

Planning  
Application to  
An Bord  
Pleanála

Planning  
Report &  
Statement of  
Consistency



Proposed Strategic  
Housing Development

658no. Units and a  
Childcare Facility at  
Woodbrook, Shankill,  
Co. Dublin

For Aeval Unlimited  
Company

**NOVEMBER 2019**

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## 1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, are instructed by our Client (the Applicant), Aeval Unlimited Company, Usher House, Dundrum, Dublin 14, to prepare this Strategic Housing Development (SHD) Planning Application Report.

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

- Rebuilding Ireland – Action Plan for Housing and Homelessness.
- National Planning Framework, Ireland 2040 (NPF).
- Eastern & Midlands Regional Spatial & Economic Strategy (RSES) and Dublin Metropolitan Area Spatial Plan (DMASP).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- Quality Housing for Sustainable Communities (2007).
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018).
- Dun Laoghaire-Rathdown County Development Plan 2016 – 2022.
- Woodbrook – Shanganagh Local Area Plan 2017 – 2023.
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.

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

In summary, the proposed (Strategic Housing) development broadly comprises: -

- 685no. residential units (207no. houses, 48no. duplex and 430no. apartments) in buildings ranging from 2 to 8-storeys.
- 1no. childcare facilities (c. 429 sq. m gross floor area).
- A temporary surface car park (164no. spaces).
- 2no. replacement golf holes on eastern side of railway line.
- All associated and ancillary site development, infrastructure, public amenity open space, landscaping and boundary treatment works.

A Site Location Map outlining the lands subject of the proposed works (in red) and extent of land ownership (in blue) has been prepared by O'Mahony Pike Architects, and is enclosed with this submission (Dwg. No. 1618-OMP-00-00-DR-A-11020 'Site Location Map' refers).

Letters of consent accompany this submission. There is a letter of consent from Dun Laoghaire-Rathdown County Council (DLRCC) by virtue of the fact that the proposals include works on lands currently within the control of the Council at the Old Dublin Road, Shanganagh Park and at the lands east of the DART Line which are also subject of a Section 183 agreement by the Council to transfer these lands to the Applicant. A letter of consent is also enclosed from Woodbrook Golf Club due to the fact that part of Woodbrook Avenue extends across lands currently laid out as part of the golf course.

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

In accordance with the statutory regulations, we confirm that the sum of €80,000.00 as the appropriate fee in this instance. An Cheque to this amount made to An Bord Pleanála is enclosed herewith.

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

## 1.1 Definition of Strategic Housing Development

We consider the development now being proposed to be Strategic Housing Development as defined by the Section 3 of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended.

Section 3 of the Act confirms, *inter alia*, that: -

“ ‘strategic housing development’ means—

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

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

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

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

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

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

### 1.1.1 Proposed Development

The development proposed comprises 685no. dwellings as the first phase of development on lands at c. 21.7 Ha that are zoned ‘A1’, ‘F’ and ‘GB’ under the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022. This development represents Phase 1 of the development at Woodbrook in line with the Woodbrook-Shanganagh LAP. In respect of these zoning objectives set out, the County Development Plan confirms this as being: -

**Objective A1 (Residential):** “To provide for new residential communities in accordance with approved local area plans.”

**Objective F:** “To preserve and provide for open space with ancillary active recreational amenities”

**Objective GB:** “To protect and enhance the open nature of lands between urban areas.”

As the development is for greater than 100no. dwellings and those dwellings are all proposed on land zoned for residential development, the proposal amounts to a strategic housing development.

The development also includes ancillary accommodation and additional infrastructure necessary to facilitate the overall development of approximately 1,402no. dwellings including a creche and a Local Centre (retail / commercial uses) at Woodbrook under the Woodbrook-Shanganagh LAP. The development now proposed represents Phase 1 of that overall development.

Arising from the above, the quantum of other uses falls well below the maximum allowances provided for by the Act. As a result, the proposal can be considered a strategic housing development in our professional opinion.

For all of the reasons, arguments and considerations noted above, we are of the professional opinion that the proposal before the Bord represents Strategic Housing Development.

## 1.2 Circulation to Prescribed Bodies

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

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

- National Transport Authority.
- Transport Infrastructure Ireland.
- Minister for Culture, Heritage and Gaeltacht.
- Heritage Council.
- An Taisce – the National Trust for Ireland.
- Irish Water.
- Coras Iompair Eireann
- Commission of Railway Regulation.
- Dun Laoghaire-Rathdown Childcare Committee.

## **2 SITE DESCRIPTION & CONTEXT**

### **2.1 Site Description**

The subject site is located in an area identified for development under the Woodbrook – Shanganagh LAP (2017 – 2023) – hereafter referred to the LAP.

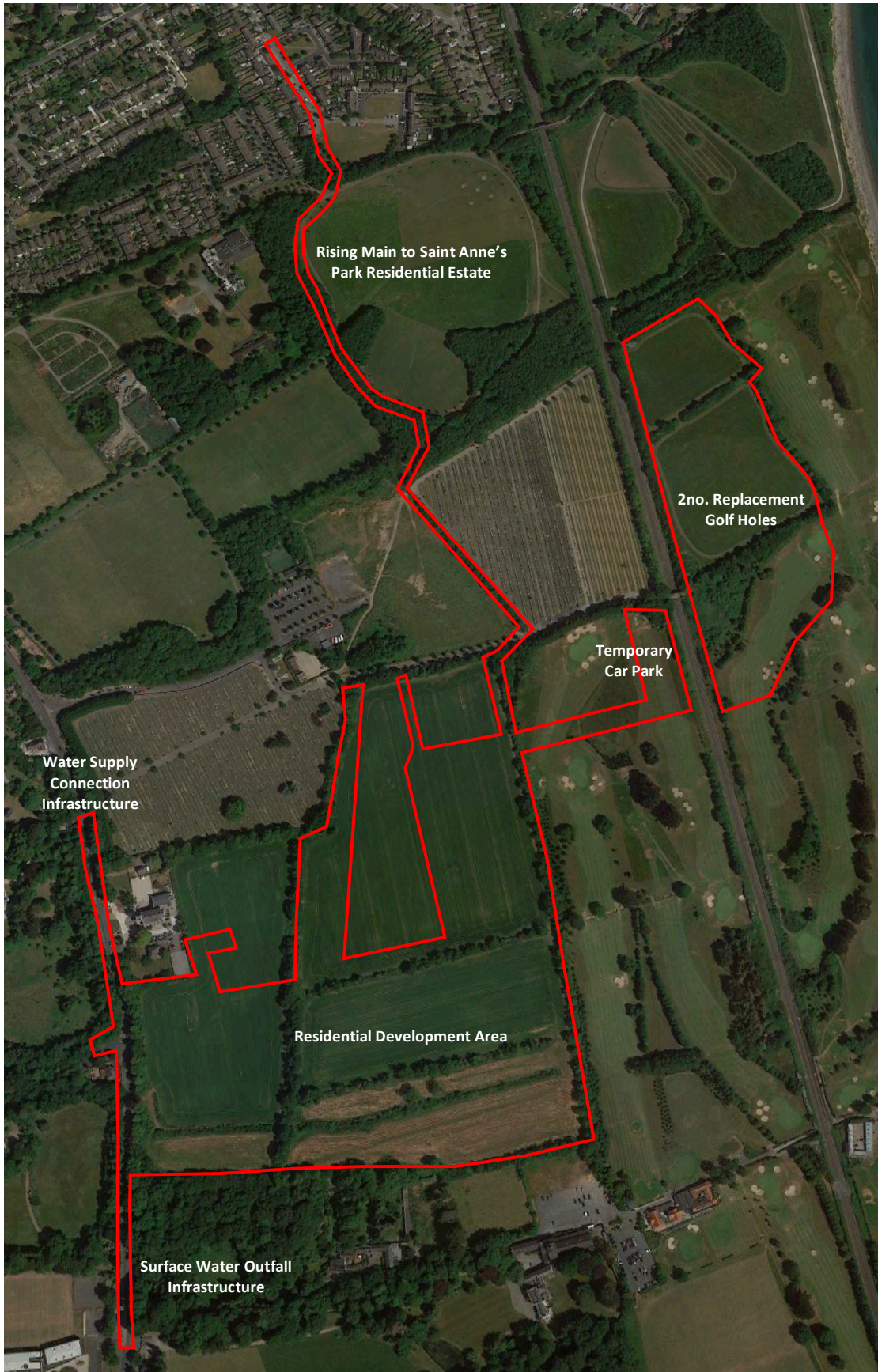
This residential site is situated between two major public transport arteries; the existing DART railway line to the east, that will include a future station on the overall Woodbrook lands and the Old Dublin Road (R119) and M11 motorway to the west. The lands in question are separated from the DART line by lands currently forming part of the adjoining Woodbrook Golf Course. The overall Woodbrook lands measuring c. 21Ha are located c. 1.5km south of Shankill Village centre and c 1.5km north of Bray town centre.

The site consists of lands generally bounded by the Old Dublin Road (R119) to the west, Shanganagh Public Park and Shanganagh Cemetery to the north, Woodbrook Golf Course to the east and Corke Lodge and woodlands to the south.

As such, the subject site is considered to represent a distinct ‘parcel’ of zoned land surrounded by a green belt area with existing access routes (both road and DART) generally running along its western and eastern boundaries.

Part of the development will also comprise the laying of a foul rising main through Shanganagh Public Park. This rising main and associated on-site foul pumping station will serve the developments planned by the Applicant at Woodbrook, and also the planned developments by the Local Authority at Shanganagh, to the north; both of which are covered by the same LAP.

The site is gently undulating, with more significant changes in levels in isolated locations, and is generally sub-divided by existing field boundaries which consist primarily of hedgerows. The site boundaries also contain mature tree lines and hedgerow. The site slopes generally downwards from north to south. An existing field ditch, which is predominantly dry, runs adjacent to the boundary with Shanganagh Cemetery south towards the southern boundary. A crematorium has recently been approved on lands to the north of Woodbrook, within the Shanganagh Cemetery lands.



**Figure 1:** Extract from Google Earth showing the subject site outlined indicatively in red (Overlay by SLA). Please refer to the Site Location Plan prepared by O'Mahony Pike Architects for the definitive red line boundary of the subject site.

## 2.2 Existing & Planned Uses

The lands proposed for residential development are currently utilised for agricultural purposes, as tillage land.

Land in the north-east of Woodbrook where it is proposed to provide a length of Woodbrook Avenue is currently in use as a golf course and forms part of Woodbrook Golf Club.

Lands to the north across which the rising foul main is proposed comprises of Shanganagh Cemetery and Shanganagh Public Park.

Lands to the east of the DART line on which it is proposed to provide two new golf holes for Woodbrook Golf Club have been the subject of a transfer arrangement between the Local Authority and the Applicant. These lands are outside the open space zoned area of Shanganagh Public Park.

Lands generally to the south and east of the overall Local Area Plan area are intended to provide the first phase of residential uses in line with the LAP, together with amenities for residents of those properties in the form of a creche and a variety of public open space areas.

The full extent of the central Green Axis and eastern linear park will be included as part of this Phase 1 planning application, with interim landscaping works proposed to a significant northern extent of the Green Axis, in order to provide early linkages north to Shanganagh Public Park.

Dun Laoghaire-Rathdown County Council are in the process of devising a Masterplan for Shanganagh Public Park and discussions with the Parks Department to date regarding the interface and connections between the development now proposed at that emerging Park Masterplan have taken place so as to ensure successful and permeable connectivity between Woodbrook and Shanganagh Park.

## 2.3 Recent Planning History

There is 1no. planning application which relates to the subject site, which is detailed below. This is an older application relating to these lands dating back to 2007, but the planning context through both the County Development Plan and Local Area Plan processes has changed to such a degree that this is not considered to be relevant to the current proposal.

### 2.3.1 Reg. Ref. D07A/1716

Permission was sought on 17 December 2007 for a mixed-use development of c. 70,668 sq. m gross floor area. In summary, the development proposal included, inter alia: -

- A Neighbourhood Centre with retail, commercial, community and other uses with a combined FFA of c. 10,368 sq. m.
- 537no. residential units in a mixture of apartments, duplexes, terraced townhouses and 4no. live/work units, incorporating balconies/terraces and gardens consisting of: -
  1. 69no. 1-bedroom units.
  2. 321no. 2-bedroom units.
  3. 93no. 3-bedroom units.
  4. 54no. 4-bedroom units.
- Open Space including a 'Civic Plaza' at the 'Neighbourhood Square' (c. 0.16 ha), Linear park running north to south through the site (c. 0.75 ha), Buffer Zone fronting the Old Dublin Road (c. 0.7 Ha), pocket parks and landscaped residential courtyards throughout the development.

Permission was refused on 18 February 2008 for 6no. reasons. These were: -

- As required by the LAP at the time, the development proposal did not provide a DART station, water and sewerage services were not in place to serve the development and essential transport infrastructure works had yet to be taken out prior to development.



- Proposed development was premature given the lack of drainage infrastructure
- The vehicular access arrangements were considered inadequate and hazardous.
- The proposed development was seen as inadequate given the deficiency of the existing road network serving the development
- The development proposal did not accord with the LAPs vision for a compact urban form, and was considered loose and incoherent and repetitive in architectural style and detailing.
- The number of single aspect units provided and the low number of family units provided was deemed unsustainable which was deemed prejudicial to the amenities of future residents.

Planning policy has changed significantly since this planning permission was refused and the current proposal is substantially different to that previously proposed.

In addition, the drainage constraints that pertained at that time have been resolved. This can be seen from the Certificate of Feasibility and Certificate of Design Acceptance from Irish Water included in this submission.

### 3 THE APPLICANT

We wish to confirm that the Applicant in this case is Aeval Unlimited Company, an associated company of Castlethorn, the required details of which are as follows: -

**Name:** Aeval Unlimited Company

**Address:** Usher House, Main Street, Dundrum, Dublin 14.

**Telephone:** 01 216 40 80

**Email:** jleonard@castlethorn.ie

Please note that Aeval Unlimited Company is referred to hereafter simply as 'Aeval'. This is also reflected on drawing titles and within reports of the accompanying Consultants documentation. For the avoidance of doubt, this is the same entity. Aeval is an associated company of Castlethorn.

### 4 APPLICANTS LEGAL INTEREST

#### 4.1 Ownership

The Applicant own the lands being proposed for the residential development in this instance.

There are lands at Shanganagh Public Park across which essential water services need to pass that are in the control of Dun Laoghaire-Rathdown County Council. The new junction on the Old Dublin Road (R119) and infrastructure required both north and south of the subject lands on Old Dublin Road (R119) is also within lands controlled by the Council.

The lands which are proposed to accommodate 2no. replacement holes for Woodbrook Golf Club located on the east side of the DART tracks are also presently in the ownership of Dun Laoghaire-Rathdown County Council. The Board should take comfort from the fact that the Council have concluded a Section 183 procedure in respect of these lands, whereby the Local Authority have agreed the transfer of these lands to the Applicant. The execution of that land exchange has not yet taken place, hence the need for the letter of consent in this case.

A section of the proposed Woodbrook Avenue, located to the north-east of the site, crosses lands currently in use as part of Woodbrook Golf course and is in control of Woodbrook Golf Club.

#### 4.2 Letters of Consent

As a result of the above, there are 2no. areas of these proposed application lands which are currently controlled by third parties.

##### 4.2.1 Woodbrook Golf Club

We attach herewith a letter dated 27 August 2019 from Woodbrook Golf Club that consents to the making of the ultimate planning application on these lands insofar as they relate to lands in their control.

##### 4.2.2 Dun Laoghaire-Rathdown County Council

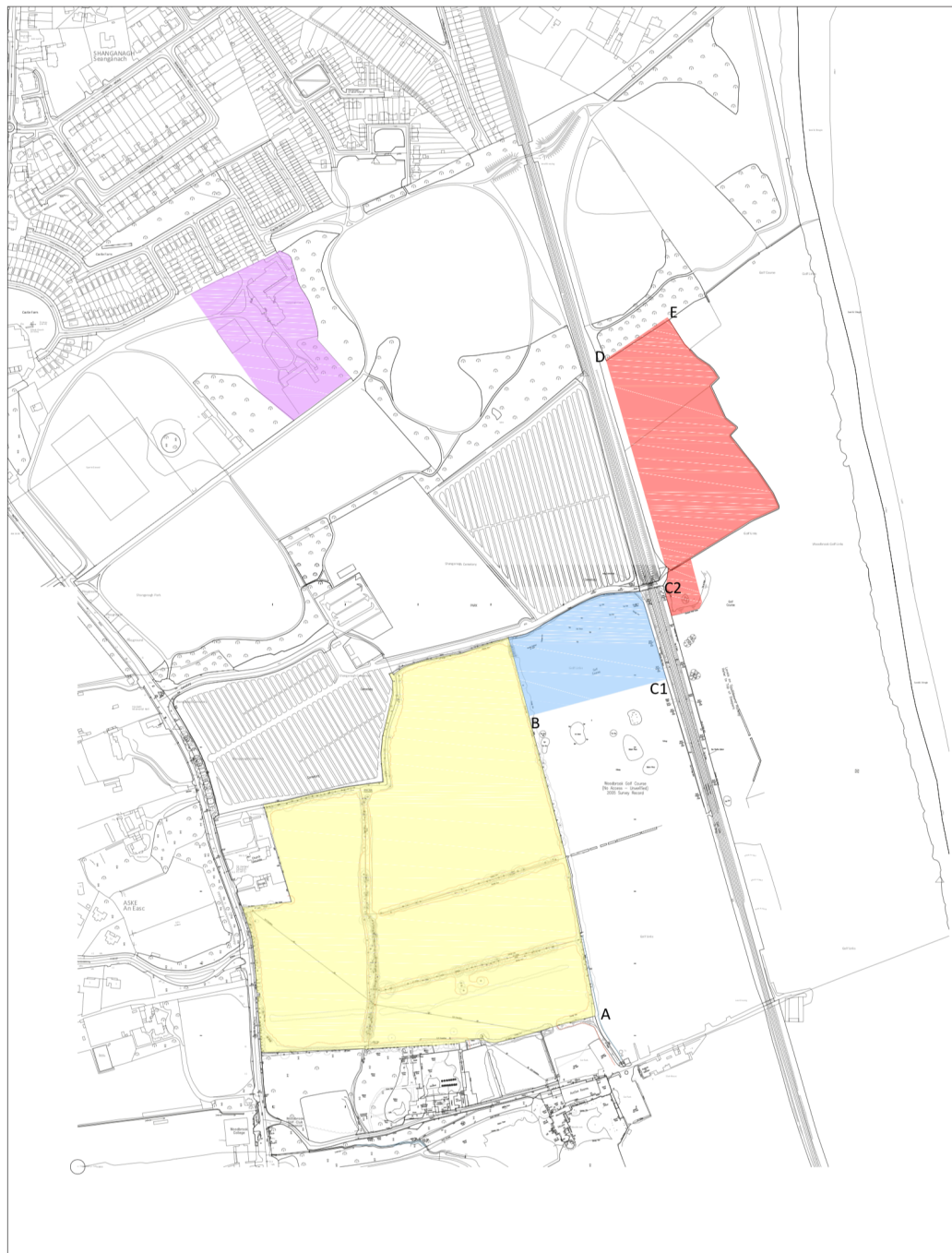
We attach herewith a letter dated 23 October 2019 from Dun Laoghaire-Rathdown County Council that consents to the making of the ultimate planning application on these lands insofar as they relate to lands in their control.



### 4.3 Tri-Partite Agreement

The lands located in the north-east corner of the Woodbrook lands are currently occupied by part of the golf course at Woodbrook Golf Club. This area has long been referred to as the ‘DART Gateway’ and extends to approx. 2.4 Ha (c. 6 acres).

As part of the long planned tripartite exchange of lands, Woodbrook Golf Club will acquire the Council owned 11 acres on the eastern side of the DART line, Aeval will get control of the ‘DART Gateway’ lands and will acquire Shanganagh Castle and some land within Woodbrook.



**Land Transfer - Context Plan**

<span style="display: inline-block; width: 15px; height: 15px; background-color: yellow; border: 1px solid black;"></span> 46 Acres - Woodbrook Lands	<span style="display: inline-block; width: 15px; height: 15px; background-color: red; border: 1px solid black;"></span> 11 Acres - Council Lands
<span style="display: inline-block; width: 15px; height: 15px; background-color: blue; border: 1px solid black;"></span> 6 Acres - DART Gateway Lands	<span style="display: inline-block; width: 15px; height: 15px; background-color: purple; border: 1px solid black;"></span> 6.29 Acres - Shanganagh Castle Lands

**Figure 2:** Extract from the Design Statement, prepared by O’Mahony Pike Architects illustrating the land transfers in the context of the Tri-Partite Agreement between the Applicant, DLRC and Woodbrook Golf Club.

The Woodbrook Tripartite Agreement is a signed and executed legal agreement between Aeval (the Applicant), DLRCC and Woodbrook Golf Club. It contains an associated and signed legal agreement with the original owner of the Woodbrook lands who continues to own the freehold of the bulk of the golf course lands. The tripartite agreement follows on from an original draft Heads of Agreement between the parties dating back to 2006 when Aeval originally acquired the Woodbrook lands. Aeval owns the freehold of the 52 Acre residential zoned Woodbrook lands as well as c. 6.3 Acres of residential zoned land at Shanganagh Castle. Upon the receipt of a successful determination of this SHD Planning Application the tripartite agreement will automatically trigger land exchanges between the parties comprising of: -

- The transfer of the '11 Acre' (actually 10.97 Acres) from DLRCC to Woodbrook Golf Club (shaded red in Figure 2).
- The transfer of an equivalent '11 Acres' area from Aeval to DLRCC comprising of 6.29 Acres at Shanganagh Castle and 2no. lots of zoned residential lands at Woodbrook with a combined area of 4.68 Acres.
- The assignment by WGC of their sporting lease on the 6 Acre DART Gateway (shaded blue in Figure 2).

The associated agreement with the freehold owner of the golf course lands also grants Woodbrook Golf Club new long term leases on the balance of the existing golf course lands. Once these land exchanges are triggered, Woodbrook Golf Club will be automatically granted a licence to continue occupation and use of the 6 Acre (shaded blue in Figure 2) as part of their golf course until such time as the two new replacement golf holes on the 11 Acre (shaded red in Figure 2) are completed and matured so that they are fit for regular play. This is an envisaged 12 – 18 month period from completion of the golf course works. There is also financial consideration payable at this point from Aeval to Woodbrook Golf Club and in the event of dispute as to whether the holes are fit for regular play the matter can be referred to an independent expert with both parties bound by the expert's determination. It is the Applicant's intention upon receipt of a successful determination to complete the golf course works by the end of Q3 2020. This would mean that the Applicant would have vacant possession of the 6 Acre DART Gateway lands by the end of Q1 2022 at the latest.

Iarnrod Eireann have confirmed their commitment to the delivery of Woodbrook DART Station and the lodgement of planning for the DART Station in Q1 2020. Evidence of that commitment is contained in the letter dated 1 October 2019 from the NTA which accompanies this application. Even if this DART Station application was appealed they should have planning permission for the station secured by Q2 2021. Allowing for the tender of the station construction and enabling works along the line the timing of the vacation of the 6 Acre DART Gateway by the end of Q4 2021 is understood by and aligns with Iarnrod Eireann's intentions. Woodbrook DART Station should thus be completed and fully operational by the end of Q3 2022. Aeval would be well underway in terms of the construction of Phase 1 at Woodbrook at that stage with much of Phase 1A-C complete and occupied. The Applicant does not envisage having Phase 1D (the large courtyard apartment blocks) completed and ready for occupation before the DART Station would become operational, towards the end of Q3 2022.

The main distributor road linking the Old Dublin Road to the planned future DART Station is referred to as Woodbrook Avenue. Its delivery is planned to be funded by LIHAF. It will be delivered in two stages, the first to commence early in 2020 upon receipt of a successful planning determination. The final stage through the 6 Acre DART Gateway cannot commence until these lands are vacated by Woodbrook Golf Club i.e. towards the end of 2021. This final section of Woodbrook Avenue would be completed in Q2 2022 at the latest and the Applicant could construct the temporary DART Station car park at that time so that it is ready for use when the DART Station becomes operational.

These are the steps involved as set out in the tripartite legal agreement. They are fully understood by Aeval, DLRCC and Woodbrook Golf Club as well as the NTA and Iarnrod Eireann. It is important to clarify that the proposed Phase 1 development at Woodbrook has been considered and fully assessed as part of this SHD application from a traffic and broader environmental perspective in isolation of Woodbrook DART Station becoming operational. The adopted Woodbrook-Shanganagh LAP does not restrict completions or occupations until such time as the DART Station is completed and this position has been clarified in pre-planning consultations with both DLRCC and the NTA. It is important from a development funding perspective that there are no undue impediments to the implementation of this development.

We refer to the Design Statement, prepared by O'Mahony Pike Architects which illustrates the parcels of lands which have been exchanged to facilitate the development of the residential lands, the replacement golf holes and the provision of the future DART Station.

We enclose herewith a Letter dated 10 October 2019 from Byrne Wallace Law Firm confirming the exchange of the lands has been agreed by the parties involved. For clarity and convenience for the Board, this Solicitors Letter confirms that the 'Tri-Partite Agreement' is a legal agreement and confirms that the provisions noted above do indeed form part of this Agreement.

## 5 AGENT

This SHD application has been co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants under a Design Team led by O'Mahony Pike Architects.

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

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

### 5.1 Design Team

The following sets out a list of consultants that have been involved in the preparation of the proposal to date: -

**Stephen Little & Associates Chartered Town Planners & Development Consultants** – Preparation and co-ordination of the SHD Planning Application to An Bord Pleanála. Providing guidance from a Town Planning perspective, and consultation with Dun Laoghaire-Rathdown County Council Planning Department.

**O'Mahony Pike Architects** – Preparation of the Masterplan for the overall Woodbrook lands and the detailed layout and design of the proposed Phase 1 development including Computer Generated Images (CGI's) and a detailed Architect's Design Statement booklet setting out the detailed design rationale for the proposed development.

**Atkins Consulting Engineers** – Full civil engineering consultancy services including detailed roads and engineering services design, M&E, Fire and structural advice, public lighting design, preparation of Traffic and Transport Assessment, Energy Statement and other infrastructural requirements of the proposed development including liaising with Irish Water and Dun Laoghaire-Rathdown County Council (Roads and Water Services Department) as appropriate.

**Brady Shipman Martin Landscape Architects and Environmental Consultants** – Preparation of the landscape masterplan, visual impact (verified photomontage views) and guidance on conservation and ecology. Preparation of an Appropriate Assessment Screening (with additional specialist input) including liaising with the National Parks and Wildlife Service and Parks and Heritage Department in Dun Laoghaire-Rathdown County Council.

**The Tree File Ltd.** – Preparation of Tree Surveys and Arboriculture Assessment.

**AWN Consulting** – Preparation of a Construction Management Plan and Waste Management Plans.

**ARC Architectural Consultants** – Preparation of a Daylight and Sunlight Assessment.

### 5.2 EIAR Team

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

**Stephen Little & Associates Chartered Town Planners & Development Consultants** – Preparation and Co-ordination of EIAR and preparation of the EIAR Chapter relating to Population & Human Health.

**Atkins Consulting Engineers** – Preparation of the EIAR Chapters relating to Land, Soil & Geology, Water, Material Assets (Transportation) and Material Assets (Built Services).

**Brady Shipman Martin Landscape Architects and Environmental Consultants** – Preparation of the EIAR Chapter relating to Biodiversity and Landscape and Visual Impact Assessment.

**ARC Architectural Consultants** – Preparation of the EIAR Chapter relating to Climate (Daylight & Sunlight Assessments).

