



THORNTON O'CONNOR
TOWN PLANNING

Planning Report

Planning Report

In respect of a Residential and Commercial Development at
Lands located at Scholarstown Road Dublin 16

Submitted on Behalf of
Ardstone Homes Limited

November 2019

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8.0 CONCLUSION

An Bord Pleanála
No. 64 Marlborough Street
Dublin 1
D01 V902
Co. Dublin

Dear Sir/Madam

RE: STRATEGIC HOUSING DEVELOPMENT FOR THE DEMOLITION OF THE EXISTING STRUCTURES ON SITE AND CONSTRUCTION OF 590 NO. RESIDENTIAL DEVELOPMENT COMPRISING 480 NO. BUILD-TO-RENT UNITS AND 110 NO. BUILD-TO-SELL UNITS AT LANDS LOCATED NORTH OF SCHOLARSTOWN ROAD INCORPORATING DWELLINGS KNOWN AS 'BEECHPARK' AND 'MARYFIELD', SCHOLARSTOWN ROAD, DUBLIN 16 (D16 X3X8 AND D16 N6V6).

1.0 INTRODUCTION

1.1 Application for Development

The subject planning application falls within the remit of Strategic Housing Development as defined in Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (amended July 2018) as "strategic housing development", which means—

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

The subject application which proposes a residential development has been prepared by a multi-disciplinary team on behalf of Ardstone Homes Limited as set out in the Table below:

Company Name & Address	Documents Prepared
Thornton O'Connor Town Planning No. 1 Kilmacud Road, Dundrum, Dublin 14	→ Planning Report → Statement of Consistency → Response to ABP Opinion → Material Contravention Statement → EIAR Input
John Fleming Architects No. 103 Leeson Street Upper, Dublin 4	→ Drawings → Design Statement → Housing Quality Assessments
DBFL Ormond House, Ormond Quay Upper,	→ Infrastructure Design Report → DMURS Statement of Consistency → Traffic and Transport Assessment Report

<p>Inns Quay, Dublin 7</p>	<ul style="list-style-type: none"> → Infrastructure Design Report → Preliminary Construction Management Plan → Flood Risk Assessment → Mobility Management Plan → Parking Strategy → Drainage Drawings → EIAR Chapters: <ul style="list-style-type: none"> • Chapter 9: Land, Soils and Geology & NTS • Chapter 10: Water-Hydrology & NTS • Chapter 14: Material Assets – Traffic and Transportation & NTS • Chapter 15: Material Assets – Site Services & NTS
<p>Arborists Associates Ltd.</p> <p>No. 94 Ballybawn Cottages, Ballybawn, Enniskerry, Co. Wicklow</p>	<ul style="list-style-type: none"> → Arboricultural Report → Drawings
<p>Integrated Environmental Solutions</p> <p>4th Floor, Castleforbes House, Castleforbes Road, Dublin 1</p>	<ul style="list-style-type: none"> → Daylight/Sunlight and Overshadow Study
<p>O'Connor Sutton Cronin Consulting Engineers</p> <p>No. 9 Prussia Street, Stoneybatter, Dublin 7</p>	<ul style="list-style-type: none"> → Sustainability Statement → Lighting Report → Drawings
<p>3D Design Bureau</p> <p>No. 65 Rock Road, Intake, Blackrock, Co. Dublin</p>	<ul style="list-style-type: none"> → Photomontages → CGIs
<p>Aramark Property</p> <p>St Stephens Green House, Earlsfort Terrace, Dublin 2</p>	<ul style="list-style-type: none"> → Building Lifecycle Report → Estate and Common Area Management Strategy Report

<p>Future Analytics Consulting</p> <p>No. 23 Fitzwilliam Square (South), Dublin 2</p>	<p>→ Schools Demand Assessment</p>
<p>Openfield Ecology</p> <p>No. 12 Maple Avenue, Castleknock, Dublin 15</p>	<p>→ Appropriate Assessment Screening → EIAR Chapter 7: Biodiversity & NTS</p>
<p>Mitchell & Associates Landscape Architects</p> <p>Unit 5 Woodpark, The Rise, Glasnevin, Dublin 9</p>	<p>→ EIAR Chapter 8: Landscape and Visual Assessment & NTS → Landscape Masterplan → Landscape Report → Product Reference Report → Landscape Specifications Report → Drawings</p>
<p>AWN</p> <p>The Tecpro Building, Clonshaugh Business & Technology Park, Dublin 17</p>	<p>→ EIAR Chapters and Associated Appendices:</p> <ul style="list-style-type: none"> • Chapter 11-Air Quality and Climate • Chapter 12-Noise and Vibration • Chapter 13-Waste Management
<p>Archer Heritage Planning</p> <p>Unit 8, BEAT Centre, Stephenstown, Balbriggan, Co. Dublin</p>	<p>→ EIAR Chapter 5: Archaeology and Cultural Heritage</p>
<p>Molloy and Associates</p> <p>Marley, Proby Square, Blackrock, Co. Dublin</p>	<p>→ EIAR Chapter 6: Architectural Heritage</p>
<p>O’Herlihy Access Consulting</p> <p>Guinness Enterprise Centre Taylor’s Lane Dublin 8.</p>	<p>→ Accessibility Report</p>

<p>Brian Keeley (of Wildlife Surveys Ireland)</p> <p>Deerpark House, Maio, Tierworker, Kells, Co. Meath</p>	<p>→ Bat Assessment Report</p>
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The subject lands have been purchased by Ardstone Homes Limited with the intention of developing a high-quality residential development comprising 590 No. units (480 No. Build-to-Rent and 110 No. Build-to-Sell units), along with associated ancillary communal facilities and commercial floorspace.

1.2 Summary of the Proposed Development

Ardstone Homes Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at a 5.35 hectare site located north of Scholarstown Road incorporating dwellings known as 'Beechpark' and 'Maryfield', Scholarstown Road, Dublin 16, D16 X3X8 and D16 N6V6. Works are also proposed to Scholarstown Road and Woodfield junction including new traffic signals, the elimination of the left-turn slip-lane into Woodfield off Scholarstown Road, upgraded public lighting and upgraded cycle and pedestrian facilities on an area measuring 0.7 hectares, providing a total application site area of 6.05 hectares.

The development will principally consist of: the demolition of all existing structures on site which include a single story dwelling known as 'Beechpark' (172 sq m), a 2 No. storey dwelling known as 'Maryfield' (182 sq m), with associated garage/shed (33.5 sq m) and associated outbuildings (47.1 sq m); and the construction of 590 No. residential units (480 No. Build-to-Rent apartment units and 110 No. Build-to Sell duplex units and apartments), ancillary residential support facilities and commercial floorspace. The total gross floor space of the development is 51,252 sq m over a partial basement of 5,888 sq m (which principally provides car and bicycle parking, plant and bin stores).

The 480 No. 'Build-to-Rent' units will be provided in 8 No. blocks as follows: 7 No. blocks ranging in height from part 5 to part 6 No. storeys (Blocks B1 – B5, C1 and C3) and 1 No. block ranging in height from part 4 to part 6 No. storeys (Block C2) and will comprise 246 No. one bed units and 234 No. two bed units. The 110 No. 'Build-to-Sell' units will be provided in 9 No. duplex blocks which will be 3 No. storeys in height (Blocks A1 – A9) and will comprise 55 No. two bed units and 55 No. three bed units.

The development will also consist of the provision of a part 1 to part 2 No. storey ancillary amenity block (Block D1) (414 sq m) within the central open space which comprises a gymnasium, lobby, kitchenette and lounge at ground floor level and lounge at first floor level in addition to a roof terrace (facing north, south and west) to serve the Build-to-Rent residents; a 2 No. storey retail/café/restaurant building (Block D2) (657 sq m) comprising 2 No. retail units at ground floor level (328.5 sq m) and a café/restaurant unit at first floor level (328.5 sq m); a creche (438 sq m) within Block C2 at ground floor level; and a management suite (261 sq m) and café/restaurant (288 sq m) within Block C3 at ground floor level.



The development provides a vehicular access off Scholarstown Road between Blocks C1 and C3 towards the south-east corner of the site; a separate pedestrian access and emergency vehicular access off Scholarstown Road between Blocks Ag and C2 towards the south-west corner of the site; the facilitation of a pedestrian connection from the north-east corner of the subject site to the public open space in Dargle Park; 459 No. car parking spaces (178 No. at basement level and 281 No. at surface level); bicycle parking; bin storage; boundary treatments; private balconies and terraces; hard and soft landscaping; plant; services; sedum roofs; PV panels; substations; lighting; and all other associated site works above and below ground.

2.0 RATIONALE FOR THE PROPOSED RESIDENTIAL DEVELOPMENT

The subject site has recently been purchased by the Applicant with the intention of developing a high-quality residential scheme which will provide short-medium term accommodation (Build-to-Rent) and long-term accommodation (Build-to-Sell) on a key accessible site adjacent to public transport, facilities and services in South Dublin. We consider that the proposed development is appropriate having regard to recent national policy which requires the densification of sites in sustainable locations such as the subject site. This section will solely focus on the Build-to-Rent element of the proposed development, as a newer typology in the market.

2.1 Understanding the Build-to-Rent Typology

Build-to-Rent is a new form of housing development in terms of government policies seeking to deliver a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to our current housing mix. These developments consist of purpose-built residential units which are managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable development of apartment stock.

It is well documented in the media there is a critical shortage of affordable housing in the Country. This new form of building typology was introduced in *the Sustainable Urban Housing Design Standards for New Apartments* (March 2018) and seeks to directly address these issues. The Guidelines note that:

'To date rental only developments at scale in Ireland have been limited. 'Build-to-Rent' (or BTR) can be defined as:

'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.'

The Guidelines further note that Build-to-Rent developments:

'can provide a viable long term housing solution to households where home-ownership may not be a priority, such people starting out on their careers and who frequently move between countries in the pursuance of career and skills development in the modern knowledge-based economy.'

In its analysis of evolving housing need the *Apartment Guidelines, 2018* recognise the changing nature of the underlying demographic and demand factors on the existing housing supply. The policy outlines the underlying shift in demand pressures as follows:

'The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity.' [Our Emphasis]

As part of housing need, economic pressure and EU and international competitiveness, Ireland's housing stock needs to adapt to changing circumstances. Family homes are increasingly unaffordable for first time buyers, and more transient high skilled employees are becoming priced out of our meager rental supply. The *Apartment Guidelines* note:

*'... the trend whereby jobs have been increasingly located in and around Ireland's cities larger towns, and notwithstanding improvements in technology and the availability of broadband, it is likely to continue. While the availability of a range of employment is one of the reasons that skilled migrants are more likely to seek to locate in urban areas, **this is also dependent on the availability of a choice of suitable accommodation.**'*
[Our Emphasis]

2.1.1 Recent Research Supports the Need to Provide an Alternative Housing Model

Deloitte published its pre-budget analysis (2019)¹ and states that *'the decline in the number of residential landlords is compounding supply issues in our property market'* but notes that new residential policies aim to address this issue.

There is a change in the nature of housing demand, not just from a market perspective, but from a demographic shift. We note the following comments from the research completed by Knight Frank entitled *'The Dublin PRS Report'*² which states:

'There has been a cultural shift in attitudes towards renting in recognition of the flexibility it offers, with this demand particularly strong from the young, internationally mobile professionals working in the tech and finance sectors.'

The research also notes the demographic shifts underlying these trends:

'Ireland is experiencing a population boom, providing a natural long-term source of demand for housing. Over the period 1991-2016 the population grew by 34% compared to a growth rate of 7% for the EU as a whole.'

This population growth has particularly concentrated itself on Ireland's urban centres, principally in the Greater Dublin Region. Current projections anticipate this growth to continue. The Report notes:

'...Dublin is undergoing a population boom with the population set to increase by 292,400 – or 21.7% between 2016 and 2040 according to the ERSI.'

Multiple factors are contributing to this, such as fertility, inward migration, a mobile workforce, and returning emigrants of varying ages. Ireland is currently bucking the trend of current EU member states, which positively contributes towards our economic competitiveness and diversity.

¹ <https://www2.deloitte.com/ie/en/pages/tax/articles/pre-budget-real-estate.html>

² <https://content.knightfrank.com/research/1601/documents/en/the-dublin-prs-report-2018-5830.pdf>

'A high fertility rate in conjunction with low mortality rates has resulted in Ireland's natural population growth being the highest in Europe at 6.6% in 2017, far ahead of the second highest of Cyprus which had an increase of 3.8%.

The high growth rate is set to continue with Eurostat projecting that the population of Ireland will increase by 28.2% to 2080, compared to just 0.6% for the EU 28. [Sic]'
(Knight Frank)

However, with the pressures on housing supply and the rental sectors, there is an increasing gap between affordability and appropriate living standards, when it comes to residential supply. To continue to balance the needs of a growing population and maintain sustainable planning practices we must be cognisant of the evolving nature of the rental sector. In their 2019 pre-budget observations Deloitte outlined the current climate as follows:

'With FDI remaining crucial to Ireland Inc., it is imperative that action is taken to improve the supply of available stock to ensure Ireland does not lose out due to an inability to house new workers.'

The Knight Frank research on PRS also lays out how the rental market is adapting to provide and service the new housing typology of Build-to-Rent.

'The transition from a buy-to-rent to a build-to-rent market will be driven by the drying-up of standing investment opportunities coupled with the positive market fundamentals that BTR investors seek.'

The publishing of the *National Planning Framework (Ireland 2040)*, the results for Census 2016, and the *Urban Development and Building Height Guidelines, December 2018* have changed the perspective of how planning and housing delivery must respond to demand. The *National Planning Framework (NPF)* estimates a need to house one million new people by 2040, focusing development on the top 5 cities, some 50% of that development within Dublin. This new development is to be targeted at brownfield and infill sites first. Sustainable and accessible sites near transport and employment have priority, and new mechanisms such as Build-to-Rent apartments are a means of achieving this densification.

A key benefit of Build-to-Rent development is the potential to accelerate the delivery of new housing at a significantly greater scale than at present. This potential can make a significant contribution to the required increase in housing supply nationally, identified by Rebuilding Ireland, and the scale of increased urban housing provision envisaged by the National Planning Framework.

To meet current housing demands and contribute to consolidated sustainable growth, Build-to-Rent schemes offer a maintained and high standard accommodation with relative security of a management company. Specific Planning Policy Requirement 7 as set out in the *Apartment Guidelines, 2018* notes that Build-to-Rent developments must remain as a managed accommodation for 15 years, and that no individual units are sold or rented separately for this period of time. Build-to-Rent as a housing typology offers the opportunity to hasten the delivery of new quality housing at a time of an acute housing crises.

2.2 Responding to Policy Set out in the *National Planning Framework (NPF), Sustainable Urban Housing: Design Standards for New Apartments* (March 2018) and the *South Dublin County Development Plan 2016 – 2022* Relating to Demographic Changes

The NPF promotes the compact growth of urban areas and acknowledges that Ireland’s housing crisis has resulted in:

‘a time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained’.

The NPF further calculates that:

‘between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, with increasing demand to cater for one and two-person households.’

In addition, we note that Section 2.0 of the *South Dublin Development Plan 2016 – 2022* states that:

*‘Future housing provision will take account of the housing needs of the County’s population and in particular changing demographic factors such as the **decline in average household size** and the increasing number of people aged over 65’ [Our Emphasis].*

We note that the *South Dublin Development Plan 2016 – 2022* outlines the population and housing targets for South Dublin forecasting an increase of 43,262 No. persons from 2011 to 2022. It states that there is an anticipated 36,649 No. units remaining to be built to meet the RPG target. The NSS/RPG population and housing targets for South Dublin are set out below:

SDCC	Census 2006	Census 2011	Target 2016	Target 2022
Population	246,935	265,205	287,341	308,467
Housing	87,484	97,298	115,373	137,948

The *South Dublin County Development Plan 2016 – 2022* has made provisions to accommodate the future growth and to support and facilitate housing development in South Dublin County by identifying ‘housing capacity sites’ (see Section 2.3 below).

