and above standard GSDSDS requirement to provide a robust flood protection regime for the site.

CLIMATE ACTION PLAN, 2019

Ireland's environment has directly experienced the extreme weather events. The Climate Action Plan 2019 set out a path for Ireland to transition to a low carbon and climate resilient society. The plan emphasizes compact forms of growth in development of settlements of all sizes, with a focus on urban infill and the re-use of brownfield lands. More people are envisaged to be living within existing footprint of cities and towns. The Action plan recognizes that 12.7% of Ireland's greenhouse gases were produced by built environments. A hierarchy of the most cost-effective investments underpinning emission reductions in the Built Environment, including:

- Improving the fabric of buildings
- District heating in commercial buildings
- Switching from oil burners to heat pumps
- Setting new building standards

To meet the required level of emissions reduction, by 2030 we will:

- Reduce CO₂ eq. emissions from the sector by 50–55% relative to 2030 Pre-NDP projections
- Deliver an early and complete phase-out of coal- and peat-fired electricity generation
- Increase electricity generated from renewable sources to 70%,

New buildings from latter half of 2019 are required to be designed as Near Zero Energy Building (NZEB). Better spatial planning will reduce the carbon emissions of new developments, and deliver a better quality of life, including shorter commute times, better connections between our places of work and homes, and more vibrant, people-focused environments.

To make development less transport intensive and reduce carbon emissions the key policies include expansion of walking, cycling and public transport that will promote modal shift.

EVALUATION OF CONSISTENCY

The proposed development has good connectivity with existing and proposed high frequency transport corridors that will reduce the commute times. The site is at an accessible distance of Clongriffin station that will provide the site with DART connectivity. At present shared cycle paths that run along Malahide road/R107 will connect the site with the city centre in 35 minutes.

Proposed development will employ the latest technology to provide for sustainable heating and insulation of apartments. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan.

4. REGIONAL PLANNING POLICY

The key policies documents in terms of regional planning policy are in

- Regional Spatial and Economic Strategy (Eastern and Midland Regional Assembly)
- Transport Strategy for the Greater Dublin Area 2016 – 2035

REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019- 2031

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Midlands regions and-Eastern Region - have been replaced by the Eastern and Midland Regional Assembly (EMRA).

The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond which is a new concept in Irish Planning tying spatial planning to economic factors. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

To this end the RSES Settlement Strategy supports, and as set out in Regional Policy Objective 4, the *consolidation and re-intensification of infill/ brownfield sites to **provide high density and people intensive uses within the existing built up area of Dublin and suburbs** and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*

In section 4.4, which deals with Dublin City and Suburbs, it supports *continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration.* To achieve this and the targets set by the NPF, it has identified strategic residential and employment development opportunities which includes *“the large scale urban expansion on the North Fringe of the city”*. The North Fringe includes Clongriffin- Belmayne and Baldoyle-Stapolin.



Figure 3 RSES Settlement Strategy

Section 5.3 sets the Guiding Principles for the growth of the Dublin Metropolitan Area. Some of these principles include:

- **Compact sustainable growth** - Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.
- **Integrated transport and land use** – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including Bus Connects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.
- **Accelerate housing delivery**– Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.
- **Co-ordination and active land management** - enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and **land management policies that focus on the development of underutilised, brownfield, vacant and public lands.**



Figure 4 Dublin Metropolitan Area Strategic plan

MASP Housing and Regeneration policy object RPO 5.4 states that “Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities”

RPO 5.5 goes on to identify that “Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

The RSES along with the NTA and Local Authorities have developed Guiding Principles for Integration of Land Use and Transport in the region. These include:

- For urban-generated development, **the development of lands within or contiguous with existing urban areas should be prioritised** over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.
- The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be provided for, but in a manner, which complements the alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided.
- **Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.**
- Support the **'10 minute' settlement concept**, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
- Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.
- **Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency**

EVALUATION OF CONSISTENCY

The subject development is part of the wider Clongriffin-Belmayne LAP area which is identified in the RSES as a key development hub in the metropolitan area of the city. This site, in line with the policy objectives set out in the plan will provide for residential development on a key urban brownfield site at an appropriate density and height. It will enable the consolidation of this Belmayne area while also providing more amenity spaces for the wider area.

This site is within 15 minutes' walk of the Clongriffin Dart station, which is part of the DART Expansion Programme which is due to be delivered by 2027. This supports the provision of increased densities in locations such as this.

The proposed development is on zoned, serviced lands and is therefore compliant with the overall policies and objectives of the RSES in this regard.

TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035

The NTA Strategy promotes the consolidation of the Metropolitan Dublin area (where the application is located) allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike. This document identifies under its primary policy, in section 2.2 that *"the*

*Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. **This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.***

Section 7 states that “the implementation of the Strategy will facilitate a more efficient use of land within the GDA. By focussing public transport investment, and investment in the cycling and pedestrian network, into the city centre, major suburban centres and hinterland growth towns, the Strategy will complement national, regional and local planning policy by promoting and enabling the consolidation of development into higher order centres... In terms of the provision of housing, the Strategy will directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

EVALUATION OF CONSISTENCY

The application site is located within “Corridor-A (Drogheda – Balbriggan – Swords – Airport – North Inner City – to Dublin City Centre)”, in the inner metropolitan area. The NTA has identified that there is limited scope for further increases in road capacity and identifies that trips will have to be catered for by public transport. This proposed development will be within easy access of multiple forms of public transport in line with the transport strategy. It will also enhance the pedestrian and cyclist routes in the area support the strategy. There are multiple upgrades in this area to both the DART and through bus connects all of which aim to create a modal shift to other modes of transport other than reliance on cars.

Clongriffin is also identified as providing a core radial bus corridor for the Core Bus Network (Clongriffin – Artane - Fairview), along with A Bus Rapid Transit route from Clongriffin to Tallaght. The station is also part of the DART Expansion Programme which will be delivered in full by 2027.

This proposed development, Parkside 4, due to its location close to the Dart and a variety of bus routes, is in line with the ambitions of this policy.

5. LOCAL PLANNING POLICY

As noted above the site falls primarily within the jurisdiction of Dublin City Council however, there is a small area, immediately beside the Mayne River which falls within the jurisdiction of Fingal County Council. As a result, we will address the relevant policies within both the Dublin City Council Development Plan and Fingal County Council Development Plan. It is worth noting that a key objective of the Local Area Plan for this area is to see the two councils working together and creating links into Fingal County Council. This site incorporates this primary aim.

DUBLIN CITY DEVELOPMENT PLAN, 2016-2022

Settlement Strategy & Land Use Zoning Objective

The Development Plan incorporates the principles of the Regional Planning Guideline's settlement strategy in its settlement hierarchy which prioritises the inner city, key district centres and Strategic Development & Regeneration Areas (SDRAs).

The North Fringe (including Clongriffin and Belmayne) is designated as SDRA 1. The majority of SDRAs relate to a zoning objective which seeks the social, economic, physical development or rejuvenation of an area with residential, employment and mixed uses (Z14).