**AWN Consulting** – Preparation of the EIAR Chapters relating to Climate (Air Quality & Climate Change) and Air (Noise & Vibration) and Material Assets (Waste).

**Cathal Crimmins Architectural Conservation** – Preparation of the EIAR Chapter relating to Cultural Heritage (Architectural Heritage).

**Irish Archaeology Consultants Ltd.** – Preparation of the EIAR Chapter relating to Cultural Heritage (Archaeology).

## **6 PRIOR CONSULTATION IN RESPECT OF PROPOSED STRATEGIC HOUSING DEVELOPMENT**

### **6.1 Section 247 Consultations**

We can confirm that a formal Section 247 Pre-Planning Meeting was held with the Planning Authority on the 20 September 2018. The formal request for this Section 247 Consultation was issued to the Planning Authority by letter dated 30 August 2018 submitted by Stephen Little & Associates (copy enclosed). This was the fourth pre-planning meeting.

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

- Liam Walsh, Senior Planner, Planning.
- Zara Horan, Executive Planner, Planning.
- Bob Hannon, Architect.
- Andrew Davenport, Architect.
- Clare Casey, Transportation Department.
- Marin Dancia, Drainage Department.
- Ruairí O'Dúlaing, Parks Department.

At this meeting the Planning Authority addressed the proposed development in light of updates to the proposal since the previous meeting. The Planning Authority provided a list of actions that the applicant's design team must undertake prior to any lodgement. These are as follows: -

- Applicant to discuss feasibility of roundabout / junction options with NTA and add as an alternative within EIA.
- Applicant and Parks to engage in relation to the Park Masterplan.
- Applicant to meet again with Drainage Planning on site.

### **6.2 Previous DLRCC Meetings**

The meeting held on the 20 September 2018 was the fourth Pre-Planning Meeting held with the Planning Authority regarding these lands. Previous Pre-Planning Meeting were held with the Planning Authority on the following dates regarding this development: -

- 28 March 2018.
- 2 May 2018.
- 27 June 2018.

#### **6.2.1 Meeting No. 1 – 28 March 2018**

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

- Liam Walsh, Senior Planner, Planning.
- Julienne Browne, Senior Executive Planner, Planning.
- Zara Horan, Executive Planner, Planning.
- Rauiri O'Dulaing, Parks Department.
- Mick Mangan, Transportation Department.
- Clare Casey, Transportation Department.
- Bernard Egan, Drainage Department.

- Dermot O'Connor, Waste Department.
- Michael Tuohey, Irish Water.

### 6.2.2 Meeting No. 2 – 2 May 2018

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

- Liam Walsh, Senior Planner, Planning.
- Julienne Browne, Senior Executive Planner, Planning.
- Zara Horan, Executive Planner, Planning.
- Andrew Davenport, Architect.
- Claire Casey, Transportation Department.
- Sean Manton, Projects Office.
- Marin Dancia, Drainage Department.
- Aidan French, Parks Department.

### 6.2.3 Meeting No. 3 – 27 June 2018

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

- Liam Walsh, Senior Planner, Planning.
- Julienne Browne, Senior Executive Planner, Planning.
- Zara Horan, Executive Planner, Planning.
- Andrew Davenport, Architect.
- Claire Casey, Transportation Department.
- Sean Manton, Projects Office.
- Bernard Egan, Drainage Department.
- Paul Conlon, Parks Department.
- Dara O'Daly, Parks Department.
- Dermot O'Connor, Waste Department.

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

## 6.3 An Bord Pleanála Pre-Planning Consultation

A Pre-Application Consultation meeting was held on the 17 December 2018 under Section 6 the Act. This was attended by representatives from An Bord Pleanála, Dun Laoghaire-Rathdown County Council, the Applicant and its Design Team.

Broadly, the following issues were discussed: -

- **Density** – Densities proposed should be considered in the context of the prevailing planning context (particularly the National Planning Framework and Building Height Guidelines) and whether densities have been maximised in particular locations at the interface with adjacent open greenbelt lands and proximate to the proposed future DART Station.

- **Building Height** – Consideration to be given to the building height in appropriate locations including interfaces with the greenbelt / coastal area and future DART Station.
- **Connectivity / Permeability** – Clarity to be provided with regard connections toward Shanganagh Public Park and potential future connections to the south.
- **Transportation** – Clarity to be provided on the provision of the future DART Station.
- **Water Supply & Wastewater Treatment** – Clarity to be provided in relation to the rising main connecting to St. Anne’s Park. Clarity to be provided in relation to the timelines for works proposed by Irish Water.
- **Surface Water Management** – issues highlighted in DLRCC Drainage Department issued to An Bord Pleanála as part of the consultation process to be addressed.
- **Golf Holes** – Further detail to be provided on the proposed works associated with the replacement golf holes.

We refer the Board to the plans and particulars submitted with the SHD Planning Application. The Design Statement prepared by O’Mahony Pike Architects, provide an overview of the key information which addressed the Board’s Opinion following Pre-Planning Consultation. We further refer to the Enclosures list at the end of this Report (Section 15) which details all relevant material submitted with this SHD Planning Application.

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

#### 6.4 DLRCC Consultation Subsequent to An Bord Pleanála Pre-Application Consultation

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

A meeting was held with the Planning Authority on 8 February 2019 and 1 May 2019. Broadly, the following issues were discussed: -

- Applicant’s Rationale as to why the response to An Bord Pleanála’s Opinion is considered the optimal architectural solution i.e. the more intensive Park Edge scale and form of development including an 8 storey element at the end of Woodbrook Avenue, increased density at and towards the Phase 2 DART Station and other alterations and improved efficiencies both within Phase 1 and the overall Masterplan.
- Contiguous sections / elevations along east and west of apartment blocks to show full extent of emerging streetscape.
- Car Parking ratios having regard for the increase in number of units.
- Clarity on the Old Dublin Road junction layouts.
- Temporary DART car park to be included as part of Phase 1 to include suitable landscaping in the planned car park.
- Further discussion on the detail of surface water management required with DLRCC Drainage Department.
- Ensure that connections are proposed through open spaces and connection to the future DART Station.
- Provide rationale for the current mix of communal open space serving apartment blocks and interaction with public open space along Coastal Park.
- Demonstrate that trees to be retained are co-ordinated with proposed attenuation etc.
- Consideration whether access to undercroft car parking from Coastal Park rather than from Woodbrook Avenue is the optimum solution.



## 6.5 Other Consultation with SDCC Departments

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

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

## 6.6 Prescribed Bodies

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

### 6.6.1 Irish Water

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

A Confirmation of Feasibility Statement from Irish Water, dated 16 July 2018 is enclosed with this SHD Planning Application.

We refer the Board further to the Statement of Design Acceptance, dated 2 October 2019, in respect of the proposed development of 685no. residential dwellings and Childcare Facility demonstrating compliance with Irish Water Standards and confirmation that connection to the Irish Water network is feasible.

### 6.6.2 National Transport Authority & Iarnrod Eireann

Meeting were held on 18 September 2018 and 5 March and 14 March 2019 with the National Transport Authority and Iarnrod Eireann to discuss the future Woodbrook DART Station.

The relationship between the proposed temporary car park and the design of the future train station was discussed to ensure an effective and coherent interface between the station and the adjacent public realm.

### 6.6.3 Irish Aviation Authority

Stephen Little and Associates Chartered Town Planners & Development Consultants sought formal response from the Irish Aviation Authority in relation to the proposed development.

In response by latter dated 26 July 2019, the Irish Aviation Authority stated that they had no observation to make in relation to the proposed development.

### 6.6.4 Other prescribed Bodies

We note that the Prescribed Bodies identified in the Board's Opinion, dated 14 January 2019, and in Section 1.2 of this Report, will otherwise be notified of the SHD Planning Application and invited to make submissions.

## 6.7 Local Infrastructure Housing Activation Fund

As the Board will be aware, the development at Woodbrook has the benefit of funding for certain infrastructure under the Local Infrastructure Housing Activation Fund (LIHAF) arrangements. As part of

this, Aeval and a number of their Consultants attended a number LIHAF Meetings chaired by Anne Devine of DLRCC. These meetings have been attended by: -

- DLRCC Planning Department.
- DLRCC Property Department.
- DLRCC Transportation Department.
- DLRCC Housing Department.
- National Transport Authority.
- Aeval.

Given the strategic nature of the LIHAF arrangements these meetings have served to co-ordinate the relevant agencies involved in delivering on the LIHAF commitments so as to ensure that this occurs as smoothly and efficiently as possible.

In the context of this SHD Planning Application, these LIHAF meetings were the venue where the detailed design of the Woodbrook Avenue linking the Old Dublin Road (R119) and the DART line were initially discussed and co-ordinated between the agencies. It was also agreed at these meetings that whilst the Aeval application would incorporate the proposals for this road, a separate Planning Application would also be made directly to DLRCC for the Woodbrook Avenue in isolation from the remainder of Woodbrook.

In addition, there have been a series of meetings held with the National Transport Authority (NTA) / Transport Infrastructure Ireland (TII), DLRCC and Aeval around the delivery of the transport infrastructure for Woodbrook, including the DART Station. The Applicant's Masterplan demonstrates a preferred solution for the balance of these 'DART Gateway' lands which will form part of a future phase of development at Woodbrook.

## 7 MASTERPLAN

The Applicant has engaged with DLRC in a process whereby the requirements of the LAP were tested in order to arrive at a detailed Masterplan for the entire lands owned by Aeval at Woodbrook, together with that portion of the Woodbrook lands located immediately adjacent to the planned DART Station, currently occupied on a Sporting Lease by Woodbrook Golf Club.

The Masterplan was devised over several months and following multiple Pre-Planning Meetings with the Planning Authority and Pre-Planning Consultation with An Bord Pleanála. The development now being proposed is for a part of the lands covered by the overall Masterplan.

The development now being proposed is for a part of the lands covered by the Masterplan. Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Masterplan', prepared by O'Mahony Pike Architects. This drawing highlights for the Board how the red line of this proposed development corresponds to the overall Masterplan for the lands controlled by the Applicant. This demonstrates that the proposals now before the Board have been carefully considered and co-ordinated in the context of the wider future development of these lands. This Masterplan accompanies this SHD Planning Application. It is supplemented by the Design Statement, prepared by O'Mahony Pike Architects and will assist in setting the context for the development now being proposed.

The Masterplan provides for approximately 1,402no. units in a mix of apartments and houses and results in a net density of circa 93no. units per Ha. This layout includes the retention of the temporary surface car park proposed as part of this SHD Planning Application. Should the temporary surface car park become surplus to requirements in the future the Masterplan includes an optional layout to include 1,488no. units in a mix of apartments and houses on an enlarged residential site area and results in a net density of circa 96no. units per Ha.

There is an existing wayleave traversing the site from north to south which will not be impacted upon by the proposed development. It follows the line of the linear 'Coastal Park' proposed as part of this SHD Planning Application.

The Masterplan as it is set out in the documentation included as part of this SHD Planning Application requires the implementation of a range of infrastructural works for the full implementation of the Woodbrook – Shanganagh Local Area Plan 2017 – 2023 as it is envisioned. For the benefit of the Bord generally, the following steps will occur: -

### **Woodbrook Distributor Road**

The Woodbrook Distributor Road (referred to as Woodbrook Avenue as part of this proposal) from Dublin Road to the location of the proposed DART station will be applied for as part of the initial planning application. In tandem with this application a second application for the Avenue only is being lodged directly with Dun Laoghaire Rathdown as a standalone planning application given its inclusion for funding under the Local Infrastructure Housing Activation Fund (LIHAF). This will provide the Council with the ability to deliver this strategic road in circumstances whereby this development were delayed for whatever reason. It was considered prudent to ensure that the LIHAF funding was capable of being secured.

### **DART Station**

Whilst not forming part of Phase 1 of development at Woodbrook, the DART Station is to be delivered by the NTA / TII. It is acknowledged by all of the agencies that the delivery of the DART Station is not a requirement of this Phase 1 development. The provision of the DART Station as soon as possible is equally acknowledged by all of the agencies to be a reasonable objective. Woodbrook Avenue is to be provided as part of this application to facilitate connection to the proposed DART Station, as also is the provision of the temporary car park adjacent to the planned station. The NTA have already commenced the design of the Station and have engaged with the Planning Authority in Pre-Planning discussions. The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.

There have been a series of meetings held with the NTA / TII, DLRCC and Aeval around the delivery of the transport infrastructure for Woodbrook, including the DART Station. The Masterplan accommodates the emerging Iarnród Éireann station design and provides a high quality landscaped interface with the station incorporating a public plaza at the entrance to the station. The initial meeting to start that dialogue occurred on the 18 September 2018 and was attended by Irish Rail, the NTA, Dun Laoghaire-Rathdown County Council and Aeval. Aeval and Iarnród Éireann met again on the 5 March and the 14 March and there has been close liaison between both parties as this SHD application has progressed.

### **Tri-Partite Agreement and Woodbrook Golf Holes**

The lands located in the north-east corner of the Woodbrook lands are currently occupied as part of the golf course by Woodbrook Golf Club. This area has long been referred to as the 'DART Gateway' and extends to approx. 2.4 Ha (c. 6 acres).

As part of the long planned tri-partite exchange of lands, the Golf Club will acquire the Council owned 11 acres on the eastern side of the DART line, Aeval will get control of the 'DART Gateway' lands and DLRCC will acquire Shanganagh Castle and some land within Woodbrook. Given that the LAP is predicated on delivery of the Woodbrook DART Station, the 2no. new golf holes on Council owned land is fundamental to the Applicant securing vacant possession of the DART Gateway lands and thus the two new golf holes are proposed for inclusion as part of this forthcoming SHD planning application to allow both DLRCC and An Bord Pleanála to consider all related elements of the Woodbrook Phase 1 proposal.

### **Sequence**

In order for the lands in the immediate vicinity of the planned DART Station to become available for development (it is currently part of the Woodbrook Golf Course), the alternative golf holes will need to be constructed and ready for use, thereby enabling Woodbrook Golf Club to vacate the 'DART Gateway' lands. We understand that there would need to be a period of 12 – 18 months after the golf holes are constructed before they will be ready for regular play to allow for a bedding in of the ground conditions. It is only after that point that Woodbrook Avenue can be completed up to the boundary of the DART line and the DART Station can be completed and become operational.

It is for this reason, and to give comfort to An Bord Pleanála that the DART Station is capable of being progressed, that the decision was taken to include the replacement golf holes as part of this SHD Planning Application. That position was articulated to An Bord Pleanála as part of the Pre-Application dialogue also.

The Applicant envisages completion of the 11 Acres works to create the 2no. new golf holes by the end of Q3 2020, which would facilitate vacation of the DART Gateway 6 Acres in Q1 2022 at the latest. Enabling works for Woodbrook DART Station could be carried out before then but completion of Woodbrook Avenue and completion of the DART Station is envisaged by the end of Q3 2022. It is envisaged that the Applicant would be well progressed on Phase 1D (please refer to the Construction Phasing Plan, prepared by O'Mahony Pike Architects) at that stage but would not have completed the large apartment blocks A, B & C before the completion and operation of Woodbrook DART Station.

## 8 PARTICULARS OF THE PROPOSED STRATEGIC HOUSING DEVELOPMENT

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

- The proposed development consists of a residential-led development comprising 685no. residential units and 1no. childcare facility in buildings ranging from 2 to 8-storeys. The breakdown of residential accommodation is as follows: -
- 207no. own door detached, semi-detached, terraced and end of terrace houses, including: -
  1. 134no. 3-bed 2-storey houses (House Type 01, 02, 03, 08, 10) – (House Type 01 are provided with optional ground floor extensions and/or attic conversions, House Type 03 are provided with optional ground floor extensions).
  2. 48no. 4-bed 2 – 3-storey houses (House Type 04, 05, 07) – (House Type 05 are provided with optional ground floor extensions).
  3. 25no. 5-bed 3-storey houses (House Type 06).
- 48no. duplexes (33no. own door), in 3 to 4-storey buildings, including: -
  1. Old Dublin Road Blocks accommodating 16no. 2-bed duplex and 17 no. 3-bed duplex.
  2. Park Edge Block accommodating 6no. 2-bed duplex 6no. 3-bed duplex.
  3. Block A accommodating 3no. duplexes (3no. 2-beds).
- 430no. apartment units accommodated in 6no. 3 to 8-storey buildings, including: -
  1. Block A accommodating 66no. apartments (14no. 1-beds and 52no. 2-beds) and Tenant Amenity area (c. 93 sq. m gross floor area).
  2. Block B accommodating 151no. apartments (47no. 1-beds and 104no. 2-beds) and Tenant Amenity area (c. 203 sq. m gross floor area).
  3. Block C accommodating 151no. apartments (47no. 1-beds and 104no. 2-beds) and Tenant Amenity area (c. 203 sq. m gross floor area).
  4. Block D accommodating 36no. apartments (13no. 1-beds, 18no. 2-beds and 5no. 3-bed).
  5. Block E accommodating 21no. apartments (7no. 1-beds, 13no. 2-beds and 1no. 3-bed).
  6. Old Dublin Road Block accommodating 5no. apartments (2no. 1-beds and 3no. 2beds).
- Private rear gardens are provided for all houses. Private patios / terraces and balconies are provided for all duplex and apartment units at ground floor. Balconies are proposed on elevations to all upper levels of duplex and apartment buildings.
- The proposed development includes 1no. childcare facility (c. 429 sq. m gross floor area).
- And, all associated and ancillary site development and infrastructural works (including plant), hard and soft landscaping and boundary treatment works (including temporary hoarding to undeveloped lands), including: -
  1. Provision of Woodbrook Distributor Road / Woodbrook Avenue from the Old Dublin Road (R119) to the future Woodbrook DART Station, including the provision of a temporary surface car park (164no. parking spaces including set down areas and ancillary bicycle parking and storage) adjacent to the future Woodbrook DART Station in northeast of site on lands currently forming part of Woodbrook Golf Course.
  2. New vehicular access provided from the Old Dublin Road (R119) opposite Woodbrook Downs entrance including new junction arrangements and associated road re-alignment.
  3. Provision of emergency access to Shanganagh Cemetery access road.
  4. Provision of internal road network including pedestrian and cycle links.

5. Provision of a series of linear parks and green links (Coastal Park and Corridor Park), including 2no. pedestrian / cycle links to Shanganagh Public Park to allow full north / south connection, supplemented by smaller pocket parks.
6. Provision of SuDS infrastructure and connection to existing surface water culvert on Old Dublin Road (R119).
7. Provision of waste water infrastructure (pumping station including 2.4m fencing to perimeters, 24 hour emergency storage and rising foul main through Shanganagh Public Park to tie-in to existing services at St. Anne's Park Residential Estate) and the extension of and connection to public watermain on Old Dublin Road (R119).
8. 844no. car parking spaces.
9. 1,305no. long and short-term bicycle parking spaces.
10. Bin store and bicycle storage for all terraced houses, duplex / apartment and apartment blocks.
11. 2no. ESB Unit Sub-stations.
12. Provision of 2no. replacement golf holes in lands to the east of the rail line (northeast of the future DART Station) and associated 2m paladin fence to western and northern perimeter.

All on a total site area of approximately 21.9 Ha.

## 8.1 Key Site Statistics

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

Key Site Statistics	
Total Number of Units	685
Maximum Gross Floor Area (Residential only)	82,991 sq. m
Gross Floor Area (Residential and ancillary uses)	83,420 sq. m
Gross Site Area	21.9 Ha
Net Site Area ( <b>Note:</b> Net Site Area omits replacement golf holes area, infrastructure connections and open space serving wider public – aligned with 'Residential Area' defined in Woodbrook Shanganagh Local Area Plan 2017 – 2023).	8.8 Ha
Net Density	78no. unit per Ha
Unit Mix	<b>1 Bed:</b> 130 (19% of total units) <b>2 Bed:</b> 319 (46.5% of total units) <b>3 Bed:</b> 163 (24% of total units) <b>4 Bed:</b> 48 (7% of total units) <b>5 Bed:</b> 25 (3.5% units)
Public Open Space	2.96 Ha
Part V	10% (72 no. Units)
Plot Ratio	0.38
Site Coverage	33%

## 8.2 Proposed Residential Development

685no. residential units are proposed in this case, including a mix of 21no. different unit types. These range from apartments, duplexes and houses.

The housing design typology ranges from deep plan to wide frontage semi-detached and terraced houses, of two to three storeys, and accommodating 3, 4 and 5 bed units.

The apartment design typology is reflected in 5no. apartment buildings, ranging from 4 to 8 storeys, and accommodating a range of 1, 2 and 3 bed apartment units.

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

Houses			
Unit Type	No. of Units	GFA (m <sup>2</sup> ) / Unit	Min. Size – Guidelines 2007
House Type 01 – 3 bed deep plan terrace house	52	108.7 – 144	100
House Type 02 – 3 bed 5.4m wide compact terrace house	17	96.4	92
House Type 03 – wide plan terraced / semi-detached / end of terrace	23	107.1 – 118.9	110
House Type 03B – wide plan semi-detached / end of terrace with bay window	12	109.8 – 121	110
House Type 04A – 4 bed deep plan terraced house	17	152.4	120
House Type 04AL – 4 bed deep plan terraced house	3	155.3	120
House Type 04AR – 4 bed deep plan terraced house	3	152.4	120
House Type 04 – 4 bed deep plan terraced house	9	151	120
House Type 04L – 4 bed deep plan terraced house	2	153.9	120
House Type 04R – 4 bed deep plan terraced house	2	151.1	120
House Type 05 – 4 bed deep plan semi-detached house	6	141 – 152	120
House Type 06A – 5 bed deep plan mid-terrace house	25	191.4	120
House Type 07 – 4 bed detached wide front house	6	157	120
House Type 08 – 3 bed plus study terraced house	26	143.4	102
House Type 10 – 3 bed narrow plan, end of terrace starter house	4	106.2	102
<b>Total</b>	<b>207</b>	<b>Max. 29,604 sq. m</b>	
Apartments			
Unit Type	No. of Units	GFA (m <sup>2</sup> ) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	130	45.6 – 64.1	45
2 Bed Apartment – 3 person	23	66.3	63

2 Bed Apartment – 4 person	271	79.2 – 82.8	73
3 Bed Apartment	6	95.2 – 100.3	90
2 Bed Duplex	25	88.7 – 113.8	73
3 Bed Duplex	23	106.7 – 118.3	90
<b>Total</b>	<b>478</b>	<b>35,905 sq. m *</b>	
<b>Overall Total</b>	<b>685</b>	<b>Max. 65,509 sq. m</b>	

\* **Net Internal Area** (i.e. floor area of apartments only – omitting circulation areas etc. within apartment blocks).

These details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the House Type and Apartment Block drawings prepared by O’Mahony Pike Architects enclosed with this submission.

### 8.3 Proposed Ancillary Development

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

Class of Development	Gross Floor Space in m <sup>2</sup>
Creche	429 sq. m

### 8.4 Residential Density

The proposed development seeks to provide 685no. units on a net site area of 8.8 Ha, resulting in a net density of 78no. units per Ha. This is above the minimum standard of 50no. units per Ha outlined by policy RES3 of the Development Plan. Within the overall Masterplan area a net density of at least 93no. units per Ha will be achieved.

Policy RES3 of the County Development Plan promotes higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development.

The Woodbrook – Shanganagh Local Area Plan 2017 – 2023 sets out that average minimum net density of 60no. units per Ha shall apply to the lands at Woodbrook.

A DART Station will be developed as part of the overall plan for the LAP area. The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station. The Local Area Plan lands fall within 1km of the indicative location for the proposed DART Station. On that basis, it is reasonable to consider that higher densities of min. 50no. units per Ha are to be encouraged.

The proposed development seeks to provide 685no. units on a net site area of 8.8 Ha, resulting in a net density of 78no. units per Ha. This is above the minimum standard of 50no. units per Ha outlined by Policy RES3 of the Development Plan and the average minimum of 60no. units per Ha set out in the Local Area Plan. The densities proposed are also in accordance with the National Planning Framework which encourages higher densities in proximity to existing and planned transport hubs.

In response to An Bord Pleanála’s Opinion issued 14 January 2019 a robust rationale is provided in relation to the density achieved within the proposed development in Section 9.2 of the Planning Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which accompanies this SHD Planning Application. Further supporting information is set out in the Design Statement as prepared by O’Mahony Pike Architects.



## 8.5 Proposals to Integrate with Surrounding Land Uses

The site consists of lands generally bounded by the Old Dublin Road (R119) to the west, Shanganagh Public Park and Shanganagh Cemetery to the north, Woodbrook Golf Course to the east and Corke Lodge and woodlands to the south.

### Interface with Shanganagh Public Park / Crematorium

The proposed landscape layout has been designed in accordance with the provision of the Local Area plan and includes the north / south linear parks (Corridor Park and Coastal Park) which will provide future connection with Shanganagh Public Park.

The proposed pedestrian and cycle connections points from the proposed residential development to Shanganagh Public Park have been agreed with DLRCC Parks Department. Discussion have been held with the Parks Department DLRCC to ensure that the connection from the proposed development integrate appropriately with Shanganagh Public Park to the north. These links are illustrated in the Landscape Masterplan, prepared by Brady Shipman Martin Built Landscape & Environment Consultants.

### Interface with future DART Station

Whilst not forming part of Phase 1, the DART Station is to be implemented by the NTA and TII. It is acknowledged by the Local Authority and State Agencies that the delivery of the DART Station is not a requirement of the Phase 1 development. The provision of the DART Station as soon as possible is equally acknowledged by all parties to be a reasonable and desirable objective. Woodbrook Avenue is to be provided as part of this SHD Planning Application to facilitate connection to the proposed DART Station. The temporary DART Station car park and hard landscaped plaza or threshold space to the DART Station forms part of this SHD application. It has been designed in close consultation with Iarnrod Eireann and their proposed station design. That hard landscaped space will extend to meet the boundary with the station and provide a coherent and attractive interface with the station steps and ramps.

The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that DART Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.

We refer the Board to the Design Statement, by O'Mahony Pike Architects and the Engineering Drawings, prepared by Atkins Consulting Engineers illustrating the layout of the temporary car park and the interface with the future DART Station. Details of the design of the future DART Station including pedestrian overpass, platforms, levels etc. have been provided to the Design Team by the NTA so as to ensure that the future station integrates effectively with the proposed development.

### East Coast Cycle Trail

Under an earlier Chief Executive's Order in accordance with Section 211 of the Planning and Development Act 2000 (as amended) and subject to the provision of Section 183 of the Local Government Act 2001, the transfer of the lands required for the 2no. replacement golf holes to the Applicant has been approved by the Council. In agreeing the disposal of these lands, the Council retained a 30ft wide corridor between the rail line and the lands for the 2no. replacement golf holes specifically to ensure that the delivery of the east coast trail was not prejudiced. Therefore, the East Coast Cycle Trail will not be impacted upon as a dedicated corridor of land will remain available for Dun Laoghaire-Rathdown County Council to provide this amenity in the future.

We refer the Board to Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Masterplan' and Dwg. No. 1618-OMP-00-00-DR-A-XX-11002 'Site Plan Page 3 of 4', prepared by O'Mahony Pike Architects which shows the corridor which is maintained on the eastern side of the existing rail line specifically to facilitate the delivery of the East Coast Cycle Trail.

### Site Boundaries / Edges

The layout provides appropriate set back from both the Old Dublin Road (R119) – approximately 20m and is adequately screened by existing mature trees to be retained. The proposed Coastal park along the eastern boundary of the site provides an adequate buffer and amenity forming a landscaped linear park between the proposed apartment blocks and the existing Woodbrook Golf Course. Generally, the houses proposed along the southern edge of the development step down to approximately 2 storeys to provide an appropriate relationship with this more sensitive boundary. In general, the proposed development responds to the edge conditions of the existing site to integrate effectively with adjoining conditions.