It is our professional opinion that the subject lands are eminently suitable to provide higher density residential accommodation which can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in the South Dublin administrative area.

The Apartment Guidelines identify the location of the application site as an ‘Intermediate Urban Location’ as the site is:

*‘within walking distance (i.e between 10-15 minutes or 1,000-1,500m of high capacity urban public transport stops (such as Dart, commuter rail or Luas) or **within reasonable walking distance (i.e 5-10 minutes or up to 1,000 m) of high frequency (i.e 10 minute peak hour frequency) urban bus services or where such services can be***

provided'...and is...'within easy walking distance (i.e up to 5 minutes or 400-500m) of reasonably frequent (min 15 peak hour frequency) urban bus service.' [Our Emphasis]

The subject site is located within suitable walking distance of bus stops (routes No. 15 and No. 15b for example) providing access to areas such as Clongriffin Dart station, Terenure and the City Centre for example. The No. 15 runs at a frequency of 6 – 12 minutes throughout most of the day and the No. 15b runs at a peak frequency of 10 minutes, therefore the site is considered an intermediate urban location (public transport availability discussed in more detail in Section 2.4). The Go Ahead Ireland bus No 175 also runs along Scholarstown Road with bus stops adjacent to the subject site. This service provides access to Citywest, Tallaght, Dundrum and UCD for example.

The Apartment Guidelines state that *'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.* It is considered that (private) car parking provisions can be reduced as part of the proposal given the future tenure (split between Build-to-Sell and Build-to-Rent) and the accessibility of the subject site.

As such, the inclusion of Build-to-Rent apartment units within the wider residential scheme also comprising Build-to-Sell units provides a welcome alternative in South Dublin.

2.3 The South Dublin County Development Plan 2016 – 2022 Identifies the Subject Site as a 'Housing Capacity Site'

The *South Dublin Development Plan 2016-2022* describes the area surrounding the subject site as a *'Consolidation Area within the Gateway'*, which is an urban area close to the boundary with Dublin City Council and Dun Laoghaire – Rathdown County Council that is of high importance for residential development.

The South Dublin County Settlement Strategy is derived from, and consistent with, the Settlement Strategy for the Greater Dublin Area outlined in the *Regional Planning Guidelines 2010-2022* (now superseded by the new Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland region – adopted 28th June 2019). Settlements to the east of the M50 and south of the River Dodder have been identified as Consolidation Areas within the Gateway due to their established character and strong economic and social ties with Dublin City.

The National Planning Framework (NPF) adopted in 2018 calls for consolidation of development for a projected one million extra people living in Ireland by 2040. The designation of *'Consolidation Areas within the Gateway'* in the Development Plan will ensure that sustainable lands are orderly developed, outwards of serviced and accessible land radiating from the city and regional towns. These areas are to be of higher densities (where appropriate) than other lower designations and are important for the delivery of the NPF going forward. This is indicated in the following map from *South Dublin Development Plan 2016-2022* (see Figure 2.1 below).

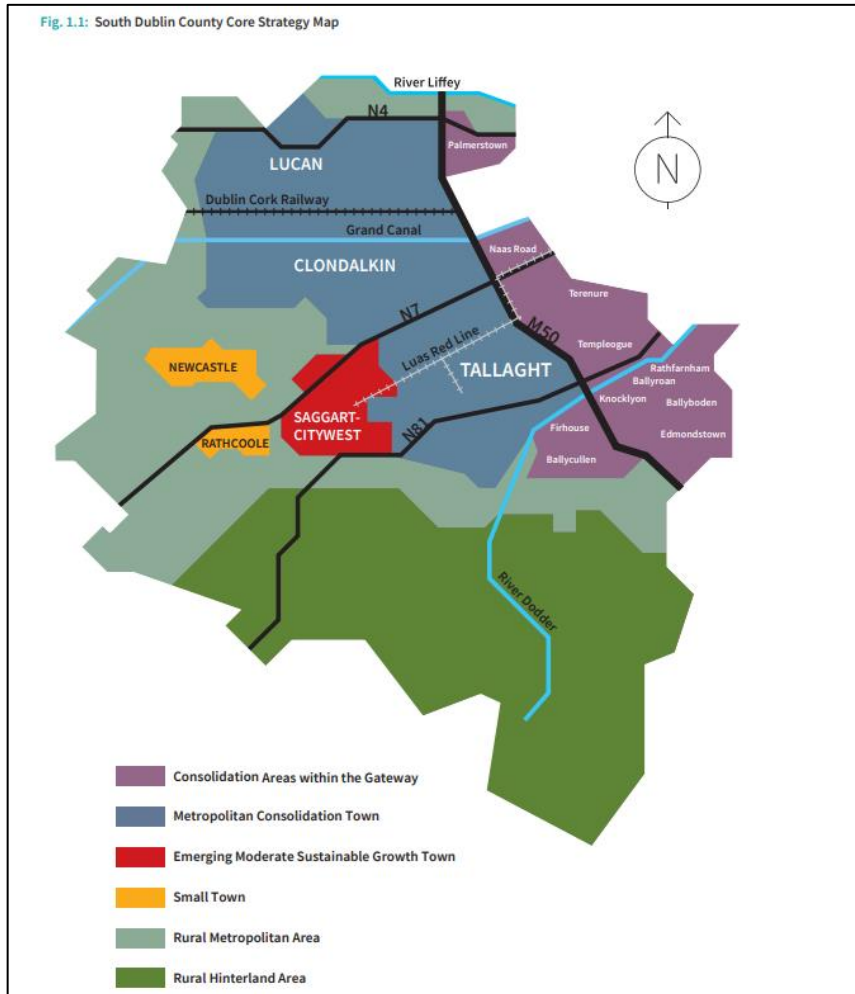


Figure 2.1: South Dublin County Core Strategy Map

(Source: **Fig 1.1 of the South Dublin County Council Development Plan 2016 – 2022**)

In the current Development Plan, the Council identified sites which have capacity for housing development. The subject site was indicated in the following map (Figure 2.2 below) as being one of these sites.

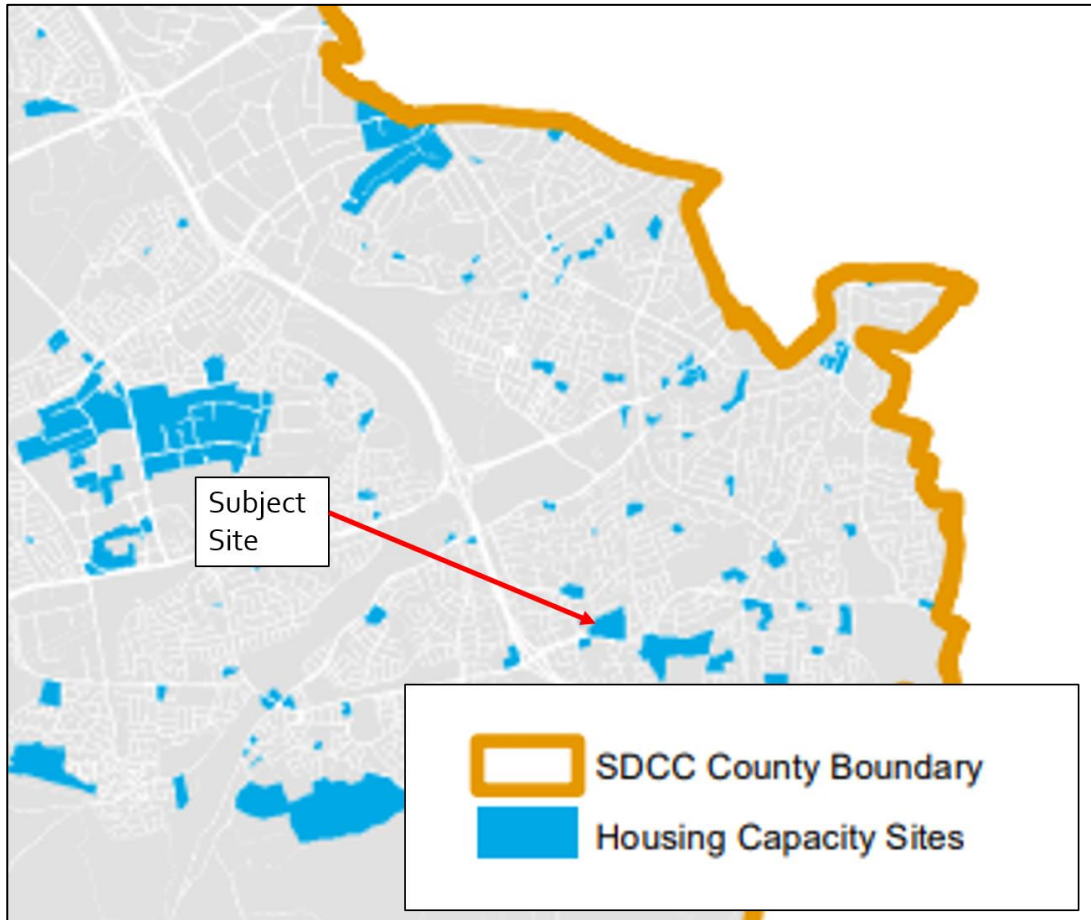


Figure 2.2: Housing Capacity Sites within South Dublin County Council

(Source: **Map 1.3 of South Dublin County Council Development Plan 2016-2022, Annotated by Thornton O’Connor Town Planning, 2019)**

Therefore, in the sequential development of South Dublin and the attempt to respond to the current housing demand context and shifts in planning policy, the subject site is suitably designated for residential development. The site’s location close to the urban core, public transport and services and facilities has influenced the site’s residential use along with the scale, height, and massing considered appropriate for the subject site.

2.4 Location is Eminently Suitable for ‘Built-to-Rent’ Accommodation as the Site is Well Served by Public Transport Providing Easy Access to a Range of Employment Locations

Important to the siting of Build-To-Rent developments is the availability of public transport. The subject site is well served by public transport as it is located adjacent to two bus routes which serve the area (No. 15 and No. 15b). We also note that Go Ahead Ireland bus route No. 175 runs adjacent to the site along Scholarstown Road with bus stops located directly in front of the subject lands. This service operates every 30 No. minutes during the week with an hourly service provided at the weekend.

Please see map below demonstrating the existing bus services serving the subject site.

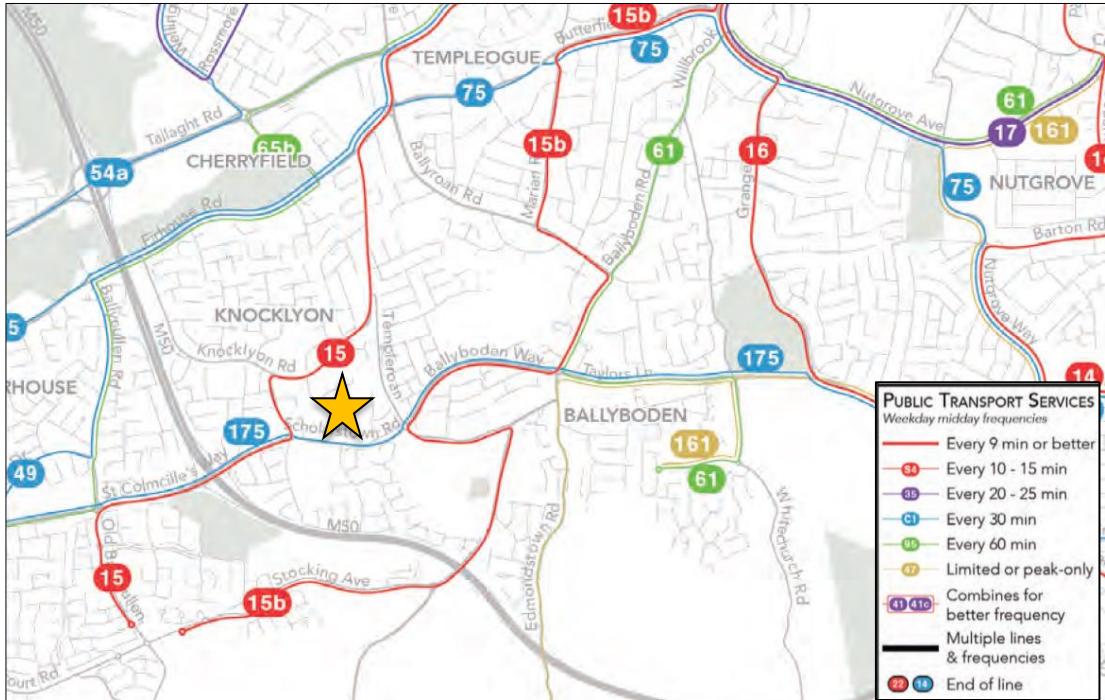


Figure 2.3: Existing Bus Routes in the Immediate Vicinity of the Subject Site (Indicative Location Denoted by Orange Star)

(Source: BusConnects.ie, Existing Bus Network, Annotated by Thornton O'Connor Town Planning, 2019)

The No. 15 Bus is a high frequency service running 8-12 No. minutes throughout the majority of the day (10 – 15 No. minutes off-peak). The nearest stop is located a short distance from the site on Saint Colmcille’s Way, c. 300 metres away. The No. 15 route travels from Firhouse to Clongriffin DART station via Rathmines, the City Centre and Fairview.

The No. 15b is a slightly less frequent bus to the Ringsend Road (Barrow Street) with its nearest stop c. 450 No. metres away (outside Scholarstown Wood estate). With services running with a frequency of 15 No. minutes, the No. 15b allows local residents to head directly to the city centre.

Please see Figure 2.4 below demonstrating the bus services available in proximity the site:

Bus Routes Nearby					
Route Number	Distance to Nearest Stop	Destinations	Peak Frequency	Off-Peak Frequency	
Highest Frequency					
15	c. 300 No. metres to the West on St Colmcille’s Way	Ballycullen to Clongriffin Dart Station (Via Terenure, Rathmines City Centre, Fairview)	8-12 minutes	10-15 minutes	

15b	c.450 No. metres to the East on Scholarstown Road (Beside Scholarstown Wood)	Stocking Avenue to Ringsend Road (Barrow Street)	15 minutes	15 minutes
175 (Go Ahead)	Adjacent to the site (and c.100 – 150 No. metres to the west)	Citywest, Tallaght, Dundrum	30 minutes	60 minutes
Other Services of Note				
75/A	1.5 Km Knocklyon Avenue, on the R114	Dun Laoghaire to Tallaght, Via Dundrum Luas and Stillorgan (Via Dundrum and Stillorgan)	30-45 minutes	45-50 minutes
49	1.5 km to Crossfield Stop on the R114 (Beside Delany's Public House)	The Square Tallaght to Pearse Street	30 minutes	30 minutes
65b	1km Ballycullen Road	City West to Poolbeg Street (via Rathmines)	20 minutes-40 minutes	40 minutes
Night Services				
15 N	Stop in front of subject site.	Richmond Street, to Tallaght (Ellensborough)	Night Service	Friday and Saturdays: 0000, 0200, 0400
49N	1.5 Km on R114	Rathmines Garda Station, to Tallaght (Kilnamanagh)	Night Service	Friday and Saturdays: 0000, 0200, 0400

Figure 2.4: Proximate Bus Services and Frequencies

(Source: Google Maps, Dublin Bus, and Go Ahead (No. 175), Annotated by Thornton O'Connor Town Planning, 2019)

The existing bus services available in proximity to the subject site (No. 15, 15b, 175 and 75) offer frequent services to city centre employment areas. The No. 15 bus route is a frequent bus service which crosses the city centre, while the No. 15b is a slightly less frequent service which travels to the Grand Canal Dock. A high concentration of Information Technology companies such as Google and Facebook are located within the Grand Canal Dock area and as such considered to be a major location for the attraction of inward investment to the Irish economy.

