

**STATEMENT OF CONSISTENCY**  
**STRATEGIC HOUSING DEVELOPMENT-**  
**ST. PAUL'S COLLEGE,**  
**SYBIL HILL ROAD, RAHENY, DUBLIN 5**

**BSM**

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**Brady Shipman  
Martin**

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CLIENT  
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**16<sup>th</sup> October 2019**

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## 1 INTRODUCTION

On behalf of the Crekav Trading GP Limited, this Statement of Consistency with Planning Policy has been prepared to accompany a planning application to An Bord Pleanála in relation to a proposed strategic housing development at St. Paul's College, Sybil Hill Road, Raheny, Dublin 5.

### Description of Development

The subject application site (hereafter called 'the site') is located at St. Paul's College, Sybil Hill Road, Raheny, Dublin 5. The site application area is approx. 6.7 hectares, with a site development area of 6.4 hectares. The site is bound to the north, east and south by St Anne's Park and to the west by residential development at The Meadows, Sybil Hill House (a Protected Structure) and St Paul's College. Vehicular access to the site is from Sybil Hill Road.

The development for which permission is being sought can be summarised as follows:

1. *The construction of a residential development with a gross floor area of c. 65,125 sq.m (excluding basement parking areas) set out in 9 no. blocks, ranging in height from 5 to 9 storeys to accommodate 657 no. apartments, residential tenant amenity spaces and a crèche. The site will accommodate 499 no. car parking spaces, 1646 no. bicycle parking spaces, storage, services and plant areas. Landscaping will include extensive communal amenity areas, and a significant public open space provision.*
2. *The 9 no. residential buildings range in height from 5 storeys to 9 storeys accommodating 657 no. apartments comprising 224 no. 1 bed units, 378 no. 2 bed units and 55 no. 3 bed units. Balconies and terraces to be provided on all elevations at all levels for each block. The breakdown of residential accommodation is as follows:*
  - *Block 1 is a 5 to 8 storey building, accommodating 143 no. units*
  - *Block 2 is an 8 storey building, accommodating 63 no. units*
  - *Block 3 is a 9 storey building, accommodating 71 no. units*
  - *Block 4 is an 8 storey building, accommodating 63 no. units*
  - *Block 5 is a 9 storey building, accommodating 71 no. units*
  - *Block 6 is a 7 storey building, accommodating 124 no. units*
  - *Block 7 is a 5 to 6 storey building, accommodating 36 no. units*
  - *Block 8 is a 5 to 6 storey building, accommodating 43 no. units*
  - *Block 9 is a 5 to 6 storey building, accommodating 43 no. units*
  - *Residential tenant amenity space is provided at ground and basement level of Block 1 (c.719 sq.m) and ground level of Block 6 (c.162 sq.m). External residential open space is provided to the west, east and between all blocks. A crèche is provided at ground level in Block 7 with a total floor area of c.612 sq.m.*
3. *Blocks 1 to 6 are located above a proposed basement accessed from the new access road. The basement will accommodate 465 no. car parking spaces (456 for residential and 9 for crèche staff) and 1314 no. bicycle parking spaces, storage, services and plant areas. 34 No. Surface car parking is provided for visitors, crèche drop off and shared parking/club car adjacent to*

- Block 7 and 332 no. cycle parking spaces, are provided throughout the landscaped areas.*
- 4. A new 1.6ha public open space is provided to the south of the site. Proposed pedestrian access from the site to the adjacent St Anne's Park is proposed in the north-west, north-east, east and south-east boundaries of the site.*
  - 5. Widening and realignment of an existing vehicular access onto Sybil Hill Road to facilitate the construction of an access road with footpaths and on-road cycle tracks from Sybil Hill Road between Sybil Hill House and St Paul's College incorporating new accesses to Sybil Hill House and St Paul's College and the provision of new wall and railing boundary treatment along the new road and new pedestrian/vehicular gates to the new and existing accesses to Sybil Hill House and St Paul's College. To facilitate this new access road it is proposed to demolish an existing pre-fab building. The application also includes for a proposed pedestrian crossing on Sybil Hill Road.*
  - 6. The laying of a foul water sewer in Sybil Hill Road. The routing of surface water discharge from the site via St. Anne's Park to the Naniken River and the demolition and reconstruction of existing pedestrian river crossing in St. Anne's Park with integral surface water discharge to Naniken River.*
  - 7. The proposed application includes all site landscaping works, green roofs, substations, PV panels, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site development works above and below ground.*

This Statement of Consistency with planning policy has been prepared to specifically address the requirements of the strategic housing development guidance document issued by An Bord Pleanála. This planning application is also accompanied by a Planning Report which includes further details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.

This standalone planning policy consistency statement, prepared by Brady Shipman Martin, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying Statements of Consistency and planning application documentation prepared by OMP Architects, OCSC Engineers, and other reports and drawings included with this application.

For further details of consistency with the quantitative standards for residential units as set down in the Sustainable Urban Housing: Design Standards for New Apartment Guidelines for Planning Authorities 2018, the Quality Housing for Sustainable Communities 2008 and the Dublin City Development Plan 2016-2022, please refer to the Design Report and Housing Quality Assessment prepared by OMP Architects.