The key district centres (KDCs) represent the top tier of urban centres outside the city centre, a number of which form part of the larger SDRAs. Clongriffin and Belmayne (North Fringe East & West) is designated as KDC 1.

The majority of SDRAs relate to the Z14 zoning objective *"To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and "Z6" would be the predominant uses."* Residential is permitted under this zoning.

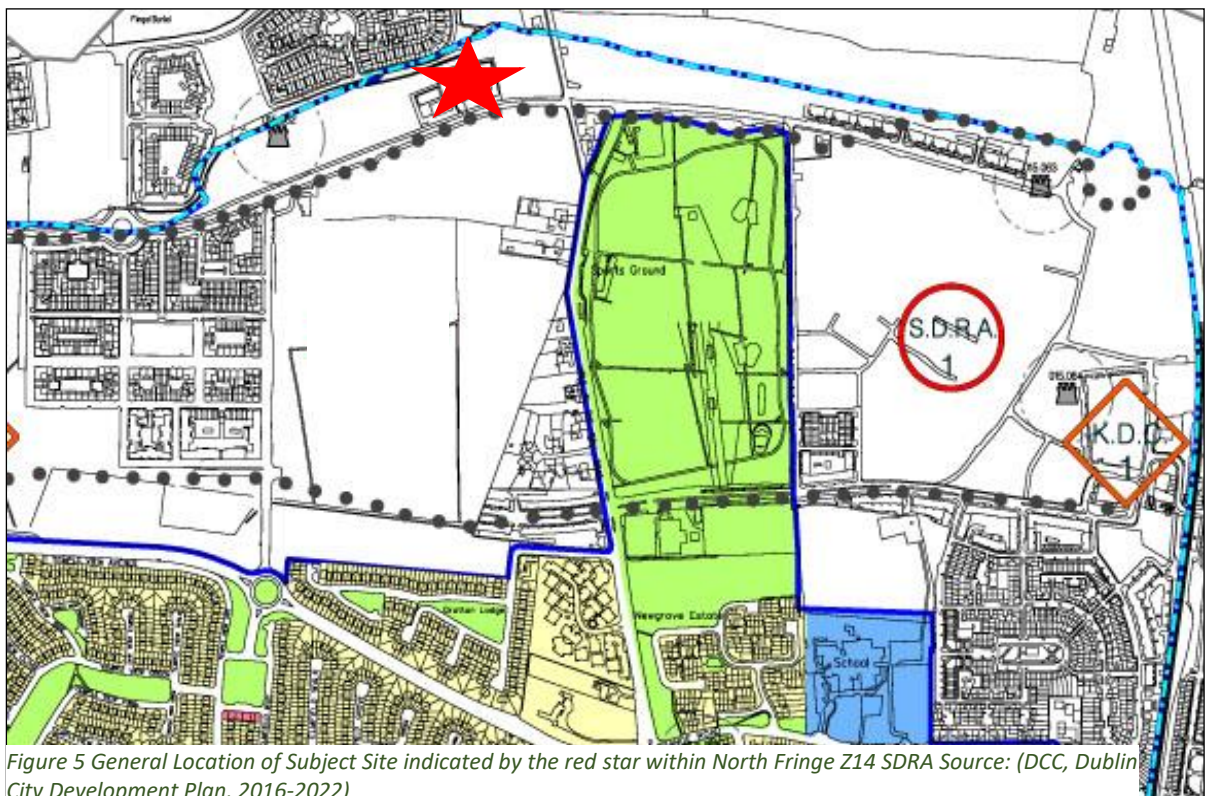


Figure 5 General Location of Subject Site indicated by the red star within North Fringe Z14 SDRA Source: (DCC, Dublin City Development Plan, 2016-2022)

SDRA1 North Fringe (Clongriffin-Belmayne)

Section 15.1.1.1 of the City Plan refers to the following:

The Local Area Plan is based on the following key objectives/guiding principles:

- 1. To create a highly sustainable, mixed-use urban district, based around high-quality public transport nodes, with a strong sense of place.*
- 2. To achieve a sufficient density of development to sustain efficient public transport networks and a viable mix of uses and community facilities.*
- 3. To establish a coherent urban structure, based on urban design principles, as a focus for a new community and its integration with the established community, comprising the following elements:*
 - *A central spine route, in the form of a boulevard or high street, linking the Malahide Road with the proposed train station to the east*
 - *Two high quality urban squares (one at the junction of the Malahide Road with the Main Street boulevard and the other adjacent to the rail station) as the main focus for commercial and community activity*
 - *A series of smaller urban squares as significant place markers and activity nodes e.g. a recreation square adjacent to Father Collins Park*
 - *A flagship urban park in the re-designed Father Collins Park*
 - *A new perimeter route running north from the Malahide Road via Belcamp Lane, relieving traffic pressure from the N32 and from the proposed Main Street boulevard*
 - *An interconnected network of streets and public spaces*
 - *To promote the creation of a high-quality public domain by establishing a high standard of design in architecture and landscape architecture*
 - *To use building heights to define key landmark locations, including:*
 - *Minimum heights of 5 stories for the key district centres at Clongriffin rail station and the N32/Malahide Road junction*
 - *Minimum heights of four to five storeys for the Main Street boulevard*
 - *A landmark structure of 10-14 storeys (office height) adjacent to the rail station.*
 - *To develop the amenity potential of the Mayne River in the creation of a linear park*
 - *To develop an urban design strategy for the lands at St. Michael's Cottages that is co-ordinated with the overall strategies for the developing areas.*

These objectives have informed a set of further policies and objectives contained within the subsequent Local Area Plan adopted for the area. The proposed development is assessed against these in the review of the LAP below.

Development Standards

The following tables review Development Plan policies on urban design, residential, open space and landscaping and physical and social infrastructure as relevant to the proposed development.

Chapter 5 – Quality Housing

POLICY	EVALUATION OF CONSISTENCY
<p><i>QH1: To have regard to the DECLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007); ‘Delivering Homes Sustaining Communities – Statement on Housing Policy’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2015) and ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009)</i></p>	<p>✓ We refer to the Schedule of Accommodation prepared by MCORM Architects for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.</p>
<p><i>QH3: (i) To secure the implementation of the Dublin City Council Housing Strategy` in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city</i></p>	<p>✓ Cairn Homes Properties Limited have engaged with the Housing Department at Dublin City Council with regard to the Part V. Please find enclosed the proposed Part V submission.</p>
<p><i>QH7: To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</i></p>	<p>✓ We refer to the Schedule of Accommodation which shows the net density of the scheme is c.89 gross units per hectare.</p>
<p><i>QH9: To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.</i></p>	<p>✓ It is envisaged that the subject application will be carried out in a single phase. This development forms part of an overall phasing scheme for the Parkside Development Lands.</p>
<p><i>QH10: To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.</i></p>	<p>✓ The linear park will connect Malahide Road to Clongriffin while the centralised public open space will connect Parkside Boulevard and the wider Parkside Area to the River Mayne, thus creating a well-connected and permeable neighbourhood.</p>
<p><i>QH12: To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the</i></p>	<p>✓ The scheme design employs the most up-to-date design and construction techniques that will improve energy performance throughout the Parkside Scheme.</p>