Sandyford Business District is located c. 9.5km to the east of the site the general area contains several large-scale employers such as Microsoft, Vodafone Ireland, SSE Airtricity, and the Beacon Quarter Hotel and Private Hospital, as well as Leopardstown Race Course.

This can currently be accessed by the No. 75 bus, however this will be improved under Bus Connects.

Tallaght contains Third Level education with Institute of Technology Tallaght, which is now part of the Technical University of Dublin. This is in combination with Dublin Institute of Technology and Institute of Technology Blanchardstown. This will result in a significant increase in investment in trade skills, technical skills, research and further/ higher education for the surrounding areas. This will also provide possible avenues for upskilling and continuous professional development for residents of any development of the subject site.

In our professional planning opinion, the subject site is well located in terms of access to the wider employment, enterprise and education hubs of the Greater Dublin Area. We contend that the sites location in close proximity to the emerging growth areas of Sandyford and Tallaght will present further employment prospects in the near future, particularly having regard to the improvement of bus services and easy access to the City Centre.

2.5 Improvement of Public Transport in the Area

In addition to existing bus services, the subject site will benefit from improved services as part of the Bus Connects programme. Bus Connects is a national program of investment in the bus network of the Greater Dublin Area into the near future.

The Mobility Management Plan prepared by DBFL Consulting Engineers enclosed separately states the following in relation to Bus Connects:

'The National Transport Authority (NTA) has recently published a consultation report entitled 'Dublin Area Bus Network Redesign Public Consultation Report'. The report introduces a number of significant changes to the bus services within Dublin including: -

- *Services to be arranged along seven cross-city super-frequent spines*
- *Dramatic increase in the numbers of orbital services*
- *Increase in the number of all-day high-frequency services*
- *Move to a simplified two-fare system*
- *A new route numbering system.*

Under the proposals, the level of bus service will increase by 27%. This includes services on 11 brand-new orbital routes that will operate on a 15-minute frequency or better, in the north, south and west of the network area.'

In regard to the subject site, Figure 2.5 demonstrates the preferred option emerging which will potentially open the site up for greater access to many areas of the city, increasing employment opportunity and access to local services and amenities.

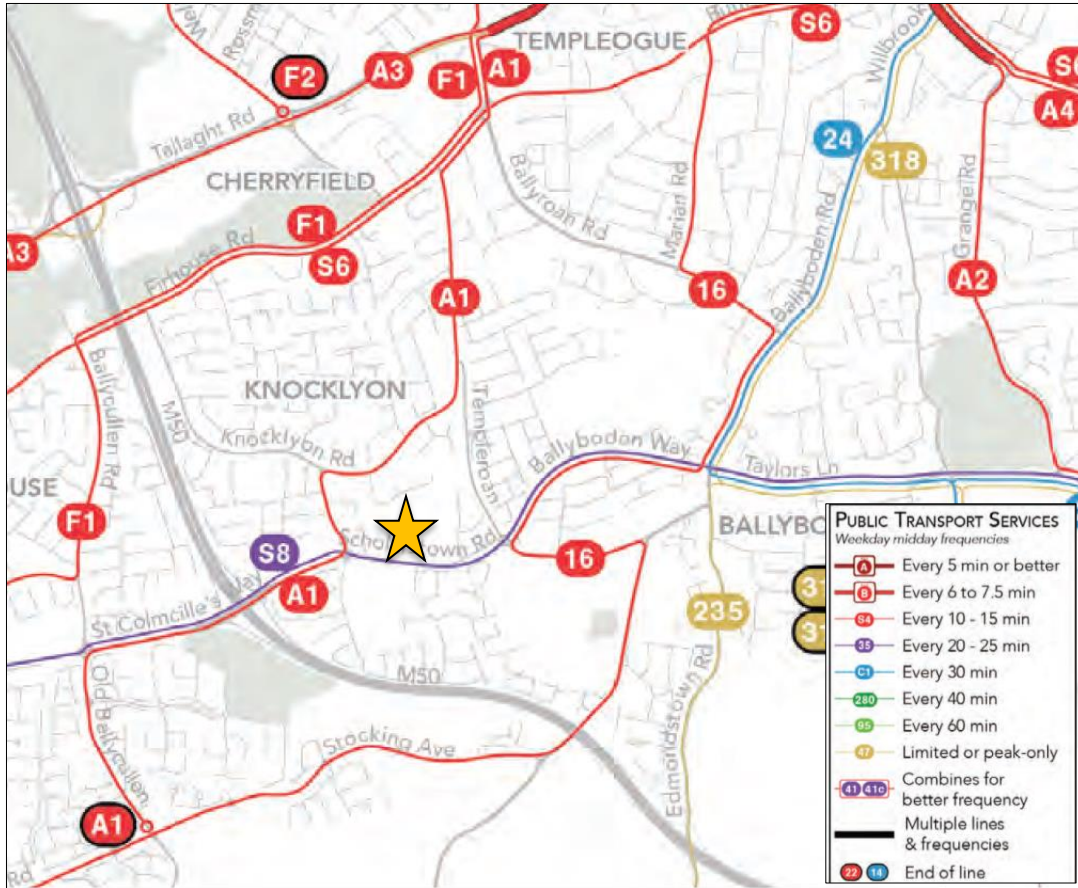


Figure 2.5: Emerging Preferred Network Options Surrounding the Subject Site (Indicative Location Denoted by Orange Star)

(Source: **BusConnects.ie, Proposed Network, Annotated by Thornton O'Connor Town Planning, 2019)**

As proposed, the “A1” route will form part of the “A Spine” and specifically will run near the western boundary of the subject site from Beaumont through the City Centre to Knocklyon (10-15 No. minutes off-peak service).

The proposed S8 route will pass directly along the southern boundary of the subject site and will run from Tallaght to Dun Laoghaire via the Sandyford Industrial Estate. This service is intended to have an off-peak service time of every 20-25 No. minutes. This will open up the subject site to a greater array of employment, shopping and recreation opportunities. The No. 16 will serve Kiltipper, Ballycullen, Ballyboden, Rathfarnham, Terenure, Harold’s Cross, Clanbrassil St, Dublin City Centre and will have an off-peak service time of every 10 – 15 No. minutes.

We submit that the availability of frequent bus services in close proximity to the subject site demonstrates that the subject site is easily accessible which will allow future tenants of the development easily access their place of employment. The proposed scheme will create a highly sustainable development through the promotion of sustainable modes of transport.

2.5.1 Greater Dublin Area Cycle Network Plan (2013)

In addition to the upgrades proposed under BusConnects, we note that the National Transport Agency (NTA) for a Greater Dublin Area Cycle Network have a long term plan which will expand and advance the provision of improved cycling facilities for the Dublin Region. These range from basic cycle lanes on existing streets, segregated paths where there is space to do so and Greenways along major rivers, and the Royal and Grand Canals.

The subject site is located to the south of the proposed Dodder River Greenway. The Dodder River runs from Blessington in the Dublin and Wicklow Mountains, to Dublin Docklands. When complete this will offer a mostly segregated commuting and tourist trail from the mountains to urban villages, and the large employer destinations around Grand Canal Dock and the wider Docklands.

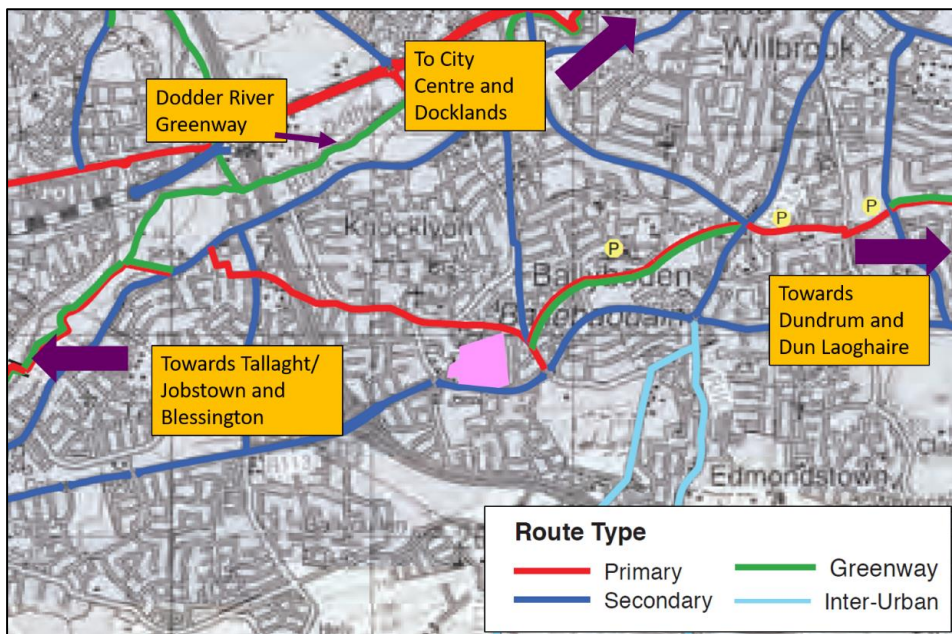


Figure 2.6: Proposed Cycle Network Surrounding Subject Site (Indicative Site Boundary in Pink)

(Source: *Greater Dublin Area Cycle Network Plan (2013)*, Sheet 2 CN2, Annotated by Thornton O'Connor Town Planning, 2019)

The NTA Cycle Network Plan and the *South Dublin County Council Development Plan 2016-2022* both indicate an upgraded link to the north of the site running west-east which will provide connections onwards to Dundrum and Dun Laoghaire.

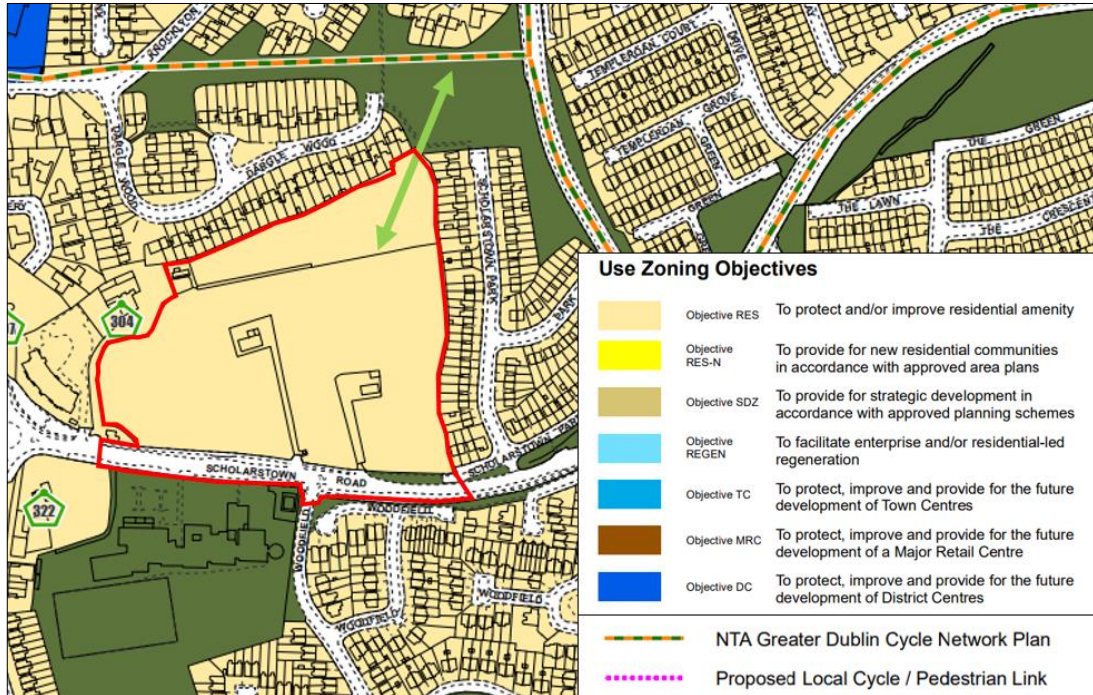


Figure 2.7: Site Permeability, as Indicated by the Green Arrow at the North-Eastern Boundary of the Subject Site (Indicatively Outlined in Red) may become an Important Permeable Connection to the Wider Cycling Network

(Source: *South Dublin County Council Development Plan 2016 – 2022, Annotated by Thornton O’Connor Town Planning, 2019*)

Therefore, the facilitation of a pedestrian connection from the north-eastern corner of the subject site to the public open space in Dargle Park will add greater permeability and social cohesion to the wider area. It is noted from the above that the cycling infrastructure will be greatly improved in the coming years in proximity to the subject site.

2.6 There are a Wide Range Services and Facilities Available in Close Proximity to the Subject Site

The immediate area is also well served by commercial and community offerings, with Knocklyon being the closest district centre. The Knocklyon Shopping Centre is an 8 No. minute walk from the subject site. There is also a neighbourhood level commercial offering including a Spar nearby on Orlagh Grove (< 200 metres away).

The local area is also well served by educational facilities, which are all within comfortable walking distances.

Education nearby the Subject Site	
Primary Level	
Name	Distance
St Colmcille’s	570 Metres
Scoil Naomh Padraig	1.1 Kilometres
Secondary Level	
Sancta Maria (Girls School)	800 Metres

Coláiste Éanna (Boys School)	1.2 Kilometres
Further Education	
St Colmcille's Community School	Directly Opposite the Site on Scholarstown Road

It is noted that the Schools Demand Assessment enclosed with the application concludes that 4 No. local primary schools recorded decreases over the last 3 No. years therefore indicating an ability to absorb demand. There is also 1 No. primary school planned to be constructed in the area (Gaelscoil Cnoc Liamha in Knocklyon).

The Assessment also notes that 2 No. local post-primary schools have recorded a decrease in enrolment numbers over the last 3 No. years which also indicates an ability to absorb demand. There is 1 No. post-primary school planned to be constructed locally (Firhouse ET Secondary School). It should be noted that there is an expected lower frequency of children to catered for in the Build-to-Rent element of the scheme (which represents 81% of the units) compared to a similar Build-to-Sell development.

In terms of other community facilities, St Colmcille's Church and Pastoral Care Centre, as well as the Knocklyon Community Centre are located to the rear of Knocklyon Shopping Centre.

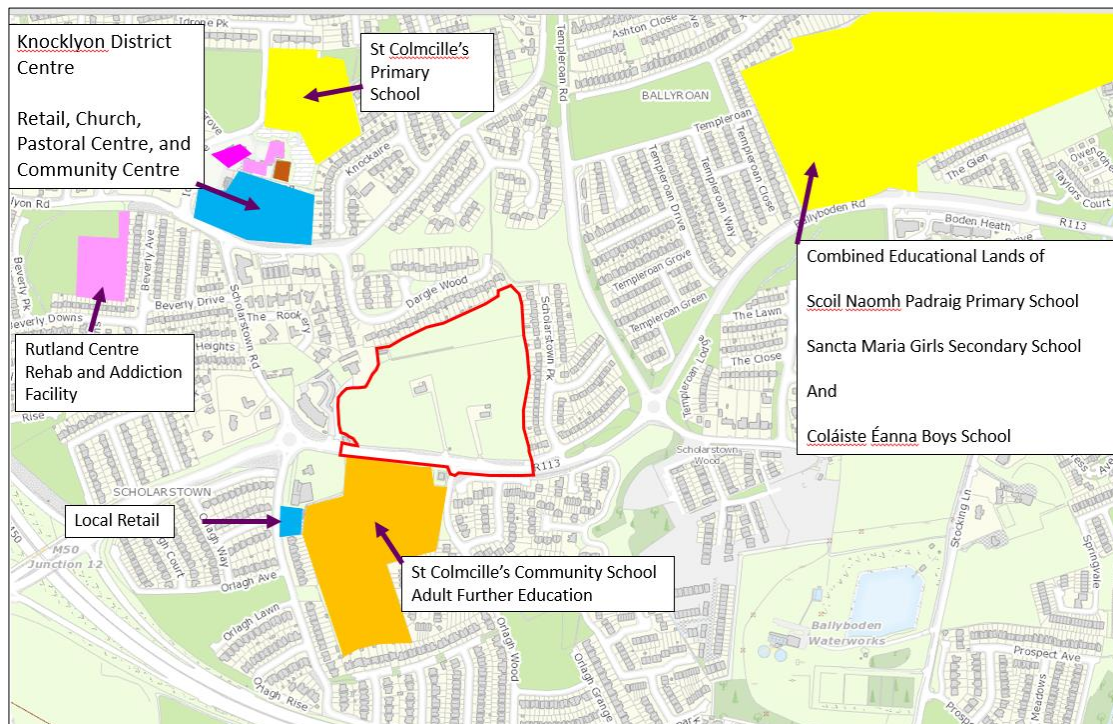


Figure 2.8: Map of the Surrounding Community Infrastructure Including Primary and Secondary Education (in Yellow), Further Education (in Orange), Local Retail (in Blue) and Other Facilities (Pink)

(Source: www.myplan.ie, Annotated by Thornton O'Connor Town Planning, 2019)

Therefore, it is clear from the examples above that there are a variety of facilities and services located in close proximity to the subject site that the future residents of the scheme can utilise on foot or bicycle. The proposed scheme also provides a gymnasium, lounge, kitchenette and roof terrace for the residents of the Build-to-Rent apartments in addition to a 2 No. retail units, 2 No. café/restaurant units, and crèche for the use of all residents and existing residents immediately adjacent to the site if required.