## 2 CONSISTENCY WITH NATIONAL & REGIONAL PLANNING POLICY

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

- Rebuilding Ireland – Action Plan for Housing and Homelessness;
- Project Ireland 2040 - National Planning Framework;
- Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES);
- 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;
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Design Manual for Urban Roads and Streets (2013);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- EIA Directive
- The Planning System and Flood Risk Management (2009); and
- Birds and Habitats Directive – Appropriate Assessment;

### 2.1 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland is the Government's Action Plan for Housing and Homelessness, launched in 2016. The Plan's aim is to accelerate housing supply by addressing the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector.

The Plan contains five key pillars of which Pillar 3 and Pillar 4 are most relevant in this instance. The proposed development at St. Paul's College is consistent with Pillar 3 to 'Build More Homes'; and, Pillar 4 – Improve the Rental Sector, as the scheme is proposing to construct 657 no. apartments on a highly accessible site location on the northside of Dublin.

Pillar 3 and 4 state:

- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

## 2.2 Project Ireland 2040 National Planning Framework (2018)

Project Ireland 2040 (published 2018) is the Government's plan to 're-imagine' Ireland and prepare for the future. Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenity and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The plan identifies that by 2040 it is expected that an additional one million people will live in Ireland, an additional two-thirds of a million people will work here. These are huge increases: more people will be travelling to work, school and universities, more buildings will be needed to accommodate them, clean water will be needed for homes, farms and industry, more and better care facilities will be required for the elderly.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. The NPF identifies that activating '*strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development*' as a top priority.

With regards to Dublin the NPF identifies that the city needs to *'accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice'*.

National Policy Objective 4 in this regards states:

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

National Policy Objective 32 in this regard states:

*To Target delivery of 550,000 additional households to 2040*

National Policy Objective 33 in this regard states:

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

The NPF requires homes to be located in places that can support sustainable development this includes places that are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change. The proposed development is also responding to the existing strong demand in the area and in a location that is highly accessible to both existing local facilities and public transport routes.

### **2.3 Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES)**

The Regional Spatial and Economic Strategy (adopted June 2019) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

The Strategy identifies that the region *'is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region'*.

The Strategy is underpinned by key principles that reflect the three pillars of sustainability: Social, Environmental and Economic, and expressed in a manner



which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as 'quality of life' encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located with the Dublin Metropolitan Area, as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion.

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this '*the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities.*' The subject site is located within a high quality public transport corridor which includes the DART and frequent bus services.

Policy Objectives relating to Housing Delivery include:

*RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines, and Draft 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

*RPO 5.5: Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.*

This application enables the consolidation of a strategically located site within the urban envelope north east of Dublin City centre.

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

The aim of these Guidelines is to set out the key planning principles which should guide the delivery of residential development in urban areas. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in

their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed in the section below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines reinforce that planning authorities '*should promote increased residential densities in appropriate locations, including city and larger town centres*' and that '*firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved*'.

These qualitative standards have been brought through in the Design Manual as referenced above, the Development Plan and in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, which have guided the design approach of the scheme. This is set out in detail in the accompanying Architects Design Statement prepared by OMP Architects.

To maximise the return on public transport investment, the above referenced Guidelines identify that it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors- this includes 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station.

The subject site is entirely located within 1km of the Harmonstown and Killester DART Stations, and entirely within a 450m (5 min) walk of a Quality Bus Corridor. In total there are 8 no. Dublin Bus Routes (Routes 27a, 29a, 31, 31a, 31b, 32, 104, 130) within 1km radius of the site, this is set out clearly in the Traffic & Transport Assessment and Mobility Management Plan, prepared by ILTP. Therefore the proposed density meets minimum net density of 50 dwellings per hectare as set out in the Guidelines.

## **2.5 Urban Design Manual – A Best Practice Guide (2009)**

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. These are listed, with a response to each provided, in the accompanying Urban Design Manual Statement of Consistency as prepared by OMP Architects.

## 2.6 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The Urban Development and Building Height Guidelines identify that *there is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.*

As reflected in *'the National Planning Framework .... these guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels'*

Further, the Guidelines set out national planning policy that *'Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally... (b) suburban and wider town locations, buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'*.

The Guidelines reference NPO 13 (from the NPF) which states that *'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'*.

**SPPR 4 states:** *It is a specific planning policy requirement that in planning the future development of **greenfield** or edge of city/town locations for housing purposes, planning authorities must secure:*

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

As such, the proposed scheme, as set out in this application to ABP meets the criteria of the Guidelines. The site's suitability for this approach is set out in detail, as considered in the context of the Guidelines, in the accompanying Planning Report. It is considered that, the subject site, is well served by public transport

with high capacity, *'frequent service and good links to other modes of public transport'*; is sensitively designed *'to integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views'*.

A full consideration of the scheme in regards to the Urban Development and Building Height Guidelines is set out in the Planning Report.

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

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018. The Guidelines update previous guidance from 2015 and note that this is done so *in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.*

The Guidelines note that the NPF projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities and of particular relevance to this site it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

The Guidelines have been updated, from the previous 2015 Guidelines, to amend and address new areas including:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small-scale urban infill schemes;
- Address the emerging 'build to rent' and 'shared accommodation' sectors; and
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.

The subject site is a highly accessible site and as such represents a proposal that is fully supported by these Guidelines.