<p>development standards set out in the Development Plan.</p>	
<p>QH13: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in The Residential Quality Standards and with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).</p>	<p>✓All units are generously sized to allow some minor internal reconfiguration and adaptation.</p>
<p>QH14: To support the concept of independent living and assisted living for older people, to support the provision of specific purpose-built accommodation, and to promote the opportunity for older people to avail of the option of 'downsizing'. To support the promotion of policies that will: • Encourage/promote full usage of dwellings units • Incentivise property owners of underutilised dwellings to relocate to smaller age friendly dwellings. • Actively promote surrendering larger accommodation/financial contribution schemes without compulsion</p>	<p>✓The apartment scheme has a lift within each block making all apartments to be suitable for older people or people with reduced mobility. The proposed development complies with Part M.</p>
<p>QH15: To require compliance with the City Council's policy on the taking-in-charge of residential developments.</p>	<p>✓A taking in charge drawing will be provided with the full application.</p>
<p>QH16: To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas and facilities in the context of the Multi-Unit Developments Act 2011, the Property Services (Regulation) Act 2011 and the establishment of the Property Services Regulatory Authority.</p>	<p>✓All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up-keep.</p>
<p>QH18: To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.</p>	<p>✓All apartments front the public open spaces and communal space and road. Private amenity space in the form of balconies/terraces will provide for safe and secure private amenity space. Open space to the side/rear of the blocks will provide communal open space for residents. The centralised public open space, the Mayne River Linear Park, along with the other public open spaces within the wider area including the plaza, neighbourhood park and Father Collins Park contribute to the public open space of residents of the scheme.</p>

<p><i>QH19: To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable mixed-income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.</i></p>	<p>The unit mix is conducive to the creation of a well-balanced residential community. This development provides a mix of 282 no. as follows:</p> <ul style="list-style-type: none"> - 94 no. 1 bed (33.3%) - 8 no. 2 bed (3 person) (2.8%) - 167 no 2 bed (4 person) (59.3%) - 13 no 3 bed (4.6%)
<p><i>QH21: To ensure that new houses provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation.</i></p>	<p>✓ Generous internal living spaces, storage areas and private open spaces create a high-quality residential environment, consistent with the previous phases of development.</p>
<p><i>QH22: To ensure that new housing development close to existing houses has regard to the character and scale of the existing houses unless there are strong design reasons for doing otherwise.</i></p>	<p>✓ The majority of unit types have been constructed or are currently under construction. The design, materials, scale and height of apartments is therefore complementary of the existing Phases 1, 3 (also known as P13 and P15), 2A, 2B and 2C. The scale and form of the apartment blocks combined with the proposed materials and palette of colours visually harmonise and integrate the entire residential scheme.</p>

Chapter 10 – Green Infrastructure, Open Space and Recreation

POLICY	EVALUATION OF CONSISTENCY
<p><i>GI3: To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.</i></p>	<p>✓ The proposal will develop the central section of the Mayne River Linear Park and will be a natural meandering environment linking into the wider area. Please see the Ait Landscape drawings.</p>
<p><i>GI5: To promote permeability through our green infrastructure for pedestrians and cyclists</i></p>	<p>✓ The linear park will provide access between existing and proposed areas of open space, thus enhancing connectivity and permeability for both pedestrians and cyclists.</p>
<p><i>GI02: To apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects.</i></p>	<p>✓ All public and communal spaces will be landscaped and planted with trees/shrubs to improve tree cover and enhance biodiversity on site.</p>
<p><i>GI30: To encourage and promote tree planting in the planning and development of urban spaces, streets, roads and infrastructure projects.</i></p>	

Chapter 16 – Development Standards

POLICY	EVALUATION OF CONSISTENCY																		
<p>16.10.1 Residential Quality Standards – Apartments <i>Minimum overall apartment floor area*</i></p> <ul style="list-style-type: none"> • Studio-type 40 sq.m • 1-bed 45 sq.m • 2-bed 73 sq.m • 3-bed 90 sq.m <p><i>* All apartment floor area measurements are taken from internal wall-to-wall dimensions.</i></p>	<p>✓ All apartment/duplex units comply with the relevant Residential Quality Standards. Please see the Housing Quality Assessment prepared by MCORM for further details</p>																		
<p>Aspect, Natural Lighting, Ventilation and Sunlight Penetration: <i>Living rooms and bedrooms shall not be lit solely by roof lights and all habitable rooms must be naturally ventilated and lit. Glazing to all habitable rooms should not be less than 20% of the floor area of the room. Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011).</i></p>	<p>✓ 50% of all apartments are dual aspect. Corner units are triple aspect. Windows are generously sized to illuminate internal living spaces.</p>																		
<p>Minimum aggregate floor areas for living/dining/kitchen rooms:</p> <table border="1" data-bbox="225 1133 783 1473"> <thead> <tr> <th colspan="3" style="background-color: #800040; color: white;">Minimum widths for the main living/dining rooms</th> </tr> <tr> <th style="background-color: #800040; color: white;">Apartment type</th> <th style="background-color: #800040; color: white;">Width of living / dining room</th> <th style="background-color: #800040; color: white;">Aggregate floor area of living/ dining/kitchen area*</th> </tr> </thead> <tbody> <tr> <td style="background-color: #f0f0f0;">Studio</td> <td style="background-color: #f0f0f0;">5 m**</td> <td style="background-color: #f0f0f0;">30 sq.m**</td> </tr> <tr> <td style="background-color: #f0f0f0;">One bedroom</td> <td style="background-color: #f0f0f0;">3.3 m</td> <td style="background-color: #f0f0f0;">23 sq.m</td> </tr> <tr> <td style="background-color: #f0f0f0;">Two bedroom</td> <td style="background-color: #f0f0f0;">3.6 m</td> <td style="background-color: #f0f0f0;">30 sq.m</td> </tr> <tr> <td style="background-color: #f0f0f0;">Three bed</td> <td style="background-color: #f0f0f0;">3.8 m</td> <td style="background-color: #f0f0f0;">34 sq.m</td> </tr> </tbody> </table> <p><small>*Note: an enclosed (separate) kitchen should have a min floor area of 6.5 sq.m. In most cases, the kitchen should have an external window.</small></p> <p><small>**Note: Combined living/dining/bedspace</small></p>	Minimum widths for the main living/dining rooms			Apartment type	Width of living / dining room	Aggregate floor area of living/ dining/kitchen area*	Studio	5 m**	30 sq.m**	One bedroom	3.3 m	23 sq.m	Two bedroom	3.6 m	30 sq.m	Three bed	3.8 m	34 sq.m	<p>✓ All living room and bedroom areas meet the standards set out in the City Plan.</p> <p>✓ Adequate internal storage space is provided for.</p> <p>✓ We refer to the Schedule of Accommodation accompanying this application for more information.</p>
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<p>Minimum area for Private Open Space: Studio unit: 4 sq. m. 1-bedroom unit: 5 sq.m, 2-bedroom unit: 7 sq.m, 3-bedroom unit: 9 sq.m.</p>	<ul style="list-style-type: none"> ✓ Private open space in the form of terraces and balconies are provided for each apartment/duplex unit. All units meet and exceed these standards. ✓ We refer to the Schedule of Accommodation accompanying this application for more information. 																								
<p>Minimum area for communal amenity space: Studio: 4 sq. m, One bedroom: 5 sq. m, Two bedroom: 7 sq. m, Three bedroom: 9 sq. m</p>	<ul style="list-style-type: none"> ✓ The apartments are directly overlooking the linear park and the Boulevard. There are also two large areas of communal open space between block A and B and block C and D providing c. 1950sqm of communal open space. The areas are inviting spaces and are easily accessible from the apartments. ✓ We refer to the Schedule of Accommodation accompanying this application for more information. 																								
<p>16.10.2 Residential Quality Standards – Houses Private Open Space A minimum standard of 10 sq.m of private open space per bedspace will normally be applied. A</p>	<ul style="list-style-type: none"> ✓ N/A 																								