2.7 There is an Acute Shortage of Rental Units Available in the Local Area

It is well documented that there is a critical shortage of residential accommodation in Ireland and it is considered that the development of Build-to-Rent units have the potential to emerge as a distinct segment within the overall accommodation sector. On 7th October 2019 Thornton O'Connor Town Planning conducted a search of rental properties in the Knocklyon area. On this date there were just 4 No. properties to rent which included 2 No. 3 bed units, 1 No. 4 bed unit and 1 No. 5 bed unit.

We submit that the proposed Build-to-Rent element of the scheme will provide an alternative rental option that delivers high quality social interaction/amenity spaces. As noted above, rental properties are in very scarce supply in this area of Dublin. As a result of the disparity between supply and demand in rental accommodation, the price of available properties has become unaffordable for many workers as discussed in Section 2.9 below.

2.8 The Shortage of Housing Units in Dublin 16 Has Resulted in Rental Accommodation Price Surges

As documented in an article in *The Irish Times* entitled 'Average rents reach all-time high of €1,304 per month', as published on 17th August 2018, rental prices across the State are now 26% higher than Celtic Tiger peak. The article states that in Dublin, rents are now 34 per cent, or almost €500 a month, higher than the previous high point a decade ago. The capital also has the highest average rents in the country of €1,936 with rental growth running at 13.4 per cent in the year to June 2018.

At a more micro level analysis the subject lands are located in Dublin 16. The Daft.ie Rental Price Report entitled 'An analysis of recent trends in the Irish rental market 2019 Q2' documents the average monthly rent nationwide increased by 6.7% in the past year to €1,391.

As documented in Figure 2.10 below, the average monthly rental cost for a one bed apartment in Dublin 16 is €1,482, which represents an increase of 7.7% from Q2 2018 to Q2 2019. However as documented in Section 2.8 above, there is currently just 4 No. rental properties available in the Knocklyon area. To rent an average house in Dublin 16 ranges from €1,482 to €2,297 per month (dependent on number of bedrooms).

	1 Bed Apartments	2 Bed House	3 Bed House	4 Bed House	5 Bed House
Dublin 16	€1,482	€1,704	€1,975	€2,175	€2,297
Percentage Change from Q2 2018	+7.7%	+7.4%	+6.3%	+6.3%	+2.4%

Figure 2.10: Average Rental Prices in Dublin 16

(Source: Abstracted from <https://www.daft.ie/report/2019-Q2-rental-daftreport.pdf>)

The Build-to-Rent element of the residential scheme will provide an accommodation typology for persons looking to rent close to services and employment opportunities on excellent public transport routes. In addition, the provision of amenities and facilities for social interaction and integration within the site will ensure a high-quality standard of living for the residents of the entire scheme. The provision of Build-to-Rent units at the subject site will therefore significantly contribute to addressing the acute shortage of short-medium term residential accommodation within Dublin which has had associated impacts on rental costs and housing affordability.

	1 Bed Apartments	2 Bed Terraced	3 Bed Semi-Detached	4 Bed Bungalow	5 Bed Detached
Dublin 16	€220,000	€301,000	€415,000	€716,000	€788,000
Percentage Change from Q3 2018	-5.2%	-2.4%	-1.1%	+7.4%	+3.4%

Figure 2.11: Average Asking Prices in Dublin 16

(Source: Abstracted from <https://www.daft.ie/report/2019-Q3-houseprice-daftreport.pdf>)

The proposed residential development will provide choice of tenure as both Build-to-Rent and Build-to-Sell units are provided within the scheme, recognising the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect household formation and housing demand in addition to providing permanent accommodation for those seeking to purchase a home.

3.0 SITE LOCATION AND DESCRIPTION

3.1 Site Location

The subject site has a developable area of 53,510 sq m (5.35 Hectares) and is located on the northern side of the R113 Scholarstown Road. Works are also proposed to Scholarstown Road and Woodfield junction including new traffic signals, the elimination of the left-turn slip-lane into Woodfield off Scholarstown Road, upgraded public lighting and upgraded cycle and pedestrian facilities on an area measuring 0.7 hectares, providing a total application site area of 6.05 hectares.

The lands are located c. 500 metres (as the crow flies from the M50). The site has been enclosed by development in recent decades and remains a location of mature agricultural legacy, with many hedgerows and trees amongst the tilled lands. It is however zoned residential and has been identified as part of the hierarchy of development for providing housing within the current *South County Dublin Development Plan 2016 – 2022*.



Figure 3.1: Location of Subject Site (Indicative Site Boundary Outlined in Red)

(Source: www.myplan.ie, Annotated by Thornton O'Connor Town Planning, 2019)

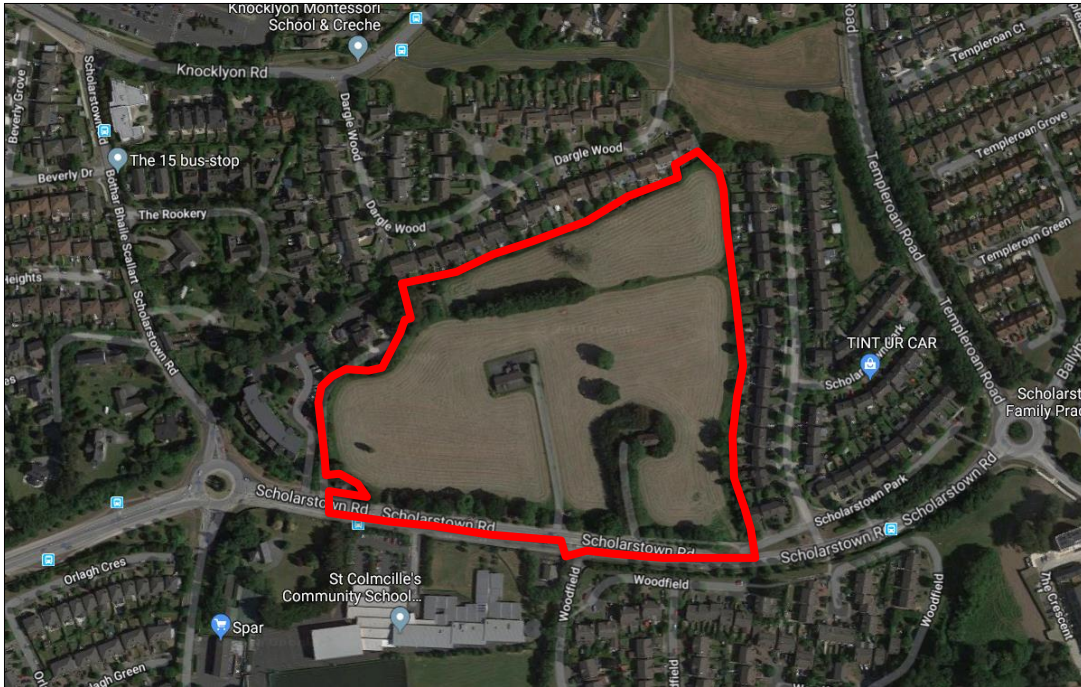


Figure 3.2: Aerial View of Subject Site, Indicative Site Boundary in Red

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2019)

3.2 Site Description

The subject site contains 2 No. detached residential dwellings and ancillary outbuildings. The dwellings are not considered to be of any architectural or historic significance that would preclude their demolition as shown in Figure 3.3 below and detailed in the Architectural Heritage included as Chapter 6 (prepared by Molloy & Associates Architects) of the Environmental Impact Assessment Report submitted with this application.



Figure 3.3: Photographs of the 2 No. Detached Dwellings at the Subject Site

(Source: Thornton O'Connor Town Planning, 2019)

The site is currently accessed from the R113 Scholarstown Road to the south via 2 No. entrances to the detached dwellings. The site is completely underutilised and has significant potential for densification (current density is just 0.37 No. units per hectare).

3.3 Site Context

The site is bound by low density residential units to the north and east, primarily two storey semi-detached dwelling houses and by a part three – part four storey 'Ros Mor View' apartment development and detached dwellings including a protected structure to the west. The R113 'Scholarstown Road' is located along the southern boundary. Directly opposite the site on Scholarstown Road is St Colmcille Community School. The north-east of the site abuts the public open space in Dargle Park which provides an east-west pedestrian connection from Templeroan Road to Knocklyon Road.

The site is located in an area comprising predominately residential development (predominately late 20th century and more recent housing developments). However, the area also contains a mix of other uses such as education facilities and local shops including Knocklyon Shopping Centre (8 No. minute walk from the subject site) which contains a large Supervalu and Lloyds Pharmacy for example. There is also neighbourhood level commercial units located on Orlagh Grove (< 200 metres away) including a Spar convenience store.

In terms of other community facilities, St Colmcille's Church and Pastoral Care Centre, as well as the Knocklyon Community Centre are located to the rear of Knocklyon Shopping Centre.

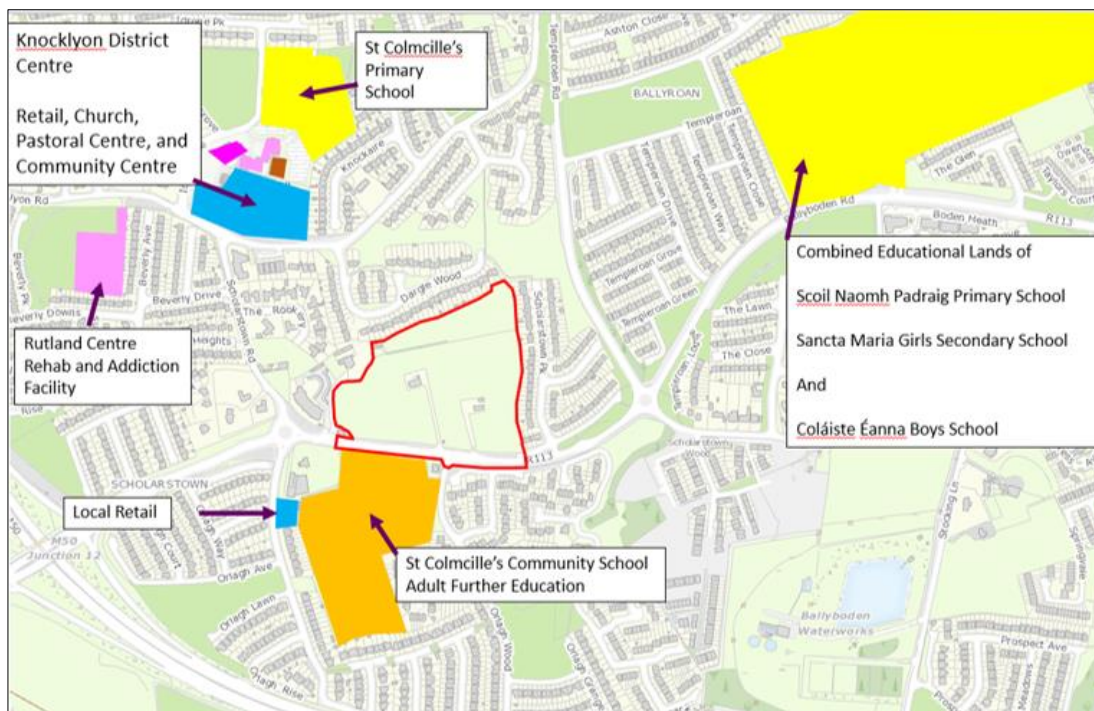


Figure 3.4: Map of the Surrounding Community Infrastructure Including Primary and Secondary Education (in Yellow), Further Education (in Orange), Local Retail (in Blue) and Other Facilities (Pink)

(Source: www.myplan.ie, Annotated by Thornton O'Connor Town Planning, 2019)

It is clear from Figure 3.4 above that a wide range of services and facilities are located in close proximity to the subject site for future residents to utilise.

4.0 PLANNING HISTORY

4.1 Overview of Planning Applications at the Subject Site

There is 1 No. live planning application pertaining to the majority of the subject site which relates to demolition and enabling works (see below).

Reg. Ref.	SD19A/0088
Date of Application:	15 th March 2019
Dev. Description:	Demolition and enabling works on a 5.2 hectare site located north of Scholarstown Road incorporating a dwelling known as 'Beechpark'; demolition of the 172 sq m, single storey dwelling located towards the western portion of the site (known as 'Beechpark') and the diversion of existing private foul drainage network within the boundary of the subject site (maintaining services to existing third party connections).
SDCC Decision	Grant Permission
SDCC Decision Date	9 th May 2019
ABP Ref.	ABP-305147-19
ABP Decision Due Date	17 th December 2019

We note that significant archaeological works have taken place at the subject site in recent months. It was therefore considered appropriate to apply for demolition and enabling works at the subject site, given that the land has been disturbed to facilitate this archaeological work in order to ensure that the proposed SHD application would be progressed as soon as possible (if An Bord Pleanála is minded to grant permission for the subject SHD application).

It is noted that although granted permission by South Dublin County Council, the enabling works application has been appealed by third parties to An Bord Pleanála.

4.2 Overview of Relevant Planning Applications Proximate to the Subject Site

This section will discuss in detail the relevant planning applications on lands in close proximity to the subject site.

4.2.1 Ros Mor View

Reg. Ref.	S01A/0852 (PL06S.130122)
Date of Application:	19/12/2001
Location:	"Rosmor", Scholarstown Road, Knocklyon, Dublin 16.
Dev. Description:	Three storey with penthouse apartment building comprising 4 No. 3 bed apartments, 26 No. 2 bed apartments, 7 No. 1 bed apartments 65 No. car spaces, bicycle storage, refuse storage area, new vehicular/pedestrian entrance off Scholarstown Road, new boundary wall treatment to north boundary and associated landscaping.

Additional Information Received:	25 th March 2002 <i>(Revised Drawings as per ABP Inspectors Report)</i>
SDCC Decision:	Grant Permission
SDCC Decision Date:	21 st May 2002
ABP Reg. Ref.:	PLo6S.130122
ABP Decision:	Grant Permission
Final Grant Date:	16 th October 2002
Inspector's Report:	We note that the Inspector recommended that permission be Refused for reasons relating to deficient private open space, surface car parking encroaching on Ros Mor House and the quantum of north facing apartments.