The Guidelines identify Central/Accessible Urban Locations which are suited to higher density development. The subject site falls within this category as it is a *'Site within reasonable walking distance to/from high capacity urban public transport stops'*. The site is a short minute walk from both the Killester and Harmonstown DART Stop and located adjacent to a QBC bus route on the Howth Road.

This SHD planning application is accompanied by a Housing Quality Assessment (HQA), prepared by OMP Architects, and forms part of the OMP Design Statement, which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines 2018.

The HQA illustrates in tabular format how each apartment within the proposed scheme meets or exceeds the relevant standards as set out in the Guidelines including SPPR3: Minimum Apartment Floor Areas and SPPR 4: Dual Aspect Apartments.

Another key update in the 2018 Guidelines is the ability to reduce car parking standards. The Guidelines identify that *'in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances'*. The proposed development includes for car parking at a rate of 0.7 spaces per unit. The enclosed Traffic & Transport Assessment and Mobility Management Plan prepared by ILTP, provides a justification for this level of car parking as it relates to the site's accessibility to public transport and employment zones.

With regards to cycle parking, the proposed scheme is in accordance with, and exceeds, the standards as set out in the City Development Plan. The ILTP Report, referenced above, equally provides a justification for this level of cycle parking.

## **2.8 Design Manual for Urban Roads and Streets (DMURS) (2013)**

The Design Manual for Urban Roads and Streets (DMURS), was adopted by the Department of Transport and the Department of Environment (now Department of Housing) in 2013. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. A DMURS Statement of Consistency, prepared by OCSC provides further detail in respect of the compliance of the proposed development with DMURS.

## 2.9 Guidelines for Planning Authorities on Childcare Facilities (2001)

The proposed development comprises a childcare facility of 612sq.m. This proposal is in accordance with the requirements of the Childcare Facilities Guidelines for Planning Authorities published in June 2001. These Guidelines provides a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

Section 2.4 discusses appropriate locations for childcare stating: *“Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary such as development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.”*

Further section 3.3.1 states: *“In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.”*

It is proposed to provide crèche spaces for all 2 and 3 bed apartments (433 apts). In accordance with the guidance in “Childcare Facilities - Guidelines for Planning Authorities” the total number of units to be provided with crèche spaces is 115 (20 spaces per 75 units), which equates to a crèche of approximately 600msq.

The proposed crèche is 612msq and is proposed in block 7 with an external play area of 422msq. The crèche will be located on the ground floor of block 7, adjacent to the road for ease of access. Parking spaces at grade will be provided for drop off along with staff parking in the basement. The external play area associated with the crèche will be South-East facing with easy access to the proposed public open space.

## 2.10 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

- i) to reduce overall travel demand
- ii) to maximise the efficiency of the transport network
- iii) to reduce reliance on fossil fuels
- iv) to reduce transport emissions and
- v) to improve accessibility to transport.

The key targets that the Smarter Travel Policy sets to achieve are:

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

The subject site encourages sustainable and smarter travel by providing a high density development on an underutilised site in close proximity to key employment zones and existing high capacity public transport routes, and through the reduction in car parking and provision of significant cycle facilities.

## 2.11 Transport Strategy for the Greater Dublin Area 2016 – 2035

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by providing residential development in proximity to existing employment and public transport networks thereby reducing the requirement of the car and encouraging a shift to more sustainable transport methods.

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

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the Planning System and Flood Risk Management Guidelines a Site Specific Flood Risk Assessment (SSFRA) has been prepared for the current application by OCSC. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

## **2.13 EIA Directive**

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

As the proposed development is over 500 residential units, being the threshold for mandatory EIA, an Environmental Impact Assessment Report, has been prepared and accompanies this SHD Planning Application.

## **2.14 Birds and Habitats Directive – Appropriate Assessment**

Under Article 6(3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000-2010.

An Appropriate Assessment is required if likely significant effects on Natura 2000 sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

A Natura Impact Statement has been prepared by Enviroguide and accompanies this application which concludes that no likely significant impacts on Natura 2000 sites are predicted. The information contained in this planning application, AA Screening Report and Natura Impact Statement seeks to assist the competent authority (in this instance An Bord Pleanála) to undertake a Screening for Appropriate Assessment and Natura Impact Statement



### 3 LOCAL PLANNING POLICY

This section provides an overview of consistency with Local Planning Policy which is the Dublin City Development Plan 2016-2022 as the site is within the administrative area of Dublin City Council. This section sets out high level compliance with Development Plan objectives and Appendix 1 contains a more detailed review of Development Plan objectives.

#### 3.1 Dublin City Development Plan 2016-2022

##### 3.1.1 Core Strategy

The Development Plan sets out its overall 'Vision for the Dublin' City which is to create a more sustainable and resilient city. Within this vision the Development Plan aims to improve quality of life for all.