In addition, the required 20m set back off the Dublin Road to the nearest dwelling has been provided and assists in delivering an area of open space in which the existing mature trees and boundary wall of the site are set.

## 8.6 Landscape Proposals

The landscape proposals in this case have been designed by Brady Shipman Martin Landscape & Built Environment Consultants having regard to the provisions of the Woodbrook – Shanganagh Local Area Plan 2017 – 2023. The proposed landscape scheme is a key component of the integration of the new building environment with the existing and proposed landscape conditions having regard to the provisions of the LAP. The key landscape features include: -

- 2no. north / south linear parks which will include areas for formal and informal play. These green links will include formal access point to the north to provide connectivity with Shanganagh Public Park.
  1. The western linear park, directly opposite the planned Local Centre where it is ultimately proposed that a civic plaza will be developed in line with the requirements of the LAP.
  2. That area is to be finished with a temporary interim soft landscaped approach, pending the detailed design of the Local Centre as part of subsequent phases of development at Woodbrook.
  3. The eastern linear park (Coastal Park) also makes provision for future connections to the south to tie into the wider 'green network' vision of Dun Laoghaire-Rathdown County Council.
- Landscape buffer along Old Dublin Road (R119). The proposed buildings will be set back approximately 20m from the existing western boundary. This area will be further 'softened' by the introduction of appropriate planting as part of the landscape proposal. The mature trees along the existing boundary will be retained other than those short sections strictly required for removal to facilitate vehicular and pedestrian/cycle access and egress to the development. To facilitate the provision of a dedicated pedestrian / cycle path to serve the Old Dublin Road, 2no. smaller openings will be required on the northern and southern end of the existing western boundary in addition naturally to the main vehicular entrance to the site. The openings will result in the removal of some trees, however, this is minimised to that required to provide the necessary road infrastructure.
- A pocket park in Woodbrook South housing area.
- Retention of trees as far as practically possible within the existing hedgerow along the northern edge of Woodbrook Avenue, further augmented with additional tree planting within this east/west green corridor.
- Landscaped buffer maintained along the southern boundary of site between building line and existing mature tree line.

The landscape proposal has been carefully co-ordinated with the surface water attenuation proposals to ensure that trees can be practically incorporated in open space areas.

Following discussions with the DLRCC Parks Department at a number of the Pre-Planning meetings, a desire was expressed to ensure that the initial phase of residential development would be provided with access to the Shanganagh Public Park lands to the north. As a result, the extent of this SHD Planning Application includes the required open space linkages to allow this to occur. In one area of the Green Axis, directly opposite the planned Local Centre where it is ultimately proposed that a civic plaza will be developed in line with the requirements of the Local Area Plan, that area is to be finished with a temporary interim soft landscaped treatment, pending the detailed design of the Local Centre as part of subsequent phases of development at Woodbrook. It was acknowledged in a Pre-Planning Meeting held with Dun Laoghaire Rathdown County Council (20 September 2018) that this interim arrangement was acceptable in principle until such time that the plaza was provided in the next phase of development subject to a separate planning application.

We refer the Board to the Landscape Drawings and Landscape Design Statement, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail. Specifically, the relationship between the development proposed and the Council's Masterplan for Shanganagh Park, including the Crematorium can be found at page 20 of the Landscape Design Statement prepared by Brady Shipman Martin, Landscape Consultants.

## 8.7 Water Services

There has been on-going engagement with Irish Water and DLRCC Drainage Department by Atkins Consulting Engineers with regard to the provision of wastewater and surface water services respectively. We refer the Board to the Engineering Report, prepared by Atkins Consulting Engineers which provides a more detailed discussion regarding water and drainage infrastructure requirements.

### Waste Water

The following wastewater infrastructure is proposed to facilitate the proposed development, including: -

- Pumping station located adjacent the southern boundary of the application site at the natural low point of the site and associated 2.4m mesh fencing to perimeter.
- Associated 24 hour emergency storage tank.
- Rising main through Shanganagh Public Park to the north to connect with existing foul network in St. Anne's Park residential estate.
- Internal wastewater network commensurate with residential development proposed.

Irish Water have confirmed that a final solution to provide a rising main for Woodbrook – Shanganagh Local Area Plan direct to the Shanganagh Wastewater Treatment Plant is at design stage and that an interim solution to discharge to the St. Anne's Park residential estate to the North of the LAP area is feasible.

The proposed pumping station has been sized so as to accommodate not just the development of the Applicant's lands, but also the development of the lands at Shanganagh to be developed by DLRCC in due course.

The Confirmation of Feasibility and Statement of Design Acceptance provided by Irish Water confirms that the proposed pumping station and rising main to an existing manhole in St. Anne's Park is acceptable.

The route of the rising main through Shanganagh Public Park was discussed and agreed with DLRCC. Atkins Consulting Engineers liaised with Mr. A. Davenport, DLRCC Architects Department to ensure the route is consistent with the emerging Masterplan for Shanganagh Public Park. The relationship between the development proposed and the Council's Masterplan for Shanganagh Park, including the Crematorium can be found at page 20 of the Landscape Design Statement prepared by Brady Shipman Martin, Landscape Consultants.

## Surface Water

The surface water network proposed has been designed to cater for the entire Woodbrook – Shanganagh Local Area Plan. There has been on-going dialogue between Atkins Consulting Engineers and the DLRCC Drainage Department to review the proposed design including surface water run-off rate and soil types.

The Sustainable Urban Drainage System (SuDS) measures employed as part of the proposed development are broadly set out as follows: -

- Underground attenuation.
- Swales.
- Tree pits.
- Porous / permeable paving.
- Green roofs on apartment blocks.
- Filter drains.

The surface water will be discharged at greenfield run-off rates along the southern boundary of the site in a westerly direction to the Old Dublin Road (R119) and then continuing along the Old Dublin Road in a southerly direction until discharge to the existing culverted section of the Crinken Stream at the location of Woodbrook College.

The proposed surface water infrastructure has been sized so as to accommodate not just the development of the Applicant's lands, but also the development of the lands at Shanganagh to be developed by DLRCC.

With regard to the surface water management of the 2no. replacement golf holes SuDS measures will include attenuation areas and vortex flow control. Additional attenuation storage is to be provided within a natural valley / depression within the existing golf course lands prior to the existing outfall. Atkins Consulting Engineers have liaised closely with both Woodbrook Golf Club and DLRCC Drainage Department in relation to the surface water management of the proposed replacement golf holes also.

## Water Supply

It is proposed to provide a water supply to the site by connecting into the Irish Water network extension project 250 dia. watermain on Old Dublin Road (R119) approximately 250m north of the proposed development entrance. Irish Water are carrying out upgrades to the network and the understanding is that this is now completed.

## Flood Risk

A Site Specific Flood Risk Assessment, prepared by Atkins Consulting Engineers sets out the site is considered to be located within Zone C, therefore, there is a low probability of flooding.

## 8.8 Transportation

We refer the Bord to the Traffic & Transport Assessment, prepared by Atkins Consulting Engineers which sets out how the proposed development would address traffic and transportation issues, including road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

The proposed development will include the provision of the Avenue from the Old Dublin Road (R119) to the proposed location for the Woodbrook DART Station. The Avenue will naturally be built in two phases with that last stretch across the 6 Acre DART Gateway only constructed when Woodbrook Golf Club vacate those 6 Acre lands i.e. when the replacement golf holes on the eastern 11 Acre site are fit for regular play. A separate Planning Application is to be made for the entire Avenue between the Old Dublin Road and the planned DART Station which is intended as a standalone application for this key piece of LIHAF funded infrastructure.

### **Access / Layout**

The proposed development includes the development of an internal road network, with a clear hierarchy of streets each of which provides for cycle and pedestrian safety and access. The proposed scheme itself has been designed so as to be highly permeable, ensuring ease of circulation throughout and easy access to proposed areas of public open space and local centre facilities. The proposed development delivers: -

- New vehicular access from Old Dublin Road (R119). 3no. access layout scenarios from Old Dublin Road have been considered as follows: -
  1. Cycle tracks are incorporated on both sides of Dublin Road and a right-turning vehicular lane into Woodbrook accommodated to serve the volume of development proposed without delaying southbound traffic along the Old Dublin Road. In order to maintain the maximum number of trees along Dublin Road, the cycle track and footpath on the eastern side of the road are diverted behind the existing trees and boundary wall adjacent to the residential building line of the proposed development. Cyclists are accommodated on segregated cycle tracks on both sides of the road as opposed to the current integrated advisory cycle lane provision. The existing inline bus stop on the eastern side of the Dublin Road will be relocated slightly further northwards from the signalised junction. This relocated bus stop will be provided as an inline bus stop.
  2. This option incorporated the cycle and footpath provision adjacent the road edge of Dublin Road whilst accommodating the required right-turning vehicular lane into the development. In order to facilitate this option, only 8no. trees would be retained along the site frontage along Dublin Road. The majority of the boundary wall would be removed and replaced with a new wall constructed from material salvaged from the existing wall.
  3. This option was developed in order to demonstrate that the junction was future-proofed to accommodate the development of the Bus Connects bus corridor along Dublin Road. The layout was developed based on the proposed layout for the bus corridor that was presented during the recent public consultation on this bus corridor. The Bus Connect layout is presented purely for illustrative purposes and without prejudice to the ongoing consultation and design process for the bus corridor. It also assumes a 'worst-case' scenario in that the land take associated with the widened corridor has been accommodated entirely on the eastern side of the existing Old Dublin Road on the Applicant's lands. However, Dun Laoghaire-Rathdown County Council and the National Transport Authority have confirmed that the illustrated layout is appropriate in terms of the general layout and bus priority that would be afforded. This layout would result in the loss of all existing trees along Dublin Road. The full extent of the existing boundary wall would also be removed, and a new boundary wall would be formed, constructed from material salvaged from the existing wall.

Details of the options set out for the new vehicular entrance are set out in the Traffic & Transportation Assessment and Entrance Detail Drawings, prepared by Atkins Consulting Engineers. The first scenario forms the basis of this SHD application and represents the Applicant's preferred approach.
- Provision of Woodbrook Avenue to future Woodbrook DART Station to be developed in two phases.

- Appropriate access road is provided to the future primary school site located to the north of the future Local Centre.
- Hierarchy of DMURS compliant streets from the link Avenue to internal local shared streets / homezones and pedestrian / cycle paths providing a high degree of permeability.
- Pedestrian and cycle linkage to the Shanganagh Public Park to the north, both from the central Corridor Park and the eastern Coastal Park.

The layout of the proposed development has been designed in accordance with the Design Manual for Urban Roads and Streets (2013). The overall layout is highly permeable and encourages walking and cycling.

## **Car Parking**

### Houses

In total, 380no. car parking spaces are provided for houses. Car parking provision for houses is broadly allocated in line with requirements of the Development Plan. The standards provided as part of the proposed development are: -

- 1.5 – 2no. spaces per 3 bed units.
- 2no. spaces per 4 and 5 bed units.

The above provisions are marginally reduced compared to the nominal Development Plan standard. However, given the proposed developments prominent location in vicinity of existing good public transport services along the R119 Dublin Road, the Applicants commitment to provision of a car sharing scheme for the Phase 1 development and the future public transport provisions in the form of BusConnects and Woodbrook DART Station, the proposed parking provisions are considered to be appropriate. The proposed development provides approximately 1.84no. car parking spaces per house.

### Apartments / Duplex Units

In total, 416no. car parking spaces are provided for apartments and duplexes (resident parking and visitor parking inclusive).

Given sites location to the immediate north of Bray and south of Shankill, and the wider urban environs, the available services / facilities and good access to public transport it is considered that Woodbrook lies within an 'Intermediate Urban Location' as set out in the Design Standards for New Apartments (March 2018).

An Intermediate Urban Location is defined as sites including "*Sites within easy walking distance (i.e. up to 5 minutes or 400- 500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services*". Based on the proposed developments intermediate location a reduced car parking standard is proposed. The proposed development provides approximately 0.9no. car parking spaces per apartment / duplex.

### Childcare Facility

The Development Plan set out that a maximum of 1no. space per staff member and an appropriate number of set down parking spaces should be provided for a childcare facility. In total, the proposal includes 6no. car parking spaces to serve the childcare facility.

## **Bicycle Parking**

### Houses

In total, 172no. bicycle parking spaces are provided for houses which do not have separate entrances to a rear garden. Bicycle parking for detached and semi-detached houses will be readily accommodated in their rear gardens. Formal bicycle parking facilities will be provided in the form of: -

- Long stay bicycle parking: Secure and sheltered bicycle stores.
- Short stay (visitor) bicycle parking: Sheltered Sheffield stands located adjacent to the secure resident / long stay facilities.

### Apartments / Duplex Units

In total, 1,125no. bicycle parking spaces are provided for apartments and duplexes. Formal bicycle parking will be provided in the form of: -

- Long stay bicycle parking: Secure sheltered bike store directly accessible from adjacent streets and secure sheltered bike store within apartment footprint.
- Short stay (visitor) bicycle parking: Sheffield stands located throughout the proposed development.

### Childcare Facility

The Development Plan set out that a maximum of 1 no. bicycle parking space per 5 staff members & 1 bicycle parking space per 10 children should be provided for a childcare facility. In total, the proposal includes 8no. bicycle parking spaces to serve the childcare facility.

## **Motorcycle Parking**

In accordance with the Development Plan standards, a minimum of four or more motorcycle parking spaces per 100 car parking spaces should be provided.

The apartment / duplexes accommodate 13no. motorcycle parking spaces. Motorcycles can be readily accommodated on-curtilage of all houses. The parking layout and allocation of motorcycle spaces is illustrated on the Site Layout Plans, prepared by O'Mahony Pike Architects.

## **Car Sharing**

It is proposed to provide 4no. car sharing (GoCar) spaces within the proposed Phase 1 development. Based on the uptake of the scheme there is potential to provide additional car sharing spaces. In overall terms car sharing spaces can replace up to 15no. traditional car parking spaces.

We refer to the Board to the Letter, from GoCar Carsharing Ltd. outlining their interest in providing car sharing services within the proposed development. The final locations car sharing facilities will be agreed with the relevant operator once permission is granted.

## **Temporary Surface Car Park**

A temporary surface car park is proposed in the north east of the application site. The surface car park provide 164no. car parking spaces to server the future Woodbrook DART Station. The parking provision breakdown is as per below: -

- 148no. general car parking.
- 8no. disabled car parking spaces
- 2no. E-Car parking spaces.

- 3no. taxi spaces.
- 3no. set down spaces.
- Bus pick-up / drop-off area.
- 16no. Sheffield stand bicycle parking.
- 8no. bicycle lockers.

The surface car park will include a public plaza that will interface with the future DART Station and all associated landscaping including paths, crossing points and planting.

## 8.9 Childcare Facility

The proposed development will include the provision of a childcare facility (approximately 429 sq. m) with an outdoor play area to accommodate approximately 63no. full time equivalent children.

It is to be located on the ground floor of Block D to the west of the site adjacent the area designated for the future school and to the west of the future Local Centre to ensure that the community uses are clustered close together.

An additional childcare facility may be required for Phase 2 and would be most likely provided at the DART Gateway should there be a requirement for same in due course.

## 8.10 Part V

There has been on-going dialogue between Aeval and DLRC Housing Department with regard Part V provision prior to making this SHD Planning Application. The proposed development will include the provision of 72no. units under Part V. These will include a mix of apartments, duplexes and houses.

We refer the Board to the Part V Proposal, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants on behalf of the Applicant which sets out the breakdown of the units proposed and the associated costs. Furthermore, we refer the Board to Part V Layout included as part of the Design Statement, prepared by O'Mahony Pike Architects illustrating the location of the units.

## 8.11 Replacement Golf Holes

The Masterplan for Woodbrook includes the residential development of lands currently occupied by Woodbrook Golf Course. In order for the lands in the immediate vicinity of the planned DART Station to become available for development, the replacement golf holes will need to be constructed and ready for use. These lands are located on the eastern side of the rail line.

The works on this parcel of land will include the development of 2no. replacement golf holes which will necessitate the removal of existing trees / hedgerow where required, excavation, regrading and shaping of the soil to form the golf holes and installation of associated irrigation, surface water drainage including wetland areas and extensive landscape planting.

We refer the Board to the Statement, prepared by Eddie Connaughton, Golf Course Designer / Agronomist, for further detail in relation to work proposed to create the golf holes.

Furthermore, we refer the Board to the Landscape Drawings and Landscape Design Statement for further detail in relation to the layout of the proposed replacement golf holes.



### Exempted Works to Woodbrook Golf Course

There has been a close working relationship over the years between Aeval and Woodbrook Golf Club. Woodbrook Golf Club have been fully aware since these lands were first zoned residential that there is to be residential development located alongside their existing course and indeed that they would vacate the DART Gateway 6 acres and secure replacement golf holes on the eastern side of the railway line plus other considerations.

Class 34 of the Planning & Development Regulations 2001, as amended, make specific allowance that: -

*“...works incidental to the maintenance of any golf course or pitch and putt course, including alterations to the layout thereof, excluding any extension to the area of the golf course or pitch and putt course.”*

Whilst development, the works are exempted development and can be undertaken without the need for permission being obtained.

It is understood that Woodbrook Golf Club intend making modifications to a number of the golf holes that are in closest proximity to the Woodbrook lands to be developed. These works involve modest re-aligning of golf holes in proximity to the residential development so as to mitigate any issue relating to ‘fly balls’ interacting with the residential scheme.

In this regard, the 1<sup>st</sup> Hole and tee box are being re-aligned such that the approach to the tee box is angled away from the planned residential developments at Woodbrook. In addition, the new 2<sup>nd</sup> Hole is being re-aligned alongside the new 1<sup>st</sup> Hole.

Lastly, the existing 7<sup>th</sup> Hole is being shortened and re-aligned and a new tee box developed so as to now play as a Par 3. The position of the tee box is angled away from the planned DART Station at Woodbrook so that shots to the green will be away from the DART Station.

The envisaged realignment works to existing golf holes by way of exempted development works are subject to agreement between Woodbrook Golf Club and Aeval and their respective Course Design Consultants.

The exempted works to the golf hole are illustrated in Landscape Drawings and Landscape Design Rationale, prepared by Brady Shipman Martin Landscape & Built Environment Consultants.

The environmental impact of these exempted development works have been considered as part of the EIAR submitted in this instance.

## 9 RESPONSE TO AN BORD PLEANÁLA OPINION

The following sets out a response to the Board's Pre-Planning Application Consultation Opinion dated 14 January 2019.

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

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

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

We refer the Board in the first instance to the Design Statement, prepared by O'Mahony Pike Architects. This clearly identifies the key changes to the proposed scheme made following the Pre-Application Consultation (17 December 2018) and in response to the design issues raised in the Board's Opinion dated 14 January 2019.

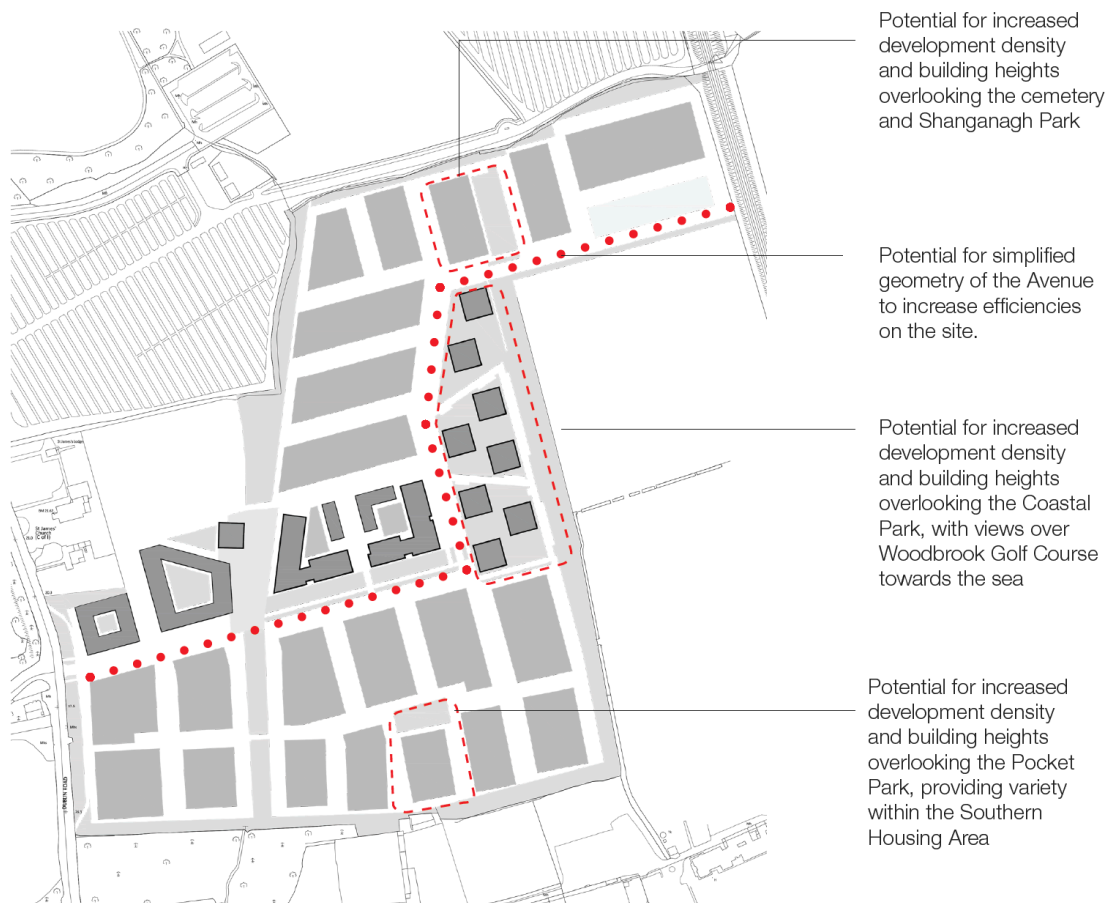
In broad terms, the key change is an increase in the number of units proposed: -

ABP Pre-Planning Submission	Post ABP Opinion	Change
Proposal: 428 no. Units	Proposal: 685no. units	Additional 257no. units

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

- The geometry of Woodbrook Avenue running north / south has been simplified to provide for a more rationalised development adjacent Coastal Park.
- The original point blocks or 'Pavilion Blocks' which were located on the eastern edge of the development have been replaced with 3no. large courtyard apartment blocks ranging in height from 5 to 8 storeys.
- Apartment block included in Southern Housing Area adjacent the pocket park.
- Consideration has also been given to the indicative blocks associated with Phase 2 to ensure the built footprint could be maximised with appropriately 1,402no. units being proposed within the proposed Masterplan.
- The Masterplan show increased building heights and density adjacent to the proposed Woodbrook DART station, to make effective use of lands beside public transport infrastructure.

We refer the Board to the Design Statement, prepared by O'Mahony Pike Architects which sets out in detail the extent of those changes in relation to the key design moves, density, urban framework, and building heights within the proposed development (i.e. Phase 1) and the overall Masterplan.



**Masterplan - Areas of the subject site where locational attributes could suggest densification of development**

**Figure 3:** Extract from the Design Statement, prepared by O’Mahony Pike Architects illustrating the areas where redesign was considered in response to An Bord Pleanála’s Opinion.

## 9.2 Response to Issue Raised

### 9.2.1 Issue 1 – Height, Density and Unit Mix

Further consideration of the documents as they relate to the development strategy for the site as it relates to the heights, density and unit mix proposed. This should be outlined in the context of **both Phase 1 of the proposed development and also the overall proposed development** of the Woodbrook lands (Phase 1 & 2). In this regard, the prospective applicant should satisfy themselves that the design strategy which they proposed for the site, as it relates to **height, and unit mix provides the optimal architectural solution for this strategic site** and is proposed for development at a **sufficiently high density** to provide for an **acceptable efficiency in serviceable land usage given the site is served by existing and planned public transport**. The proposed development shall have regard inter alia, national policy including the National Planning Framework, Urban Development and Building Height Guidelines for Planning Authorities 2018, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and Sustainable Urban Housing: Design Standards for New Apartments March 2018, local planning policy and the sites context and locational attributes.

(SLA bold font emphasis)

#### Applicant’s Response

We refer the Board in the first instance to the Design Statement, prepared by O’Mahony Pike Architects, which sets out in detail the key changes made on foot of Pre-Application Consultation with An Bord Pleanála.

This illustrates the specific design response to the issues raised by the Board with regard to layout and design (as highlighted in bold above). We provide a summary description of the proposed changes and how this addresses the issues raised by the Board also below.

**Building Height**

Appendix 9 – Building Height Strategy of the DLRC Development Plan sets out the approach to building height across the administrative area of DLRC. Section 4 of this Strategy sets out a number of categories that outline the manner in which building heights will be assessed. This Section notes that the appropriate vehicle for identifying the specific sites within these centres that have potential for accommodating building height are statutory (and non-statutory) local plans.

The subject site is governed by the Woodbrook – Shanganagh Local Areas Plan 2017 – 2023 which sets out generally that: -

*“It is proposed to apply a building height range of circa 3-5 storeys, plus a setback level, generally in the LAP Area having regard to its location and the need to cater for a diverse range of housing typologies, **albeit with the provision for potential greater height at certain key or landmark locations.**”*

Furthermore, Objective WB3 sets out that: -

*“A general building height range of 3-5 stories will be sought, with appropriate heights along any sensitive site boundaries (2-4 stories) and thereafter a transition to higher building heights towards the centre of the site and along the main avenue; with a general building height range of 3-4-5 stories (plus setback), and rising to a maximum of 6 stories, unless a compelling urban design case is otherwise made for reasons of legibility, place-making and identity.”*

It was noted as part of the Pre-Planning Consultation Meeting with An Bord Pleanála that consideration should be given to the proposed building height in appropriate location on the site including interfaces with greenbelt / coast and the future DART Station.

The Design Team have re-considered the layout of the scheme to include increased building height in a number of areas as follows: -

- Coastal Park (adjacent Woodbrook Golf Course).
- Southern Housing Area (overlooking proposed pocket park).
- Future DART Station (northeast of application site).



**Figure 4:** Extract from the Design Statement, prepared by O’Mahony Pike Architects illustrating the evolution of the building heights proposed [1] LAP Requirements, [2] Masterplan before An Bord Pleanála Pre-Planning Consultation [3] Current Masterplan.

Figure 4 above illustrates the evolution of the layout / design of the scheme from Pre-Planning through to current proposed scheme. Generally, the Masterplan locates higher density apartment buildings of some scale along Woodbrook Avenue, the eastern site edge beside Woodbrook Golf Course, Shanganagh Public Park and the DART Station, thereby offering views over significant open spaces to apartment residents and making the most of the sites locational attributes.

#### Phase 1 – Coastal Park / Edge

The height proposed has taken cognisance of the Boards commentary and considered the built height distribution having regard to the setting of the apartment blocks adjacent Woodbrook Golf Course which sit directly adjacent to the Coastal Park linear space and benefit from existing mature trees along this eastern boundary to providing natural screening. The alignment of Woodbrook Avenue has been simplified, to avoid a kink at its northern end, which allows a more efficient building footprint to be achieved. The height proposed in this area range from 5 – 8 storeys with the 8 storey element serving as a focal point at the end of Woodbrook Avenue.

The proposed apartment are designed to meet the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) details of which are further demonstrated in the Apartment Floor Plans and Housing Quality Assessment prepared by O'Mahony Pike Architects that accompany this SHD Planning Application. Furthermore, a Daylight and Sunlight Assessment, prepared by ARC Architectural Consultants demonstrates that all apartments meet the requirement for access to daylight and sunlight. Having regard for the commentary from An Bord Pleanála, increased densities have been achieved but not at the expense of good design. The necessary design standards have also been met to ensure high-quality housing will be provided.