SDCC Reg. Ref. So1A/o852 [ABP Ref. PLo6S.130122] relates to the provision of a 37 No. unit apartment scheme which was Granted Permission by South Dublin County Council and An Bord Pleanála with a Final Grant Date of 16th October 2002. As noted above the Inspector recommended a Refusal however the Board considered that *'the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would not adversely impact on the character of the protected structure, would be acceptable in terms of traffic safety and convenience and would be in accordance with the proper planning and development of the area.'*

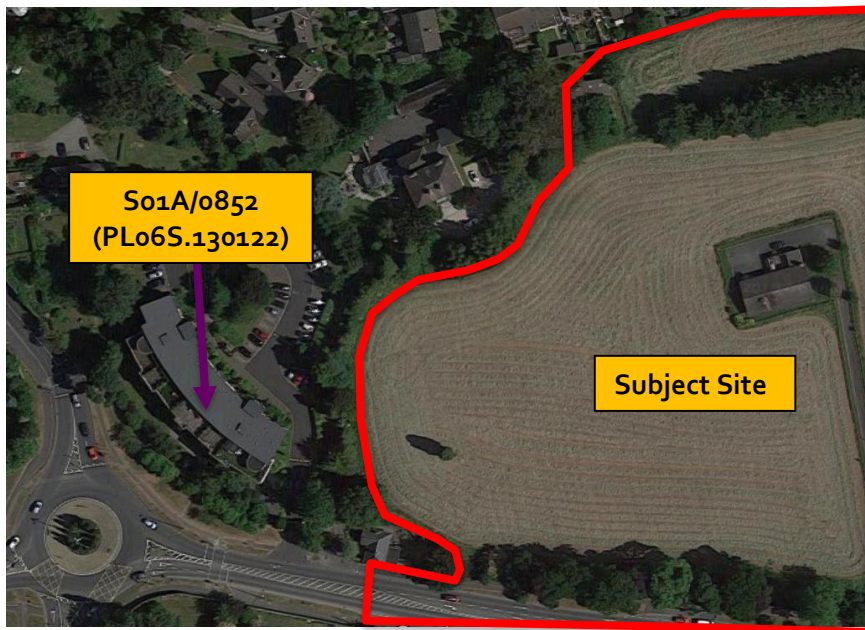


Figure 4.2: Location of SDCC Reg. Ref. So1/o852 Adjacent to the Subject Site
 (Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2019)

It is noted that this scheme provides a 4 No. storey building adjacent to the subject site.

4.2.2 Scholarstown Wood

Reg. Ref.	SD15A/0017 (PLo6S.244732) (as Amended)
Date of Application:	26 th January 2015
Location:	Scholarstown Road, Rathfarnham, Dublin 16
Dev. Description:	10 year permission for a residential development consisting of 317 dwelling units (247 No. houses and 70 No. apartments) and 223 sq m. crèche including two vehicular accesses from Scholarstown Road and one vehicular access from Stocking Lane, all associated site and infrastructural works including foul and surface water drainage, 599 No. car parking spaces (534 No. surface and 65 No. underground), landscaping and public open space, boundary walls and fences, roads, cycle paths and footpaths. The development consists of 247 No. houses (detached, semi-detached, terraced and end-terrace two and three storey units) and 70 No. apartments (Block A, B and C) to be provided as follows: (i) 6 No. 2 bed terrace and end terrace houses (Type 3C and 3D), (ii) 124 3 bed terrace, end-terrace and semi-detached houses (Type 1A, B & C; 3A, B & E and 4A, B & C); (iii) 102 No. 4 bed terrace, end-terrace, semi-detached and detached houses (Type 2A, B, C, D & E and Type 5); (iv) 15 5 bed detached houses (Type 6); (v) 14 1-bed apartments, 51 2-bed apartments and 5 2-bed with study apartments in 3-4 No. storey apartment blocks (Block A, B [both over basement] & C); (vi) a ground floor crèche with a gross floor area of 223 sq m within Block C all on a site of approx. 9.77 hectares located south of Scholarstown Road, west of Stocking Lane, north of Ballyboden Waterworks and east of Woodfield Ballyboden.
SDCC Decision:	Grant Permission
SDCC Decision Date:	20 th March 2015
ABP Reg. Ref.:	PLo6S.244732
ABP Decision:	Grant Permission
Final Grant Date:	12 th September 2015

The Inspector in their Report refers to the National Transport Authority's submission regarding the proposed development and impact on traffic:

'As the subject site is served directly by a frequent bus route, with a service every 10 minutes in the peak hour and is located within the Metropolitan Area of the GDA, as defined by the Regional Planning Guidelines, and with the urban footprint of the city and suburbs, its development for residential use is consistent with the above principles of planning policy.'

'In order to cater for the increased traffic which will arise as a result of the proposed development, it is necessary to upgrade Scholarstown Road along the northern edge

of the subject site to a standard more closely associated with the district distributor function it will perform, in order to cater safely for all modes.'

The site subject of this application is located proximate to 2 No. bus routes and directly fronts the wider segment of the Scholarstown Road which feeds into the junction with the M50, and also provides a link road through to Rathfarnham and Ballinteer. We also note that the reduced car parking provision of 459 No. car parking spaces to serve the 480 No. Build-to-Rent and 110 No. Build-to-Sell units will ensure that sustainable modes of transport are encouraged.

It is noted that the residential density of this development at the time of this application was 36.6 residential units per hectare. Under the previous *South Dublin County Council Development Plan 2010 – 2016* it is noted that the following Objective sought densities as follows:

Objective H8:

'...the provision of net residential densities in the general range of 35-50 dwellings per hectare.'

The current Development Plan maintains a similar density, however current National Policy seeks higher densities in sustainable locations such as the subject lands as will be discussed in more detail in Section 7.0.



Figure 4.3: Location of SDCC Reg. Ref. SD15A/0017 (PLo6S.244732) in Proximity to the Subject Site

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2019)

4.2.3 The Rookery

Reg. Ref.	SD18A/0227 [ABP Ref. ABP-304162-19]
Date of Application:	26 th June 2018
Location:	Mount Michael & Wits End, The Rookery, Scholarstown, Dublin 16
Dev. Description:	Demolition of existing derelict outbuildings and structures and the construction of 8 dwelling houses as follows: 4 Type A detached, 2 storey 4 bedroom, to the north of Mount Michael House; 2 Type B semi-detached, 2 storey, 4 bedroom, to the east of Mount Michael House; 1 Type C detached, 2 storey, 4 bedroom, to the south of Mount Michael House with proposed access from Scholarstown Road. 1 courtyard house: dormer style detached house, 3 bedroom, with projecting front dormer, to the west of Mount Michael House, all with private rear gardens. Modified entrance to the site from The Rookery with widened vehicular entry and pedestrian entrance. All associated site works including shared space access road and footpaths, driveways, parking, hard and soft landscaping, boundary treatments and drainage. Part of boundary wall with Scholarstown Road to be removed and rebuilt to form new vehicular access to house 8 (House Type C). There will be no change to Mount Michael House (a Protected Structure); proposed works will only consist of landscaping and site alterations, including new boundaries, proposed gates in existing courtyard walls to access front and rear gardens and new vehicular entrance and gate to front, accessed through The Rookery estate
Additional Information Received	15 th February 2019
SDCC Decision Date:	14 th March 2019
ABP Reg. Ref.:	ABP-304162-19
ABP Decision:	Grant Permission
Final Grant Date:	7 th October 2019

On 14th March 2018, South Dublin County council refused planning permission for 5 No. reasons relating to conservation, site entrance, inadequate bat survey submitted and surface water attenuation.

An Bord Pleanála overturned South Dublin's Decision and granted permission for 6 No. dwellings on 7th October 2019. The granted scheme has been reduced from the originally proposed 8 No. dwellings [1 No. removed at Further Information and 1 No. reduced by Condition No. 2 of the Board Order]. Condition No. 2 omits a dwelling in the interest of protecting the integrity, setting and character of the protected structure at the site. We note that the subject site is positioned at a distance from the development of 6 No. dwellings and existing buildings are located between the subject site and this small development.



Figure 4.4: Location of SDCC Reg. Ref. SD18A/0227 (ABP-304162-19) in Proximity to the Subject Site

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2019)

The An Bord Pleanála Inspector noted the following in their Assessment:

'The site is an existing residential curtilage within a large residential suburban area, where there are shops, schools, amenity facilities to cater for families and a broad spectrum of the population. The National Planning Framework calls for new developments to be located on serviced lands in cities. The subject location is a strategic location close to public transport links and a broad range of community and commercial facilities.' [Our Emphasis].

Therefore, having regard to this recent assessment by An Bord Pleanála, it is clear that this area of South Dublin is a sustainable and strategic location for residential development.

5.0 PRE-PLANNING CONSULTATION

5.1 Pre-planning Meeting No. 1 with South Dublin County Council – 7th February 2019

A Section 247 pre-planning meeting took place on 7th February 2019 at the offices of South Dublin County Council and was attended by the following:

South Dublin County Council Team	
Hazel Craigie (HC)	Senior Planner
Jim Johnston (JJ)	Senior Executive Planner
Róisín Ní Dhubhda (RND)	Assistant Planner
Willie Purcell (WP)	Roads
Brendan Redmond (BR)	Environment and Public Realm
Paddy Malone (PM)	Environment and Public Realm
Brian Harkin (BH)	Water Services and Drainage
Irenie McLoughlin (IM)	Architectural Conservation Officer
Applicant and Design Team	
Mark Forrest (MF)	Ardstone Homes Limited
John White (JW)	Ardstone Homes Limited
Steve Cassidy (SC)	Ardstone Homes Limited
John Fleming (JF)	John Fleming Architects
Brendan Dineen (BD)	John Fleming Architects
Brendan Keogh (BK)	DBFL Consulting Engineers
Dan Reilly (DR)	DBFL Consulting Engineers
Marc Campbell (MC)	Mitchell & Associates Landscape Architecture
Patricia Thornton (PT)	Thornton O'Connor Town Planning
Elaine Hudson (EH)	Thornton O'Connor Town Planning

The main comments which arose in the first pre-planning meeting are as follows:

Introduction

- PT introduced the proposed development and outlined the number of Build-to-Rent and Build-to-Sell units that were proposed in addition to the retail/café/restaurant and residential amenity elements of the scheme.
- PT noted that an archaeological dig is being carried out at present with the Planning Authority seeking confirmation of the status of the site in this regard.

Archaeology

- JJ asked if testing had been carried out and JW responded by saying that a number of trenches have been surveyed and nothing of significance is expected to arise. A ringfort and medieval remains have been found but are not of significance.
- JW noted that the site had been effectively handed over to the Department and all findings will be reported to National Monuments.

- HC requested that an Archaeological Report is submitted. PT advised that this will be concluded in the coming weeks and will be submitted with the pre-app submission to An Bord Pleanála with a full report to follow in the EIAR.

Discussion on Commercial Element

- JF set out that the retail/café/restaurant units would be located to the front of the site.
- MF noted that there will be just small scale local convenience shops, a coffee shop, and food and beverage unit. MF noted that these elements will give the scheme a village feel and is intended that locals will visit here on foot.
- JJ noted that the site is not designated as local retail but an element can be permitted.
- HC commented on the building line of the retail element, preferring it to be further set-back.
- HC ultimately advised that she will be comfortable with small scale convenience and a café. SC advised a restaurant would be desirable providing food options into the evening and HC didn't raise a concern in principle. RND advised that careful consideration was required in respect of the rear of the commercial units/ventilation for the restaurant etc. in the context of impact on residents to the rear.

Build-to-Rent Amenity Space

- MF set out that the amenity building proposed to the front of the site contains management suite/concierge room and gym. HC advised that the amenity space here needs to be considered further.
- MF outlined the bespoke pavilion communal building which will be located in the open spaces to the centre which will be for the use of the Build-to-Rent residents only. MF noted that extensive research has been carried out in the designing of the subject scheme.

Parks Comments

- BR asked if a Bat Survey is being carried out. PT said this is lined up for May as it cannot be carried out until then and BR agreed. PT noted it would be lodged with the main SHD application.
- BR requested that the different areas of green/open space is clearly delineated on drawings e.g. central space, area to the west of the site, open space to the north towards Dargle Wood and the areas around the boundary of the site as well as the communal/semi-private spaces.
- BR requested that sufficient setbacks from trees is provided and considered that the existing set-backs along Scholarstown Road were inadequate. HC agreed and queried the building line of the retail/commercial element.
- HC advised that a Daylight/Sunlight Analysis will need to be carried out.

- MC advised that it has been a challenge to create a space which the residents can look into but is also not too public and feels that this has been achieved. MC also noted that play facilities, bicycle parking and seating will be incorporated throughout the scheme.
- BR queried how the public realm feature in the centre is going to work. MC responded by presenting example of how this feature will look.

Open Space to the North of the Site

- JJ and HC are in favour of the principle of providing this pedestrian link however felt that the design needs to incorporate more surveillance of this space and less opportunity as a space for gathering/anti-social behaviour. HC suggested that the design of the duplexes adjacent to this open space be revisited.
- SC noted that Ardstone can show how the link can be done at the boundary subject to the Planning Authority's consent. In response HC advised that the Planning Department's preference would be to supply a letter of consent from SDCC.

Roads

- DR noted the parking standard proposed for the scheme. The parking spaces assigned to the creche/retail elements have been kept to a minimum as these units are not intended as destinations for car users.
- DR outlined the access strategy through the signalised junction and outlined existing cycle and bus provision. DR commented that we should be looking at future bus provision and not just present and noted that linkages to various areas around Dublin are planned to be improved resulting in less travel time.
- WP commented that a second entrance should be provided. There was further discussion as to whether the second access would be for emergency access only.
- WP favoured the increased permeability of the northern park link.
- WP raised the potential of a setdown lay-by along the main road to service the shops.
- WP noted that traffic calming measures are required.

Drainage

- BH advised that SuDS should be used as much possible and include green roofs, swales etc.
- BH requested that a comment is made on flood risk.

Conservation

- IM advised that there is not much concern with the development from a conservation perspective as the layout maximises the setting of the Protected Structure and is happy with the screening provided by the trees.
- Careful consideration required in respect of the duplex units nearest the Protected Structure and its impact on adjacent trees which should be retained as they help screen the development from the Protected Structure.
- IM doesn't consider that the development would have a negative impact on the Gate Lodge and is happy with the setbacks.
- IM requested that an Architectural Heritage assessment is carried out and PT advised that Maoliosa Molloy is preparing this as part of an EIAR.

Other Comments

- SC noted that there may be an opportunity to provide private gardens at rear boundaries of duplexes.

5.2 Pre-Planning Meeting No. 2 with South Dublin County Council - 14th March 2019

A second pre-planning meeting took place on the 14th March 2019 and was attended by the following:

South Dublin County Council	
Hazel Craigie (HC)	Senior Planner
Jim Johnston (JJ)	Senior Executive Planner
Róisín Ní Dhubhda (RND)	Assistant Planner
Applicant & Design Team	
John White (JW)	Ardstone Homes Limited
John Fleming (JF)	John Fleming Architects
Patricia Thornton (PT)	Thornton O'Connor Town Planning
Rachel Deadman (RD)	Mitchells & Associates Landscape Architects

Introduction

- JW updated SDCC on the latest Archaeological works at the subject site.
- JF presented the design revisions to the scheme.
- RD presented the revised landscape masterplan detailing all boundary treatments and the general landscape strategy.

SDCC Feedback

- The Planning Authority generally welcomed the changes proposed including the reduced retail, set-back from the trees along Scholarstown Road, the provision of communal open space to the rear of the duplex blocks along the eastern boundary to maintain the wayleave and keeping the trees in common ownership and the general revised landscape approach.