Section 1.2 outlines how to achieve this and the following is of relevance:

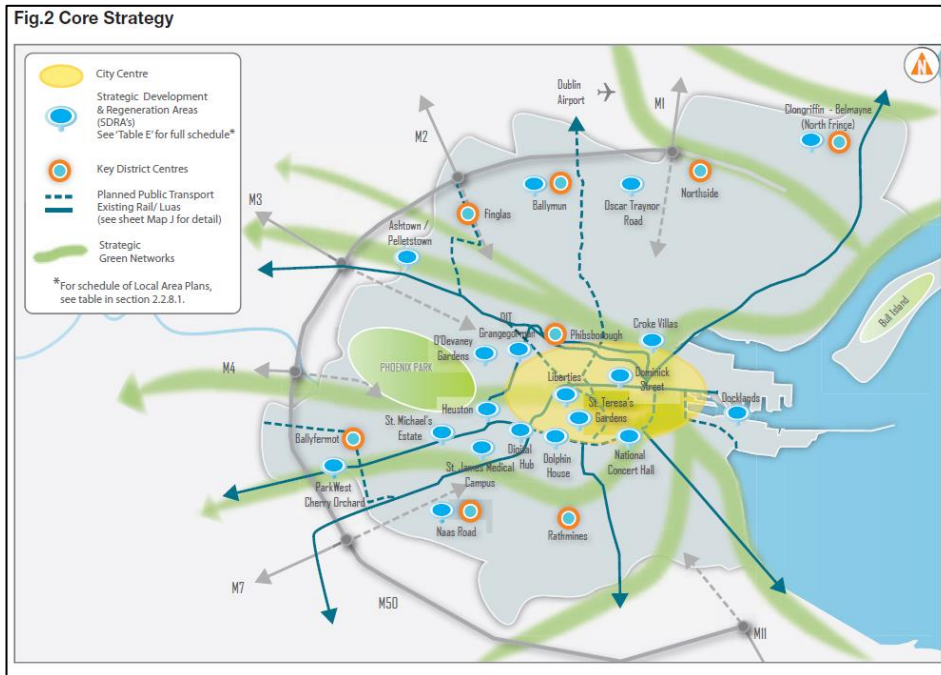
*b) Social/Residential – Developing Dublin as a compact city with a network of sustainable neighbourhoods which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic communities.*

The Core Strategy sets out 'Population and Housing Figures Based on Census Data 2011, Estimate for 2013', and Regional Planning Guidelines allocations (now superseded by the RSES).

Table A of the Core Strategy identifies a need for approximately 29,500 new residential units over the life of the Plan. Table C quantifies the area of lands zoned for residential development (4,466ha) or for a mix of uses including residential (2,043ha).

Table C of the Core Strategy includes Z15 lands. In this regard the subject Z15 zoned lands are included in Core Strategy calculations for achieving sufficient zoned lands to cater for targeted population growth. The development of the lands for residential purposes supports the achievement of Core Strategy targets.

The subject area is located in the North Central housing strategy area. The Core Strategy in the Dublin City Development Plan 2016 – 2022 (DCDP) indicates the subject lands zoned have strategic capacity in terms of housing provision for the North Central Area. The lands have been included in the residential core strategy as 'available suitable land for housing development'.



Development Plan Core Strategy Map

The Development Plan states the long-term vision and the core strategy can be translated into ‘three strongly interwoven strands’ which are as follows:

1. *Compact, Quality, Green, Connected City*
2. *A Prosperous, Enterprising, Creative City*
3. *Creating Sustainable Neighbourhoods and Communities*

In summary, the proposed development supports the achievement of the above vision by providing high quality residential development in proximity to public transport corridors. This development will foster a new community through its landscaped and open space strategy; mix of unit types and sizes; and provision of residential facilities; and, high quality architectural design.

### 3.1.2 Shape and Structure of the City

Chapter 4 relates to the future Shape and Structure of the City. It sets out the development strategy to ensure that Dublin retains and builds on its renowned urban form and character, while developing new city neighbourhoods which are well connected to their surrounding environment and to the city centre.

In this regard Objective SC13 aims: *To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.*

The proposed net residential density is 103 units per hectare. The development is proximate to both Killester and Harmonstown DART station and Howth Road QBC which is serviced by numerous bus routes. There is a strong presence of community infrastructure in the locality, as St. Paul's College and St. Anne's Park are both adjoining the development site, and the site is within walking distance of Raheny and Killester villages.

The proposal exhibits high quality neighbourhood urban design and excellent architecture and landscape design. The wider area provides extensive community facilities as detailed in the Community Infrastructure and School Demand & Capacity Assessment Report prepared by Enviroguide.

*Objective SC14 aims: To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.*

The apartment blocks vary in types, sizes, length and height creating a sense of place, visual interest and variety. The block heights range from 5 storey to 9 storey. The units are a mix of 1, 2 and 3 bed types. The elevations alternate between floors creating further variation in the units. Feature pop out windows provide individuality to the units and protection of privacy.

*Objective SC15 aims: To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public places.*

To boost biodiversity green roofs are proposed to the apartment blocks and Sustainable Urban Drainage Systems will be used throughout the scheme. A master planning context and landscape strategy has been described, which promotes protection of natural heritage and integration into the Green Network. The landscape Masterplan provides for a series of high quality landscaped spaces and green infrastructure network with linkages into St. Anne's Park.

### **3.1.3 Residential Development**

The Development Plan identifies that the provision of quality homes which provide for the needs of the city's population and which contribute to the making of good, connected neighbourhoods as a key priority. In this regard it is the policy of DCC:

*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.*

*QH8: To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.*

The Development Plan further notes that, in Dublin City, it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. With regards apartments, the DCC policies area as follows:

*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.*

*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.*

*QH20: To ensure apartment developments on City Council sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed-use and mixed-income neighbourhoods.*

The proposed scheme provides for high quality residential accommodation close to the City Centre. The site provides well designed external spaces for both residents and visitors to the site.