<i>single bedroom represents one bedspace and a double bedroom represents two bedspaces.</i>	
<i>15 Units or 1,500 sq. m All proposals for new development over 15 units or 1,500 sq. m must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to place-making and the identity of an area</i>	<ul style="list-style-type: none"> ✓ We refer to the design rationale prepared by MCORM Architects for more information.
<i>When submitting plans for large-scale residential, typically over 50 units depending on local circumstances, and/or mixed-use schemes (i.e. circa 5,000 sq.m and above), developers will be required to submit an audit of existing facilities within the area and to demonstrate how the proposal will contribute to the range of supporting community infrastructure. Proposals in excess of 50 dwelling units must be accompanied by an assessment of the capacity of local schools to accommodate the proposed development in accordance with the above guidelines and the DES and DEHLG's Code of Practice on the Provision of Schools and the Planning System 2008. Dublin City Council may also require developers to submit a phasing and implementation programme for large residential schemes in excess of 50 units, to ensure an agreed co-ordinated approach is taken to the timely delivery of key physical and social infrastructure elements that are essential for sustainable neighbourhoods. Proposals of this scale must also be accompanied by an Urban Design Statement (as set out above).</i>	<ul style="list-style-type: none"> ✓ It is considered that this planning letter includes all the necessary information pertaining to existing facilities in the area. ✓ A range of retail and commercial functions are provided for in the nearby Clarehall Shopping Centre and Northern Cross. ✓ Educational uses in the form of two brand new purpose built primary schools are located in the heart of the overall Parkside development. A creche is provided within the Phase 2C site. ✓ In relation to the phasing of development, it is noted that the following Parkside developments have been constructed (Phase 1, 2A, 2B, 3 (P13-P15)), whilst Phase 2C is nearing completion. Phase 5A has recently been granted permission. Phases 5B and 6 will be subject of a future SHD planning applications. The subject of this application is the next phase of development following on from phase 5A.

Car and cycle parking

277 basement car parking spaces along with a further 9 surface car parking spaces have been provided for the apartments. This is considered an appropriate quantity given the highly sustainable and connected site in terms of public transport. 289 resident bicycle parking spaces are provided in the basement with a further 134 visitor bicycle parking spaces at surface level. This is also considered to be in compliance with DCC policy.

CLONGRIFFIN-BELMAYNE LOCAL AREA PLAN, 2012-2018

This LAP provides a framework for the proper planning and sustainable development of the North Fringe area in accordance with the policies and objectives of the Dublin City Development Plan 2016-2022. Sections B & C of the LAP contains a broad range of policies and objective, the following which are reviewed with respect to the current application.

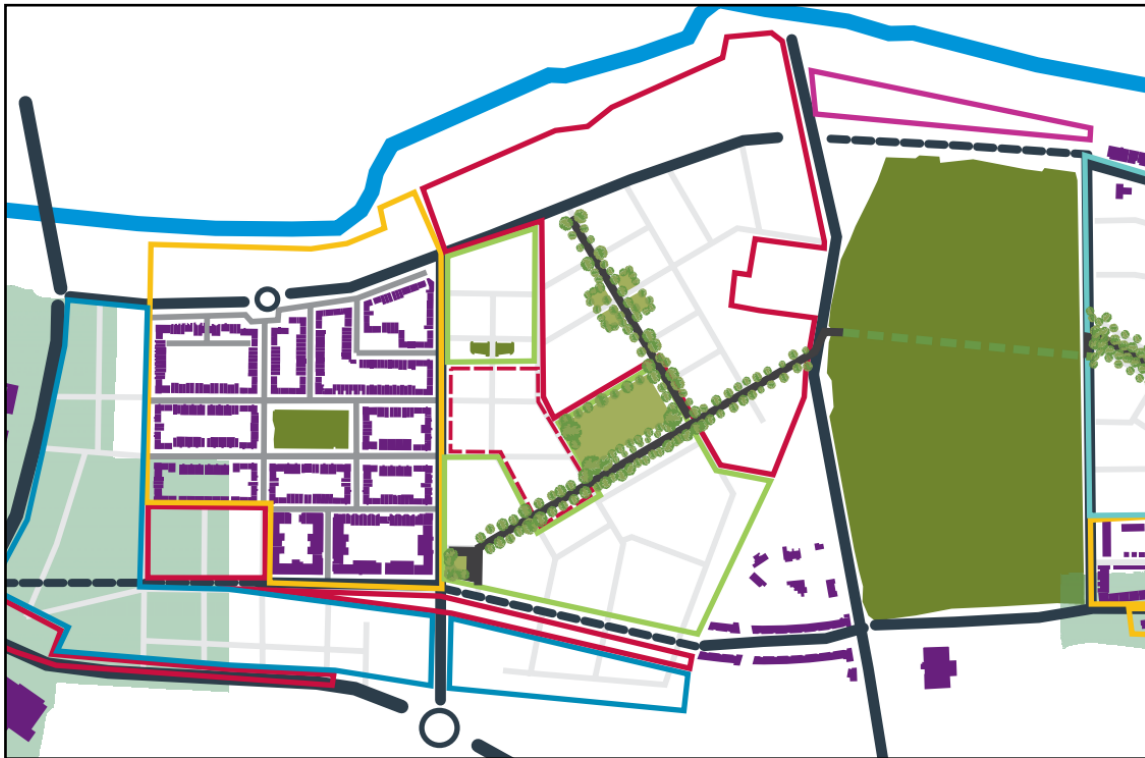


Figure 6 LAP Area Source: (Clongriffin-Belmayne LAP, 2012-2018)