Roads and Parking Issues

- JJ queried the width of the road advising a 5.5m width would be preferable in accordance with DMURS. JF advised that a 6 metre width was required to facilitate access and egress to parking spaces.
- JJ asked the Applicant to explore echelon or angled parking spaces to see if that would facilitate a narrower road width and to break up the mass of parking. We note that echelon parking has been introduced to the scheme – please see drawings by DBFL Consulting Engineers.
- JJ and HC asked that DBFL contact Willie Purcell from Roads to confirm if he is happy with an emergency access in lieu of a full second access. We note that Brendan Keogh of DBFL Consulting Engineers discussed the second access with Willie Purcell subsequent to the second pre-planning meeting. His initial opinion was that this should be a permanent left in / left out access. Following some discussion Mr Purcell accepted a 6.0m wide shared surface with adjacent footpath. Please see drawings by DBFL Consulting demonstrating the above.

Open Space at NE Corner of Site

- HC and JJ acknowledged that the Planning Authority were still very favourably disposed towards facilitating a link. We subsequently contacted SDCC in relation to getting a letter of consent for works required and discussions are currently taking place.

5.3 Pre-Planning Meeting with An Bord Pleanála – Friday 7th June 2019

A Section 5 pre-planning meeting took place on 13th February 2019 with An Bord Pleanála, South Dublin County Council and the Design Team in attendance as follows:

An Bord Pleanála	
Tom Rabbette (TR)	Assistant Director of Planning
Stephen O' Sullivan (SOS)	Senior Planning Inspector
Ciaran Hand (CH)	Executive Officer
Maeve Williams (MW)	Clerical Officer
South Dublin County Council	
Jim Johnston (JJ)	Senior Executive Planner
Róisín Ní Dhubhda (RND)	Assistant Planner
Ronan Toft (RT)	Drainage Department
Yasef Khan (YK)	Drainage Department
Robert Roche (RR)	Roads Department
John Hegarty (JH)	Roads Department

Applicant & Design Team	
John White (JW)	Ardstone Homes Limited
Mark Forrest (MF)	Ardstone Homes Limited
John Fleming (JF)	John Fleming Architects
Brian Boyle (BB)	John Fleming Architects
Dan Reilly (DR)	DBFL Consulting Engineers
Brendan Keogh (BK)	DBFL Consulting Engineers
Rachel Deadman (RD)	Mitchells & Associates Landscape Architects
Ciaran McGuinness (CM)	Archer Heritage Limited
Patricia Thornton (PT)	Thornton O'Connor Town Planning
Elaine Hudson (EH)	Thornton O'Connor Town Planning

- JF set out that the design has evolved over the past year and has been dictated by the large tree in the centre of the site and as a result a large central open space has been provided. The scheme has evolved taking into consideration national policy which has provided the opportunity for taller buildings and requires a denser development.
- PT noted that the central open space provided in the scheme is similar in size to Fitzwilliam Square which has the ability to absorb the heights proposed.
- SoS queried the status of the 'potential' pedestrian link through the north-eastern corner of the site. PT advised that a request for a letter of consent has been sent to the Local Authority to seek agreement to break through the existing boundary wall. JJ noted that the Planning Department are in favour of this link. [A letter of consent has subsequently been received – attached to the Planning Application Form].
- SoS queried whether there would be gated access to the scheme and JF said it would not be gated. JW noted that we are not separating the scheme from surrounding areas to encourage natural connectivity through the site.
- TR noted that this is the first scheme proposing both Build-to-Sell and Build-to-Rent and queried how the management will work. JW revised that the entire scheme would be managed under 1 No. company.
- PT concluded by stating that the large extent of the site has the capacity to absorb the proposed height and the Design Team feel comfortable with the height and massing provided within the scheme.

Further to this meeting, An Bord Pleanála issued their Opinion in respect of the scheme, which has been responded to in full.

6.0 PROPOSED DEVELOPMENT IN DETAIL

6.1 Description of the Proposed Development

The proposed development includes:

Demolition

The development will consist of the demolition of the 2 No. detached dwellings (1 No. (172 sq m) known as 'Beechpark' and 1 No. (182 sq m) known as 'Maryfield') in addition to a shed/garage associated with Maryfield (33.5 sq m) and associated outbuildings (47.1 sq m). Chapter 6 of the Environmental Impact Assessment Report enclosed with this application notes that both dwellings are of no architectural or historic interest and are suitable for demolition as part of the overall development. The chapter concludes that the demolition of both structures is recommended.



Figure 6.1: Images of the Subject Structures to be Demolished

(Source: Thornton O'Connor Town Planning, 2019)

Development

Ardstone Homes Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at a 5.35 hectare site located north of Scholarstown Road incorporating dwellings known as 'Beechpark' and 'Maryfield', Scholarstown Road, Dublin 16, D16 X3X8 and D16 N6V6. Works are also proposed to Scholarstown Road and Woodfield junction including new traffic signals, the elimination of the left-turn slip-lane into Woodfield off Scholarstown Road, upgraded public lighting and upgraded cycle and pedestrian facilities on an area measuring 0.7 hectares, providing a total application site area of 6.05 hectares.

The development will principally consist of: the demolition of all existing structures on site which include a single story dwelling known as 'Beechpark' (172 sq m), a 2 No. storey dwelling known as 'Maryfield' (182 sq m), with associated garage/shed (33.5 sq m) and associated outbuildings (47.1 sq m); and the construction of 590 No. residential units (480 No. Build-to-Rent apartment units and 110 No. Build-to Sell duplex units and apartments), ancillary residential support facilities and commercial floorspace. The total gross floor space of the development is 51,252 sq m over a partial basement of 5,888 sq m (which principally provides car and bicycle parking, plant and bin stores).

The 480 No. 'Build-to-Rent' units will be provided in 8 No. blocks as follows: 7 No. blocks ranging in height from part 5 to part 6 No. storeys (Blocks B1 – B5, C1 and C3) and 1 No. block ranging in height from part 4 to part 6 No. storeys (Block C2) and will comprise 246 No. one bed units and 234 No. two bed units. The 110 No. 'Build-to-Sell' units will be provided in 9 No. duplex blocks which will be 3 No. storeys in height (Blocks A1 – A9) and will comprise 55 No. two bed units and 55 No. three bed units.

The development will also consist of the provision of a part 1 to part 2 No. storey ancillary amenity block (Block D1) (414 sq m) within the central open space which comprises a gymnasium, lobby, kitchenette and lounge at ground floor level and lounge at first floor level in addition to a roof terrace (facing north, south and west) to serve the Build-to-Rent residents; a 2 No. storey retail/café/restaurant building (Block D2) (657 sq m) comprising 2 No. retail units at ground floor level (328.5 sq m) and a café/restaurant unit at first floor level (328.5 sq m); a creche (438 sq m) within Block C2 at ground floor level; and a management suite (261 sq m) and café/restaurant (288 sq m) within Block C3 at ground floor level.

The development provides a vehicular access off Scholarstown Road between Blocks C1 and C3 towards the south-east corner of the site; a separate pedestrian access and emergency vehicular access off Scholarstown Road between Blocks A9 and C2 towards the south-west corner of the site; the facilitation of a pedestrian connection from the north-east corner of the subject site to the public open space in Dargle Park; 459 No. car parking spaces (178 No. at basement level and 281 No. at surface level); bicycle parking; bin storage; boundary treatments; private balconies and terraces; hard and soft landscaping; plant; services; sedum roofs; PV panels; substations; lighting; and all other associated site works above and below ground.



Figure 6.2: CGI of the Proposed Scheme

(Source: 3D Design Bureau, 2019)

6.2 Key Site Statistics

Site Area:	5.35 hectares (Developable Site) + 0.7 hectares (Scholarstown Road) = total 6.05 hectares
Existing Gross Floor Area:	172 sq m, 182 sqm, 33.5 sq m, 47.1 sq m = 434.6 sq m
Extent of Demolition proposed:	All structures (434.6 sq m)
Gross Floor Area (above ground):	51,252 sq m
Gross Floor Area (below ground):	5,888 sq m
Site Coverage:	24%
Plot Ratio:	0.96
No. of Units per ha.	110 No.
Max. height:	18.53 m
Internal Amenity for Build-to-Rent residents	414 sq m
Car Parking Spaces:	459 [178 No. at basement and 281 No. at surface level]
Cycle Parking Spaces:	800 No.

6.3 Height and Massing

The scheme transitions from 2/3 No. storeys adjacent to existing neighbouring dwellings to part 5 to part 6 No. storeys and part 4 to part 6 No. storeys at the least sensitive locations at the subject lands (towards the centre of the site and fronting part of Scholarstown Road).

The recent publication of the *National Planning Framework (NPF)* and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018*, both encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl. Therefore, we submit that the current planning context is supportive of developments being designed to achieve additional height at appropriate locations, with the supporting documentation accompanying this application demonstrating the appropriateness of the heights proposed.

6.4 Density

The subject application proposes 590 No. units (480 No. Build-to-Rent and 110 No. Build-to-Sell units) on a developable site area of 5.35 hectares (the additional 0.7 hectares relates to Scholarstown Road upgrades). The proposed gross residential density is calculated below:

$$\frac{590 \text{ No. Units}}{5.35 \text{ Ha}} = 110 \text{ Units Per Hectare}$$

It is considered appropriate that this site be utilised for increased density to provide a greater number of homes in a highly accessible and sustainable location using a mix of Build-to-Rent and Build-to-Sell typologies. We note that the provision of Build-to-Rent units within the development which includes a high number of one bedroom units skews the density parameters (246 No. – 42% of the development).

6.5 Design Rationale

The Architectural Design Statement prepared by John Fleming Architects and the Landscape Report by Mitchell and Associates Landscape Architects are enclosed as separate documents, and both demonstrate the primary concept of the proposed development which is to appropriately assimilate the development into the surrounding area by providing a development that is sympathetic to the existing typology of surrounding housing by setting back highest building forms from neighbouring dwellings. The development of the subject site has the benefit of facilitating a pedestrian/bicycle link through the north-east of the site to the public open space in Dargle Park (a letter of consent has been received from South Dublin County Council to facilitate this link through the boundary wall).

6.5.1 Materials

An Architect's Design Statement has been prepared by John Fleming Architects and is enclosed separately. This Design Statement sets out the following in relation to the proposed façade materials.

The proposed building will be finished with a sympathetic mix of red/ orange brick and buff brick facade with black cantilevered steel balconies. This will be broken up, to soften the massing, by rendered panels and a set-back top floor sitting behind the brick parapets.

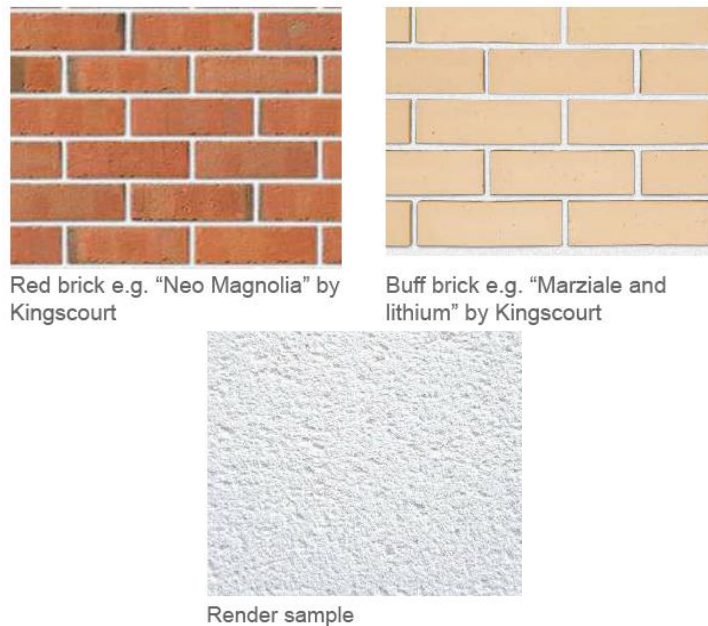


Figure 6.3: Example of Materials Proposed to be Utilised in the Proposed Scheme

(Source: John Fleming Architects, 2019)

A high quality, modern brick will be used to give the building longevity and easy maintenance.

The front elevation is divided into wings, differentiated with render and brick and glazed stairwells Each apartment will have a steel balcony with railings or a bay window as

appropriate. The glazing elements will be a powder coated black aluminium framed window system with glazed spandrel panels. The brick colour of all duplex units is a selected buff brick.



Figure 6.4: Examples of Schemes Utilising Similar Materials Proposed for the Subject Development

(Source: John Fleming Architects, 2019)

It is clear from the detailed Architectural Design Statement submitted with this application that high-quality materials have been proposed for the subject scheme.

6.5.2 Communal Internal Amenity Space

The internal communal amenity space is located within a two storey amenity building within the central open space (414 sq m), to serve the Build-to-Rent residents. The two storey building contains a gymnasium, lobby, kitchenette and lounge at ground floor level and lounge at first floor level in addition to a roof terrace. The provision of these amenity spaces will encourage interaction between residents which will create a sense of community.

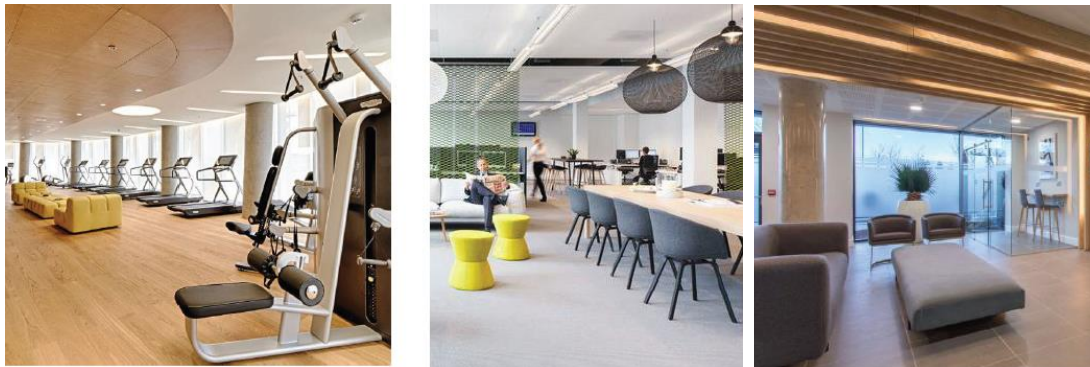


Figure 6.5: Examples of Internal Amenity Spaces Proposed to Serve the Build-to-Rent Element of the Development

(Source: John Fleming Architects, 2019)

6.5.3 Creche and Retail/Café/Restaurant Units

The scheme proposes a 2 No. storey retail/café/restaurant building (Block D2 – 657 sq m) and a café/restaurant within the ground floor of block C3 (288 sq m) which will serve the future residents of the subject scheme in addition to immediate existing residents in the surrounding area. These small-scale services front onto Scholarstown Road and the relevant blocks maintain the established building line. The scheme also provides a crèche (438 sq m) within the ground floor of Block C2.

6.5.4 Landscaping and Open Space

A Landscape Design Report has been prepared by Mitchell & Associates Landscape Architects and is enclosed with this application. This Report sets out in detail the 3 No. primary pockets of open space which are to the centre of the site, to the north-east of the site and to the west of the site.



Figure 6.6: Open Space Proposed Within the Scheme

(Source: Mitchell & Associates Landscape Architects, 2019)

The Landscape Report details the pockets of open space as follows:

Northeast Pocket Park (1,956 sq m)

To the northeast of the site a pocket park is proposed which facilitates a cycle and pedestrian link to Dargle park. This is proposed to be primarily an ecological zone comprising a native wildflower meadow with mown grass spaces and sculptural landform to provide informal play opportunities. Re-used cut logs and boulders from the felling and construction works will be incorporated into the space as natural play elements. Small copses of native tree planting will frame the space and provide additional habitats with suitable shade tolerant wildflower seeding beneath the stands.

It is noted that an interpretation panel with information in relation to the archaeological work carried out on site is located in this area, with the trees and the bank following the line of the ring-fort.