### **3.1.4 Movement and Transport**

Chapter 8 of the Development Plan relates to Movement and Transport within the City. It sets out the development strategy to ensure the optimum use of existing and proposed transport infrastructure.

Objective MT2 states: *Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.*

Objective MT13 aims: *To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.*

Objective MT17 aims: *To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.*

Objective MTO23 aims: *To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.*

Demonstration of compliance with these objectives is set out in the ILTP Traffic & Transport Assessment and Mobility Management Plan.

Objective MTO45 aims: *To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.*

Roads are designed in accordance with DMURS. Please refer to separate DMURS Statement of Consistency prepared by OCSC.

### **3.1.5 Green Infrastructure, Open Space and Recreation**

Chapter 8 of the Development Plan relates to Green Infrastructure, Open Space & Recreation. It aims to protect and enhance open spaces for both biodiversity and recreational use for benefit of the city's sustainability and attractiveness as a place to live, work and visit.

Objective GI2 states: *That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.*

An Appropriate Assessment will be carried out by An Bord Pleanála as the competent authority. To facilitate this the application is accompanied by an Appropriate Assessment Screening Report and a Natura Impact Statement prepared by Enviroguide.

Objective GI5 aims: *To promote permeability through our green infrastructure for pedestrians and cyclists.*

The landscape strategy, prepared by BSM, provides a network of footpaths throughout the development that connect to the adjoining parklands. This is set out further in the Landscape Design Rationale Report.

Objective GIO1 aims: *To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city.*

Please refer to separate OCSC Engineering Services Report which describes the Green Infrastructure to be incorporated into the drainage strategy for the proposed development.

Objective GI13 aims: *To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children.*

The proposed development includes for 25% of the development site area set out as public open space, that it is proposed to be made available to the public through the Taking In Charge of the area by Dublin City Council.

The proposed scheme also includes for extensive open space provision for residents which includes play facilities.

Objective GI23 aims: *To protect flora, fauna and habitats, which have been identified by Articles 10 and 12 of Habitats Directive, Birds Directive, Wildlife Acts 1976 – 2012, the Flora (Protection) Order 2015 S.I No. 356 of 2015, European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.*

Please refer to separate Enviroguide AA Screening Report/NIS Reports.

### **3.1.6 Height**

Section 16.7.2 of the Development Plan sets out guidance in relation to height in Dublin City. The Development Plan height strategy identifies a building height cap of 24m for residential development within 500m of Rail Hubs; and, up to 16m in the Outer City.

The proposed building heights across the site vary between 5 and 9 storeys. It is submitted that the rationale for increased height at this location goes beyond the specific height limits set out in the Development Plan and should be considered in the context of the wider height policies of the Development Plan, Government policy, and the site context. The Urban Development and Building Height Guidelines (2018) establish the principle for the re-examination of height limits

and these now take precedence over the Development Plan height limits on a site specific contextual basis. This is considered in detail in the Planning Report.

### 3.1.7 Residential Development Standards- Apartments

Section 16.10.1 of the Dublin City Development Plan 2016 – 2022 sets out the standards for apartments which are based upon the apartment standards set out in the Department of Environment, Community and Local Government Guidelines entitled Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities (December 2015). These are in parts superseded by the Updated Guidelines of 2018 (as outlined earlier in this document).

The Housing Quality Assessment, prepared by OMP Architects submitted with this SHD Application, as well as the Planning Report, sets out detailed compliance with the guidelines for apartment standards.

### 3.1.8 Part V – Social Housing

The City Development Plan identifies as a policy:

*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.*

The proposed scheme has been designed in a manner to ensure an appropriate mix and location of Part V units. This has been discussed with Dublin City Council and agreed as an acceptable proposal.

## 4 CONCLUSION

The proposed redevelopment of the site at St. Paul's College, Sybil Hill Road represents an opportunity to deliver a new apartment development offering a quality living environment, respectful of its context adjacent to St. Anne's Parkland, site topography, and site character, while making efficient use of land which is in close proximity high frequency public transport.

We consider the proposed development to be fully in accordance with recent Government guidance in relation to the delivery of apartment developments, Dublin City Development Plan 2016-2022 policies and objectives, and the *Sustainable Urban Housing: Design Standards for New Apartments* (2018), and with the proper planning and sustainable development of the area.