Along the Coastal Park edge, the courtyard apartment buildings vary in height from 5 to 7 storeys. The buildings have been designed so as to provide variety and a rhythm in form, height, mass and materiality so as to create a distinctive park edge condition, and to optimise views and the sense of space and light for apartments opening onto the courtyard and looking east towards the coast.

The arrangement of the apartment block are such that they provide a shared internal communal courtyard which is enclosed to the Coastal Park edge by a tenant amenity space, which sits at the edge of the podium level. The apartments, communal landscaped podium and tenant amenity area all overlook the Coastal Park which will ensure a high degree of passive surveillance making the park and associated pedestrian / cycling links a safe and secure area to traverse.

The scale and orientation of the courtyard apartment blocks addressing the Coastal Park and extending north towards the cemetery boundary (particularly Phase 2) emphasises the significance of this linear space not just as an amenity but an important route connecting north towards the DART Station and Shanganagh Public Park. These large apartment blocks will also serve as a wayfinder identifying the route south for pedestrians and cyclists from Shanganagh towards Woodbrook and its DART Station which accords with urban design principles of the Urban Design Manual – A Best Practice Guide (2009).





**Figure 5:** Computer Generated Image of Coastal Park looking north, prepared by O’Mahony Pike Architects.

Furthermore, the highest element of the proposed scheme which is 8 storeys in height terminates the view east along Woodbrook Avenue from the entrance to the site and serves as a significant focal point within the development. This assists in creating a strong sense of place within the proposed scheme by creating a prominent feature building at the end of this main east/west axis and directly addressing a local pocket park at the end of this street. This will assist in orientating both prospective residents and visitors alike and will act as a waypoint on route to the future DART Station. Creating such distinctiveness is an important aspect of positive urban design as set out in the Urban Design Manual – A Best Practice Guide (2009).



**Figure 6:** Computer Generated Image of the view along Woodbrook Avenue toward the 8 storey element of Apartment Block A, prepared by O’Mahony Pike Architects.



**Figure 7:** Extract from Photomontages, prepared by Brady Shipman Martin, Landscape & Built Environment Consultants showing the proposed Phase 1 development from Woodbrook Golf Course which is effectively screened by the existing tree line.

The existing landscape is the key asset which establishes the character of the site. In line with the Woodbrook – Shanganagh Local Area Plan 2017 – 2023, it is proposed to make best use of this asset as a generator for the urban form.

This SHD Planning Application is accompanied by an EIAR which includes a Landscape and Visual Impact Assessment Chapter, prepared by the Brady Shipman Martin Landscape & Built Environment Consultants which assesses the impact for the proposed development in relation to views and prospects.

Figure 7 above, demonstrates that even with the increased building height proposed along the park edge, beyond that indicated in the Woodbrook – Shanganagh Local Area Plan 2017 – 2023, the proposed development (Phase 1) integrates well within the existing landscape.

The Landscape and Visual Impact Chapter sets out that the views to and from the site are restricted by mature boundary planting and the nature of surrounding land uses. Therefore, views to and from the site are limited and the following are considered as sensitive visual receptors: -

- Views along R119 Dublin Road and from areas west of the road.
- Views of users from within Shanganagh Public Park and Cemetery.
- Views from Woodbrook Golf Course and Clubhouse.
- Views to and from Crinken Church, a protected structure.
- Views from with the small residential estate of St Anne’s Park, Shankill.
- Views from properties south of the site.
- Views from more distant elevated vantages, including those protected in the County Development Plan and Local Area Plan.
- Views of the generally dark nature of the Site at night-time.

Photomontages, prepared by Brady Shipman Martin Landscape and Built Environment Consultants, illustrated the proposed development in the context of the views outlined above (16no. views in total) are enclosed within this SHD Planning Application. Section 13.7.3 of the Landscape and Visual Impact Chapter of the accompanying EIAR provides an assessment of all these views which are generally identified as having no impact, minor neutral impact and medium negative impact.

Notwithstanding, it is noted that on completion, the disturbance and change associated with the construction stage will be gradually altered by the influence that the new development establishes on the character and visual context of its environs.

In this regard it is considered that the proposed development will have residual moderate local impacts on the landscape character of its environs. These impacts will be viewed as being negative in the short-term, but the effect of the establishment of the new residential neighbourhood also has the potential to be viewed as a neutral or positive intervention in the longer-term.

#### Southern Housing Area

A smaller apartment block has been located within the Southern Housing Area which is 4 storeys in height. The proposed apartment block provides: -

- Greater variety in building height and form within the Southern Housing Area.
- Provides additional passive surveillance overlooking the pocket park.
- Provides a defined edge to the pocket park to assist in creating a sense of enclosure for the space and emphasises the focal point nature of this space.

#### Future DART Station

The building height toward the future DART Station will generally range from 5 to 6 storeys. The Masterplan anticipates that the buildings closest to the DART station and to Shanganagh Public Park will be not dissimilar in scale to those apartment blocks proposed along the Coastal Park edge of Phase 1.

Phase 2 will be subject naturally to detailed design and a subsequent planning application to form the subject of detailed pre-planning negotiations with DLRC in due course.

The scale of development proposed increases generally from 2 – 3 storeys at the more sensitive edge from the south of the site to an equivalent 4 storeys along Woodbrook Avenue stepping up to 5 and 7 storeys along the north/south stretch of the Avenue and eastern park edge as one progresses towards the future DART Station. This is generally consistent with the spirit of the Woodbrook – Shanganagh Local Area Plan 2017 – 2023 and having regard to the advice received from the Board at Pre-Planning Consultation stage careful consideration has been given to a revised layout including increased building heights at appropriate locations. Higher buildings are focussed along the Avenue, the eastern park edge and close to the planned DART Station. This creates a coherent and legible variation in scale and unit typology based on local context and proximity to the DART station and aids the creation of distinct Character Areas across the site.

An increase in building height in a number of considered areas across the application site are supported by national policy which seek to create sustainable development which are cognisant of achieving higher densities as well and introducing increased building height where relevant to achieve these goals.

The National Planning Framework states that: -

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

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

#### **National Policy Objective 13**

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment".*



**National Policy Objective 35**

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

Furthermore, Section 2 of the Urban Development and Building Height Guidelines states that the implementation of the NPF requires increased density, scale and height of development in town and city cores, including an appropriate mix of both the living, working, social and recreational space we need in our urban areas.

Paragraph 2.3 states that whilst achieving high density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability.

Specific Planning Policy Requirements 1 seeks to 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.

As set out above the exercise undertaken to provide higher density within the site has necessitated increased building height at certain locations away from sensitive areas / edges to achieve an optimal solution for the Woodbrook land with consideration being given to the provision of the future DART Station and creating the necessary critical mass adjacent transport nodes. The proposed development addresses both the provision of the NPF and Urban Development and Building Height Guidelines by: -

- Locating larger apartment blocks adjacent to the eastern site boundary addressing significant public open space on-site and the golf course and coast beyond and also benefitting from existing natural screening along this boundary.
- Maintaining residential amenity standards in accordance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) and access to daylight and sunlight standards.
- Creating distinctiveness by locating the tallest element of the proposed scheme, 8 storeys in height, at the end of Woodbrook Avenue to provide a focal point. This assists in creating distinctiveness within the proposed scheme by providing a landmark feature along that key east/west alignment of Woodbrook Avenue from the entrance to the scheme.
- The proposed development sits comfortably into the landscape and benefits from the mature existing trees along the perimeters of the site.
- Locating larger apartment blocks enroute to and in close proximity of the planned DART Station. This assists in creating a varied yet legible urban form capitalising on those open and high amenity aspects and guiding visitors towards the DART station.

Overall, the height strategy for the subject scheme respects the more sensitive nature of the lower building heights in the southern portion of the site, adjoining sensitive neighbouring protected structures, while also utilising increased building heights towards the body of the site along the Avenue and those parts of the site that overlook significant open spaces, such as Shanganagh Public Park and Woodbrook Golf Club, as suggested by the Opinion of An Bord Pleanála. The proposed development is designed so as to provide appropriate heights in response to these varied contextual conditions, which provides meaningful variety in character, scale and form throughout the scheme.



**Figure 8:** Extract from the Design Statement, prepared by O'Mahony Pike Architects illustrating height of the proposed buildings for the overall Masterplan (i.e. including Phase 1 and 2).

### Unit Mix

685no. residential units are proposed in this case, including a mix of 21no. different unit types. These range from apartments, duplexes and houses, ranging in size and layout to accommodate a variety of household needs. The following breakdown of unit size is proposed: -

- 1 Bed: 130 (19% of total units)
- 2 Bed: 319 (46.5% of total units)
- 3 Bed: 163 (24% of total units)
- 4 Bed: 48 (7% of total units)
- 5 Bed: 25 (3.5% units)

The housing design typologies range from deep plan to wide frontage semi-detached and terraced houses, of two to three storeys, and accommodating 3, 4 & 5 bed units.

The apartment design typologies are reflected in 5no. apartment buildings, ranging from 4 to 8 storeys, and accommodating a range of 1, 2 and 3 bed apartment units.

The duplex typologies are contained in two blocks adjacent to the Old Dublin Road (R119), ranging from 3 to 4 storeys and an exaggerated 3-storey height block at the park edge between housing and the large courtyard apartment blocks. These comprise predominantly of 2 and 3 bed duplex units.

The proposed house types include three with optional extensions (House Type: H01, H03 and H05). This provides further variety for prospective purchasers and provides additional variety to the extensive range and mix of units provided. All proposed houses are in accordance with the standards set out in Quality Housing for Sustainable Communities (2007) and as illustrated in the House Type drawings Apartment Floor Plans and Housing Quality Assessment prepared by O'Mahony Pike Architects that accompany this SHD Planning Application.

With regard to the apartments being proposed variety in terms of unit mix is provided for not just in terms of the mix of 1 and 2-Bed apartments but also in terms of the variety of 2-Bed units. There are a range of 2-Bed typologies comprising of mid-corridor open plan apartments to larger through-aspect apartments and dual aspect corner apartments. Mostly 4-Person 2-Beds, there are a number of 3-Person 2-Beds also. This provides further variety for prospective owners and potential occupancy which will suit first time buyers, young families or young professionals depending on their particular circumstances. All proposed apartments are laid out fully in accordance with and generally well in excess of the standards set out in Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) as set out in the Apartment Floor Plans and Housing Quality Assessment prepared by O'Mahony Pike Architects that accompany this SHD Planning Application.

Phase 2 forms the subject of a robust and tested Masterplan as prepared by O'Mahony Pike Architects. It is designed to a higher density and contains a higher proportion of apartments given the proximity of that phase to the planned DART Station and Local Centre. The overall Masterplan development at Woodbrook (allowing for the temporary DART Station car park) provides for a circa 80:20 split between apartments/duplexes and houses. This compares to the subject Phase 1 70:30 split between apartments/duplexes and houses. We would submit that a mix of dwelling types to include a reasonable proportion of own-door houses is crucially important in order to create a sustainable and balanced community where a broad demographic profile and the full resident life-cycle housing needs are met on-site. This is all the more important given the self-contained nature and location of Woodbrook, which does not form an extension to an existing built-up urban or suburban area.

Prospective residents will include public and private tenants and private homeowners, in a range of household sizes and formats from families to individuals, young and old, as part of a very much integrated and vibrant new community in a largely self-contained and highly sustainable new settlement.

### **Proposed Residential Density (Revised)**

On foot of our engagement with the Board at Pre-Application Consultation, the Applicant in consultation with Dun Laoghaire-Rathdown County Council, has carefully considered the advice of the Board to further consider the density of the proposed scheme.

In the first instance we can confirm that the design and layout of the proposed scheme has been revised to increase the number of units by 257no. to a total of 685no. units. This results in a net residential net density of 78no. units per Ha based on a net site area of 8.8 Ha.

### Serviced Lands / Future Connectivity

As set out in Section 7 of this Report, the Woodbrook Distributor Road (referred to as Woodbrook Avenue as part of this proposal) from Dublin Road to the location of the proposed DART station will be applied for as part of the initial planning application. In tandem with this application a second application for the Avenue only is being lodged directly with Dun Laoghaire Rathdown as a standalone Planning Application given its inclusion for funding under the Local Infrastructure Housing Activation Fund (LIHAF).

This will provide the Council with the ability to deliver this strategic road in circumstances whereby this development were delayed for whatever reason. It was considered prudent to ensure that the LIHAF funding was capable of being secured.

The provision of Woodbrook Avenue under LIHAF will support the provision of the future DART Station. The provision of the DART Station and BusConnects (along the Old Dublin Road – R119) will provide substantially increased public transport connectivity to the site. The detail of the transportation policy context is set out in the Traffic and Transport Assessment, prepared by Atkins Consulting Engineers. The following national planning policy context sets out the aspirations to generally increase densities on sites which benefit from higher levels of public transport.

- **National Planning Framework – Ireland 2040**

The NPF also sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered, including: -

**National Policy Objective 2a**

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

**National Policy Objective 3b**

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

**National Policy Objective 11**

*“In meeting urban development requirements, there will be a presumption in favour of development that 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.”*

- **Regional Spatial & Economic Strategy – Eastern & Midlands Regional Strategy**

The RSES identifies Woodbrook as one of a number of strategic sites, located along the strategic North – South Corridor that will benefit from increased capacity on the DART Line planned by 2027: -

*“The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate. On the south-eastern commuter line capacity is unlocked by a new station at **Woodbrook - Shanganagh**, with the consolidation and westward expansion of Bray to Fassaroe and Old Conna linked to improved public transport connections.”*

- **Sustainable Residential Development Guidelines (2009)**

Section 5.8 of the Guidelines recommends that: -

*“...in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations, bus stops, and decreasing with distance away from such nodes.”*

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

Having regard for the location of the subject site, it is considered that under the provision of the New Apartment Guidelines it is most appropriately defined as an ‘Intermediate Urban Location’. The locational attributes of the site is set out in the Traffic and Transport Assessment, prepared by Atkins Consulting Engineers which have a bearing on car parking quantum.

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

- Within 1,000m (10 mins. walking) distance of a principal town or suburban centre or employment location [*N/A - Bray Village is located c.1.8km to the south*].

- Within 1,500m (15 mins walking) distance of high capacity urban public transport stops (commuter rail/light rail) [*Potential for improvements to rail/light rail station located – proposed DART Station*].
  - Within 1,000m (10 mins. walking) distance of existing or planned high frequency urban bus service [*Potential for improvements to bus commuting service under Bus Connects*].
  - Within 500m (5 mins. walking) distance of reasonably frequent urban bus service (min 15 minute peak hour frequency) [*Potential for improvements to bus commuting service under Bus Connects*].
- **Dun Laoghaire-Rathdown County Council Development Plan 2016 – 2023**  
The Development Plan sets out that where a site is located within c. 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and / or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a **minimum of 50 units per Ha** will be encouraged.
  - **Woodbrook – Shanganagh Local Area Plan 2017 – 2023**  
The Local Area Plan sets out that average minimum net density of 60no. units per Ha shall apply to the lands at Woodbrook.

The site is located adjacent to a planned DART Station and will also benefit from the future roll out of BusConnects (on the Old Dublin Road – R119) which will ensure that the site will be exceptionally well served by public transport in the future. Having considered the advice of An Bord Pleanála subsequent to our Pre-Planning Meeting Consultation, the Applicant has sought to address the issues raised around densities and building heights having regard to the landscape context of the site including the location of the planned DART Station, adjoining land uses and potential coastal views whilst ensuring that it will still integrate successfully into the landscape having regard to existing views and prospects in the wider area and is rooted in a coherent and legible overall pattern and built form that respects the Woodbrook LAP structuring principles. The Design Statement, prepared by O’Mahony Pike Architects sets out the key changes which have occurred to the proposed layout from Pre-Planning Consultation with An Bord Pleanála to the current proposal and the wider design rationale for the scheme. The proposed scheme is consistent with: -

- Urban Framework / Layout.
- Land Use.
- Provision of Open Space.
- Road network / permeability.
- Connections.

The key deviation from the Woodbrook – Shanganagh Local Areas Plan 2017 – 2023 relates to the incorporation of increased densities which has been accommodated through additional height above what is indicated in the Local Area Plan. The following table sets out the densities which are proposed as part of Phase 1 and Phase 2. The masterplan has been devised to include both the retention of the temporary DART car park and the full development of this area also.

Phase	Phase 1	Overall Woodbrook (with Temporary Car Park)	Overall Woodbrook (without Temporary Car Park)
No. of Units	685	1,402	1,488
Net Density	78no. units per Ha	93no. units per Ha	96no. units per Ha

The densities proposed, having regard for the future provision of high frequency public transport options in proximity to the site, for both Phase 1 and the fully completed Masterplan area will ensure that sufficient critical mass is developed on serviceable and highly accessible land in accordance with the objectives of current national planning policy.

### 9.2.2 Issue 2 – Permeability

Further consideration of documents as they relate to the **proposed connections particularly to the north of the proposed development and potential future connections to the south**, with regard to inter alia, the criteria set out in the Urban Design Manual relating to ‘Connections’ which accompanies the Guidelines for Planning on Sustainable Residential Development in Urban Areas’ and the Design Manual for Urban Roads and Streets. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

(SLA bold font emphasis)

#### Applicant’s Response

We refer the Board to the Landscape Rationale, prepared by Brady Shipman Martin Landscape & Built Environment Consultants which demonstrates connectivity within the site and permeability to the wider surrounding area. The Landscape Masterplan identifies the 2no. new connections provided to Shanganagh Public Park from the proposed development which support connection to the wider residential areas for both pedestrians and cyclists.

Provision have also been made in the south eastern corner of the proposed development to facilitate a potential future connection south to adjoining third party lands should they be developed in due course. We refer to the Site Layout Plans prepared by O’Mahony Pike Architects which indicated this future connection.

Furthermore, we refer the Board to the Traffic And Transport Assessment, prepared by Atkins Consulting Engineers which sets out how the street network has been designed in accordance the Design Manual for Urban Roads and Streets and illustrates the general permeability of the site and proposed and potential future connections to the surrounding context.

A Quality Audit (including a Road Safety Audit), prepared by Atkins Consulting Engineers which considered accessibility requirements, movement and place function requirements and road safety. The recommendation proposed have been considered and implemented as required to ensure the layout of the proposed scheme is in accordance the Design Manual for Urban Roads and Streets.

### 9.2.3 Issue 3 – Surface Water Management

Further consideration of the documents as they relate to **surface water management for the site**. This further consideration shall have regard to the requirements of the Drainage Division as indicated in their report received by the Board on 6<sup>th</sup> December 2018 and contained in Appendix B of the Planning Authority’s Opinion (report dated 20<sup>th</sup> November 2018). Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

(SLA bold font emphasis)

#### Applicant’s Response

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

The surface water network proposed has been designed to cater for the entire Woodbrook – Shanganagh Local Area Plan. There has been subject to extensive dialogue between Atkins Consulting Engineers and the DLRCC Drainage Department to review the proposed design including surface water run-off rate and soil types. All elements of the DLRCC, Drainage Department Report which was issued to An Bord Pleanála at Pre-Planning Consultation have all been addressed as part of the drainage reports and Drawings, prepared by Atkins Consulting Engineers.

The Sustainable Urban Drainage System (SuDS) measure employed as part of the proposed development are broadly set out as follows: -

- Underground attenuation.
- Swales.
- Tree pits.
- Porous / permeable paving.
- Green roofs on apartment blocks.
- Filter drains.

The surface water will be discharged at greenfield run-off rates along the southern boundary of the site in a westerly direction to the Old Dublin Road (R119) and then continuing along the Old Dublin Road in a southerly direction until discharge to the existing culverted section of the Crinken Stream at the location of St. Brendan's College.

The proposed surface water infrastructure has been sized so as to accommodate not just the development of the Applicant's lands, but also the development of the lands at Shanganagh to be developed by DLRCC.

With regard to the surface water management of the 2no. replacement golf holes SuDS measures will include an attenuation area and vortex flow control. Additional attenuation storage is to be provided within the natural valley of existing golf course lands prior to discharge to existing storm drainage network. Atkins Consulting Engineers have liaised with DLRCC Drainage Department in relation to the surface water management of the proposed replacement golf holes also.

In accordance with DLRCC Development Plan a Stormwater Impact Assessment Report has been carried out along with an independent Stormwater Audit, prepared by Punch Consulting Engineers on behalf of DLRCC. These Reports have informed the Site Specific Flood Risk Assessment, prepared by Atkins Consulting Engineers which sets out the site is considered to be located within Zone C, therefore, there is a low probability of flooding.

### 9.3 Response to Specific Information Requested

#### 9.3.1 Item 1 – Mobility Management

A car parking management strategy for the proposed development which should have regard to existing and planned public transport which serves the area.
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#### **Applicant's Response**

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

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

Furthermore, we refer the Board to Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Car and Bicycle Parking Plan', prepared by O'Mahony Pike Architects which identifies the allocation of parking across the site.

### 9.3.2 Item 2 – Bicycle Parking

A layout plan should be provided that details the location and appropriate quantity of bicycle parking spaces.

#### **Applicant's Response**

We refer the Board to the Site Layout Plans and the ground floor plans of the various apartment buildings on site, prepared by O'Mahony Pike Architects which illustrates the location of bicycle parking within the proposed development.

Furthermore, we refer the Board to Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Car and Bicycle Parking Plan', prepared by O'Mahony Pike Architects which identifies the long and short term cycle parking across the site.

### 9.3.3 Item 3 – Entrance Detail from Old Dublin Road

Detailed drawings and supporting documentation of the proposed arrangements for the entrance the proposed development and the proposed Woodbrook Avenue from the Old Dublin Road.

#### **Applicant's Response**

We refer the Board to Traffic & Transport Assessment, prepared by Atkins consulting Engineers which illustrates the proposed options for the entrance to the residential scheme. Detailed Engineering Drawings have also been prepared showing how the proposed entrance will accommodated upgrades to the new junction and the potential future changes to the Old Dublin Road (R119) road layout (including facilitation of proposed BusConnects).

A Boundary Drawing by Brady Shipman Martin Landscape & Built Environment Consultants illustrated the changes to the boundary treatment along Old Dublin Road (R119). These are supplemented by Computer Generated Images (CGI's) have been prepared by O'Mahony Pike Architects illustrating the new entrance layout.

### 9.3.4 Item 4 – Reservation for East Coast Trail

Details of the reservation provided for the proposed East Coast Cycle Trail.

#### **Applicant's Response**

We refer the Board to Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Masterplan' and Dwg. No. 1618-OMP-00-00-DR-A-XX-11002 'Site Plan Page 3 of 4', prepared by O'Mahony Pike Architects which shows the corridor which is maintained on the eastern side of the existing rail line so as not to prejudice the delivery of the East Coast Cycle Trail.

This 30ft corridor as required by DLRCC for the provision of the future East Coast Cycle Route is retained in Council ownership and is outside of the boundary of the adjacent 11 Acre site that forms part of the tripartite transfer from DLRCC to Woodbrook Golf Club. It has thus been fully safeguarded and is outside of the boundary of this planning application. It is envisaged that this cycle route will connect west across the existing old stone bridge at the northeast corner of the 6 Acre DART gateway lands and provide access immediately south to the DART station and a little further west to the Coastal Park linear park. A potential future connection south along the eastern side of the railway line is not precluded by the proposed development and would be a matter for DLRCC, Woodbrook Golf Club and other third party landowners should there be a desire to achieve a more direct route to Bray in due course.



### 9.3.5 Item 5 – Section 47 Agreement

The prospective applicant shall clarify with the Planning Authority, prior to the lodging of any application, as to whether a Draft Section 47 agreement should be submitted with the application concerning works which are proposed under the LIHAF agreement.

#### **Applicant's Response**

A Draft Section 47 Agreement will not be required in this instance. The Applicant has already entered into a Heads of Agreement with DLRCC with respect to LIHAF. A Deed of Dedication or alternative procurement arrangement will be agreed with the DLRCC post planning lodgement and executed once Woodbrook Avenue has been permitted and there is certainty as to the scope of works.

A separate Planning Application pertaining to Woodbrook Avenue only will be submitted to DLRCC shortly to satisfy the provision of the LIHAF funding.

### 9.3.6 Item 6 – Stage Two Natura Impact Statement

Prospective applicant should satisfy themselves that a Stage Two Natura Impact statement is not required for the proposed development.

#### **Applicant's Response**

We refer the Board to the Information for Screening for Appropriate Assessment, prepared by prepared by Brady Shipman Martin Landscape & Built Environment Consultants which concludes that: -

*“...on the best scientific evidence that it can be clearly demonstrated that no elements of the project will result in any likely significant impact on any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives.*

*Based on these conclusions a **Stage 2 Natura Impact Statement is not required for the proposed development.** As such no mitigation measures are required for the protection of any European sites.*

*It is considered that this report provides sufficient relevant information to allow the Competent Authority (An Bord Pleanála) to carry out an AA Screening, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives.”*

### 9.3.7 Item 7 – Site Sections

Additional cross sections at appropriate intervals showing the proposed development and the relationship with existing developments adjacent the site to the south. Drawings should be appropriately scaled. Site sections should be clearly labelled and located on a layout 'key' plan.

#### **Applicant's Response**

We refer the Board to the Site Section Drawings, prepared by O'Mahony Pike Architects which shows how the proposed development relates to the surrounding context including existing developments adjacent the site to the south.

**9.3.8 Item 8 – Boundary Treatments**

A full and complete drawing that details all proposed boundary treatments.

**Applicant's Response**

We refer the Board to Boundary Treatments Drawings, prepared by Brady Shipman Martin Landscape & Built Environment Consultants which illustrates the various boundary treatment proposed within the scheme.

**9.3.9 Item 9 – Open Space Hierarchy**

A plan of the proposed open spaces with the site clearly delineating the hierarchy of open spaces.

**Applicant's Response**

We refer the Board to Landscape Design Rationale, prepared by Brady Shipman Martin Landscape & Built Environment Consultants which illustrates the hierarchy of public open spaces within the proposed development.

**9.3.10 Item 10 – Taking in Charge**

A site layout that details any areas to be taken in charge by the local authority.

**Applicant's Response**

We refer the Board to the Taking in Charge Drawings, prepared by O'Mahony Pike Architects which illustrates the areas to be taken in charge by the Local Authority.

## 10 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

### 10.1 National Planning Framework – Ireland 2040

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

The NPF marks a shift away from allowing urban sprawl, to more brownfield and infill urban development, focussed on integrated investment in and use of quality public transport focussed development and other essential services, to deliver a denser and sustainably compact urban form.

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

#### **National Policy Objective 2a**

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

#### **National Policy Objective 3b**

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

#### **National Policy Objective 11**

*"In meeting urban development requirements, there will be a presumption in favour of development that 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 enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment".*

#### **National Policy Objective 27**

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

#### **National Policy Objective 33**

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

The NPF has strategic high level objectives regarding progressing the sustainable development of new greenfield areas for housing, particularly those that are on public transport corridors.

### **Applicant's Response**

The proposed development will deliver a new plan-led residential neighbourhood on lands zoned for residential use as part of the Woodbrook – Shanganagh Local Area Plan 2017 – 2023. The proposed development will provide additional amenities including a dedicated creche and a significant quantum of public open spaces which will support greater connectivity to the surrounding areas in particular to Shanganagh Public Park. Provision is also made to facilitate the future development of the DART Station by providing direct access to the future station. The future DART Station and the future provision of BusConnects along the R119 (to the west of the site) will support a general modal shift toward the use of public transport. These provisions are consistent with the aspirations of the NPF.