Movement and Transport

POLICY	EVALUATION OF CONSISTENCY
<p><i>MTP1</i></p> <p><i>To facilitate the completion of the existing road infrastructure network as identified in the movement and transport strategy.</i></p>	<p>Parkside Boulevard has been completed to the south of the site, enabling access directly from this road into the proposed basement within this development. We refer to DBFL Consulting Engineers drawings and reports for more information.</p>
<p><i>MTP3</i></p> <p><i>To promote increased cycling and pedestrian activity by the development of cycle and pedestrian network of routes that connect with local parks, community facilities, employment areas, retail areas and public transport facilities.</i></p>	<p>The pedestrian network will be extended as part of the development, in particular for the linear park. This development will link into the existing pedestrian and cycle network in line with the objectives of the LAP.</p>
<p><i>MTO1</i></p> <p><i>To develop routes through sites that are likely to remain vacant in the long term, as pedestrian/cyclists' routes, eliminate barriers to movement and provide significantly enhanced</i></p>	

<p><i>permeability and through access to adjoining streets that are safe and pleasant to use by all.</i></p>	
<p>MTO2</p> <p><i>To provide new patterns of pedestrian and cycle movement in both the east-west and north-south directions throughout the area that is coherent, direct, safe and convenient.</i></p>	
<p>MTO4</p> <p><i>To facilitate enhanced patronage and efficient utilization of public transport and promote walking and cycling, through a range of means including a reduced provision of car parking for commercial development particular attention to visitor parking and car storage.</i></p>	<p>New connections will link people with places notably public transport, retail services and recreation areas. The green link will provide direct access from the site to Dublin Bus services and the Clongriffin Dart station. It will also provide access to Father Collins Park.</p>
<p>MTO8</p> <p><i>To seek well integrated design solutions for adequate car parking within the design and layout of schemes with particular attention to visitor parking and car storage.</i></p>	<p>The proposed Site Layout includes for 286 basement and surface car parking spaces. Parking is provided in accordance with the standards in the City Development Plan and includes visitor parking also.</p>
<p>MTO10</p> <p><i>That the design of all streets fully complies with the design standards and requirements of the Roads and Traffic Department of Dublin City Council to facilitate the orderly taking in charge process for all public roads. Requirements of Dublin City Council for street design including public lighting, traffic and pedestrian control signalling, street signage and traffic calming shall be ascertained at the design stages and completed if requested before taking in charge.</i></p>	<p>The street design and layout has been informed by the parent permission, the layout of the Parkside Boulevard and the linear park and is considered in accordance with current standards.</p> <p>Furthermore, it is proposed that streets will be taken in charge by DCC in the future as per the Taking in Charge Plan Drawing prepared by MCORM Architects.</p>

Urban Design

POLICY	EVALUATION OF CONSISTENCY
<p>UDO1</p> <p><i>To achieve high quality and sustainable densities to consolidate the area, maximise access for residents and employees to public transport and successfully define important locations and routes</i></p>	<p>✓ The proposed layout, residential design and density are in accordance with the LAP objectives. The development provides a sustainable density of c.89 units per ha gross.</p>

<p><i>including the Main Street access and town centres (KDC designated zones).</i></p>	
<p>UDO2</p> <p><i>To promote the development of family orientated, high quality, adaptable, lifelong homes within the LAP area through creative design that still delivers a sustainable density to support the provision of services.</i></p>	<p>✓ The proposed development is for apartments at a sustainable residential density with a mix of apartment sizes including 1, 2 and 3 bed units.</p>
<p>The proposed mix as a result of the subject application is as follows:</p> <p style="padding-left: 40px;">94 no 1 bed apartments (188 bed spaces)</p> <p style="padding-left: 40px;">175 no 2-bed apartments (692 bed spaces)</p> <p style="padding-left: 40px;">13no 3-bed apartments (78 bed spaces)</p> <p>The reference to Section 7.6 (Sustainable Density) of the LAP is also noted. While the LAP recognises that density will vary due to location (proximity to public transport), unit type and design, it is intended that the overall net density of the overall LAP lands will be on average 50 units per hectare with higher density and heights along the Mayne River linear Park. The overall density is achieved and is considered appropriate when assessed with the existing and permitted development in the Parkside area. Given current national policy on residential development which supersedes the 2012 LAP this is considered acceptable.</p>	
<p>UDO3</p> <p><i>To promote public spaces that provides both passive and active recreation and a connection to those forms of activities in the surrounding area.</i></p>	<p>✓ The linear park, along with the wider area (neighbourhood park, the pocket park, green link and Father Collins Park) will provide adequate open space for future residents. Semi-private, private and public spaces will provide for both active and passive recreation.</p>
<p>UDO4</p> <p><i>To ensure high quality streetscapes are achieved through distinctive high quality street furniture, lighting, paving and public artwork that creates a distinctive character associated with the North Fringe.</i></p>	<p>✓ We refer to drawings and report prepared by Áit Urbanism which outline the streetscape and landscape specifications for the development, and which will create a distinctive character for the Parkside development.</p>
<p>UDO5</p> <p><i>To design park spaces and all open spaces linkages to be part of the larger green network in particular from Father Collins Park to the surrounding area and along the River Mayne</i></p>	<p>✓ All open spaces included in this application tie into the network of open spaces outlined in the LAP and will provide connections to other services and facilities in the area.</p>

<p><i>incorporating a dedicated network of cycle paths and pedestrian routes.</i></p>	
<p>UDO7</p> <p><i>The height strategy for the LAP will seek positive integration of new building height with established character. Locations identified for special height character are the designated Key District Centres (in general 5 storeys minimum) and the Main Street Boulevard axis (in general four to five storeys). Heights of 2-6 storeys (including a set back at the top floor of a 5/6 storey building) may be facilitated subject to quality design criteria and set back requirements along the river corridor to complete the urban form of pavilion buildings to complete Marrsfield, One location for a landmark profiled building (10-14 storey office height equivalent) is designated adjacent to Clongriffin Rail Station. In other locations, where 4 storeys residential height is proposed, some flexibility will be allowed on the height equivalent (13m) to achieve design improvements to the façade.</i></p>	<ul style="list-style-type: none"> ✓ The proposed scheme provides for 4 blocks with a max of 6 storeys and a corner block that rises to 7 storeys. This is in line with the intention of the policy of having taller buildings along the river corridor to complete the urban form along Marrsfield. However, it is noted that it is not in line with this policy, as a result a statement of material contravention has been submitted with this application. The review of the national Building Heights Guidelines in this Statement is also noted. ✓ This height will provide a presence and sense of place to both the linear park and the Boulevard. Given the wide open space surrounding the scheme it is considered that this height will provide an appropriate sense of enclosure, particularly in relation to the Boulevard.