## APPENDIX 1- DEVELOPMENT PLAN OBJECTIVES



Development Plan Objective	Proposed Scheme
<b>Chapter 2 Core Strategy</b>	
<p>The Core Strategy guides the formulation of objectives throughout the Development Plan. The policies and objectives in the Plan promote intensification and consolidation of Dublin city, all of which lies within the metropolitan area. The Development Plan policies also underpin the creation of a compact city with mixed-use environments, sustainable neighbourhoods and green infrastructure, to reduce the city's reliance on fossil fuels and provide for carbon soakage, all in accordance with the National Climate Change Strategy.</p>	<p>The proposed development supports the achievement of the Core Strategy through the consolidation of the north Dublin suburbs, the provision of higher density residential development, within public transport catchments.</p>
<p>Table A of the Core Strategy identifies a need for approximately 29,500 new residential units over the life of the Plan. Table D quantifies the area of lands zoned available (Zoned Lands and Planned Housing Units) for Residential development or for a mix of uses including Residential at 440 ha.</p>	<p>Table C of the Core Strategy includes Z15 lands. In this regard the subject Z15 zoned lands are included in Core Strategy calculations for achieving sufficient zoned lands to cater for targeted population growth. The development of the lands for residential purposes supports the achievement of Core Strategy targets.</p> <p>The subject area is located in the North Central housing strategy area. The Core Strategy in the Dublin City Development Plan 2016 – 2022 (DCDP) indicates the subject lands zoned have strategic capacity in terms of housing provision for the North Central Area. The lands have been included in the residential core strategy as <i>'available suitable land for housing development'</i>.</p>
<b>Chapter 3 Addressing Climate Change</b>	
<p>The encouragement of energy efficiency in the built environment relates not only to the building code and individual buildings, but also to the design and layout of schemes by maximising benefits from natural ventilation and lighting and also by encouraging walking/cycling for residents/occupants and reduced reliance on fossil fuels. Also, because the range and design of buildings within the city varies enormously, innovative ways to improve energy efficiency within them are encouraged</p>	<p>The proposed development has been designed with energy and sustainability as a key elements. This is set out in the Energy &amp; Sustainability Report which is included in this application prepared by OCSC. Key sustainability features of the St Paul's residential development are accessibility to alternative modes of transportation, commissioning of the building's systems, a reduction of waste generation, use of water efficient fixtures and good indoor air quality for the building occupants.</p>

<p>It is an Objective of Dublin City Council:</p> <p><b>CCO12:</b> To ensure high standards of energy efficiency in existing and new developments in line with good architectural conservation practice and to promote energy efficiency and conservation in the design and development of all new buildings in the city, encouraging improved environmental performance of building stock.</p> <p><b>CCO15:</b> To facilitate the provision of electricity charging infrastructure for electric vehicles.</p>	<p>The apartments will be energy efficient, with target BERs of A2/A3. This will be achieved through a combination of low U Values, air tightness and thermal bridge levels combined with community Combined Heat and Power (CHP) and mechanical heat recovery ventilation (MVHR).</p> <p>Two of the apartment buildings incorporate internal streets, covered but ventilated, which promote energy efficiency and improved environmental performance.</p> <p>Electric car charging parking spaces will be provided within the development. The basement car park has been designed to easily facilitate the roll out of charging points for electric cars as demand increases.</p>
<p><b>Chapter 4 Shape &amp; Structure of the City</b></p>	
<p>It is the Policy of Dublin City Council:</p> <p><b>SC10:</b> To develop and support the hierarchy of the suburban centres, ranging from the top tier key district centres, to district centres/urban villages and neighbourhood centres, in order to support the sustainable consolidation of the city and provide for the essential economic and community support for local neighbourhoods, including post offices and banks, where feasible, and to promote and enhance the distinctive character and sense of place of these areas.</p>	<p>The site is located within walking distance of Neighbourhood Centres at Artane and Killester Raheny in an established suburban area with a relatively static and ageing population and the proposed development adding new additional residents will provide economic and community support for local neighbourhood services and public transport.</p>
<p><b>SC13:</b> To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.</p>	<p>The proposed net residential density is 103 units per hectare. The development is located proximate to the Harmonstown &amp; Killester DART stations and Howth Road QBC and is serviced by numerous bus routes. There is a strong presence of community infrastructure in the locality as St. Paul's College and St. Anne's Park are both adjoining the development site. The proposal exhibits good quality neighbourhood urban design and excellent architecture and landscape design. The development standards have been derived, with due consideration for protection of surrounding residents, households, communities and the adjacent school and parkland setting.</p>

<p><b>SC14:</b> To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.</p>	<p>The apartment blocks vary in types, sizes, length and height creating a sense of place, visual interest and variety. The block heights range from 5 storey to 9 storey. The units are a mix of 1, 2 and 3 bed types. The elevations alternate between floors creating further variation in the units. Feature pop out windows provide individuality to the units and protection of privacy.</p>
<p><b>SC15:</b> To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public places.</p>	<p>To boost biodiversity green roofs are proposed to the apartment blocks and Sustainable Urban Drainage Systems will be used throughout the scheme. The landscape masterplan provides for a series of high quality landscaped spaces and green infrastructure network with potential linkages into St. Anne's Park.</p>
<p><b>Chapter 5 Quality Housing</b></p>	
<p><b>QH1:</b> To have regard to the DEHLG 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).</p>	<p>Please refer to the Statement of Consistency for further details of compliance with national Guidelines.</p>
<p><b>QH6:</b> To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.</p>	<p>With its accessible, inclusive, safe open spaces combined with a wide variety of unit types and existing and proposed amenities this development will attract a wide range of occupants and users in terms of age, family size and physical ability. There is a variety of apartment types in a managed neighbourhood environment with on-site resident facilities, good public realm and amenities.</p>
<p><b>QH7:</b> 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</p>	<p></p>
<p><b>QH8:</b> To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.</p>	<p>The land is currently grasslands. The residential development will facilitate an efficient neighbourhood expansion in a location served by good public transport whilst also maintaining the institutional functions of the land.</p>