Figure 6.7: Visual Examples of Open Space Areas to be Utilised in the North-East of the Site

(Source: Mitchell & Associates Landscape Architects, 2019)

We note that the provision of a link through this pocket park to the public open space in Dargle Park to the north-east of the site will open up access to public transport and cycle networks in the area. This will enhance the permeability and connectivity of the area which is considered a significant planning gain for the wider area.

Central Open Space (5,035 sq m)

The central open space is comprised primarily of a large multipurpose lawn area. The existing Category A Oak tree is retained and integrated into the design of the space as an important landmark, on a visual axis with the entrance road. Additional tree planting is proposed to the edges of the space to create a strong landscape framework and visual buffer to the central open space whilst allowing passive surveillance across the space at eye level. Native trees are suggested here, such as oaks and birches, as well as flowering feature trees such as foxglove tree, Japanese cherry or juneberry.

A playground for 4-12 year olds at a scale in keeping with the Apartment Design Guidelines (200-400 sq m) is proposed to be provided within the central open space and is located adjacent to the communal amenity building to facilitate passive surveillance.

This provides opportunities for a range of inclusive and age appropriate play experiences such as role playing, swinging, balancing, rocking, spinning and bouncing and is proposed to be simply surfaced with an appropriate depth of bark chippings. Sculptural bespoke benches will be integrated into the central open space design at key nodal gathering space at the amenity building.

To the north of the central open space a series of formal tilted lawns create opportunities for both informal play and passive recreation whilst incorporating the design of the natural ventilation opes for the car park.



Figure 6.8: Visual Examples of Open Space Areas to be Utilised in the Centre of the Site

(Source: Mitchell & Associates Landscape Architects, 2019)

Western Green (1,117 sq m)

To the west of the site a formal community garden will be provided in keeping with the design of the protected structure to the north.

A more formal planting is suggested here, with clipped Portuguese Laurel hedges and lines of whitebeam.

Benches are located here to provide a sunny south facing seating spot, whilst an equipped toddler play space to the northern end of the green, away from the roads, will create a safe overlooked area for 2-6 year olds with robust timer play elements designed to promote imaginative play.

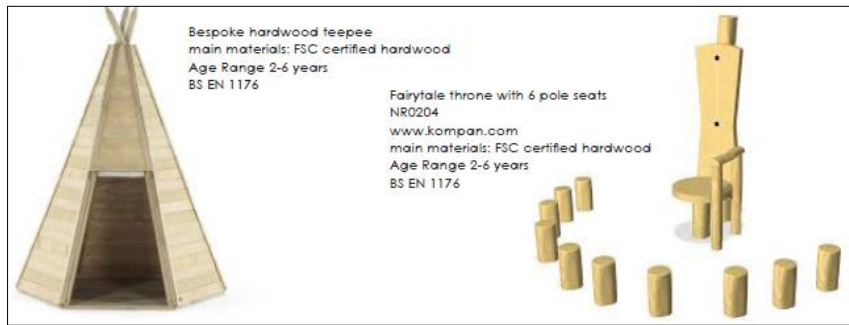


Figure 6.9: Visual Examples of Open Space Areas to be Utilised in the Centre of the Site

(Source: Mitchell & Associates Landscape Architects, 2019)

The proposal is also designed to adhere to the provisions set out in the *Design Manual for Urban Roads and Streets (2013)*. This is confirmed by Mitchell + Associates Landscape Architects stating that:

'street planting is proposed at least every 6 parking spaces to break up the hard landscape and create a leafy, green streetscape. Linden trees are proposed as street trees. A generous privacy planting strip is provided at the building frontages to define the public and private realm and in addition to this, the paving at the threshold is contrasting in terms of unit size, texture and colour to the street paving to provide a "doormat" to each dwelling.'

Therefore, it is clear that the open space proposed has been central to the design of the development and will contribute to the assimilation of the development within its surrounding context.

6.6 Archaeology

Chapter 5 of the EIAR 'Archaeological and Cultural Heritage' prepared by Archer Heritage Limited notes the following:

'Following completion of pre-development geophysical survey and Phase I test excavation, archaeological remains were identified in the north-eastern corner of the site. The site was interpreted as an enclosed burial site, otherwise known as a secular cemetery or a settlement/cemetery. Consultation took place between representatives of the developer and the NMS in September 2018. Significant constraints on the design and layout of the proposed scheme, regarding the natural physical topography and the requirements of foul- and surface-water drainage provision were outlined by the Applicant. It was concluded that avoidance of the archaeological site recorded in pre-development archaeological assessments would have required a very substantial revision of the layout of the development. This would have been difficult to achieve given the nature and type of development proposed.

Following consideration of the development proposal and the results of test trenching, the NMS concluded that, in this case, the expected negative impact on the archaeological site from future development works could be mitigated by preservation-by-record (i.e. archaeological excavation) of the archaeological remains at the north-eastern corner of the subject site.

Archaeological excavation has been completed at the site under licence to the DCHG in consultation with the NMI. This involved the systematic removal of all archaeological layers, deposits and their associated archaeological objects (including human remains) from the site to preserve a complete and meaningful record of the archaeological remains and their stratigraphical sequence. Post-excavation processing and analysis of this material is ongoing off-site in a controlled environment.

The archaeological excavation thus reduced ground levels across the site to the exposed natural subsoil surface, including the emptied 'cuts' of archaeological features (ditches, pits, postholes and stakeholes). Adequate financial provision has been made available for the completion of post-excavation work, the conservation of artefacts and the publication of archaeological excavation results through the excavation licensing system. A preliminary report on the excavation was lodged with the DCHG and NMI on 22nd May 2019. The final excavation report is due for completion by February 2020.

No additional archaeological sites or features were recorded during Phase II or Phase III archaeological test excavations.'

The Report recommends the following mitigation measures during pre-construction/construction stage:

- It is acknowledged that archaeological excavation of the settlement/cemetery is complete. It is recommended that the post-excavation analysis and report preparation currently underway is brought to completion

- Following mitigation of any impacts to the identified archaeological site, all ground disturbance works across the remainder of the development site should be monitored by a suitably qualified archaeologist.

The Chapter concludes that no potential impacts are identified at this moment during the operational phase as it is anticipated that issues of archaeological and cultural heritage interest will have been resolved prior to or during the construction phase. No potential cumulative impacts are identified as it is anticipated that matters of archaeological and cultural heritage interest at this site will have been resolved during the construction phase of this proposal. It is not anticipated that there will be any residual impacts with the appropriate mitigation measures in place.

6.7 Trees

The Arboricultural Report prepared by the Arborists Associates Limited and enclosed separately with this planning application assesses the condition of the tree vegetation within the site and any impacts that may occur as a result of the proposed development. A Tree Protection Plan and Tree Constraints Plan have also been prepared.

The Arboricultural Report notes that 28 No. of the 56 No. individually surveyed trees are to be removed however none of these trees are listed as Category 'A' (11 No. are Category 'B', 11 No. are Category 'C' and 6 No. are Category 'U'). In addition, 4 of the 6 No. lines of conifers, 1 No. hedge line and a c. 5 No. metres section of another hedge are to be removed. The Report states that:

'The loss of the above tree vegetation is to be mitigated against within the landscaping of this completed development with new tree, shrub and hedge planting that will complement the development and help provide good quality and suitable long-term tree cover.'

A range of tree sizes are proposed within the landscape plan ranging from whips to semi-mature trees and as these establish and grow in size, they will be continuously mitigating any impacts created by the development and will enhance and secure the treescape of this area into the future.

Out of the above list of trees to be removed, 1 No. tree (tree No. 0875), a large mature Sycamore is located within a central area within the open field next to tree No. 0876 (a large prominent mature Oak which is the most significant). This tree is in poor condition structurally with substantial basal decay present that is compromising its stability, and this would make retaining this tree within any development layout for this site area very difficult.

Therefore, we submit that a key tenet of the proposed scheme has been to provide maximum protection to any trees worthy of retention within the subject lands.

7.0 PLANNING POLICY CONTEXT

7.1 Relevant Development Management Standards

The purpose of this section is to detail the relevant current development policy and guidelines applicable in relation to the proposed development at the subject site. The Statement of Consistency submitted with this planning application sets out a full assessment of the consistency of the proposed development with national, regional and local policy.

The key national documents in assessing the subject scheme are the *National Planning Framework – Project Ireland 2040*, the *Urban Development and Building Heights Guidelines for Planning Authorities, December 2018* and the *Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018*. At a local level, the *South Dublin County Development Plan 2016 – 2022* is the statutory plan for the area and guides development relating to the subject site.

7.2 National Policy

7.2.1 National Planning Framework – Project Ireland 2040

The *National Planning Framework* (NPF) was published in February 2018 and is the Government’s high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. The proposed development has been designed in accordance with the objectives of the NPF. Section 2.2 of the NPF sets out an overview of the NPF Strategy which includes reference to ‘Compact Growth’ as follows:

- *Targeting a greater proportion (40%) of future housing development to be **within and close to the existing ‘footprint’ of built-up areas.*** [Our Emphasis]
- ***Making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport’*** [Our Emphasis]

The NPF expressly seeks the densification of suburban, brownfield, infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

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

The NPF also sets out the following regarding future growth needs:

*‘**Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards.** This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.’* [Our Emphasis]

Therefore, it is our opinion that the NPF supports the provision of the proposed residential development through increased density and height at the subject site having regard to the brownfield, underutilised status of the site in close proximity to public transport as well as a range of services and facilities to serve the future tenants.

7.2.2 ***Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)***

The Guidelines set out that a key objective of the NPF is to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.

The Minister's foreword to the *Urban Development and Building Heights Guidelines, December 2018* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas. This is regarded in the guidelines and literature as an unsustainable model in need of proactive and inventive solutions.

The *Building Height Guidelines* state that there is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* note that:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.' [Our Emphasis]

These Guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.

The Guidelines also note the following:

'In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.' [Our Emphasis].

The subject site is well served by public transport with many bus stops located in close proximity to the subject site providing easy access to locations such as Dublin City Centre,

Rathmines, Terenure, Ringsend, Citywest, UCD, Dundrum and Tallaght for example via the No. 15, 15b and 175 bus routes.

As such, it is considered that the proposed residential development providing heights of 2 to 6 No. storeys and comprising 590 No. units at the subject site represents the proper planning and sustainable development of the area as density and heights must be increased in appropriate urban locations that have access to public transport.

It is considered that the subject lands are ideally located to accommodate increased density without having adverse impacts on the receiving environment. We submit that the development as proposed is in accordance with the clear direction in recent national legislation to increase height and density in appropriate locations and the proposed development can be successfully assimilated into its context.

7.2.3 Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018 (Apartment Guidelines)

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018* in March 2018.

The purpose of the 2018 Apartment Guidelines is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. These Guidelines build on the content of the 2015 Apartment Guidelines particularly in relation to design quality safeguards such as internal spaces standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.

The Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply and projected need for additional housing supply out to 2020, the Government's *Rebuilding Ireland – Action Plan for Homelessness, 2016* and the *National Planning Framework – Ireland 2040*, published since the 2015 Guidelines. We note that the Apartment Guidelines take precedence over any conflicting policies and objectives of Development Plans, Local Area Plans and Strategic Development Zone Planning Schemes.

Build-to-Rent model is a new model of housing delivery within the Irish planning system as defined by policy within the *Apartment Guidelines*. It is defined as the following:

'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord'.

Build-to-Rent as a housing typology offers the opportunity to accelerate the delivery of new housing and provide enhanced security of tenure to future residents. The proposed development includes 480 No. Build-to-Rent units which will contribute towards allowing Build-to-Rent to emerge as its own residential segment within the functional area of South Dublin County Council.

It is considered that the subject site is located within an 'Intermediate Urban Location' as set out in the Apartment Guidelines, which states:

'Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:

- *Sites within walking distance (i.e between 10-15 minutes or 1,000-1,500m of high capacity urban public transport stops (such as Dart, commuter rail or Luas) or within reasonable walking distance (i.e 5-10 minutes or up to 1,000 m) of high frequency (i.e 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e up to 5 minutes or 400-500m) of reasonably frequent (min 15 peak hour frequency) urban bus service.'* [Our Emphasis]

TOC Assessment:

The subject site is well served by public transport as it is located adjacent to two bus routes which serve the area (No. 15 and No. 15b). We also note that Go Ahead Ireland bus route No. 175 runs adjacent to the site along Scholarstown Road with bus stops located directly in front of the subject lands. This service operates every 30 No. minutes during the week with an hourly service provided at the weekend.

The No. 15 Bus is a high frequency service running 8-12 No. minutes throughout the majority of the day (10 – 15 No. minutes off-peak). The nearest stop is located a short distance from the site on Saint Colmcille's Way, c. 300 metres away. The No. 15 route travels from Firhouse to Clongriffin DART station via Rathmines, the City Centre and Fairview.

The No. 15b is a slightly less frequent bus to the Ringsend Road (Barrow Street) with its nearest stop c. 450 No. metres away (outside Scholarstown Wood estate). With services running with a frequency of 15 No. minutes, the No. 15b allows local residents to head directly to the city centre.

Bus Routes Nearby					
Route Number	Distance to Nearest Stop	Destinations	Peak Frequency	Off-Peak Frequency	
Highest Frequency					
15	c. 300 No. metres to the West on St Colmcille's Way	Ballycullen to Clongriffin Dart Station (Via Terenure, Rathmines City Centre, and Fairview)	8-12 minutes	10-15 minutes	

15b	c.450 No. metres to the East on Scholarstown Road (Beside Scholarstown Wood)	Stocking Avenue to Ringsend Road (Barrow Street)	15 minutes	15 minutes
175 (Go Ahead)	Adjacent to the site (and c.100 – 150 No. metres to the west)	Citywest, Tallaght, Dundrum	30 minutes	60 minutes
Other Services of Note				
75/A	1.5 Km Knocklyon Avenue, on the R114	Dun Laoghaire to Tallaght, Via Dundrum Luas and Stillorgan (Via Dundrum and Stillorgan)	30-45 minutes	45-50 minutes
49	1.5 km to Crossfield Stop on the R114 (Beside Delany's Public House)	The Square Tallaght to Pearse Street	30 minutes	30 minutes
65b	1km Ballycullen Road	City West to Poolbeg Street (via Rathmines)	20 minutes-40 minutes	40 minutes
Night Services				
15 N	Stop in front of subject site.	Richmond Street, to Tallaght (Ellensborough)	Night Service	Friday and Saturdays: 0000, 0200, 0400
49N	1.5 Km on R114	Rathmines Garda Station, to Tallaght (Kilnamanagh)	Night Service	Friday and Saturdays: 0000, 0200, 0400

Figure 2.4: Proximate Bus Services and Frequencies

(Source: Google Maps, Dublin Bus, and Go Ahead (No. 75), Annotated by Thornton O'Connor Town Planning, 2019)

The existing bus services available in proximity to the subject site (No. 15, 15b, 175 and 75) offer frequent services to city centre employment areas. The No. 15 bus route is a frequent bus service which crosses the city centre, while the No. 15b is a slightly less frequent service which travels to the Grand Canal Dock. A high concentration of Information Technology companies such as Google and Facebook are located within the Grand Canal Dock area and as such considered to be a major location for the attraction of inward investment to the Irish economy.

Sandyford Business District is located c. 9.5km to the east of the site the general area contains several large-scale employers such as Microsoft, Vodafone Ireland, SSE Airtricity, and the Beacon Quarter Hotel and Private Hospital, as well as Leopardstown Race Course.

This can currently be accessed by the No. 75 bus, however this will be improved under Bus Connects.

Tallaght contains Third Level education with Institute of Technology Tallaght, which is now part of the Technical University of Dublin. This is in combination with Dublin Institute of Technology and Institute of Technology Blanchardstown. This will result in a significant increase in investment in trade skills, technical skills, research and further/ higher education for the surrounding areas. This will also provide possible avenues for upskilling and continuous professional development for residents of any development of the subject site.