## 10.2 Eastern and Midlands Regional Spatial & Economic Strategy

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

The RSES contains the following elements: -

- Spatial Strategy – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- Economic Strategy – that builds on the region’s strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- Metropolitan Plan – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- Investment Framework – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- Climate Action Strategy – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

### **Applicant’s Response**

The RSES objectives broadly support the development of strategic sites in proximity to public transport (such as the subject site). They promote the consolidation of Dublin City & Suburbs through sustainable and intense urban form.

## 10.3 Smarter Travel – A Sustainable Transport Future, A New Transport Policy for Ireland 2009 – 2020

This document represents a new transport policy for Ireland for the period from 2009 – 2020. Overall the transport policy document has the following aims: -

- To reduce overall travel demand.
- To maximise the efficiency of the transport network.
- To reduce reliance on fossil fuels.
- To reduce transport emissions.

To improve accessibility to transport, the Policy recognises progress made under the National Spatial Strategy (now superseded by the National Planning Framework) and the Regional Planning Guidelines (which will be superseded by the Regional Spatial and Economic Strategies when adopted) in promoting integrated transport and spatial planning. These strategies recognise the need for more compact, walkable urban areas that support investment in good quality public transport under Transport 21.

### **Applicant’s Response**

In accordance with this policy document, the proposed development would provide a compact urban form by locating new high density residential development on a strategically located greenfield site. Future provision of both the DART Station and BusConnects will support a general modal shift toward the use of public transport

## 10.4 Section 28 Ministerial Guidelines

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

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

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

#### Applicant's Response

The proposed development seeks to provide 685no. units on a net site area of 8.8 Ha, resulting in a net density of 78no. units per Ha. Within the overall Masterplan area a density of at least 93no. units per Ha will be achieved. This layout includes the retention of the temporary surface car park proposed as part of this SHD Planning Application. Should the temporary surface car park become surplus to requirements in the future the Masterplan includes an optional layout to include 1,488no. units in a mix of apartments and houses on an enlarged residential site area and results in a net density of circa 96no. units per Ha.

In response to An Bord Pleanála's Opinion issued 14 January 2019 a robust rationale is provided in relation to the density achieved within the proposed development and masterplan in Section 9.2 of the Planning Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which accompanies this SHD Planning Application.

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

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

Criteria	Applicant's Response
<b>1. Context</b>	<ul style="list-style-type: none"> <li>The proposal will see the inclusion of the north / south Green Axis through the Woodbrook site to ensure appropriate connection to the Shanganagh Public Park.</li> <li>The proposed building heights generally adhere to the provision of the Woodbrook Shanganagh Local Area Plan 2017 – 2023. Apartment Block C includes an 8 storey element (marginally above the LAP requirements) to provide a focal point at the end of the Avenue and support generally urban legibility. Building heights decrease as you move towards sensitive boundaries and away from the planned DART Station – i.e. reducing to 2 storeys towards the southern boundary.</li> <li>Existing site boundaries treatments will be retained and trees of merit within existing hedgerows on-site are being retained where feasible.. There is substantial additional planting proposed throughout the scheme along residential streets and within the linear parks, landscape buffers and pocket parks.</li> <li>The Masterplan acknowledges the views towards St. James Church and provides for a framed view through the layout of the future Local Centre.</li> </ul>
<b>2. Connections</b>	<ul style="list-style-type: none"> <li>The street layout is designed to provide a well-defined urban building block layout, while respecting the existing natural tree and hedgerow lines. This block layout provides a grid of simple and legible secondary streets, promoting connectivity through the scheme and into the surrounding areas.</li> <li>A dedicated cycle / walkway is being provided along both north / south linear parks which will provide a link between the proposed development and Shanganagh Public Park to the north. Furthermore, it is envisaged that future connections to the south will ultimately link up with the Coastal cycle / walkway (being promoted by the Council separately).</li> <li>The internal looped and onward connecting cycle / walking routes will encourage and facilitate more walking and cycling within the proposed development.</li> </ul>

	<ul style="list-style-type: none"> <li>The proposed development is located within 1km of the future DART Station which is approximately 10 – 12 minutes walking distance from southern most part of the proposed development.</li> </ul>
<b>3. Inclusivity</b>	<ul style="list-style-type: none"> <li>A holistic approach has informed the design, including architecture, landscaping, servicing, drainage, sustainable transportation and energy management with the intention of delivering a healthy, integrated and natural urban environment, fostering a sense of community.</li> <li>The proposed units are designed to provide high quality homes and choice to the full range of prospective purchasers. The development is also focused on providing homes in the immediate future to match the aspirations set out in ‘Rebuilding Ireland’ to increase provision.</li> <li>The scheme is fully compliant with Part M of the Building Regulations.</li> <li>A creche (approximately 430 sq. m) will be provided as part of the proposed development.</li> <li>The overall landscape approach is to provide a variety of hard and soft landscaped spaces (including play areas) that create a high quality public realm.</li> <li>The public spaces are legible which is further assisted by the connectivity of the linear spaces which allows the user to intuitively navigate the entire scheme.</li> <li>Provision has been made within the Masterplan for Woodbrook to provide an appropriately scaled local centre (café and shops) which will provide an amenity for the neighbourhood. The local centre also provides a civic space which is capable of accommodating markets, or other informal neighbourhood gatherings.</li> </ul>
<b>4. Variety</b>	<ul style="list-style-type: none"> <li>While the proposed scheme is primarily a residential development, it will form part of a larger integrated scheme including school facility and a Local Centre which be subject to future separate Planning Applications.</li> <li>There is a range of apartments, duplexes and houses (detached, semi-detached and terraced) in 1 bed, 2 bed, 3 bed, 4 bed and 5 bed formats in buildings ranging in height from 2 to 8 storeys. The individual units range from 45.6 sq. m to 191.4 sq. m in size. The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.</li> <li>A range of public open spaces will also be provided. In addition, pathways and cycle ways are provided through the development.</li> </ul>
<b>5. Efficiency</b>	<ul style="list-style-type: none"> <li>The site will achieve a net density of c. 78no. units per Ha. The Applicant’s Masterplan for the overall Woodbrook development achieves a minimum net density of c. 93no. units per Ha. In the event that the temporary surface car is developed in future the the overall Woodbrook development achieves a minimum net density of c. 96no. units per Ha</li> <li>The proposed layout incorporates existing natural features into the new network of green spaces and green loops, in order to make efficient use of existing landscape features in achieving the required open space provision.</li> <li>The scheme is landscaped to ensure that the public open spaces benefit from the best solar orientation.</li> <li>All dwellings within the proposed development will be constructed to meet the current Part L Building Regulation with regard energy efficiency.</li> <li>The layout of the proposed development will optimise orientation to minimise the provision of north facing gardens / balconies / terraces thus optimising the benefits of passive solar gain for individual units.</li> </ul>
<b>6. Distinctiveness</b>	<ul style="list-style-type: none"> <li>The proposed residential development will include a number of ‘Character Areas’ which will introduce differentiation in building form, materials finishes and landscape layout to provide interest and variety.</li> <li>The proposed Apartment Blocks will add distinction in terms of form, finishes and architectural quality. Apartment Block C framed at the end of the Main Avenue running east / west will provide a feature within the wider setting of the scheme for those walking / cycling toward the future DART Station for example.</li> <li>The street hierarchy of formal avenues and side streets will further enhance the sense of place within each character area.</li> </ul>
<b>7. Layout</b>	<ul style="list-style-type: none"> <li>The proposed layout is arranged as a series of well-defined urban blocks and streets set into a structure of green open spaces and green links. The streets are arranged in a hierarchy of street types, formal avenues and side streets with no dead-end cul-de sacs.</li> </ul>

	<ul style="list-style-type: none"> <li>• The building types are arranged to create an organised hierarchy of scales appropriate to their particular locations. A large range of dwelling types is proposed, with a well-integrated tenure mix.</li> <li>• The scheme encourages walkability and provides the necessary desire lines within the site to allow users ease of access across the scheme.</li> <li>• The internal road network is designed to reduce the dominance of cars and encourage an environment that is pedestrian friendly.</li> <li>• The orientation and layouts of residential units ensures that all roads and public spaces benefit from passive surveillance.</li> <li>• The street network is designed to adhere to the provisions set out in the Design Manual for Urban Roads and Streets (2013). It is intended that the road layout supports a reduction the primacy of car usage, making it more conducive for those who wish to walk or cycle.</li> <li>• Street trees are provided along the network of streets in order to create people friendly places with distinctive character to aid legibility.</li> </ul>
<b>8. Public Realm</b>	<ul style="list-style-type: none"> <li>• All public and communal spaces within the scheme are more than adequately overlooked.</li> <li>• The public open spaces are an integrated feature of the design that allow users to naturally traverse the subject site without unnecessary barriers or dead ends.</li> <li>• The layout of the proposed development maximises the use of passive surveillance. Public open space and dedicated cycle / walking routes benefit from passive surveillance which will encourage their use and provide an effective deterrent for anti-social behaviour.</li> <li>• The road layout is intended to reduce the speed of cars through reduced carriageway widths and junction radii, changed surface treatments and raised tables where necessary. Parking is provided in a range of conditions including on curtilage of dwelling, banked on street parking, grouped courtyard or podiums and parking has been integrated with the overall landscape treatment and 'softened' where possible with planting and other landscaping features.</li> </ul>
<b>9. Adaptability</b>	<ul style="list-style-type: none"> <li>• The proposed units meet appropriate accessibility standards and are capable of internal modification to meet changing household needs. A number of house type have been included with optional extensions to ensure a range of options are available to prospective owners.</li> <li>• The scheme includes a range of energy efficient measures that assist in reducing the overall carbon footprint of the scheme over its lifetime.</li> <li>• A Building Lifecycle Report will set out how the apartment blocks are managed and maintained efficiently.</li> <li>• All units within the proposed development have been designed to meet Part L energy efficiency standards.</li> <li>• External materials have been selected to ensure longevity and minimal maintenance, the selected materials allow for future additions or changes to be readily constructible.</li> <li>• All private open spaces including rear gardens, communal spaces and private balconies meet the requirements of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022.</li> </ul>
<b>10. Privacy &amp; Amenity</b>	<ul style="list-style-type: none"> <li>• Each unit will have access to dedicated private open space that meets the standards of the Quality Housing Guidelines (2007) and the Apartment Guidelines (2018)</li> <li>• 62% of the proposed apartment / duplex units within the proposal are dual aspect.</li> <li>• Private and communal open space will meet the requirements of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022.</li> <li>• Units will be laid out and orientated toward all major open spaces area to ensure that passive surveillance is maximised.</li> <li>• Storage space will be provided within all units and will meet the requirements of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 and the appropriate apartment guidelines.</li> </ul>
<b>11. Parking</b>	<ul style="list-style-type: none"> <li>• Car parking is integrated into the layout of residential streets with additional visitor parking also provided for. Car parking is provided adjacent to all duplex within parking courts and apartments at podium and street level.</li> </ul>

	<ul style="list-style-type: none"> <li>• Bicycle storage will be provided for all apartment and duplexes to meets the requirements of the New Apartment Guidelines 2018. Bicycle storage will be catered for in communal bike stores integrated into the local street to serve mid-terrace houses, or, in the case of the apartments, bike parking has been provided within the podium parking areas or at grade in the immediate vicinity for visitors.</li> </ul>
<p><b>12. Detailed Design</b></p>	<ul style="list-style-type: none"> <li>• The building forms are designed to create clear, legible and well-defined street blocks. Street corners are designed with windows onto both sides of each corner, ensuring good animation and levels of passive overlooking consistently throughout the development.</li> <li>• The building heights proposed respond to the context of the site. Woodbrook Avenue is lined to the south and east by building between 4 – 8 storeys providing a sense of enclosure which will be fully implemented with the development of Phase 2. 2 – 3 storey housing is proposed adjacent the more sensitive southern edges of the site are generally where the less intense.</li> <li>• An 8 storey element of Block A is located at the end of Woodbrook Avenue opposite from the proposed new entrance from the Old Dublin Road (R119). This creates a focal point within the development which supports greater legibility within the development and creates distinctiveness.</li> <li>• The higher densities of the proposed development are focused along the Avenue and eastern Coastal Park edge and toward the future DART Station which will ensure the creation of sufficient critical mass.</li> <li>• The selection of materials and the elevational treatments are designed to deliver a sense of urban quality, and particular care has been taken to ensure a coherency of elevation treatment.</li> <li>• A wide range of house, duplex and apartment types are proposed to deliver a sustainable housing mix. Each unit type has been carefully designed to achieve the unit and individual room dimension requirements within an efficient plan form.</li> <li>• All of the apartment blocks have been oriented to maximise access to daylight / sunlight. The majority of apartment units are dual aspect.</li> <li>• The courtyards associated with Apartment Block A, B and C are orientated toward Coastal Park to maximise views and integration with the landscape. They courtyards provide a high quality usable communal spaces for prospective residents.</li> <li>• The overall layout is permeable and improves walkability and connectivity.</li> <li>• The open spaces are designed to be accessible, encourage active use and positive visual amenity within the overall scheme.</li> <li>• A high quality landscape approach using a mixture of paving, textured finishes and planting to provide a public realm that is aesthetically pleasing, functional and practical in terms of facilitating maintenance.</li> <li>• Car parking within the local streets has been carefully managed to ensure it does not dominate the streetscape.</li> </ul>

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

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

**Apartment Floor Area**

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



Minimum Apartment Floor Areas	
Studio	37 sq. m
One bedroom	45 sq. m
Two bedroom	63 sq. m
Two bedroom	73 sq. m
Three bedroom	90 sq. m

### **Applicant's Response**

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

Apartments			
Unit Type	No. of Units	GFA (m <sup>2</sup> ) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	130	45.6 – 64.1	45
2 Bed Apartment – 3 person	23	66.3	63
2 Bed Apartment – 4 person	271	79.2 – 82.8	73
3 Bed Apartment	6	95.2 – 100.3	90
2 Bed Duplex	25	88.7 – 113.8	73
3 Bed Duplex	23	106.7 – 118.3	90
<b>Total</b>	<b>478</b>	<b>Max. 35,905 sq. m *</b>	

\* **Net Internal Area** (i.e. floor area of apartments only – omitting circulation areas etc. within apartment blocks).

### **Safeguarding Higher Standards**

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

### **Applicant's Response**

All apartments in the proposed development will meet the floor area requirements set out the Guidelines. A HQA, prepared by O'Mahony Pike Architects, is contained in in this SHD Planning Application for reference which shows the vast majority of the units are 10% of greater than the minimum size required.

### **Dual Aspect**

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

**Applicant's Response**

The site is considered a suburban or intermediate location in the context of the Guidelines. Of the 298 no. apartments, approximately 62% are either dual or triple aspect. A HQA, prepared by O'Mahony Pike Architects shows the proportion of dual aspect apartment.

This SHD Planning Application is accompanied by an Assessment of Sunlight & Daylight Access within the Proposed Development and EIAR which includes a Daylight & Sunlight Chapters, prepared by the ARC Architectural Consultants which assesses the impact of the proposed development in terms of daylight and sunlight within the development and on surrounding existing development. It is generally concluded that the in the sample apartments identified, daylight / sunlight in excess of the minimum levels recommended is achieved.

**Lift and Stair Core**

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

**Applicant's Response**

The apartment blocks are serviced generally by 2no. stair and lift cores. On each floor there are between 4 – 10no. apartments accessing the stair and lift core, complying with the above standard.

We refer the Planning Authority to the Apartment Floor Plans prepared by O'Mahony Pike Architects for further details.

**Floor to Ceiling Height**

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

**Applicant's Response**

As illustrated on the enclosed Section drawings prepared by O'Mahony Pike Architects, the ground floor apartments have a general floor to ceiling height of 2.850m at ground floor level and a floor to ceiling height of 2.850m on the remaining levels, thus complying with the above standard.

**Private & Communal Open Space**

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

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq. m
One bedroom	5 sq. m
Two bedroom (3 person)	6 sq. m
Two bedroom (4 person)	7 sq. m
Three bedroom	9 sq. m

### **Applicant's Response**

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

Based on the above, the 478no. apartments / duplexes proposed requires c. 3,126 sq. m of communal amenity space.

The communal amenity space provided as part of the proposed development provided in a number of courtyards associated with each apartment / duplex block. The total amount of communal open space provided as part of the proposed development amounts to 3,988 sq. m which comfortably exceeds the standards set out in the Guidelines.

We refer the Board to the Site Layout Plans, prepared by O'Mahony Pike Architects and the Landscape Plans prepared by brady Shipman Martin Landscape & Built Environment Consultants for further details on the layout and treatment of these spaces.

### **Car Parking**

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

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

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

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

### **Applicant's Response**

The SHD Planning Application is accompanied by a Traffic & Transport Assessment, prepared by Atkins Consulting Engineers which provides a rationale as to why the site is considered as an intermediate location.

A total of 416no. car parking spaces are proposed to serve the apartment and duplexes proposed. This equates to approximately 0.8no. car parking spaces per unit. Car parking provisions for apartments and duplexes are in accordance with car parking provisions of the Department of Planning, Housing and Local Governments Design Standards for New Apartments (March 2018), which suggests a reduction from normal Development Plan standards, depending on location.

It is proposed to provide 4no. car sharing (GoCar) spaces within the proposed development. Based on the uptake of the scheme there is potential to provide additional car sharing spaces. The provision of car sharing services will assist in reducing the requirement in general for car ownership which will be further supported by the future provision of both Woodbrook DART Station and BusConnects along the Old Dublin Road.

## Bicycle Parking

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

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

## Applicant's Response

In total, 1,125no. bicycle parking spaces are provided for apartments and duplexes. The bicycle parking spaces are located in facilities that are directly accessible from the adjacent street for duplex unit. All bicycle parking is located at ground floor level within dedicated, secure and well-lit facilities within the apartment blocks.

### 10.4.4 Quality Housing for Sustainable Communities (2007)

The 'Typical Dwelling Sizes' standards of these Guidelines are the most relevant to the provision of quality housing.

## Typical Dwelling Sizes

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

Table 5.1: Space provision and room sizes for typical dwellings

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

### **Applicant's Response**

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

<b>Houses</b>			
<b>Unit Type</b>	<b>No. of Units</b>	<b>GFA (m<sup>2</sup>) / Unit</b>	<b>Min. Size – Guidelines 2007</b>
House Type 01 – 3 bed deep plan terrace house	52	108.7 – 144	100
House Type 02 – 3 bed 5.4m wide compact terrace house	17	96.4	92
House Type 03 – wide plan terraced / semi-detached / end of terrace	23	107.1 – 118.9	110
House Type 03B – wide plan semi-detached / end of terrace with bay window	12	109.8 – 121	110
House Type 04A – 4 bed deep plan terraced house	17	152.4	120
House Type 04AL – 4 bed deep plan terraced house	3	155.3	120
House Type 04AR – 4 bed deep plan terraced house	3	152.4	120
House Type 04 – 4 bed deep plan terraced house	9	151	120
House Type 04L – 4 bed deep plan terraced house	2	153.9	120
House Type 04R – 4 bed deep plan terraced house	2	151.1	120
House Type 05 – 4 bed deep plan semi-detached house	6	141 – 152	120
House Type 06A – 5 bed deep plan mid-terrace house	25	191.4	120
House Type 07 – 4 bed detached wide front house	6	157	120
House Type 08 – 3 bed plus study terraced house	26	143.4	102
House Type 10 – 3 bed narrow plan, end of terrace starter house	4	106.2	102
<b>Total</b>	<b>207</b>	<b>Max 29,604 sq. m</b>	

All of the houses proposed are significantly in excess of the minimum size requirements of the Housing Guidelines (2007). A HQA, prepared by O'Mahony Pike Architects, further confirms this.

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

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

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

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

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

Appendix 9 – Building Height Strategy of the Dun Laoghaire-Rathdown County Development Plan sets out the approach to building height across the administrative area of Dun Laoghaire-Rathdown County Council. Section 4 of this Strategy sets out a number of categories that outline the manner in which building heights will be assessed. This Section notes that the appropriate vehicle for identifying the specific sites within these centres that have potential for accommodating building height are statutory (and non-statutory) local plans.

The subject site is governed by the Woodbrook – Shanganagh Local Areas Plan 2017 – 2023 which sets out generally that: -

*“It is proposed to apply a building height range of circa 3-5 storeys, plus a setback level, generally in the LAP Area having regard to its location and the need to cater for a diverse range of housing typologies, **albeit with the provision for potential greater height at certain key or landmark locations.**”*

Furthermore, Objective WB3 sets out that: -

*“A general building height range of 3-5 stories will be sought, with appropriate heights along any sensitive site boundaries (2-4 stories) and thereafter a transition to higher building heights towards the centre of the site and along the main avenue; with a general building height range of 3-4-5 stories (plus setback), and rising to a maximum of 6 stories, unless a compelling urban design case is otherwise made for reasons of legibility, place-making and identity.”*

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

**SPPR 4**

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

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

**Applicant’s Response**

The proposed development is strategically located within the built-up footprint of Dublin’s Metropolitan Area. It is earmarked for strategic housing development in the Regional Spatial and Economic Strategy for the East and Midlands and Dublin Metropolitan Area Strategic Plan. The proposed development will deliver a new plan-led residential neighbourhood on land zoned for residential use. The land is well connected to road transport networks, with the potential to deliver public transport and cycle facilities to this area.

The proposed development comprises housing and duplexes ranging from 2 – 4 storeys and apartment blocks ranging from 5 – 8 storeys. The 8-storey element of apartment Block A forms a focal point at the end of Woodbrook Avenue to create a distinctive feature within the proposed development to assist in place-making and general legibility of the urban form. The large courtyard blocks along the Coastal Park are well articulated with pre-cast concrete frames enclosing and supporting the balconies on the main gables of these blocks, both on the Woodbrook Avenue and Coastal Park sides of these buildings.

These frames extend above parapet level and these prominent gables are stepped in scale between 5 and 7 storeys to create visual interest and an interesting rhythm looking up and down the Avenue and Coastal Park. The pre-cast balcony frames as an architectural device add further depth and contrast to key elevations of the courtyard blocks and provide a useful degree of enclosure to users of those balconies. They also serve a structural role in supporting the balconies.

The proposed development certainly raises the prevailing height, while also seeking to ensure that new building heights have regard to surrounding context and transitions appropriately from established sensitive boundaries to the south and increase in general density and building height towards the eastern coastal edge and the planned DART station in the north east of the site. It achieves a net density of c. 78no. units per Ha as part of Phase 1 and a Masterplan net density of approximately a minimum of 93no. units per Ha. This layout includes the retention of the temporary surface car park proposed as part of this SHD Planning Application. Should the temporary surface car park become surplus to requirements in the future the Masterplan includes an optional layout to include 1,488no. units in a mix of apartments and houses on an enlarged residential site area and results in a net density of circa 96no. units per Ha.

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

#### **10.4.6 The Planning System and Flood Risk Management (2009)**

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

The Site Specific Flood Risk Assessment sets out the site is considered to be located within Zone C, therefore, there is a low probability of flooding.

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

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

The Traffic and Transport Assessment Report, prepared by Atkins Consulting Engineers sets out the rationale for the proposed road design of the scheme noting that the 30km/h special speed limit as required on residential streets is promoted via the combination of the following design elements: -

- Horizontal and vertical alignment designed to 20km/h and 30km/h.
- Carriageway widths in line with DMURS requirement for street type.
- Constrained junction radii in line with DMURS requirement.
- Raised Pedestrian & Cyclist Crossings at the R119 Dublin Road Junction and along Woodbrook Avenue and provision of Raised Tables at Internal Road Junctions.

#### **10.4.8 Childcare Facilities, Guidelines for Planning Authorities (2001)**

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

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

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

#### **Applicant's Response**

A childcare facility (approximately 429 sq. m) is included as part of the proposed development and is located adjacent the future Local Centre and future school site.

Having regard to the existing geographical distribution of childcare facilities in the Woodbrook area and having regard to the number of residential units proposed as part of the development, it was considered that the inclusion of a childcare facility is appropriate. The proposed creche will provide enough space to accommodate approximately 63no. full time equivalent children. A further childcare facility is envisaged ultimately at the DART Gateway area.

Arising from the above it is our opinion that the proposal is consistent with the relevant Guidelines in this regard.



## 11 STATUTORY PLANNING CONTEXT – STATEMENT OF CONSISTENCY

### 11.1 Dun Laoghaire Rathdown County Development Plan 2016 – 2022

The Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 (hereafter referred to as the Development Plan) came into effect on the 16 March 2016 and is the statutory land-use plan governing the subject lands at this time.

#### 11.1.1 Core Strategy

The Core Strategy of the Development Plan sets out that the Woodbrook – Shanganagh Local Area Plan is one of the primary growth nodes from which a significant portion of the supply of residential units will derive up to the 2022 horizon – and potentially beyond.



**Figure 9:** Extract from the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 – Core Strategy Map (SLA Overlay).

#### Applicant’s Response

The proposal includes the development of 685no. residential units. The proposal will amount to approximately 30% of the units allocated for Woodbrook under the Woodbrook – Shanganagh LAP which is consistent with the provisions of the Core Strategy within the Development Plan. The proposal will make a significant positive impact on reaching the quantum of housing identified in the Core Strategy within Dun Laoghaire-Rathdown County.

The proposed development supports the appropriate growth of Dun Laoghaire-Rathdown County by ensuring that development takes place on residentially zoned land within Woodbrook – Shanganagh, which is a 'Future Development Area'.

### 11.1.2 Land Use Zoning

Under the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 (hereafter the Development Plan) the subject site has primarily been zoned Objective A1, the objective of which is: -

*"To provide for new residential communities in accordance with approved local area plans."*

This relates to the lands on which residential development is being proposed.