<p><b>QH9:</b> 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.</p>	<p>The project will be constructed in 3 phases over approximately 36 months. In summary, the phases will be as follows:-</p> <ul style="list-style-type: none"> <li>• Phase I will comprise 277 units with the site enabling works and basement dig. Phase II</li> <li>• Phase II will comprise of 3 blocks 4, 5 &amp; 6 and all ancillary over ground and underground works. This Phase comprises a total of 258 units.</li> <li>• Phase III will comprise of 3 blocks 7,8 &amp; 9 giving a total of 122 units for this Phase, and all ancillary over ground and underground works. This will complete the build and will be completed by the end of 2023. There is no basement in phase 3.</li> </ul> <p>This is set out in the Construction Environmental Management Plan.</p>
<p><b>QH10:</b> To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.</p>	<p>The proposed development is accessible from St. Anne's Park with well-located public open spaces and lack of barriers to encourage permeability.</p>
<p><b>QH11:</b> To ensure new developments and refurbishments are designed to promote safety and security and avoid anti-social behaviour in accordance with the Safety and Security Design Guidelines contained in Appendix 14.</p>	<p>All open spaces and access routes in the proposed development are overlooked ensuring there will be no secluded footpaths that could lead to anti-social behaviour. Access to the apartment blocks is via these open spaces, which will ensure they are well used.</p> <p>The public realm is overlooked by the residential blocks and from the apartment blocks which have direct access to amenity areas at ground floor level to encourage animation.</p>
<p><b>QH12:</b> To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new developments throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set out in the development plan.</p>	<p>The application is supported by an Energy and Sustainability Report, which outlines how the scheme will be energy efficient.</p>
<p><b>QH13:</b> 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</p>	<p>The adaptability of homes is considered in the enclosed OMP Urban Design Manual Consistency Statement.</p>

Sustaining Communities' (2007).	
<b>QH15:</b> To require compliance with the City Council's policy on the taking-in-charge of residential developments.	This is to be a managed Residential Scheme, without taking in charge of any of the residential areas. The proposed 25% public open space to the south of the site is proposed to be taken in charge by Dublin City Council.
<b>QH16:</b> 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.	This development will be maintained by a management company. This is more fully set out in the Estate and Common Areas Property Management Strategy, prepared by Aramark for this application.
<b>QH17:</b> To support the provision of purpose-built, managed high-quality private rented accommodation with a long-term horizon.	The proposal provides high quality private accommodation which will be managed by a professional management company.
<b>QH18:</b> 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.	The residential development is interwoven with a variety of private and communal open spaces. The courtyards provide shared communal open space while the terraces and balconies provide private open space for residents. Each apartment is carefully designed in compliance with the Design Standards for New Apartments (2018).
<b>QH19:</b> 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.	The proposed residential breakdown is as follows: <ul style="list-style-type: none"> <li>• 1-bed apartment: 224</li> <li>• 2-bed apartment: 378</li> <li>• 3-bed apartment: 55</li> </ul>
<b>QH21:</b> 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.	The proposed development surpasses the minimum standards for residential amenity. The development provides communal open space, private open space, crèche facilities, gym facilities and tenant amenity rooms. Please refer to the OMP Housing Quality Assessment for further details.
<b>QH22:</b> 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.	Two large open spaces are proposed to the north east and north west of the site. Block 1 is located to the east of the existing residential development of The Meadows and is separated from this housing by approximately 50 meters ensuring no overshadowing. Sun path shadowing analysis has been conducted. The ground

	<p>floor level of the apartments is 2 meters lower than The Meadows and the penthouse level of this closest block has been set-back to reduce its impact. Block 1 has been split into three elements with glazed links. In addition, the apartment elevations have been designed to have a horizontal emphasis reducing their visual impact.</p>
<p><b>Chapter 8 Movement and Transport</b></p>	
<p><b>MT2:</b> Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.</p>	<p>The development is located within easy walking distance of both Harmonstown and Killester DART stations and along numerous bus routes. Ease of access to public transport will encourage the use of public transport. Secure bicycle parking is provided for both residents and visitors.</p> <p>The access road (running east-west) provides access to the underground parking area and to the visitor /crèche surface carparking area only.</p> <p>Please refer to the ILTP Traffic &amp;Transport Assessment and Mobility Management Plan.</p>
<p><b>MT13:</b> To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.</p>	<p>Please refer to ILTP Traffic &amp;Transport Assessment and Mobility Management Plan.</p>
<p><b>MTO23:</b> To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.</p>	<p>Please refer to ILTP Traffic &amp;Transport Assessment and Mobility Management Plan.</p>
<p><b>MT17:</b> To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.</p>	<p>Car parking is proposed at 0.7 spaces per apartment; plus crèche parking and drop off and visitor parking.M1314 bicycle spaces will be provided in secure facilities in the basement in addition to 332 spaces at ground level.MPlease refer to ILTP Traffic &amp;Transport Assessment and Mobility Management Plan.</p>