Economic Development

POLICY	EVALUATION OF CONSISTENCY
<p>ESP2</p> <p><i>For the long term economic strategy, it is a policy of the LAP to promote progress in delivering key drivers for economic growth including successful movement, high quality urban design, high quality visual impact, high quality natural environment, access to high quality lifelong housing and access to social and community infrastructure.</i></p>	<ul style="list-style-type: none"> ✓ It is considered that this phase will achieve the key economic strategic objectives in relation to urban design, housing, movement and community infrastructure.
<p>ESO2</p> <p><i>To seek delivery of important sections of the street network, including interim pedestrian and cyclist routes, to improve local movement between the developing areas in both Dublin City Council and Fingal.</i></p>	<ul style="list-style-type: none"> ✓ The proposal will be accessed directly from the Boulevard for vehicles. The proposal will enhance the existing cycle and pedestrian network in the area. ✓ By having basement parking, it has resulted in a car free development at surface level which

<p><i>ESO8</i></p> <p><i>To co-ordinate with stakeholders to help to achieve delivery of key transportation infrastructure improvement serving the LAP area.</i></p>	<p>provides a pleasant tranquil environment in this area.</p>
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Environment, Open Space and Amenity

POLICY	EVALUATION OF CONSISTENCY
<p><i>EOSP1</i></p> <p><i>To realise the potential of a high quality environment as a key driver in economic development, community development, biodiversity enhancement, improved sustainable movement and enhanced quality of life for the local area.</i></p>	<p>✓ The current proposal will extend the cycle and pedestrian network and provide connections to these public open spaces.</p> <p>✓ The delivery of this section of the Mayne River Linear Park, along with providing footpaths that connect into the bridges and paths connecting into Fingal County Council achieves this aim of providing a green corridor link between the amenity areas in both local authority areas.</p> <p>✓ The linear park will be delivered in conjunction with the delivery of this site.</p>
<p><i>EOSP2</i></p> <p><i>To protect and maximise the assets of natural heritage both within and adjoining the local area, in particular coastal amenities, and promote the development of green corridors between amenity areas in both Dublin City Council and Fingal County Council areas.</i></p>	
<p><i>EOSO2</i></p> <p><i>To prioritise and seek the early completion of the original network of open spaces throughout the developing area in the LAP.</i></p>	
<p><i>EOSO1</i></p> <p><i>To achieve best practice and innovations in SuDS design as part of development schemes including the successful co-ordination of surface water management with ecology and amenity functions of open space and landscaped areas.</i></p>	

Community

POLICY	EVALUATION OF CONSISTENCY
<p>CSO1</p> <p><i>To promote well designed, accessible and sustainable urban neighbourhoods throughout the LAP area that are well served by local facilities and public transport.</i></p>	<p>✓ The pedestrian and cyclist routes will provide access to local services and facilities, and public transport to be located within the urban centres within the North Fringe.</p>
<p>CSO2</p> <p><i>To ensure access for all to community and social infrastructure for community integration.</i></p>	
<p>CSO6</p> <p><i>To seek to create safe and useable open spaces with each residential development for play through overlooking and passive surveillance.</i></p>	<p>✓ The layout of the site will create passive street surveillance in accordance with the LAP.</p>
<p>CSO7</p> <p><i>To make provision for the completion of key routes and access points for all to the permanent primary school site within the LAP lands.</i></p>	<p>✓ New pedestrian accesses to the Malahide Road and to Clongriffin and to the Parkside Development to the south, including to the two new primary schools, will enhance connections in all directions.</p>

Infrastructure

POLICY	EVALUATION OF CONSISTENCY
<p>ISP1</p> <p><i>It is the policy of the Council that infrastructure delivery shall facilitate and enhance the redevelopment of the North Fringe LAP area to achieve its potential as a Key Developing Area of the City, as identified in the Dublin City Development Plan.</i></p>	<p>✓ The proposed development will include for key infrastructure delivery including the cycle and pedestrian network and the linear park.</p>
<p>ISP3</p> <p><i>To ensure that development is permitted in tandem with available water supply and only where network capacity is available. New development must include details on water conservation measures and demand management measures.</i></p>	<p>✓ The scheme is considered acceptable with regard to water supply, wastewater and surface water. Please see the confirmation letters from Irish Water.</p>

<p><i>ISP4</i></p> <p><i>To manage development so that new schemes are permitted only where adequate capacity existing in the wastewater network and at the treatment works at Ringsend.</i></p>	<p>✓ We refer to the infrastructure report prepared by DBFL Consulting Engineers for more information.</p>
<p><i>ISP5</i></p> <p><i>To require adherence to Flood Risk Management Policies for all future developments through the development management process in accordance with the guidance set out under Section 14.5.1 LAP Policies for the Local Area Plan for Flood Risk Assessment and Appendix 6 Flood Risk Assessment of the LAP.</i></p>	<p>✓ A site-specific flood risk assessment and surface water drainage plan prepared by DBFL Engineers is submitted with the application. The surface water strategy includes for optimum utilisation of SUDS measures to minimise discharge to the Mayne.</p> <p>✓ Ait Landscaping have a proposal to enhance the natural landscaping around the Mayne River within the Linear Park creating an enhanced amenity space.</p>
<p><i>ISO2</i></p> <p><i>To seek the rehabilitation of the Mayne River to good water status, it's restoration as a natural amenity and protection of the riparian corridor through the LAP area.</i></p>	
<p><i>ISO3</i></p> <p><i>To seek the achievement of good water quality in line with the Water Framework Directive requirements and the Eastern River Basin District Management Plan for all water courses in the LAP area including the River Mayne.</i></p>	
<p><i>ISO4</i></p> <p><i>All planning applications shall be required to submit a surface water drainage plan which will include proposals for the management of surface water within sites, and runoff rates from sites, protecting the water quality of the River Mayne and retrofitting best practice SuDS techniques on existing sites where possible.</i></p>	
<p><i>ISO7</i></p> <p><i>All new developments shall be required to comply with the standards set out in the Greater Dublin Strategic Drainage Study (GDSDS).</i></p>	

Sustainability

POLICY	EVALUATION OF CONSISTENCY
<p><i>SSP1</i></p> <p><i>To support sustainable design and sustainable formats of development in the LAP area which will help Dublin City Council achieve its targets in reducing energy consumption and reducing carbon dioxide emissions in accordance with the Dublin City Energy Action Plan.</i></p>	<p>✓ The proposed design and density are considered sustainable having regard to the location of the site and the planning policy for the area.</p>
<p><i>SS03</i></p> <p><i>To prioritise actions under the LAP through an effective phasing programme that help to complete the development of sustainable walkable neighbourhoods with particular emphasis on, promotion of public transport, promotion of sustainable movement, promotion of consolidating areas of development with sustainable densities and enhancement of the environment and open space.</i></p>	

Phasing

The subject lands are located in an area identified as Phase 3 in the LAP. Permissions have been secured for Phases 1 and 2 as indicated in the LAP as part of the Parkside development to date and are nearing completion. Permission has also been granted in an area of Phase 4 of the LAP but has not yet commenced development. The delay in bringing forward this LAP Phase 3 site was due to the temporary location of two primary schools on the site. These primary schools have now vacated the site to their permanent site located off Belmayne Avenue, to the north of the existing Parkside Green Route. Please see the LAP phasing plan below indicating the areas which have been completed/ have permission/ will come forward in the future.