The area in which the proposed foul water rising main will be run is zoned Objective F, the objective of which is: -

*"To preserve and provide for open space with ancillary active recreational facilities."*

The area in which the proposed 2no. replacement golf holes are proposed is zoned Objective GB, the objective of which is: -

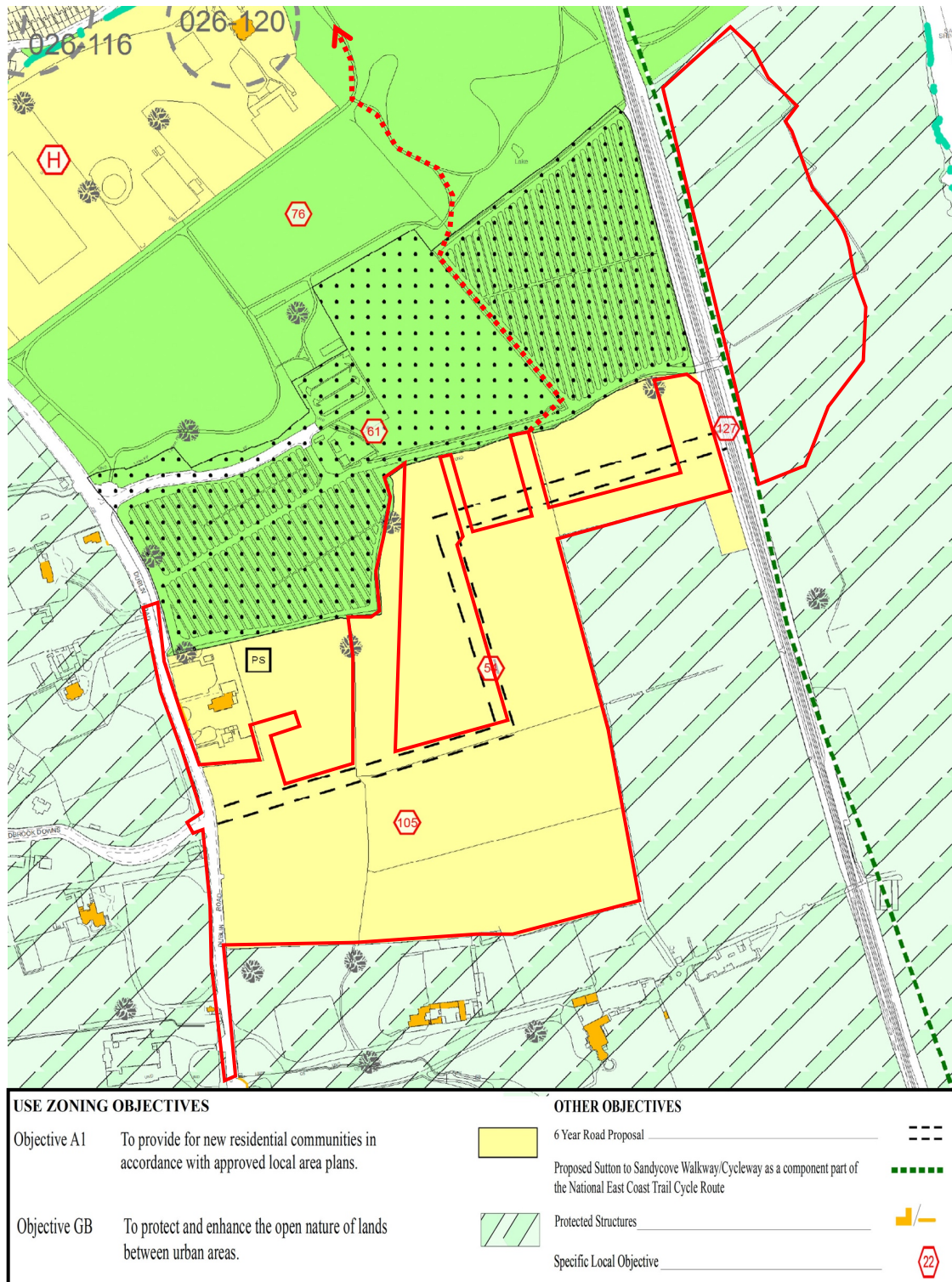
*"To protect and enhance the open nature of lands between urban areas."*

### **Applicant's Response**

Under the Objective A1 zoning 'Residential' use is 'Permitted in Principle'. The residential use proposed is fully compliant with the over-arching zoning objective for the subject lands.

With regard the drainage works which are required located to the north of the residential site these works are not defined as a permitted use under Objective F but are ancillary to the residential development. The works require the laying of underground drainage which will not compromise the open space / recreational uses above ground. This can be considered acceptable in terms of land-use zoning.

With regard the proposed 2no. replacement golf holes, these are proposed on lands zoned Objective GB. The proposal includes the provision of golf holes and associated landscaping which can be considered an appropriate use (i.e. open space) in terms of land-use zoning.



**Figure 10:** Extract from the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022 Map 14 with approximate site location shown indicatively in red including the indicative route of the rising main to the north of the residential site and the area proposed for the 2no. replacement golf holes to the east of the rail line (SLA Overlay).

### Specific Local Objectives

A number of other Specific Local Objectives (SLO) apply to the site and immediate vicinity, which are addressed in turn as follows.

#### Applicant's Response

**SLO 105** seeks to: -

*"To investigate, in consultation with the Department of Education and Science, the reservation of a single site for a Post-Primary School to serve the growth nodes of Woodbrook/Old Connaught areas.*

**Note:** *The locations of SLO symbol 105 on Map 14 are notional only and not a geographic identification of specific sites."*

We note that the location of SLO symbol 105 on Map 14 of the Development Plan are notional only and not a geographic identification of specific sites. A Post-Primary school is to be developed at Old Connaught. This SLO does not relate to the Woodbrook lands.

**SLO 54** seeks to: -

*"To implement and develop the Woodbrook and Shanganagh area in accordance with the Woodbrook / Shanganagh Local Area Plan."*

The proposal comprises the first phase of residential development of the Woodbrook area under the Woodbrook – Shanganagh Local Area Plan 2017 – 2023. The proposal as it is currently set out generally responds to the policies and objectives of the Local Area Plan having regard for physical layout, provision of open space, housing mix and provision of appropriate infrastructure. We refer the Board to the Design Statement and Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Masterplan', prepared by O'Mahony Pike Architects which sets out the detail of the proposal.

**SLO 127** sets of the Councils objective: -

*"To provide a DART Station at Woodbrook."*

Whilst not forming part of Phase 1, the DART Station is to be implemented by the National Transport Authority (NTA) / Transport Infrastructure Ireland (TII). Woodbrook Avenue is to be provided as part of this application to facilitate connection to the proposed DART Station.

The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.

We refer the Board to the Design Statement, by O'Mahony Pike Architects and the Engineering Drawings, prepared by Atkins Consulting Engineers illustrating the layout of the temporary car park and the interface with the future DART Station. Details of the design of the future DART Station including pedestrian overpass, platforms, levels etc. have been provided to the Design Team by the NTA so as to ensure that the future station integrates effectively with the proposed development.

#### **Map Based Objective**

A number of other Map Based Objectives apply to the site and immediate vicinity, which are addressed in turn as follows: -

## **Applicant's Response**

### **East Coast Trail**

The area in which the proposed 2no. replacement golf holes is adjacent a map based objective, the objective of which is: -

*"Proposed Sutton to Sandycove Walkway / Cycleway as a component part of the National East Coast Trail Cycle Route."*

The transfer of the lands required for these 2no. golf holes to the Applicant has been approved by the Council and forms the subject of the signed and legally binding Tri-partite Agreement. Evidence of this Agreement can be seen in the letter dated 10 October 2019 from Byrne Wallace, Solicitors accompanying this application. In agreeing the disposal of these lands, the Council retained a 30ft (approx. 10m) wide corridor to ensure that the delivery of the East Coast Trail cycle route is facilitated. The map-based objective to provide for the East Coast Trail will not be impacted upon as a dedicated corridor of land will remain available for DLRCC to provide the amenity in the future.

We refer the Board to Dwg. No. 1618-OMP-00-00-DR-A-XX-10010 'Masterplan' and Dwg. No. 1618-OMP-00-00-DR-A-XX-11002 'Site Plan Page 3 of 4', prepared by O'Mahony Pike Architects which shows the corridor which is maintained on the eastern side of the existing rail line so as not to prejudice the delivery of the East Coast Cycle Trail.

### **Tree & Hedgerows**

Based on Map 14 of the Development Plan (above), there is a specific objective "to protect and preserve trees and woodlands" on the site. Policy OSR7 – Trees and Woodlands sets out that it is the Council policy to ensure that tree cover in the County is managed and optimised. Trees, groups of trees and woodland should be preserved wherever possible. Within Chapter 8 – Principles of Development of the Development Plan it states that existing significant on-site natural features must influence the layout.

The proposed residential development will necessitate the re-grading of the site in certain areas and the provision of a large amount of on-site surface water attenuation. Furthermore, a number of the trees on site are in poor condition. These factors will result in the loss of existing trees particularly in the southernmost extent of the Corridor Park, which represents the lowest point on site.

Trees are being retained where feasible within the Corridor Park, the local pocket park and along Woodbrook Avenue and development is suitably setback from site boundaries to facilitate retention of mature trees, which are most significant along site boundaries, particularly to the south and west. Furthermore, suitable replacement planting will be introduced to augment the retained trees on site.

The most significant trees at Woodbrook define the perimeter of the overall landholding, particularly to the south and west. Development is set back from all site boundaries so as not to interfere with these mature trees.

We refer to the Board to the Arboricultural Report and Tree Survey Drawings prepared by The Tree File Consulting Arborists Ltd. which general summarises that: -

*"In this instance, **direct tree losses have been minimised because of the extent of open land within the "red line" area.** Nonetheless, tree losses are unavoidable, particularly across the central areas, however, the choice of unavoidable loss was based on likely survival over time and particularly the substantial groups of naturally regenerating Elm woodland that is at imminent risk of loss to Dutch Elm disease, an issue already widespread across the county and indeed has been recorded on the subject site. Additionally, the design team were aware that **a notable proportion of trees across the site were of poor quality or in a state of deterioration that would undermine any realistic expectation of retention, regardless of development extent or nature.** Nonetheless, **many boundary belts will be retained intact, thereby retaining an ongoing outward façade to the site.** This is particularly notable to the west of the site where other than the access road punctuations, the overall aspect from the Bray to Shankill road will remain broadly unchanged."*

The Arboricultural Report sets out tree protections measures to protect trees to be retained during construction which are illustrated in the Tree Protection Drawings.

### 11.1.3 Residential Development

#### **Policy RES3 Residential Density**

*It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. In promoting more compact, good quality, higher density forms of residential development it is Council policy to have regard for the policies and objectives contained in the following Guidelines:*

*'Sustainable Residential Development in Urban Areas' (DoEHLG 2009)*

*'Urban Design Manual - A Best Practice Guide' (DoEHLG 2009)*

*'Quality Housing for Sustainable Communities' (DoEHLG 2007)*

*'Irish Design Manual for Urban Roads and Streets' (DTTaS and DoECLG, 2013)*

*'National Climate Change Adaptation Framework - Building Resilience to Climate Change' (DoECLG, 2013)*

#### **Applicant's Response**

The proposed development seeks to provide 685no. units on a net site area of 8.8 Ha, resulting in a net density of 78no. units per Ha. This is above the minimum standard of 50no. units per Ha outlined by policy RES3 of the Development Plan. Within the overall Masterplan area a net density of at least 93no. units per Ha will be achieved.

Policy RES3 of the County Development Plan promotes higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development.

The Woodbrook – Shanganagh Local Area Plan 2017 – 2023 sets out that average minimum net density of 60no. units per Ha shall apply to the lands at Woodbrook.

A DART Station will be developed as part of the overall plan for the LAP area. The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station. The Local Area Plan lands fall within 1km of the indicative location for the proposed DART Station. On that basis, it is reasonable to consider that higher densities of min. 50no. units per Ha are to be encouraged.

The proposed development seeks to provide 685no. units on a net site area of 8.8 Ha, resulting in a net density of 78no. units per Ha. This is above the minimum standard of 50no. units per ha outlined by policy RES3 of the Development Plan and the average minimum of 60no. units per Ha set out in the Local Area Plan. The densities proposed are also in accordance with the National Planning Framework which encourages higher densities in proximity to existing and planned transport hubs.

In response to An Bord Pleanála's Opinion issued 14 January 2019 a robust rationale is provided in relation to the density achieved within the proposed development in Section 9.2 of the Planning Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which accompanies this SHD Planning Application. Further supporting information is set out in the Design Statement as prepared by O'Mahony Pike Architects.

**Policy RES7 Overall Housing Mix**

*It is Council policy to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the interim Housing Strategy.*

**Applicant's Response**

685no. residential units are proposed in this case, including a mix of 21no. different house types. These range from apartments, duplexes and houses, ranging in size and layout to accommodate a variety of household needs. The development includes 207 no. houses (detached, semi-detached and terraced), 430no. apartment units and 48no. duplex / apartment units.

The Phase 1 proposal includes a range of housing typologies to cater for a diverse range of household sizes, generally consisting of: -

- 130no. 1 bed units (19% of total units).
- 319no. 2 bed units (46.5% of total units).
- 163no. 3 bed units (24% of total units).
- 48no. 4 bed units (7% of total units).
- 25no. 5 bed units (3.5% of total units).

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

In response to An Bord Pleanála's Opinion issued 14 January 2019 a robust rationale is provided in relation to the housing mix achieved within the proposed development in Section 9.2 of the Planning Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which accompanies this SHD Planning Application. Further supporting detail and the architect's design rationale is set out in the Design Statement prepared by OMP Architects.

**Policy RES8: Provision of Social Housing**

*It is Council policy to promote the provision of social housing in accordance with the projects outlined in the Council's interim Housing Strategy and Government policy as outlined in the DoECLG 'Social Housing Strategy 2020'*

**Applicant's Response**

There has been on-going dialogue between Aeval and DLRCC Housing Department with regard Part V provision prior to making this SHD Planning Application. The proposed development will include the provision of 72no. units under Part V. These will include a mix of apartments, duplexes and houses.

We refer the Board to the Part V Proposal, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants on behalf of the Applicant which sets out the breakdown of the units proposed and the associated costs. Furthermore, we refer the Board to Part V Layout included as part of the Design Statement, prepared by O'Mahony Pike Architects illustrating the location of the units.

**Policy RES14 Planning for Communities**

*It is Council policy to plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide'. In all new development growth areas, and in existing residential communities it is policy to ensure that proper community and neighbourhood facilities are provided in conjunction with, and as an integral component of, major new residential developments and proposed renewal/redevelopment areas, in accordance with the concept of sustainable urban villages outlined under Policy RES15.*

**Applicant's Response**

The proposed residential development will be within 1km of the future Woodbrook DART Station which will support the development of a transport orientated residential development which is a key component of the 'Sustainable Residential Development in Urban Areas' Guidelines.

The Masterplan for the Woodbrook area prepared by the Applicant provides for approximately 1,402no. units in a mix of apartments and houses and results in a minimum net density of circa 93no. units per Ha which is consistent with the general planning policy to promote higher densities adjacent transport hubs. This layout includes the retention of the temporary surface car park proposed as part of this SHD Planning Application. Should the temporary surface car park become surplus to requirements in the future the Masterplan includes an optional layout to include 1,488no. units in a mix of apartments and houses on an enlarged residential site area and results in a net density of circa 96no. units per Ha

The layout of the proposed development has been designed having regard for the 'Urban Design Manual – A Best Practice Guide'. The proposed development provides a number of dedicated cycle / walkways within the overall layout of the scheme reflecting the preferred hierarchy of movement (i.e. walking > cycling > public transport > cars).

To ensure that the proper community and neighbourhood facilities are ultimately provided, the Applicant's Masterplan includes a Local Centre. The Local Centre will form a collection of buildings to the north of Woodbrook Avenue upon entering the site from Old Dublin Road and will include a creche, a mixed-use building with ground floor retail and commercial space with upper floor residential and a low rise pavilion building containing a café on the ground floor with residential above. To the north of this cluster of buildings is the site for the school. The creche building, including the residential units above forms part of the development now proposed. In line with the phasing of the LAP, the planned Local Centre will form part of the second phase of development at Woodbrook.

**11.1.4 Sustainable Travel & Transportation****Policy ST2 Integration of Land Use and Transportation Policies**

It is Council policy to actively support sustainable modes of transport and ensure that land use and zoning are fully integrated with the provision and development of high public quality transportation systems.

**Applicant's Response**

The proposed development will include the provision of the Woodbrook Avenue from the Old Dublin Road (R119) to the future Woodbrook DART Station. In addition to this, the Old Dublin Road will form part of the planned BusConnects Corridor 13, which will provide a high frequency bus service which will serve the development.

The provision of the Woodbrook DART Station and the proposed BusConnects Corridor will ensure that the future residential development is supported by sustainable modes of transport (i.e. train and bus) and encourage a modal shift away from the use of private cars.

Further detail with regard accessibility and access to public transport is set out in the Traffic and Transport Assessment, prepared by Atkins Consulting Engineers.



***Policy ST5: Walking and Cycling***

*It is Council Policy to secure the development of a high quality walking and cycling network across the County in accordance with relevant Council and National policy and guidelines.*

**Applicant's Response**

The proposed residential development is designed to ensure high levels of accessibility for those walking or cycling. Access to the future Woodbrook DART Station will be facilitated along the Woodbrook Avenue.

The layout of the scheme includes the provision 2 no. north / south links to Shanganagh Pubic Park along the Corridor Park and the Coastal Park as part of the proposed development.

Theses links will include dedicated walking and cycling paths to improve overall accessibility in addition to looped walks and cycle routes within the overall Woodbrook development.

The Design Statement, prepared by O'Mahony Pike Architects and the Landscape Masterplan, prepared by Brady Shipman Martin Landscape & Built Environment Consultants provide further detail with regard general connectivity within the site and to surrounding areas.

***Policy ST10 Street Lighting***

*It is Council policy to provide and maintain street lighting on the public road / footway / cycleways throughout the County in accordance with commonly accepted best practice.*

**Applicant's Response**

The Public Lighting Plan, prepared by Atkins Consulting Engineers is set out in accordance with the DLRC requirement with all streets and public paths having appropriately levels of lighting.

***Policy ST14 Public Transport Interchanges***

*It is Council policy to facilitate the provision of quality public transport interchanges at strategic Rail and Luas stations within the County in accordance with National and Regional guidelines in order to facilitate focussed access to multiple public transport modes and to maximize the movement of people via sustainable modes.*

**Applicant's Response**

The proposed development will include the provision of the Woodbrook Avenue from the Old Dublin Road (R119) to the proposed location for the Woodbrook DART Station. The development of Woodbrook Avenue supports the facilitation Woodbrook DART Station. The proposal also includes the provision of a temporary surface car park which will serve the future DART Station in the interim. The surface car park include taxi drop-off and bus set-down areas as well as bicycle parking and storage facilities.

A separate Planning Application is also to be made for the entire Avenue between the Old Dublin Road and the planned DART Station which is intended as a standalone application for this key piece of LIHAF funded infrastructure.

***Policy ST16 Rail Stations/Luas Stops***

*It is Council policy to co-operate with the NTA, Iarnrod Eireann, Transport Infrastructure Ireland and other relevant authorities to secure the improvement and further development of railway stations and Luas stops in the County.*

**Applicant's Response**

The Applicant has engaged with both DLRCC, Iarnrod Eireann and the NTA with regard the provision of Woodbrook Avenue, which is being funded under the LIHAF so as to ensure access to the future DART Station is secured. The proposed development will include the provision of the Woodbrook Avenue from the Old Dublin Road (R119) to the proposed location for the Woodbrook DART Station.

The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.

We refer the Board to the Design Statement, by O'Mahony Pike Architects and the Engineering Drawings, prepared by Atkins Consulting Engineers illustrating the layout of the temporary car park and the interface with the future DART Station. Details of the design of the future DART Station including pedestrian overpass, platforms, levels etc. have been provided to the Design Team by the NTA so as to ensure that the future station integrates effectively with the proposed development.

***Policy ST20 Travel Plans***

It is Council policy to require the submission of Travel Plans for developments that generate significant trip demand. Plans should seek to reduce reliance on car-based travel and encourage more sustainable modes of transportation over the lifetime of a development.

**Applicant's Response**

A Mobility Management Plan, prepared by Atkins Consulting Engineers is submitted with this SHD Planning Application.

This Mobility Management Plan sets out the strategy and measures proposed for the proposed development generally sets out a commitment to promoting alternatives and providing the means for active and sustainable travel choices to be made which include generally walking, cycling and public transport. The use of the car sharing scheme proposed will also be actively promoted.

***Policy ST23 Car Clubs***

*It is Council policy to support the set up and operation of Car Club schemes to facilitate an overall reduction in car journeys and car-parking requirements.*

**Applicant's Response**

It is proposed to provide 4no. car sharing (GoCar) spaces within the proposed Phase 1 development. Based on the uptake of the scheme there is potential to provide additional car sharing spaces. In overall terms car sharing spaces can replace up to 15no. traditional car parking spaces.

We refer to the Board to the Letter enclosed with this application, from GoCar Carsharing Ltd. outlining their interest in providing car sharing services within the proposed development. The final locations car sharing facilities will be agreed with the relevant operator once permission is granted.

***Policy ST25 Roads***

*It is Council policy, in conjunction and co-operation with other transport bodies and authorities such as the TII and the NTA, to secure improvements to the County road network - including improved pedestrian and cycle facilities.*

The Woodbrook/Shanganagh Access Road features in Table 2.2.5 as a Six Year Road Objective.

**Applicant's Response**

The proposed development will include the provision of the main Avenue from the Old Dublin Road (R119) to the proposed location for the Woodbrook DART Station.

A separate Planning Application is also to be made for the entire Avenue between the Old Dublin Road and the planned DART Station which is intended as a standalone application for this key piece of LIHAF funded infrastructure.

The planned upgrades to the Wilford junction are being progressed separately by DLRCC with funding provided by LIHAF.

The proposed development will include a series of pedestrian / cycle paths which have been co-ordinated with DLRCC to ensure appropriate connections are made from Old Dublin Road (R119) to provide future cycle lanes and connections to Shanganagh Public Park to the north of the application site. Furthermore, provisions have been made for potential future connections for pedestrians / cyclists to the south should the development of adjacent third party lands facilitate same.

The 30ft wide corridor between the rail line and the lands for the 2no. replacement golf holes have been retained specifically to ensure that the delivery of the east coast trail was not prejudiced. Therefore, the East Coast Cycle Trail will not be impacted upon as a dedicated corridor of land will remain available for DLRCC to provide this amenity in the future.

***Policy ST27 Traffic and Transport Assessments and Road Safety Audits***

*It is Council policy to require Traffic and Transportation Assessments and/or Road Safety Audits for major developments - in accordance with the TII Traffic and Transport Assessment Guidelines 2014 - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.*

**Applicant's Response**

A Traffic and Transportation Assessment and Quality Audit (including Road Safety Audit), prepared by Atkins Consulting Engineers are submitted with this SHD Planning Application.

***Policy ST28 Traffic Noise***

*It is Council policy to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.*

**Applicant's Response**

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

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

**11.1.5 Landscape, Heritage & Biodiversity*****Policy LHB6 Views and Prospects***

*It is Council policy to protect and encourage the enjoyment of views and prospects of special amenity value or special interests.*

**Applicant's Response**

The existing landscape is the key asset which establishes the character of the site. In line with the Woodbrook – Shanganagh Local Area Plan 2017 – 2023, it is proposed to make best use of this asset as a generator for the urban form.

This SHD Planning Application is accompanied by an EIAR which includes a Landscape and Visual Impact Assessment Chapter, prepared by Brady Shipman Martin Landscape & Built Environment Consultants which assesses the impact for the proposed development in relation to views and prospects.

The Landscape and Visual Impact Chapter sets out that the views to and from the site are restricted by mature boundary planting and the nature of surrounding land uses. Therefore, views to and from the site are limited and the following are considered as sensitive visual receptors: -

- Views along R119 Dublin Road and from areas west of the road.
- Views of users from within Shanganagh Park and Cemetery.
- Views from Woodbrook Golf Course and Clubhouse.
- Views to and from Crinken Church, a protected structure.
- Views from with the small residential estate of St Anne’s Park, Shankill.
- Views from properties south of the site.
- Views from more distant elevated vantages, including those protected in the County Development Plan and Local Area Plan.
- Views of the generally dark nature of the Site at night-time.

Photomontages, prepared by Brady Shipman Martin Landscape and Built Environment Consultants, illustrated the proposed development in the context of the views outlined above (17no. views in total) are enclosed within this SHD Planning Application. Section 13.7.3 of the Landscape and Visual Impact Chapter of the accompanying EIAR provides an assessment of all these views which are generally identified as having no impact, minor neutral impact and medium negative impact.

Notwithstanding, it is noted that on completion, the disturbance and change associated with the construction stage will be gradually altered by the influence that the new development establishes on the character and visual context of its environs.

In this regard it is considered that the proposed development will have residual moderate local impacts on the landscape character of its environs. These impacts will be viewed as being negative in the short-term, but the effect of the establishment of the new residential neighbourhood also has the potential to be viewed as a neutral or positive intervention in the longer-term.

***Policy LHB23 Non-Designated Areas of Biodiversity Importance***

*It is Council policy to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy regard shall be had to the recommendations and objectives of the Green City Guidelines (2008) and ‘Ecological Guidance Notes for Local Authorities and Developers’ (Dún Laoghaire- Rathdown Version 2014).*

**Applicant’s Response**

Full details of the likely impacts of the proposed development on ecological receptors are included in the EIAR Biodiversity Chapter, prepared by Brady Shipman Martin Landscape & Built Environment Consultants. The Chapters sets out that: -

*“No designated conservation areas will be impacted in any way by the proposed development and no mitigation measures are required in this regard. Full details are provided in the accompanying report – Information for Screening for Appropriate Assessment.”*

The Information for Screening for Appropriate Assessment Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants concludes that: -

*“...on the best scientific evidence that it can be clearly demonstrated that no elements of the project will result in any likely significant impact on any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives. Based on these conclusions a Stage 2 Natura Impact Statement is not required for the proposed development.*

*As such no mitigation measures are required for the protection of any European sites.*

*It is considered that this report provides sufficient relevant information to allow the Competent Authority (An Bord Pleanála) to carry out an AA Screening, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives.”*

#### **Policy LHB26 Hedgerows**

*It is Council policy to protect hedgerows in the County from development, which would impact adversely upon them. It is Council policy to promote the County’s hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance.*

#### **Applicant’s Response**

Within the development site, existing trees and hedgerows are retained where practicable. In some instances, the proposed development and required levels will necessitate the removal of existing internal hedgerows and tree lines. Replacement planting and habitat creation will be developed in order to mitigate potential biodiversity impacts that may arise. A series of retained trees to the north of Woodbrook Avenue will be incorporated into a new linear open space corridor not identified in the LAP. The retained trees are naturally more organic in their arrangement, contrasting with the ordered structure of trees lining the avenue, either side of the carriageway.

An Arboricultural Report and Tree Survey Drawings prepared by The Tree File Consulting Arborists Ltd. provide an overview of the quality of existing trees on site and supporting rationale for the removal as part of the proposed development. The Report generally summarises that: -

*“In this instance, **direct tree losses have been minimised because of the extent of open land within the “red line” area.** Nonetheless, tree losses are unavoidable, particularly across the central areas, however, the choice of unavoidable loss was based on likely survival over time and particularly the substantial groups of naturally regenerating Elm woodland that is at imminent risk of loss to Dutch Elm disease, an issue already widespread across the county and indeed has been recorded on the subject site. Additionally, the design team were aware that **a notable proportion of trees across the site were of poor quality or in a state of deterioration that would undermine any realistic expectation of retention, regardless of development extent or nature.** Nonetheless, **many boundary belts will be retained intact, thereby retaining an ongoing outward façade to the site.** This is particularly notable to the west of the site where other than the access road punctuations, the overall aspect from the Bray to Shankill road will remain broadly unchanged.”*

The Landscape Masterplan, prepared by Brady Shipman Martin Landscape & Built Environment Consultants demonstrate tree planting proposed to augment the existing trees within the site to provide additional natural coverage where possible.

#### **Policy OSR1 Green Infrastructure Strategy**

*It is Council policy to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development of new green infrastructure, recognising the synergies that can be achieved with regard to the following, sustainable transport, provision of open space amenities, sustainable management of water, protection and management of biodiversity and protection of cultural and built heritage.*

#### **Applicant’s Response**

In accordance with the Local Area Plan objectives the landscape concept responds to the existing site character. The north south and east west axes set up by the vegetation of the site provides a structure to the proposed development. These linear field boundaries have been utilised where feasible as linear parks and landscape corridors which provide connections and permeability through the development and beyond in accordance with the LAP.

Further development of the concept resulted in the creation of a series of linear parks supplemented by additional smaller pocket parks. The green spaces and corridors are connected via east west link streets and the overall development is set within a mature boundary of trees. This green infrastructure provides the structure and backbone to the proposed scheme.

The Landscape Masterplan and Landscape Design Report, prepared by Brady Shipman martin Landscape & Built Environment Consultants provide a rationale as to how the existing natural feature of the site have played a role in shaping the layout of the proposed scheme.

***Policy OSR14 Play Facilities***

*It is Council policy to support the provision of structured and unstructured play areas with appropriate equipment and facilities throughout the County and to ensure the needs of all age groups and abilities - children, teenagers, adults and older people - are facilitated in the public parks of Dún Laoghaire- Rathdown.*

**Applicant's Response**

The proposed development provides both informal and formal play opportunities that are linked into the landscape. The linear parks and green links comprise different landscape character zones for formal and informal play. The coastal park weaves along the eastern boundary and is informal in character. Along the route of the pedestrian/ cycle route are natural play features such as timber logs, low undulating play mounds and outdoor exercise equipment.