<p><b>MTO45:</b> To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.</p>	<p>Roads are designed in accordance with DMURS. Please refer to separate OCSC DMURS Compliance Statement.</p>
<p><b>Chapter 9 Sustainable Environmental Infrastructure</b></p>	
<p><b>SIO8:</b> All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> <li>• The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government, November 2009, as may be revised/updated and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan.</li> <li>• The site-specific flood risk assessment (SSFRA) shall pay particular emphasis to residual flood risks, site-specific mitigation measures, flood- resilient design and construction, and any necessary management measures (the SFRA and Appendix B4 of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. All potential sources of flood risk must be addressed in the SSFRA.</li> </ul>	<p>Please refer to separate OCSC Site Specific Flood Risk Assessment.</p>
<p><b>S118:</b> To require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works. The following measures will apply:</p> <ul style="list-style-type: none"> <li>• The infiltration into the ground through the development of porous pavement such as permeable paving, swales, and detention basins</li> <li>• The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands</li> </ul>	<p>Sustainable Urban Drainage Systems will be used throughout the scheme. Please refer to separate OCSC Engineering Services Report.</p>

The slow-down of the movement of water.	
<b>SIO16:</b> To require the provision of adequately- sized recycling facilities in new commercial and large-scale residential developments, where appropriate.	The managed apartment development will have ample provision for recycling in the basement with segregated waste bin stores provided. Please refer to the AWN Operational Waste Management Plan for details.
<b>SIO17:</b> To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re- use/recycled materials to be used shall be implemented by the developer.	Please refer to OCSC Outline Construction and Demolition Waste Management Plan.
<b>SI26:</b> To ensure that the design of external lighting proposals minimises light spillage or pollution in the surrounding environment and has due regard to the residential amenity of the surrounding area.	The application is supported by a Site Lighting Analysis Report prepared by OCSC.
<b>SIO33:</b> To support the development of energy efficient initiatives such as use of District Heating and Combined Heat and Power, and to promote the use of CHP in large developments.	The application is supported by an Energy and Sustainability Report prepared by OCSC.
<b>Chapter 10 Green Infrastructure, Open Space and Recreation</b>	
<b>GI2:</b> That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.	An Appropriate Assessment will be carried out by An Bord Pleanala as the Competent Authority. To facilitate this the application is accompanied by an Appropriate Assessment Screening Report and a Natura Impact Statement prepared by Enviroguide.
<b>GI5:</b> To promote permeability through our green infrastructure for pedestrians and cyclists.	The Landscape Masterplan provides a network of footpaths throughout the development that also have the potential to connect to the adjoining parklands, and surrounding areas.
<b>GI01:</b> To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city	Please refer to separate OCSC Engineering Services Report which describes the Green Infrastructure to be incorporated into the drainage strategy for the proposed development.
<b>GI13:</b> To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children.	The subject development is located adjacent to St. Anne's Park with 25% of the development site area set out as public open space to be taken in charge by DCC, added to by communal open space in the apartment development that is available to the residents which includes play areas.
<b>GI23:</b> To protect flora, fauna and habitats, which have been identified by Articles	Refer to separate Enviroguide AA Screening /NIS Reports.



<p>10 and 12 of Habitats Directive, Birds Directive, Wildlife Acts 1976–2012, the Flora (Protection) Order 2015 S.I No. 356 of 2015, European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.</p>	
<p><b>GI33:</b> To seek the provision of children’s play facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.</p>	<p>The eastern open space will have a large playground and kick about space as shown on the Landscape Masterplan.</p>
<p><b>GIO30:</b> To support the implementation of the Dublin City Play Plan 2012–2017, which aims to provide inclusive and accessible play opportunities for children and young people</p>	<p>All spaces will provide safe areas for occupants to play and interact, particularly children.</p>
<p><b>Chapter 12 Sustainable Communities and Neighbourhoods</b></p>	
<p><b>SN1:</b> To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this Plan.</p>	<p>The proposed development is located within an existing mature residential area that is well served by existing neighbourhood infrastructure and public transport. The site is surrounded on three sides by St. Anne’s Park which provides extensive outdoor and communal space for all ages.</p>
<p><b>SN2:</b> To promote neighbourhood developments which build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places.</p>	<p>The development sits in a parkland setting. Open space with pedestrian links throughout is an important element of the development. Please refer to separate Conservation Impact Assessment prepared by Historic Building Consultants.</p>
<p><b>SN5:</b> To ensure that applications for significant large new developments (over 50 Units) are accompanied by a Social Audit and an Implementation and Phasing Programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.</p>	<p>Please refer to separate Community Infrastructure and School Demand and Capacity Assessment Report prepared by Enviroguide Consulting.</p>
<p><b>SN02:</b> To liaise with the Department of Education and Skills on the educational needs of the city to ascertain the need for new or expanding educational facilities in the city to service the growing population.</p>	<p>The applicant has engaged with the DES and the Department has confirmed that the proposed development has been considered within their assessment for future school development and capacity for this area both at primary and post primary level. This is considered in more detail in the Community Infrastructure and School Demand and Capacity Assessment Report prepared by Enviroguide Consulting.</p>
<p><b>SN17:</b> To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic</p>	<p>Crèche facilities are included within the proposed development as required.</p>

trends in an area.	
<b>SN18:</b> To encourage and facilitate the provision of a range of community facilities in the city that caters for all.	Please refer to separate Community Infrastructure and School Demand and Capacity Assessment Report prepared by Enviroguide Consulting.
<b>SN19:</b> To enhance and improve the provision of playgrounds, play spaces, playing pitches and recreational spaces in residential areas and in the city centre in accordance with the City Council's standards and guidelines.	Playspaces and kick about spaces are proposed for the residents of the residential development in accordance with the Development Plan objectives. In addition 25% public open space is proposed to be taken in charge by Dublin City Council contributing to open space in the City.