Fig 16.4 Long Term Strategy : Phasing Priorities 1

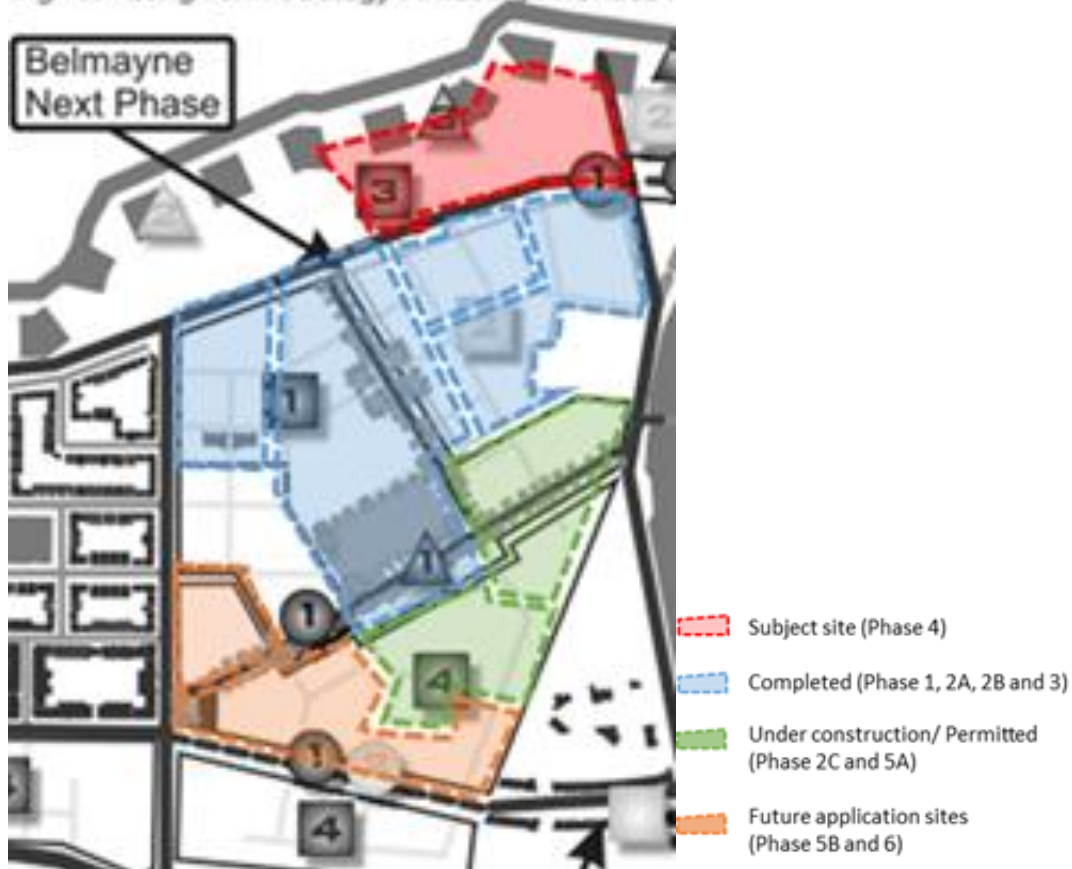


Figure 7 Parkside Development phasing superimposed on LAP phasing

Clongriffin – Belmayne Local Area Plan 2012 - 2018		Parkside Phasing	Status
LAP Phase 1	180-258	Phase- 1(in part) Phase- 2C (in part) Phase- 5A, (in part) Phase 3 (P13-P15)	Completed Nearing completion Has been granted permission Completed
LAP Phase 2	219-312	Phase- 1(in part) Phase- 2A, Phase- 2B	Completed Completed Completed
LAP Phase 3	-	Phase- 4	Subject of this application
LAP Phase 4	345-414	Phase- 2C (in part) Phase- 5A (in part) Phase- 5B Phase- 6	Nearing completion Has been granted permission Subject of a future application Subject of a future application

Table 1 Parkside development in relation to LAP phasing

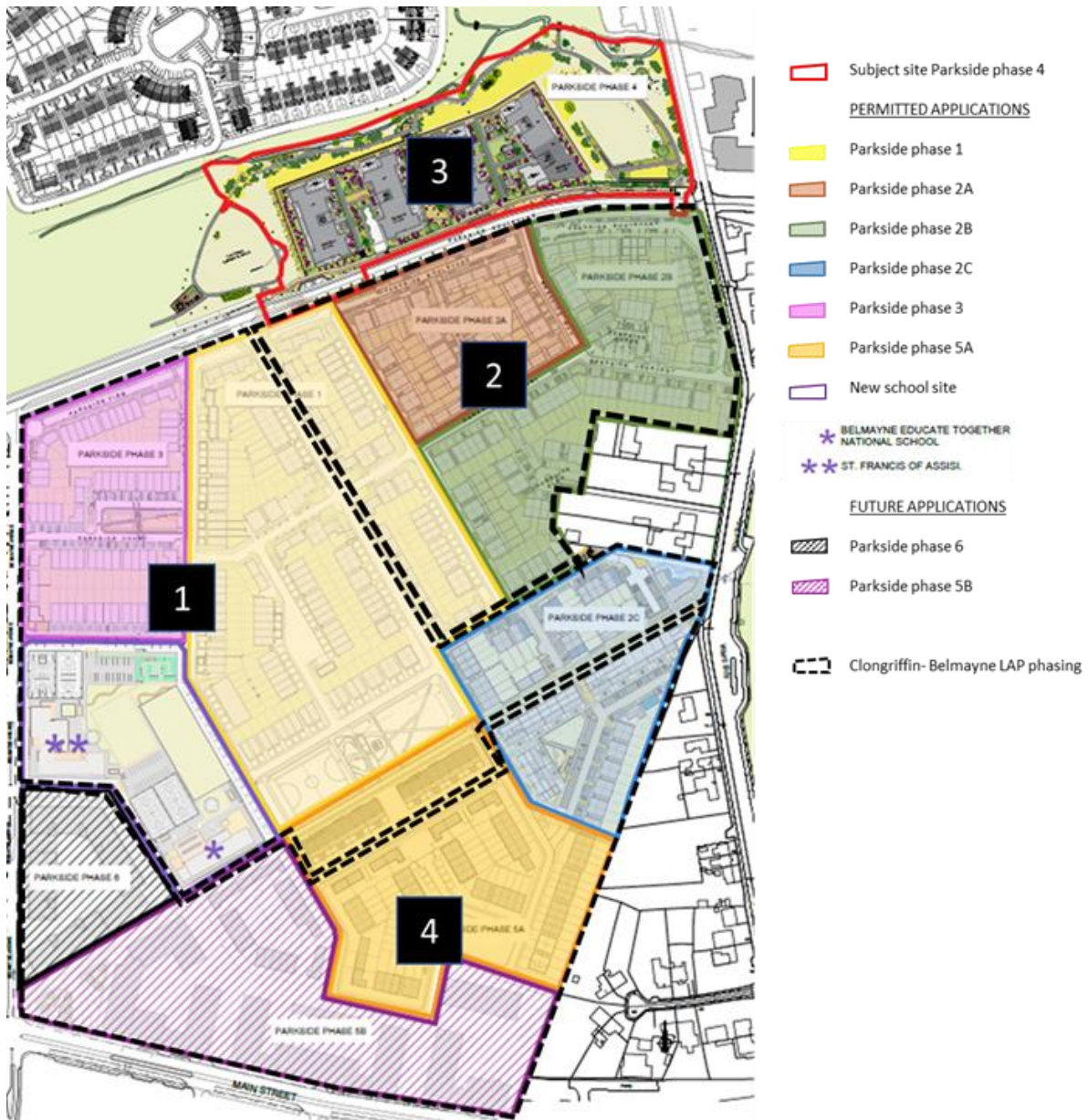


Figure 8 LAP Phasing on Parkside Development Plan

The following LAP requirements relate to development in Belmayne Phase 3:

<p><u>Phase 3</u></p> <p>To develop residential frontages that address Parkside Boulevard and a linear park along the River Mayne as a replacement of existing temporary school buildings (once the new school site is complete and occupied). Development in this area will need to be</p>	<ul style="list-style-type: none"> ✓With the school campus' off Belmayne Avenue now completed, the temporary schools at the subject site have now vacated the site enabling residential development to come forward ✓The development includes for the provision of new apartments and development of the linear park and extending the new pedestrian and cycle
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<p>sensitive to the open space and appropriate set back requirements from the River Mayne</p> <p><u>Character of Development</u></p> <p>Approximate Area: Not specified for the LAP as development in this area needs to be balanced against the timeframe for the temporary school buildings to be removed, design of public open space and set backs from the River Mayne.</p> <p>Indicative Land Use: Residential with public open space as part of a linear park along the River Mayne.</p> <p>Indicative Design and Scale: Buildings should successfully address the frontages onto Parkside Boulevard and address the linear park. Design will be sensitive in this location, particularly with regard to addressing public open space and set back requirements along the River Mayne.</p> <p><u>Indicative Residential Density:</u> This phase is envisaged as a residential phase with high quality public open space. A residential density of 35-50 units per ha is envisaged as part of this phase</p>	<p>access in the area. The apartments form higher density along the linear park and Boulevard providing frontages to both and reflecting the scale and streetscape already achieved (and currently being extended) in developments to the east along Marsfield Avenue (and also fronting the linear park).</p> <ul style="list-style-type: none"> ✓The scale of development is ranges from 3 to 7 storey generally in line with the advice in the LAP which identifies this location as appropriate for 6 storeys. The majority of the development is 6 storeys with only one corner element raising to 7 storeys. This is considered to provide an appropriate urban edge which addresses the frontages of both areas and reflects similar riverside apartment developments to the east. ✓The proposed density is considered appropriate for the area. It is worth noting that the gross density for this site is actually 89 units per hectare. The reason the net density of 188 units per hectare is so high is due to the large areas of undevelopable land due to either issues with flooding or wayleaves. The overall density against is reflective of the densities achieved in adjoining residential developments to the east of similar scale. ✓It is also worth noting that the density is in line with current National Plan Policy and is considered appropriate given the highly sustainable location of the site and the nature of the surrounding development, particularly the development currently under construction to the east of the site.
<p><u>Infrastructure Requirement</u></p> <p>Roads</p> <p>Advancing with Phase 3 proposals will be assessed on the extent of completion of all internal street infrastructure as outlined for</p>	<ul style="list-style-type: none"> ✓The Parkside Boulevard is completed, and the development will access directly off it.

Phases 1&2 Effective links (pedestrian and cyclist) between DCC and FCC should be in place by this phase.

Drainage and Water

As noted for earlier phases

✓ Drainage proposals include for SUDS provision and accord with a surface water masterplan for the future development of the overall landbank. This is set out in the DBFL documents

In summary, it is considered that the proposed residential development is in broad compliance with the full range of policies and objectives of the City Development Plan and the Local Area Plan, and with the quantitative and qualitative standards relating to a residential development of this scale and character. The proposal represents a suitable and sustainable form of residential development.

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The FCC portion of the site is denoted by the purple in the figure 9 below. The intention for this area of land is to remain as landscaped open space, and part of the linear park, with upgrading of the landscaping as necessary. There is no proposal to place any built development in this location.



Figure 9 Extract from MCORM drawings indicating area within FCC



Figure 10 Extract from the Fingal County Council Development Plan 2017 - 2023



OS - Open Space

Preserve and provide for open space and recreational amenities

The site is zoned in the Fingal Development Plan as Open Space with the objective to preserve and provide for open space and recreational amenities.

EVALUATION OF CONSISTENCY

This proposal for landscaped public open space in this location is considered to be in compliance with the Fingal Development Plan.

The Fingal Development Plan has an Objective BALGRIFFIN/BELCAMP 4 which promotes green infrastructure linkages, in particular ensuring permeability between the lands at Belcamp, Balgriffin, Belmayne and the Regional Park at Racecourse Park, facilitating access to the Fingal Coastal Way.

EVALUATION OF CONSISTENCY

This proposal will provide a continuation of the Mayne River Linear Park through Fingal County Council and Dublin City Council lands in line with Objective Balgriffin/ Belcamp 4. This linear park, and the associated high quality landscaping, will be developed in conjunction with the apartment scheme.

Objective WQ05 of the Fingal Development Plan establishes riparian corridors free from new development along all significant watercourses and streams in the County. It aims to provide a 10 to 15 metre wide riparian buffer strip measured from the top of the bank either side of all watercourses, except in respect of the Liffey, Tolka, Pinkeen, Mayne, Sluice, Ward, Broadmeadow, Corduff, Matt and

Delvin where a 30m wide riparian buffer strip from top of bank to either side of all watercourses outside urban centres is required as a minimum.

EVALUATION OF CONSISTENCY

This proposal will provide a building in excess of 35m away from the part of the Mayne River within Fingal County Council Lands. Within Dublin City Council lands, some of the buildings will be c. 20 m away from the Mayne River which is in excess of the 10m – 15m required by Fingal Development Plan within urban areas.

It is worth noting that the remainder of the site is within Dublin City Council jurisdiction and it is zoned for development under SDRA1 North Fringe (Clongriffin-Belmayne). The proposed development for the remainder of the site is considered to be in compliance with the Dublin City Council Development Plan.

6. CONCLUDING REMARKS

This statement has demonstrated the compliance of the proposed development with the following:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Project Ireland 2040: National Development Plan (2018-2027)*
- *Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)*
- *Regional Spatial and Economic Strategy (2019- 2031);*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2018);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Design Manual for Urban Roads and Streets (2019);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *The Planning System and Flood Risk Management (2009);*
- *Climate Action Plan (2019)*

Broad compliance is also demonstrated with the policies and provisions of the *Fingal County Council Development Plan 2017 – 2023, Dublin City Development Plan, 2016-2022, and Clongriffin-Belmayne Local Area Plan, 2012-2018* such as the land use zoning, density, design standards for residential schemes, streets and open spaces.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.