The direct relationship between the Woodbrook lands and Shanganagh Park to the north is enhanced by the direct provision as part of this Phase 1 development of pedestrian / cycle linkages to those Park lands to the north which will accommodate access by future residents to the amenities of this Regional Park and facilitate access south to Woodbrook DART Station

The Landscape Masterplan and Landscape Design Report, prepared by Brady Shipman martin Landscape & Built Environment Consultants provides further detail with regard the play areas proposed as part of the proposed development.

**11.1.6 Environmental Infrastructure and Management**

***Policy E18 Sustainable Drainage Systems***

*It is Council policy to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).*

**Applicant's Response**

The surface water network proposed has been designed to cater for the entire Woodbrook – Shanganagh Local Area Plan. The Sustainable Urban Drainage System (SuDS) measure employed as part of the proposed development are broadly set out as follows: -

- Underground attenuation.
- Swales.
- Tree pits.
- Porous / permeable paving.
- Green roofs on apartment blocks.

- Filter drains.

There has been extensive dialogue between DLRCC Drainage Department and Atkins Consulting Engineers in terms of design of the surface water network, classification of appropriate soil types and surface water run-off rates.

The surface water will be discharged at greenfield run-off rates along the southern boundary of the site in a westerly direction to the Old Dublin Road (R119) and then continuing along the Old Dublin Road in a southerly direction until discharge to the existing culverted section of the Crinken Stream at the location of Woodbrook College.

The proposed surface water infrastructure has been sized so as to accommodate not just the development of the Applicant's lands, but also the development of the lands at Shanganagh to be developed by DLRCC.

With regard to the surface water management of the 2no. replacement golf holes SuDS measures will include an attenuation area and vortex flow control. Additional attenuation storage is to be provided within the natural valley of existing golf course lands prior to discharge to existing storm drainage network. Atkins Consulting Engineers have liaised with DLRCC Drainage Department in relation to the surface water management of the proposed replacement golf holes also.

In accordance with Dún Laoghaire Rathdown County Council Development Plan a Stormwater Impact Assessment Report has been carried out along with an independent Stormwater Audit, prepared by Punch Consulting Engineers on behalf of DLRCC. These Reports have informed the Site Specific Flood Risk Assessment, prepared by Atkins Consulting Engineers which sets out the site is considered to be located within Zone C, therefore, there is a low probability of flooding.

#### ***Policy EI9 Stormwater Impact Assessments***

*It is Council policy to ensure that all new significant developments prepare a Stormwater Impact Assessment which incorporate Stormwater Audits in accordance with the Council's Stormwater Management Plan Guidance Document and the Council's Development Management Thresholds Information Document.*

#### **Applicant's Response**

A Storm Water Impact Assessment has been prepared by Atkins Consulting Engineers which includes an independent Stormwater Audit, prepared by Punch Consulting Engineers on behalf of DLRCC. These have been issued to DLRCC Drainage Department and agreement in principle has been reached.

### **11.1.7 Archaeological and Architectural Heritage**

#### ***Policy AH2: Protection of Archaeological Material in Situ***

*It is Council policy to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and / or recommendations of the Department of Arts, Heritage and the Gaeltacht (DoAHG).*

#### **Applicant's Response**

This SHD Planning Application is accompanied by and EIAR which includes a Cultural Heritage (Archaeology) Chapter, prepared by the Irish Archaeological Association Ltd. which assesses the impact for the proposed development in relation to potential archaeology. The application site has had the following archaeological testing carried out: -

- A geophysical survey was undertaken to inform this assessment in November and December 2018 and February 2019 within the proposed development site.

- A programme of archaeological testing based on the results of the geophysical survey was carried out within the proposed development area in April 2019. This was undertaken by Liza Kavanagh of IAC under licence 19E0098.

In conclusion the Cultural Heritage (Archaeology) Chapter noted that: -

*“Archaeological investigations and recorded monuments in the wider environs provide evidence of human activity from the Bronze Age and the post-medieval period. The presence of a fulacht fia (RMP DU026-116) c. 290m to the west and a Bronze Age burial site (RMP DU026-067) c. 340m to the west show the presence of Bronze Age populations in the surrounding landscape. This presence was confirmed within the proposed development area by a geophysical survey, carried out within the proposed development area under licence 18R0223. Possible ring ditches of Bronze Age date were identified during the survey. A programme of archaeological testing targeted the geophysical survey anomalies and was carried out under licence 19E0098. This revealed 17 potential archaeological areas including a large Bronze Age enclosure and two small ring ditches. Testing also confirmed the presence of a possible early medieval enclosure containing the remains of an adult male inhumation, 12 linear features, 25 scattered pits and a post medieval/ modern red-brick well with associated drainage.”*

The Chapter determines that the archaeological sites within the application site will be preserved by record (archaeological excavation), prior to construction taking place. This will be carried out under the direction of a licence eligible archaeologist, in consultation with the National Monuments Service of the DoCHG and the National Museum of Ireland.

#### **Policy AR1: Record of Protected Structures**

*It is Council policy to: -*

- ii. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- iii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011).*

#### **Applicant’s Response**

This SHD Planning Application is accompanied by an EIAR which includes a Cultural Heritage (Architectural) Chapter, prepared by the Cathal Crimmins Conservation Architects which assesses the impact for the proposed development in relation to features of architectural interest adjoining the site. The application site does not contain any Protected Structures. In general, it noted that: -

- The proposed development will not have a direct physical impact on any of the adjoining protected structures, buildings of architectural significance or adjoining demesnes as no works are proposed at these sites.
- The proposed new access of the R119 will involve removing a section of the existing boundary wall. Pedestrian entrances at the north end of the western boundary to the R119 and at the south end will also necessitate removing some sections of the boundary wall. If the removal of the boundary wall is limited to the three proposed access points (two pedestrian and one vehicular), the majority of the wall will be retained, and the impact will not be significant.
- Although Crinken Church (a protected structure) is located close to the red line of the subject site, the proposed development has been intentionally set back so as to avoid an indirect or direct visual impact on the church.
- The proposed development will be largely masked or obscured from adjoining demesnes and protected structures as most of the existing planting and trees on the boundary are being retained. There will be no anticipated indirect impacts on the local Cultural Heritage resource.



### 11.1.8 Community Facilities

#### **Policy SIC 7 New Development Areas**

It is Council policy to ensure that proper community infrastructure and complementary neighbourhood facilities are provided concurrently with the development of new residential growth nodes in the County.

#### **Applicant's Response**

A childcare facility (c. 429 sq. m) is proposed as part of Phase 1. This is located adjacent the future Local Centre and future educational facility which will be subject to future separate Planning Applications. These facilities are clustered together to ensure the community facilities are within convenient walking distance of each other.

The Local Centre and associated Plaza is to be incorporated into Phase 2 which will be located in a distinct character area. The Local Centre will comprise of a mixed-use building with an element of ground floor retail and commercial space, with residential on the upper floors, and a low rise pavilion building containing a café on the ground floor with residential above.

The Masterplan, prepared by O'Mahony Pike Architect which shows the cluster of community facilities on the northern side of Woodbrook Avenue adjacent the proposed new entrance of the development and east of St. James Church.

### 11.1.9 Urban Design

#### **Policy UD1 Urban Design Principles**

*It is Council policy to ensure that all development is of high quality design that assists in promoting a 'sense of place'. The Council will promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013) and will seek to ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.*

#### **Applicant's Response**

The proposed design closely aligns with the design standards outlined in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013) Guidelines. Section 10.4.2 of this Report and the Design Statement, prepared by O'Mahony Pike Architects sets out in detail how the principles of these Guidelines are incorporated in the proposed development.

#### **Policy UD3 Public Realm Design**

*It is Council policy that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.*

#### **Applicant's Response**

The proposed public realm is designed in accordance with the best practice guidelines and provides a distinctively designed landscape and streetscape. The masterplan proposes a variety of character areas, loosely grouped along Woodbrook Avenue. The character areas are defined by the building uses, heights, built form, materials and densities, proximity to public transport nodes and relationship to landscape and views.

The architectural massing and treatment is intended to form a contrast between formal building lines with strongly defined edges, parapets and corners. In relation to the proposed development, the general character areas can broadly be described as: -

- **Old Dublin Road**

The south-west housing character area creates a defined building edge to the entrance to proposed development. The building line is set back to create a green buffer that will benefit from the retention of the mature treeline (except where openings are made for the vehicular entrance and cycle lane) along Old Dublin Road. The buildings fronting Old Dublin Road and Woodbrook Avenue are generally 3 to 4 storeys in height and the remainder of housing towards the more sensitive southern boundary are generally 2 storeys in height.

- **Local Centre**

On entering the development site, a collection of three buildings to the north of Woodbrook Avenue form the Local Centre. Block D completes the frontage to Old Dublin Road and is the only part of the Local Centre being delivered under Phase 1. It includes a creche at ground floor level and apartments above. The building is 4 to 5 storeys in height and is similarly set back from the Old Dublin Road treeline as development frontage on the southern side of Woodbrook Avenue.

The remainder of the Local Centre will be developed in Phase 2 and will consist of a mixed-use building with an element of ground floor retail and commercial space, with residential on the upper floors, and a low rise pavilion building containing a café on the ground floor with residential above. To the north of this cluster of buildings a site has been earmark for the future development of a primary school.

- **Woodbrook South**

The Woodbrook South housing character area responds to the more sensitive southern boundary of the application site. This area will include a finer grain of local streets which are predominantly 'homezone' layouts. Generally, Woodbrook Avenue is fronted by 4 storey buildings which generally reduce in size to 2 storey housing further south.

- **Park Edge**

The Park Edge character area will see the development of 3no. courtyard apartment blocks. These will form a strong building line onto the eastern site of Woodbrook Avenue and will also provide a defined edge to the proposed Coastal Park which runs north to south along the eastern boundary of the application site. The apartment block range between 5 to 8 storeys. The arrangement of the courtyard blocks are such that the communal areas provided front onto the linear park and the arrangement ensure that the Coastal Park will benefit from passive surveillance. Block A includes an 8 storey building (or focal point) which is positioned at the end of Woodbrook Avenue and is indented to act as a focal point and enhance legibility within the proposal.

The Avenue is a wide, multi-modal road, with designated provision for pedestrians, cyclists and vehicles, as well as soft landscaping.

The proposed development provides for a high standard of residential amenity for the future residents of the subject proposal and mitigates against any possible effects such as overlooking, protection of privacy and access to sunlight and daylight.

The Design Statement, prepared by O'Mahony Pike Architects provides further detail in relation to the character areas within the scheme including materiality, street typologies and landscaping.

***Policy UD6 Building Height Strategy***

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

### **Applicant's Response**

The proposed building height range from 2 to 8 storeys. Generally, the building heights step down towards the more sensitive boundaries toward the south of the site. Increased densities and building heights are achieved in the direction of the future DART Station in the north east of the application site.

Section 10.4.5 of this Report set out the proposed heights in the context of the Building Height Guidelines (2018) which are modestly above the prescribed heights set out in the Woodbrook – Shanganagh Local Area Plan 2016 – 2023.

A separate Material Contravention Statement accompanies this SHD Planning Application setting out how the proposed building height for apartment Block A which includes an 8 storey element is appropriate given the context of the site and having regard for national planning policy and the Opinion of An Bord Pleanála post Pre-Planning Consultation.

## **11.1.10 Development Management**

### **Separation Distances**

Section 8.2.3.3 of the Development Plan states that a separation distance of 22m should generally be provided between directly opposing above ground floor windows to maintain privacy, particularly apartment developments and those over three storeys high.

### **Applicant's Response**

We refer to the Site Layout Plans, prepared by O'Mahony Pike Architects which demonstrate that directly opposing units have achieved sufficient separation distances.

### **Public / Communal Open Space – Quantity**

Section 8.2.8.2 of the Development Plan states that shall require an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space.

### **Applicant's Response**

The Woodbrook – Shanganagh Local Area Plan 2017 – 2023 sets out that the overall public open space requirement for the Local Area Plan lands is 3.3 Ha.

The Masterplan as set out by O'Mahony Pike Architects provide 3.4 Ha of public open space which is compliant with the requirements of the Local Area Plan.

2.96 Ha of this public open space is provide in Phase 1 alone. The green links which provide access to Shanganagh Public Park have been included on foot of consultation with DLRCC and will provide direct access to an extensive Shanganagh Public Park (Regional) for future residents of Woodbrook in conjunction with meeting the required open space quantum as set out in the Local Area Plan.

## 11.2 Woodbrook – Shanganagh Local Area Plan 2017 – 2023

The design of the proposed development on these lands has been guided by the LAP that was adopted by the Council for these lands.

The following table provides an overview of the Objectives contained within the Woodbrook - Shanganagh Local Area Plan 2017 – 2023 (hereafter referred to as the LAP), which are considered to be relevant to the proposed development in our professional opinion.

It is acknowledged that the approach taken to the LAP by the Council in preparing the LAP was holistic and that the Applicant has followed through on that approach in devising these proposals.

<b>Objective WB1</b>	<b>Applicant's Response</b>
<p><i>The Woodbrook Neighbourhood is to comprise primarily of residential development with supporting mixed-uses and community facilities clustered primarily at the Neighbourhood Centre.</i></p>	<p>The proposed development is for predominantly residential development. The initial Phase 1 development will include 685no. residential units and a childcare facility (approximately 429 sq. m).</p> <p>Phase 2 will include the development of the Local Centre which will include a mix of commercial and retail uses. These uses will be at ground floor level with residential units above.</p>
<b>Objective WB2</b>	<b>Applicant's Response</b>
<p><i>The new residential neighbourhood shall provide for a range of housing typologies and shall be designed in accordance with DMURS.</i></p>	<p>It is proposed to provide a broad mix of housing types in this phase of the proposed development. The proposed mix will generally include: -</p> <p><b>Houses (207no. units total)</b></p> <ul style="list-style-type: none"> <li>• 134no. 3 bed houses.</li> <li>• 48no. 4 bed houses.</li> <li>• 25no. 5 bed houses.</li> </ul> <p><b>Apartments (143no. units total)</b></p> <ul style="list-style-type: none"> <li>• 130no. 1 bed apartments.</li> <li>• 294no. 2 bed apartments.</li> <li>• 6no. 3 bed apartments.</li> </ul> <p><b>Duplexes (63no. units total)</b></p> <ul style="list-style-type: none"> <li>• 25no. 2 bed duplexes.</li> <li>• 23no. 3 bed duplexes.</li> </ul> <p>All internal roads have been designed in accordance with DMURS.</p>
<b>Objective WB3</b>	<b>Applicant's Response</b>
<p><i>A general building height range of 3-5 stories will be sought, with appropriate heights along any sensitive site boundaries (2-4 stories) and thereafter a transition to higher building heights towards the centre of the site and along the main avenue; with a general building height range of 3-4-5 stories (plus setback), and rising to a maximum of 6 stories, unless a compelling urban design case is otherwise made for reasons of legibility, place-making and identity.</i></p>	<p>The height range for proposed buildings is between 2 to 8 storeys. Generally this in accordance with the spirit of the Local Area Plan.</p> <p>Subject to Pre-Planning Consultation discussions with An Bord Pleanála consideration was given to additional height, in excess of the Local Area Plan requirements along the eastern and north east corner of the application site.</p> <p>Section 9.2 of this reports set out in detail the justification for this. Furthermore, a Material Contravention Statement accompanies this SHD Planning Application setting out the context of the changes to building height which deviate from this objective.</p>

<b>Objective WB4</b>	<b>Applicant's Response</b>
<p><i>A landmark structure may be provided at the Neighbourhood Centre, the height and precise location shall be subject to a design analysis and an assessment of views on approach to the neighbourhood centre and also having regard to the relationship with and potential impact on St. James Church (Protected Structure). The higher element of any landmark structure shall be of slender proportions.</i></p>	<p>The Local Centre will be the focus of a future phase of development of Woodbrook.</p> <p>It is anticipated that the Local Centre will include retail / commercial uses and the potential development of a café / restaurant within a pavilion block on the western side of the proposed public plaza.</p> <p>The Masterplan, prepared by the Applicant, includes consideration of the view towards St. James Church which will be 'framed' by the future Local Centre block by aligning the northern elevation of the block with the axis of the view to St. James Church.</p> <p>It is anticipated, that the future Local Centre block will range in height from 3 to 5 storeys with the 5 storey element presenting a strong building line towards the Main Avenue and stepping down northwards to 3 storeys having regard for the view of St. James Church to the northwest.</p>
<b>Objective WB5</b>	<b>Applicant's Response</b>
<p><i>Ensure that the scale of buildings responds to the street hierarchy and character, and affords an appropriate degree of enclosure to key civic spaces.</i></p>	<p>The proposed development has been designed to take into account the hierarchy of streets and character areas. The main heights within the proposal are centred along the Main Avenue, with heights generally being between 4 and 7 storeys.</p> <p>The design of the development also responds to the planned key civic spaces. The linear north / south links are overlooked by residential units as part of the proposed development to ensure appropriate passive surveillance.</p> <p>The future civic plaza will include active frontage (retail / commercial uses at ground level and the potential development of a café / restaurant within a pavilion block on the western side of the proposed public plaza) to ensure activity and footfall is generated within this space. The building heights in this area will generally be 3 – 6 storeys to ensure a suitable level of enclosure for the civic space.</p>
<b>Objective WB6</b>	<b>Applicant's Response</b>
<p><i>The ground floor units in the Neighbourhood Centre shall be designed with a commercial floor-ceiling height of circa 4m to potentially cater for active uses.</i></p>	<p>The Local Centre does not form part of this current phase of development. It is anticipated that the Neighbourhood Centre will include retail / commercial uses at ground level and the potential development of a café / restaurant within a pavilion block on the western side of the proposed public plaza. Ground floor units will meet the floor-ceiling height indicated.</p>
<b>Objective WB7</b>	<b>Applicant's Response</b>
<p><i>Own-door housing will be promoted across all typologies, including apartments at ground floor level, to achieve a moderately active frontage on key routes.</i></p>	<p>Along the full length of Woodbrook Avenue there is own-door housing to the south.</p> <p>The apartment block to the east of Woodbrook Avenue, adjacent Coastal Park have tenant amenity areas and cores at street level which provide animation and active frontages.</p> <p>A similar approach will be taken in the detailed design of Phase 2 to ensure the other side of Woodbrook Avenue is treated similarly.</p>

<b>Objective WB8</b>	<b>Applicant's Response</b>
<p><i>The DART Station will require a design approach to ensure successful integration to the urban form and landscape context. It will also require a co-ordinated approach between the relevant landowners and statutory transport agencies (NTA/EI).</i></p>	<p>Woodbrook Avenue is being provided as part of this development as far as the DART Station location to facilitate it's future development.</p> <p>The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.</p> <p>We refer the Board to the Design Statement, by O'Mahony Pike Architects and the Engineering Drawings, prepared by Atkins Consulting Engineers illustrating the layout of the temporary car park and the interface with the future DART Station. Details of the design of the future DART Station including pedestrian overpass, platforms, levels etc. have been provided to the Design Team by the NTA so as to ensure that the future station integrates effectively with the proposed development.</p> <p>A future phase of development will focus upon the area around the intended DART station.</p>
<b>Objective WB9</b>	<b>Applicant's Response</b>
<p><i>Ensure that new development respects the significance of adjoining Protected Structures and represents an appropriate response to historic spatial context and landscape setting.</i></p>	<p>The Masterplan, prepared by the Applicant, includes consideration of the view towards St. James Church which will be 'framed' by the future Neighbourhood Centre block by aligning the northern elevation of the block with the axis of the view to St. James Church.</p> <p>The Protected Structures located to the south of the development site (Woodbrook House and associated Gate Lodges, Out Offices and Folly) will be effectively screened from the proposed development by the existing mature trees along the southern boundary. Notwithstanding, the building height of the proposed houses generally step down to 2 storeys along the southern boundary resulting in relatively limited impact on adjoining Protected Structures.</p> <p>This SHD Planning Application is accompanied by an EIAR which includes a Cultural Heritage (Architectural) Chapter, prepared by the Cathal Crimmins Conservation Architects which assesses the impact for the proposed development in relation to features of architectural interest adjoining the site. The Chapter generally concludes that there will be limited impact on protected Structures in proximity to the site.</p>
<b>Objective WB10</b>	<b>Applicant's Response</b>
<p><i>The Woodbrook Site shall achieve an overall average <b>minimum</b> net density of <b>60 units per hectare</b> and deliver a minimum of 1,000 and a maximum of 1,320 residential units.</i></p>	<p>The net density of the proposed development will be approximately 78no. units per Ha.</p> <p>The full development of Woodbrook (Phase 1 &amp; future phases) will result in an overall net density of 93no. units per Ha (c. 1,402no. residential units), as can be seen from the enclosed Masterplan.</p> <p>This layout includes the retention of the temporary surface car park proposed as part of this SHD Planning Application. Should the temporary surface car park become surplus to requirements in the future the Masterplan includes an optional layout to include 1,488no. units in a mix of apartments and houses on an enlarged residential site area and results in a net density of circa 96no. units per Ha.</p>

<b>Objective WB11</b>	<b>Applicant’s Response</b>
<p><i>Proposals for development shall generally accord with the height range as indicated in Drawing 2, to ensure an appropriate mix of residential typologies and place-making qualities within the resultant urban form.</i></p>	<p>The height range for proposed buildings is between 2 to 8 storeys. In line with the LAP document, proposed buildings along sensitive boundaries are generally 2 storey. The main heights within the proposal are centred along the Avenue, with heights generally being between 4 and 7 storeys.</p> <p>A range of housing typologies are proposed including detached, semi-detached and terraced houses, duplexes, terraced duplexes and apartments. The varying typologies will reflect the general character areas emerging as part of the proposed development, including: -</p> <ul style="list-style-type: none"> <li>• <b>Woodbrook South &amp; Old Dublin Road</b></li> </ul> <p>This Character Area contains c. 207no. residential units (houses), with proposed house units ranging predominantly between 2 and 3+ storeys, with the higher units addressing the proposed Woodbrook Avenue. A corner duplex / apartment block is positioned at the main entrance to the Woodbrook site providing definition to the entrance of the development opposite the proposed creche building (with residential over) between 3 – 4 storeys.</p> <ul style="list-style-type: none"> <li>• <b>Park Edge</b></li> </ul> <p>The Park Edge character area will contain 3no. courtyard blocks. The blocks vary in height between 5 and 8 storeys, which breaks up their massing and provides varied elevations on all street fronts. A variety of brick types, in combination with a rendered facade finish are used, which creates a varied and rich elevational design.</p> <p>The proposed development is broadly consistent with Drawing 2 of the LAP.</p>
<b>Objective WB12</b>	<b>Applicant’s Response</b>
<p><i>A relaxation of private open space standards for terraced, semi-detached or detached housing and car parking provision will be considered in order to achieve higher sustainable densities.</i></p>	<p>In total, 380no. car parking spaces are provided for houses. Car parking provision for houses is broadly allocated in line with requirements of the Development Plan. The standards provided as part of the proposed development are: -</p> <ul style="list-style-type: none"> <li>• 1.5 – 2no. spaces per 3 bed units.</li> <li>• 2no. spaces per 4 and 5 bed units.</li> </ul> <p>The above provisions are marginally reduced compared to the nominal Development Plan standard. Such relaxation of the parking standard is specifically provided for under Objective WB12 of the Local Area Plan. However, given the proposed developments prominent location in vicinity of existing good public transport services along the R119 Dublin Road, the Applicants commitment to provision of a car sharing scheme for the Phase 1 development and the future public transport provisions in the form of BusConnects and the DART Station, the proposed parking provisions are considered to be appropriate and in accordance with the proper planning and sustainable development of the area.</p> <p>Car parking provisions for apartments and duplexes accord with the Department of Planning, Housing and Local Governments Design Standards for New Apartments (March 2018).</p> <p>The proposed development provides approximately 1no. parking space per apartment / duplex.</p>

<b>Objective WB13</b>	<b>Applicant's Response</b>
<p><i>Apartment developments to cater for a mix of household sizes and as such proposals shall comply with the following mix of units: 10% Studio Units (as part of build to let development); not more than 20% of Units shall be 1 Bed Units (30% with reallocation of the Studio Units); a range of Min. 40% - Max. 60% shall be 2 Bed Units; and a range of Min. 20% - Max. 40% shall be 3 Bed Units.</i></p>	<p>478no. apartments and duplexes proposed. As such the total apartment type mix of development is as follows: -</p> <ul style="list-style-type: none"> <li>• 1 bed – 27%</li> <li>• 2 bed – 67%</li> <li>• 3 bed – 6%</li> </ul> <p>We note that the apartment mix is generally in accordance with Objective WB13.</p> <p>In relation to the mix of 3 beds required, the New Apartment Guidelines 2018 specify under <i>Specific Planning Policy Requirement 1</i> in relation to unit mix that there 'shall be no minimum requirement for apartment with three or more bedrooms'. These National Guidelines supersede the provisions of the Local Area Plan.</p> <p>We submits that 685no. residential units are proposed, including a mix of 21no. different unit types. These range from apartments, duplexes and houses, ranging in size and layout to accommodate a variety of household needs. The following breakdown of unit size is proposed: -</p> <ul style="list-style-type: none"> <li>• 1 Bed: 130 (19% of total units).</li> <li>• 2 Bed: 319 (46.5% of total units).</li> <li>• 3 Bed: 163 (24% of total units).</li> <li>• 4 Bed: 48 (7% of total units).</li> <li>• 5 Bed: 25 (3.5% units).</li> </ul> <p>Overall, the proposed development provide a broad mix of unit types which encourages the establishment of a sustainable community.</p>
<b>Objective WB14</b>	<b>Applicant's Response</b>
<p><i>In addition to Social Housing provision under the provisions of Part V, the Local Authority will endeavour to obtain further homes within the Woodbrook Development Parcel.</i></p>	<p>72no. units are proposed as part of Social and Affordable Housing as part of this development. There have been on doing discussion between Applicant and DLRCC Housing Department.</p> <p>DLRCC will gain control of additional lands comprising 4.68 acres at Woodbrook under the terms of the tripartite agreement.</p>
<b>Objective WB15</b>	<b>Applicant's Response</b>
<p><i>Ensure a quality civic space with a favourable aspect, active frontage and direct linkage to key routes to function as a vibrant focal point at the Neighbourhood Centre.</i></p>	<p>The Masterplan, prepared by the Applicant, provides an indicative arrangement for the public plaza adjacent to the Local Centre.</p> <p>The plaza will form part of the western green link and will form a focal point at the Local Centre. The civic space will have active frontage at ground level to ensure footfall and activity is generated within the space. As this civic space is directly related to the Local Centre, which is not being provided in this phase, it is not considered appropriate to provide the final civic space at this time.</p> <p>A soft landscaped space will be provided initially as a useable amenity in the area for the civic plaza as part of Phase 1 with a view to providing a formalised plaza as part of the next phase of development.</p>



<b>Objective WB16</b>	<b>Applicant's Response</b>
<i>Provide for a public space of a different character and function at the DART Station that responds to the requirements of a public transport interchange, as well as creating an attractive space for public transport users.</i>	A temporary car park with a public plaza which will interface with the future DART Station is proposed as part of this development.
<b>Objective WB17</b>	<b>Applicant's Response</b>
<i>Provide for generous north-south green corridors as multi-functional recreational, amenity and biodiversity linkages; as in the Green Axis and Linear Park.</i>	<p>The development proposal accommodates 2no. main north-south green corridors which are broadly consistent with those outlined within the LAP document.</p> <p>The central corridor park and the coastal park are each designed to have their own identity and character. The central corridor park will be the primary green space linking the plaza, school, Local Centre and creche in addition to providing links to Shanganagh Public Park. It will incorporate informal play, new tree planting and zones for passive recreation.</p> <p>The Coastal Park will be characterised by textured planting, undulating mounds and informal play along a dedicated walking/cycle path. The existing hedgerow on the site boundary will define the edge of the park and will be reinforced with new native tree planting. Mature trees are being retained where feasible primarily within Green Axis, the local pocket park and along Woodbrook Avenue and development is suitably setback from all site boundaries to facilitate retention of mature trees, which are most significant along site boundaries, particularly to the south and west. Furthermore, suitable replacement planting will be introduced to augment the retained trees on site.</p>
<b>Objective WB18</b>	<b>Applicant's Response</b>
<i>The public realm, including new streets, civic spaces and green routes shall comprise of high quality hard and soft landscaping materials and an appropriate level of street furniture, play equipment and signage provision.</i>	<p>All proposed public realm will incorporate high quality materials as well as adequate signage, street furniture and play equipment, as per the LAP.</p> <p>The green corridors will include walking / cycle paths and appropriate soft landscaping to ensure a high-quality amenity is provided. Some formal fitness equipment will be provided and informal / natural play features such as timber logs. The main link streets will be planted with semi-mature trees and smaller trees located along local streets and within homezone areas. Ornamental grasses, hedges and shrub planting will be provided for visual interest.</p>
<b>Objective WB19</b>	<b>Applicant's Response</b>
<i>Seek to provide a new linkage to the lands east of the DART at the location of the planned DART Station for recreation and amenity purposes.</i>	The design of the proposed DART station is subject to ongoing consultation between Irish Rail, the NTA, DLRCC and the Applicant. It includes an overbridge to facilitate access down to the platforms on the eastern side of the railway line. This overbridge could provide for potential future connections east if this became appropriate with the agreement of adjoining third party landowners. This is ultimately a matter for Irish Rail and third party private landowners.

<b>Objective WB20</b>	<b>Applicant’s Response</b>
<p><i>Provide for pocket parks with a range of passive and active recreational facilities for all age-users and, where feasible, Multi-Use Games Areas (MUGAs) as part of the public and communal open space provision.</i></p>	<p>The development proposal accommodates 2no. main north-south linear parks consistent with those outlined within the LAP document and are supplemented by the east west landscaped corridor north of Woodbrook Avenue .</p> <p>A pocket park (approximately 300 sq. m) is located in front of Block A adjacent Woodbrook Avenue. A larger pocket park (approximately 900 sq. m) will be provided in the ‘Woodbrook South’ character area. A formal playground and more active recreational space is envisaged in Phase 2 adjacent to the neighbourhood plaza and school site.</p>
<b>Objective WB21</b>	<b>Applicant’s Response</b>
<p><i>Provide for moderately active frontage with own-door housing at ground floor levels along the main avenue linking the Dublin Road and the DART Station.</i></p>	<p>In general, the residential units fronting onto the Avenue are own-door units, allowing for an active frontage.</p> <p>Along the full length of Woodbrook Avenue there is own-door housing to the south.</p> <p>The apartment block to the east of Woodbrook Avenue, adjacent Coastal Park have tenant amenity areas and cores at street level which provide animation and active frontages.</p> <p>A similar approach will be taken in the detailed design of Phase 2 to ensure to other side of Woodbrook Avenue is treated similarly.</p>
<b>Objective WB22</b>	<b>Applicant’s Response</b>
<p><i>Ensure passive surveillance of public and communal open space provision by overlooking and careful juxtaposition of key routes and residential development, for example, the Green Axis and Linear Park.</i></p>	<p>The proposed residential units have been orientated to provide high levels of passive surveillance to all public and communal open spaces.</p> <p>Any ‘gable end’ units will be appropriately designed to ensure that they are well animated and contribute positively to the streetscape.</p>
<b>Objective WB23</b>	<b>Applicant’s Response</b>
<p><i>Seek to retain and enhance the sylvan character of the site boundaries for biodiversity and amenity value. Design of vehicular access to the new residential neighbourhood shall minimise the loss of mature trees and historic boundary wall along the Dublin Road, whilst meeting road safety standards. In accordance with the Landscape Strategy set out in Map 16, the landscape buffer along the Dublin Road shall be between 20 – 30m wide to protect the sylvan character of the area.</i></p>	<p>The development is set back from all existing boundaries in order to retain the sylvan character and existing enclosed character provided by the existing mature tree belts and hedgerows along the boundary. Vehicular access to the proposed development will be from the Old Dublin Road. This will necessitate the introduction of an opening approximately 26m across.</p> <p>To facilitate the provision of a dedicated pedestrian / cycle path to serve the Old Dublin Road a 2no. smaller openings will be required on the northern and southern end of the existing western boundary. These measure approximately 13m and 16m.</p> <p>The opening will result in the removal of some trees, however, this is required to provide the necessary road infrastructure. The wall will be lowered in sections and a new railing introduced to allow visibility into the proposed development. A low section of railing will be aligned with a local street to create a visual axis into the development.</p> <p>The proposed duplex units and Creche will be set back 20m from the existing western boundary. This area will be further enhanced by the introduction of additional tree planting.</p>

<b>Objective WB24</b>	<b>Applicant's Response</b>
<i>Ensure appropriate boundary treatment along all boundaries of the site in the interest of residential, visual and landscape amenity.</i>	As part of the landscape proposal for the proposed development additional tree planting will be introduced to augment the sylvan character of the existing boundaries. The eastern boundary hedgerow will be planted with additional native trees to infill gaps and weak sections of hedgerow. The southern boundary will comprise the existing hedgerow to the south east while the existing woodland edge will enclose the remainder of the site boundary. The existing stone wall will be retained along the west boundary of the Old Dublin Road and sections lowered to provide visual permeability with the insertion of a railing. Existing mature trees in fair/condition as per the Arboricultural Report will be retained. The existing hedgerow will also be retained along the north western boundary. Along the northern boundary the existing hedgerow and railing will be retained until Phase 2, when a new boundary may be agreed with Dun Laoghaire Rathdown County Council.
<b>Objective WB25</b>	<b>Applicant's Response</b>
<i>Achieve a fine grain of active uses at the main civic space of the Neighbourhood Centre to create a vibrancy throughout the day and evening.</i>	The Local Centre does not form part of this current phase of development. The Local Centre will include retail / commercial uses at ground level and the proposed development of a café / restaurant within a pavilion block on the western side of the proposed public plaza. There will be good animation and a vibrant mix of activities within this local centre.
<b>Objective WB26</b>	<b>Applicant's Response</b>
<i>Provide for a convenience retail element and small-scale retail services to cater for the daily needs of local residents.</i>	The Local Centre does not form part of this current phase of development. The Local Centre will include retail / commercial uses at ground level including an anchor convenience retail store.
<b>Objective WB27</b>	<b>Applicant's Response</b>
<i>Provide for a childcare facility ideally within or in close proximity to the Neighbourhood Centre and/or Future School Site, and also potentially at the DART Station. Future provision and demand for childcare facilities shall be assessed having regard to the needs of the emerging population and in accordance with the Development Plan Standards on Childcare.</i>	A creche (approximately 429 sq. m) including an out-door play area is proposed as part of this proposed development. It is located adjacent the entrance to the proposed development in proximity to both the school site and Local Centre and will form part of the 'civic hub' at this location.
<b>Objective WB28</b>	<b>Applicant's Response</b>
<i>Accommodate a primary school equivalent to 24 Classrooms in accordance with the determination of Future Schools Provision undertaken by the Department of Education and Science (DES).</i>	The Masterplan, prepared by the Applicant, caters for a school site located north of the Local Centre as per the provision of the LAP.

<b>Objective WB29</b>	<b>Applicant's Response</b>
<i>Consider the provision of small-scale own door offices or services in the vicinity and on key routes leading to the Neighbourhood Centre and DART Station.</i>	The Local Centre does not form part of this current phase of development. It is anticipated that the Local Centre will include retail / commercial uses at ground level.
<b>Objective WB30</b>	<b>Applicant's Response</b>
<i>Seek appropriate temporary uses such as a community café or a creative community space as an interim solution to any vacant units at ground floor level at the neighbourhood centre or DART Station Node.</i>	The Masterplan, prepared by the Applicant, considers the potential development of a café / restaurant within a pavilion block on the western side of the proposed public plaza. It is considered that this would be the most appropriate location for such a use to benefit from the footfall generated by the other uses in the Local Centre and footfall generated within the public plaza. The Applicant is open to temporary uses if and where necessary.
<b>Objective WB31</b>	<b>Applicant's Response</b>
<i>Support the clustering of a range of community facilities and social infrastructure in the vicinity of the Neighbourhood Centre, School Site and St. James Church.</i>	The proposed creche is located in proximity to both the school site, St. James's Church and Local Centre and will form part of the 'civic hub' at this location. Commercial units will be provided as part of the Local Centre which may support the provision of temporary ancillary uses. The public plaza will form a focal point and would be conducive to holding public events for example.
<b>Objective WB32</b>	<b>Applicant's Response</b>
<i>A high quality public realm, attractive streets and spaces, usable open space and local shopping facilities with a café or restaurant, will be actively promoted as important elements of social infrastructure to support a new residential community.</i>	The proposed development is consistent with this objective of the LAP. High quality design and materials have been part of the consideration of the design for this proposed development, this will continue through future phases of development. Phase 2 will include a Local Centre which will include a high quality public realm space.
<b>Objective WB33</b>	<b>Applicant's Response</b>
<i>Reserve a school site to accommodate a new primary school(s) as per the requirements of the Department of Education &amp; Skills (DES) and to explore in conjunction with the DES, the potential for sharing the school facilities, community facilities and adjoining public open spaces so as to ensure optimum use of social infrastructure.</i>	The Masterplan, prepared by the Applicant, identifies a site for a school located north of the Local Centre as per the provision of the LAP. Discussions have commenced between the Applicant and the Department of Education and Skills with respect to their acquisition of this site.
<b>Objective WB34</b>	<b>Applicant's Response</b>
<i>Promote an urban school typology which achieves an efficient use of scarce urban land, contributes positively to the streetscape and reflects the civic importance of a school to the local community.</i>	A site is being reserved for a school as a part of this application. The proposed school will be subject to a future planning application which will be informed by discussion with the Department of Education as appropriate.
<b>Objective WB35</b>	<b>Applicant's Response</b>
<i>Allow for a relaxation of the Development Plan car parking standards for schools having regard to accessibility of the site and the objective to achieve an urban school typology.</i>	A site is being reserved for a school as a part of this application. The school will not be provided as part of this application therefore parking for said school will be determined in a future application.

<b>Objective WB36</b>	<b>Applicant's Response</b>
<i>Water Supply &amp; Drainage: All planning applications to demonstrate that there is sufficient water supply and drainage capacity to serve a particular phase(s) of development with confirmation of same by Irish Water.</i>	A Design Acceptance Statement has been provided by Irish Water to show that the proposed connection to the Irish Water network can be facilitated.
<b>Objective WB37</b>	<b>Applicant's Response</b>
<i>DART: Seek early provision of the DART Station at Woodbrook to establish sustainable travel patterns. DART Station to be designed in a manner to accommodate a pedestrian over-bridge.</i>	<p>The first phase of development will incorporate the construction of the main spine road 'Woodbrook Avenue' from the proposed development access junction onto the R119 Dublin Road up to the entrance to the new DART Station. This station is being delivered by Irish Rail in conjunction with the NTA.</p> <p>An overbridge included in proposed DART Station design.</p> <p>The NTA are targeting to lodge a Planning Application with Dun Laoghaire-Rathdown County Council for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.</p> <p>It is envisaged that the Station will be completed and operational towards the middle of 2022.</p>
<b>Objective WB38</b>	<b>Prospective Applicant's Response</b>
<i>Woodbrook Main Avenue: Seek provision of the Avenue in its entirety in tandem with the first phase of the residential development to facilitate early provision of, and facilitate access to, the DART Station. The attainment of this objective may be subject to additional funding sources.</i>	<p>Woodbrook Avenue in its entirety forms part of the Phase 1 application.</p> <p>It will be delivered in two stages, the first to commence early in 2020 upon receipt of a successful planning determination. The final stage through the 6 Acre DART Gateway naturally cannot commence until these lands are vacated by Woodbrook Golf Club i.e. towards the end of 2021. This final section of Woodbrook Avenue would be completed in Q2 2022 at the latest and the Applicant would construct the temporary DART Station car park at that time so that it is ready for use when the DART Station becomes operational.</p>
<b>Objective WB39</b>	<b>Prospective Applicant's Response</b>
<i>Wilford Junction Upgrade: Potential upgrade of the existing roundabout and replacement with a higher capacity signalised 4-arm junction.</i>	The design of the Wilford junction upgrade is currently being progressed by the Local Authority as a separate project funded under LIHAF. The Wilford junction upgrade will form a separate planning process to be progressed by the Local Authority.
<b>Objective WB40</b>	<b>Prospective Applicant's Response</b>
<i>Temporary Car Park at DART Station: Seek provision of a temporary surface car park of circa 150-200 car spaces in the immediate vicinity of the DART Station.</i>	A temporary car park (164no. spaces including car parking, taxi and bus set-down area) with a public plaza which will interface with the future DART Station is proposed as part of this development.

<b>Objective WB41</b>	<b>Prospective Applicant's Response</b>
<i>Surface Water Drainage: SuDS measures to be incorporated as part of all proposals.</i>	<p>SuDS form part of the overall surface drainage scheme for the proposed development and will generally consist of: -</p> <ul style="list-style-type: none"> <li>• Underground attenuation.</li> <li>• Swales &amp; Tree pits.</li> <li>• Porous / permeable paving.</li> <li>• Green roofs on apartment blocks.</li> <li>• Filter drains.</li> </ul>
<b>Objective WB42</b>	<b>Prospective Applicant's Response</b>
<i>Each phase to demonstrate contribution to the public realm as part of the proposals for residential development.</i>	<p>The proposed development will provide 2no. linear parks, a pocket park, a buffer space along the Old Dublin Road as part of Phase 1 of Woodbrook and an east west landscape corridor.</p> <p>The Landscape Masterplan provides details of the scale and design of each public space. Prospective residents will be exceptionally well served in terms of usable open space and quality of the public realm.</p>
<b>Objective WB43</b>	<b>Prospective Applicant's Response</b>
<i>Development proposals to comply with the policies and objectives of the current Dun Laoghaire-Rathdown County Development Plan, including those set out in the Development Management Section.</i>	<p>The LAP was prepared having regard for the policies and objectives of the Development Plan. On the basis that the information set out above show the proposed development is broadly consistent with the LAP, it can be considered that the proposed development is also broadly consistent with the provision of the Development Plan. This has been specifically considered in Section 11.1 of this Report.</p>

### 11.2.1 LAP Phasing Requirements

With regard the Phasing of the Woodbrook – Shanganagh Local Area Plan 2017 – 2023, the following table sets out how the proposed development aligns with the timeframes / phasing envisioned.

<b>Infrastructure</b>	<b>Phase/Timeframe</b>	<b>Responsibility</b>	<b>Status</b>
<b>Water Supply and Drainage</b>	Demonstration of adequate water and drainage supply as part of any planning application. Interim solutions may be considered in advance of comprehensive upgrade, subject to agreement by IW.	Irish Water	The proposal will connect to an extended watermain on Old Dublin Road. The foul pump station on site is as agreed with Irish Water. The alignment and proposed termination of the foul rising mains is an interim measure as approved by Irish Water as can be seen from Design Acceptance Statement included with this SHD Planning Application (i.e. Phase 1).
<b>DART Station</b>	Early provision in tandem with delivery of initial phases of residential development. Potential timeframe c. 3 year lead-in from planning to operation.	NTA	<p>To be delivered by NTA / TII.</p> <p>The NTA are targeting to lodge a Planning Application with DLRC for that Station in Q1 2020. We refer to the Letter dated 1 October 2019 from the National Transport Authority confirming the anticipated timeline for submission of the Planning Application for the DART Station.</p> <p>It is envisaged that the Station will be completed and operational towards the middle of 2022.</p>

Infrastructure	Phase/Timeframe	Responsibility	Status
<b>Temporary Carpark/ DART</b>	Provision in tandem with DART Station to support viability of the DART.	Developer	A temporary car park is proposed as part of Phase 1. It will accommodate 164no. spaces including 148no. car parking spaces and set down areas.
<b>Main Woodbrook Avenue</b>	Early provision of road in its entirety from Dublin Road to DART station to facilitate access to station. Delivery to align with DART Station and initial phasing of housing.	Developer	The Woodbrook Distributor Road ('Avenue') included as part of Phase 1. A separate application for entire Avenue under LIHAF is to be submitted in tandem with the SHD Planning Application. It will be delivered in two stages, the first to commence early in 2020 upon receipt of a successful planning determination. The final stage through the 6 Acre DART Gateway naturally cannot commence until these lands are vacated by Woodbrook Golf Club i.e. towards the end of 2021. This final section of Woodbrook Avenue would be completed in Q2 2022 at the latest and the Applicant would construct the temporary DART Station car park at that time so that it is ready for use when the DART Station becomes operational.
<b>Neighbourhood Centre</b>	Commence construction of the NC on completion of the first 500 residential units.	Developer	A childcare facility (c. 429 sq. m) to be provided as part of Phase 1. Remainder of Neighbourhood / Local Centre to form part of Phase 2 development at Woodbrook (i.e. Phase 2).
<b>School</b>	Site identified for the new 24 classroom school to be made available to the Department of Education and Skills as per their requirements. Early provision of an access route to school site to be provided in tandem with Main Avenue is preferable.	Developer / DES	Provisions have been made within the Masterplan Plan to provide a school site. An access road to same is provided for as part of this Phase 1.
<b>Creche / Childcare Facilities</b>	Crèche facility to be provided as part of the Neighbourhood Centre development, and thereafter in accordance with the Development Plan Standards.	Developer	A childcare facility (c. 429 sq. m) to be provided as part of Phase 1. An additional creche is likely under Phase 2 at the DART Gateway.
<b>Public Realm</b>	Proposals for residential development to demonstrate contribution to the public realm, including civic spaces, shared surfaces, public and communal open space, cycle/ pedestrian routes.	Developer	Phase 1 contains both the Green Axis Corridor Park and Coastal Park, together with a pocket park and east west landscaped corridor. The proposed development will contain dedicated pedestrian friendly cycle routes and loops .

<b>Infrastructure</b>	<b>Phase/Timeframe</b>	<b>Responsibility</b>	<b>Status</b>
<b>Public Open Space</b>	Green Axis, Linear Park and Village Green to be provided in tandem with relevant phase of development. Village Green in conjunction with Neighbourhood Centre.	Developer	Phase 1 contains both the Green Axis Corridor and Coastal Linear Parks, together with a pocket park and landscaped corridor. A dedicated plaza adjacent the Local Centre will form part of our Phase 2 planning application and will be implemented as a temporary soft landscaped area as part of Phase 1 initially.
<b>Community Facilities General</b>	Proposals for residential development to demonstrates contribution to community facilities for every 200 Units / 20,000 m <sup>2</sup>	Developer	A childcare facility and a majority of the Local Area Plan open space requirements is being provided as part of Phase 1.
<b>Six-year and Longer Term Road Objectives</b>	Pending outcome of NTA/TII Studies	NTA / TII / DLRCC.	The Avenue between Old Dublin Road (R119) and the proposed DART Station is to be delivered as part of the proposed development with funding through LIHAF.
<b>Traffic Management</b>	Prepare a traffic management plan for Shankhill Village with a view to alleviating the impact of traffic generated from the future development within the Woodbook-Shanganagh LAP area.	DLRCC	For Dun Laoghaire-Rathdown County Council to prepare.

As can be seen from the above, the proposed development can commence in tandem with the provision of the DART Station. Development can commence and units can be subsequently occupied in advance of the delivery of the DART Station. There is commitment from all parties involved the Applicant, DLRCC, Woodbrook Golf Club, Iarnrod Eireann and the NTA to facilitate the completion of the DART Station in line with the phasing programme in mid-2022.

We refer to Section 4.3 of this Report for detail in relation to the Tri-Partite Agreement to facilitate the provision of the future DART Station.



## 12 SCREENING FOR APPROPRIATE ASSESSMENT

The SHD Planning Application is accompanied by an Information for Screening for Appropriate Assessment prepared by Brady Shipman Martin Landscape & Built Environment Consultants which concludes that: -

*“...on the best scientific evidence that it can be clearly demonstrated that no elements of the project will result in any likely significant impact on any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives. Based on these conclusions a Stage 2 Natura Impact Statement is not required for the proposed development.*

*As such no mitigation measures are required for the protection of any European sites.*

*It is considered that this report provides sufficient relevant information to allow the Competent Authority (An Bord Pleanála) to carry out an AA Screening, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives.”*

## 13 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

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

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

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

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

The proposed development involves the construction of 685no. residential units, a childcare facility, a temporary surface car park, 2no. replacement golf holes and associated infrastructure on a site of 21.9 Ha (net development area of 8.8 Ha).

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

## 14 CONCLUSION

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

- Rebuilding Ireland – Action Plan for Housing & Homelessness.
- National Planning Framework, Ireland 2040.
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan (DMASP).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- Quality Housing for Sustainable Communities (2007).
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018).
- Dun Laoghaire-Rathdown County Development Plan 2016 – 2022.
- Woodbrook – Shanganagh Local Area Plan 2017 – 2023.
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.

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

- The land is zoned for residential development under the Dun Laoghaire-Rathdown County Council Development Plan 2016 – 2022, and this is reflected also in the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and Dublin Metropolitan Area Strategic Plan.
- The scheme represents a well designed and thought out development which achieves a sustainable density of residential development, having regard to the Council's settlement and housing strategy for the County, in an accessible outer suburban location, supported by community facilities and open space amenities.
- The proposed development will provide additional amenities including a dedicated creche and a significant quantum of public open spaces which will support greater connectivity to the surrounding areas in particular to Shanganagh Public Park.
- The phased development of the site will ensure the timely and sustainable development of this significant new residential neighbourhood, which will respond to current and future housing demand in the area identified in the Council's housing strategy.
- The proposed residential element will provide additional critical mass to support the development of the future DART Station.
- There has been extensive dialogue and co-ordination between Atkins Consulting Engineers / Brady Shipman Martin Landscape & Built Environment Consultants and DLRCC Drainage and Landscape Department to ensure that an effective SuDs strategy will be implemented to ensure best practice management of surface water and integration with the landscape to ensure tree and hedgerows are retained where practically possible.
- Further to our Pre-Planning engagement with An Bord Pleanála, the Applicant has engaged in further extensive S.247 Pre-Planning Consultation with Dun Laoghaire-Rathdown County Council (as the Planning Authority) on these key matters, including the sustainable quantum, design and layout of proposed residential uses, and supporting physical and environmental infrastructure.
- Section 5 Pre-Planning Consultation with An Bord Pleanála, indicated that further design alternations would be required to the Board's Opinion regarding density, urban design and

environmental sustainability. All taken on board by the Applicant and culminating in the making of this SHD Planning Application to An Bord Pleanála.

- The proposed development has been subject of comprehensive design and environmental assessment, including an Environmental Impact Assessment Report, to ensure that it is representative of sustainable residential development that meets the needs of existing and future generations for good quality housing at this location, and without detracting from the sustainable expansion or consolidation of other settlements in Dun Laoghaire-Rathdown County Council.

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

## 15 ENCLOSURES

The following are enclosed with this SHD Planning Application: -

1. Planning Fee €80,000.00 (Maximum Fee – Cheque Enclosed).
2. Planning Application Form.
3. Newspaper Notice.
4. Site Notice.
5. Letter of Consent from Dun Laoghaire Rathdown County Council dated 23 October 2019.
6. Letter of Consent from Woodbrook Golf Club dated 27 August 2019.
7. Tri-partite Agreement Letter from Byrne Wallace Law Firm dated 10 October 2019.
8. DART Station & BusConnects Letter from National Transport Authority dated 1 October 2019.
9. Letter of Intent regarding Car Sharing Service from GoCar Carsharing Ltd.
10. Letter from Irish Aviation Authority dated 26 July 2019.
11. Confirmation of Feasibility Statement from Irish Water dated 16 July 2018.
12. Design Acceptance Statement from Irish Water dated 2 October 2019.
13. Confirmation from Environmental Impact Assessment Portal.
14. Part V Proposal, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants (on behalf of Aeval Unlimited Company).
15. Planning & Statement of Consistency Report (including Statement of Response), prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
16. Material Contravention Statement, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
17. Architect's Drawings, prepared by O'Mahony Pike Architects (see schedule of drawings attached with each bundle).
18. Schedules of Accommodation, prepared by O'Mahony Pike Architects.
19. Housing Quality Assessment, prepared by O'Mahony Pike Architects.
20. Design Statement, prepared by O'Mahony Pike Architects (Uploaded to website in 6no. parts).
21. Computer Generated Images (CGI's), prepared by O'Mahony Pike Architects.
22. Part V Provision (including Part V Layout), prepared by O'Mahony Pike Architects.
23. Landscape Drawings, prepared by Brady Shipman Martin Landscape and Built Environment Consultants (see schedule of drawings attached with each bundle).
24. Landscape Design Statement, prepared by Brady Shipman Martin Landscape and Built Environment Consultants (Uploaded to website in 2no. parts).
25. Agronomists Statement, prepared by Eddie Connaughton Golf Hole Designer / Agronomist.
26. Photomontages, prepared by Brady Shipman Martin Landscape and Built Environment Consultants.
27. Arboricultural Assessment Report & Tree Survey Drawing, prepared by The Tree File Consulting Arborists Ltd. (see schedule of drawings attached with each bundle).
28. Engineering Drawings (including Roads, Drainage, Utilities and Public Lighting), prepared by Atkins Consulting Engineers (see schedule of drawings attached with each bundle).
29. Engineering Report (including Roads, Drainage, Utilities and Public Lighting), prepared by Atkins Consulting Engineers.

30. Storm Water Impact Assessment, prepared by Atkins Consulting Engineers (including Stage 1 Surface Water Audit prepared by Punch Consulting Engineers).
31. Flood Risk Assessment, prepared by Atkins Consulting Engineers.
32. Foul Pumping and Rising Main Report, prepared by Atkins Consulting Engineers.
33. Traffic & Transport Assessment, prepared by Atkins Consulting Engineers.
34. Mobility Management Plan, prepared by Atkins Consulting Engineers.
35. Quality Audit, prepared by Atkins Consulting Engineers.
36. Design Process Traffic Management Plan, prepared by Atkins Consulting Engineers.
37. Environmental Impact Assessment Report, co-ordinated by Stephen Little & Associates Chartered Town Planners & Development Consultants.
38. Information for Screening for Appropriate Assessment, prepared by Brady Shipman Martin Landscape and Built Environment Consultants.
39. Assessment of Sunlight & Daylight Access within the Development, prepared by ARC Architectural Consultants Ltd.
40. Shadow Diagrams, prepared by ARC Architectural Consultants Ltd.
41. Outline Construction & Environmental Management Plan, prepared by Consulting.
42. Construction & Demolition Waste Management Plan, prepared by AWN Consulting.
43. Operational Waste Management Plan, prepared by AWN Consulting.
44. Energy Statement Report, prepared by Atkins Consulting Engineers.
45. Building Lifecycle Report, prepared by Aeval Unlimited Company.
46. Copy of Cover Letter sent to Prescribed Bodies with copy of the SHD Planning Application.
47. Copy of Cover Letter sent to Dun Laoghaire-Rathdown County Council with copies of the SHD Planning Application.

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

**Chartered Town  
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