In our professional planning opinion, the subject site is well located in terms of access to the wider employment, enterprise and education hubs of the Greater Dublin Area. We contend that the sites location in close proximity to the emerging growth areas of Sandyford and Tallaght will present further employment prospects in the near future, particularly having regard to the improvement of bus services and easy access to the City Centre.

As noted above, in addition to existing bus services, the subject site will benefit from improved services as part of the Bus Connects programme.

Therefore, having regard to the significant employment locations accessible by bus from the site, it is clear that the subject site is an accessible location that can achieve higher density development as per the Apartment Guidelines (and the NPF and the Building Height Guidelines).

The Apartment Guidelines recognises the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect household formation and housing demand. The proposed application comprising 480 No. Build-to-Rent units and 110 No. Build-to-Sell units will therefore provide flexible and permanent housing accommodation types for people seeking residential accommodation in Dublin or seeking to purchase a home.

As previously noted, the subject site is located adjacent to bus stops which provides extensive services to various locations in Dublin. These bus stops along Saint Colmcille’s Way and Scholarstown Road are located within 300 – 500 No. metres walking distance from the application site. In addition, we note that the Bus Connects project which is a comprehensive redesign of the existing Bus Networks will upgrade existing bus routes for greater transport priority, pedestrian accessibility, and cycling segregation. Therefore, the site can be described as an intermediate urban location and thus suitable for higher density development.

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

The entire scheme comprises 590 No. units comprising 480 No. Build-to-Rent units and 110 No. Build-to-Sell units. The Build-to-Rent units will consist of 246 No. one bed units and 234 No. two bed units and the Build-to-Sell units consist of 55 No. two bed units and 55 No. three bed units. This provides a breakdown of 42% one bed units, 49% two bed units and 9% three bed units therefore is fully in accordance with SPPR 1 of the *Apartment Guidelines, 2018*.

Specific Planning Policy Requirement 2

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development.*

The scheme does not comprise building refurbishment or relate to a site that is less than 0.25 Ha.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq m
- 1-bedroom apartment (2 persons) 45 sq m
- 2-bedroom apartment (4 persons) 73 sq m
- 3-bedroom apartment (5 persons) 90 sq m

All apartments meet, and in many cases, significantly exceed the minimum apartment floor areas.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) 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.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

The development proposes 51% of the units as dual aspect. This fully accords with the Apartment Guidelines, which requires a minimum of 50% in suburban or intermediate locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure attractive street frontage where appropriate.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

The ground floor of the proposed scheme meets the requirement for 2.7 m floor to ceiling heights. The proposal is fully in compliance with SPPR5.

Specific Planning Policy Requirement 6

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

Specifically, regarding apartments per floor core, the following is stated in SPPR 8 (v):

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

Therefore, SPPR 6 is not relevant to Build-to-Rent as this typology falls under SPPR 7 and 8. It is noted that the Build-to-Sell units are 3 No. storey duplexes and apartments therefore do not provide the maximum of 12 No. apartments per floor per core.

Specific Planning Policy Requirement 7

The *Apartment Guidelines, 2018* set out under Specific Planning Policy Requirement 7 (SPPR7) that:

BTR development must be:

- (a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;
- (b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:
 - (i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.
 - (ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

In response to part (a), the scheme is described as Build-to-Rent in the Statutory Notices. In addition, a Legal Covenant is enclosed with the application.

In response to part (b) of SPPR7, the proposed scheme will provide high quality communal and recreational amenity areas such as a gymnasium, lounge, kitchenette and roof terrace in a two storey resident amenity building (Block D1 - 414 sq m) (to serve the Build-to-Rent residents). A management suite is located within the ground floor Block C3 which will focus on the management of the external/estate management of the scheme (for both Build-to-Rent and Build-to-Sell units) and the overarching management of the scheme with an emphasis on security, surveillance of basement, pedestrian access, waste area, parcel deliveries and car share booking for example. A concierge will be able to deal with initial Build-to-Rent resident queries and will be responsible for achieving a sense of community

within the scheme and organising events in the residential amenity spaces in Block D1, such as movie screenings, wine/cheese tasting nights for example.

It also proposed to provide outdoor recreational amenity spaces totalling 12,126 sq m which represents 23% of the site area (public and communal). This will ensure that a high – quality standard of living that encourages social interaction will be provided for the future tenants.

Specific Planning Policy Requirement 8

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

- (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;
- (ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;
- (iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;
- (iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;
- (v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.

The scheme is fully in accordance with SPPR8 as set out in the *Apartment Guidelines, 2018*.

1. The Build-to-Rent element of the scheme provides 480 No. units including 246 No. one bed apartments (51%) in addition to 234 No. two bed apartments (%);
2. The proposed Build-to-Rent Apartments meet and in some cases, exceed the standards set out in relation to storage and private amenity space.

The majority of the Build-to-Rent apartments benefit from private balconies, with the exception of 40 No. north-west facing apartments (Blocks B3 and B4) and 7 No. north facing apartments (Block C3). The 40 No. north-west facing units will benefit from bay windows allowing western light to infiltrate into the apartments. It is considered that the projecting bay windows will ensure high quality apartments as a result of benefiting from dual aspect. The 7 No. north facing units are provided with either bay windows or Juliet windows providing

oblique parkland views of the central open space within the scheme. We note that these 7 No. units with oblique parkland views represent just 1.2% of the overall scheme.

The scheme also provides 8,108 sq m of public open space and communal open spaces adjacent to C1, C2, C3 and D2 which adequately addresses the needs of future Build-To-Rent residents, in addition to a two storey resident amenity building (414 sq m).

3. The site is located in an intermediate urban location as discussed earlier in this section therefore reduced car parking is proposed (459 No. car parking spaces to serve the development – 288 No. to serve the Build-to-Rent apartments).
4. All apartments meet the minimum floor standards and, in some cases exceed the minimum floor area by 10% although this is not a criterion of Build-to-Rent

The subject Build-to-Rent element of the scheme is consistent with the Specific Planning Policy Requirements of the *Apartment Guidelines, 2018*.

7.3 South Dublin County Development Plan 2016-2022

7.3.1 Zoning

The subject lands are zoned Objective 'RES' in the *South Dublin County Development Plan 2016 – 2022*, where the stated objective aims 'to protect and/or improve residential amenity' (see Figure 7.1 below).

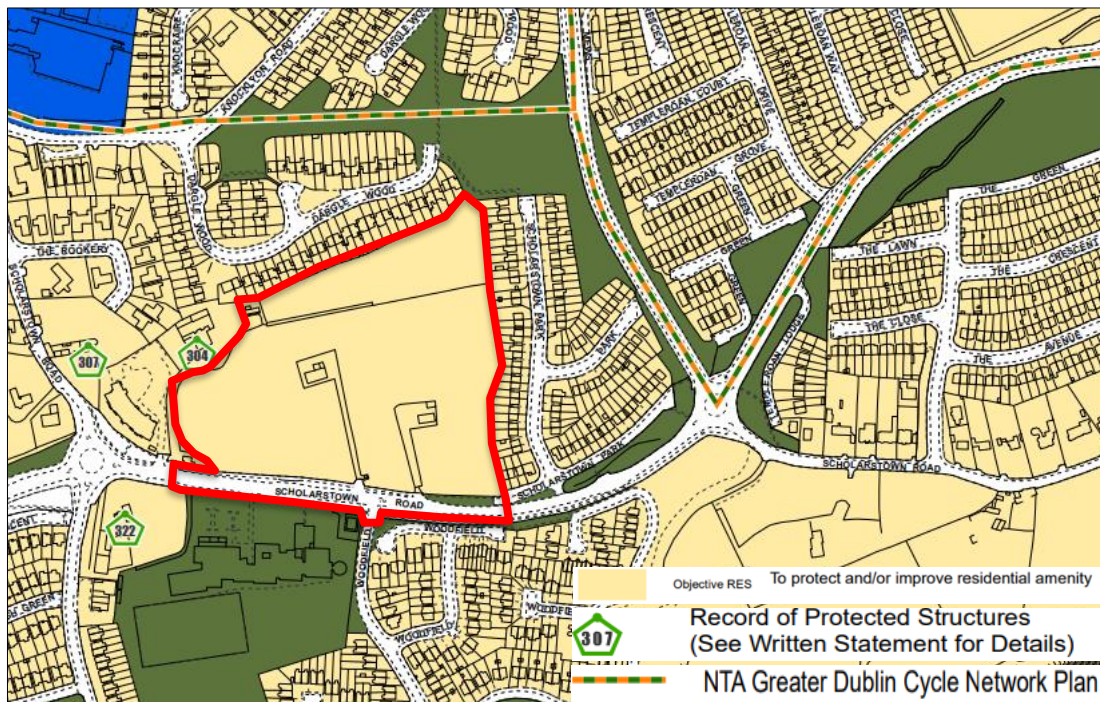


Figure 7.1: Zoning Map with Subject Site Outlined Indicatively in Red

(Source: *South Dublin County Council Development Plan 2016 – 2022, Map No. 6*)

Under this zoning, residential use is permitted in principle. The scheme provides 590 No. apartment units (comprising 480 No. Build-to-Rent units and 110 No. Build-to-Sell units) in addition to 2 No. café restaurant units and 2 No. retail units in lieu of 2 No. detached dwellings (to be demolished) which have no architectural or historical merit and has been designed taking into consideration the amenity of neighbouring residential units and Protected Structures by providing generous setbacks and breaking down the massing into separate forms. We note that café/restaurant and shop-local are both open for consideration. Therefore, the development of a residential and commercial scheme is in accordance with the 'RES' zoning objective pertaining to the subject lands.

7.3.2 Density Policies

The proposed development provides 590 No. residential units on a developable site area of 53,510 sq m which equates to a density of 110 No. units per hectare. However, due to the provision of Build-to-Rent units within the development, a very high number of one bedroom units are proposed (246 No. – 42% of the development) which skews the density parameters and therefore we submit that the proposed density is not comparable to a fully Build-to-Sell apartment development which would generally include more three bedroom units and a lesser number of one bedroom units.

We note the following objectives of the *South Dublin County Development Plan 2016-2022* states:

H8 Objective 1

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

H8 Objective 2

To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and High capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

As previously established the subject site is eminently suitable for densification, and is well located on a major distributor road, with a strong urban context, walking and cycling facilities, and nearby community services and amenities. It is the opinion of TOC Town Planning that given the scale of the site, its context and high-quality design proposed which is sensitive to the position and orientation of surrounding dwellings, we submit that the density proposed (with a plot ratio of only 0.96) is eminently suitable and fully accords with national and local policy. We also note that there are no daylight issues predicted to arise on neighbouring properties as a result of the proposed development having regard to the results of the Daylight/Sunlight Assessment enclosed with this planning application.

7-3-3 Housing Capacity Site

The *South Dublin County Development Plan 2016 – 2022* identifies sites which have capacity for housing development. The subject site is indicated in the following map as being one of these sites (see Figure 7.2 below):

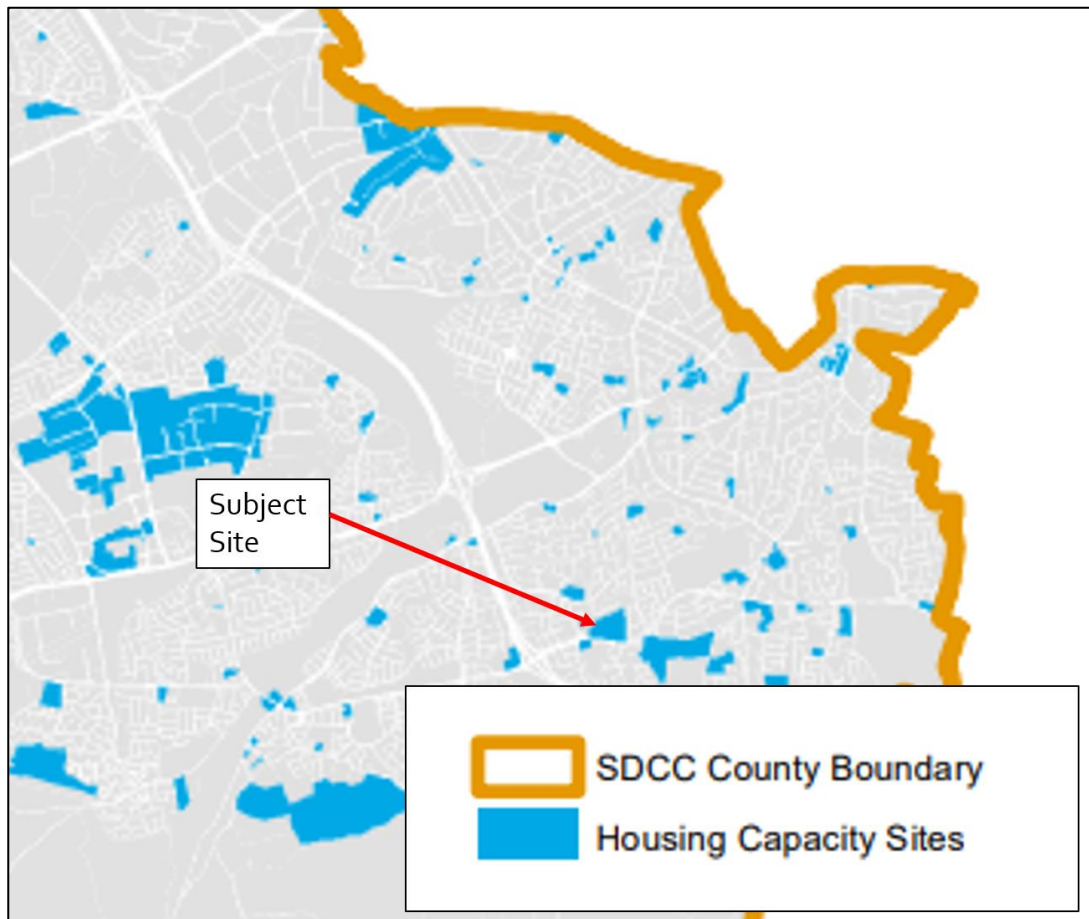


Figure 7.2: Housing Capacity Sites within South Dublin County Council

(Source: **Map 1.3 of *South Dublin County Council Development Plan 2016-2022*, Annotated by Thornton O’Connor Town Planning, 2019)**

Therefore, it is clear the subject site is suitably designated for the subject (principally) residential scheme and is capable of providing increased heights and density. The site’s designation in addition to its location close to the urban core, public transport and services and facilities has influenced the site’s principal residential use along with the scale, height, and massing considered appropriate for the subject site.

7-3.4 Creating Sustainable Communities

The *South Dublin County Development Plan 2016 – 2022* sets out the following policy:

Housing (H) Policy 6 -Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with

Government policy in relation to the development of housing and residential communities.

To create and contribute to the growth of a sustainable community in Scholarstown / Knocklyon, the design of the subject development provides a high quality design, contributes to the amenity of the future residents, and protects and enhances that of the surrounding community. As demonstrated, there is existing social and community infrastructure in the area that can support the subject development however additional support residential amenities, retail/café/restaurant units and a creche are also provided. The provision of such a mix of uses will provide for will encourage passive surveillance and a sense of community.

7-3-5 Building Height

Section 11.2.7 of the *South Dublin County Development Plan 2016 – 2022* notes the following:

'Varied building heights are supported across residential areas, urban centres and regeneration zones in South Dublin County, subject to appropriate safeguards to protect amenity of the area.'

The Development Plan does not set out specific maximum building heights for the subject location however does include the following Policy (Housing Policy 9) in relation to Residential Building Height:

'it is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County' with a specific objective to 'direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.'

In addition, we note that Housing Policy 8 stipulates that:

'it is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context'. An objective of H8 is to 'To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).' [Our Emphasis]

Therefore, as set out in the Material Contravention Statement prepared by Thornton O'Connor Town Planning and submitted with this application, it is our professional planning that the implementation of Housing Policy 9 inhibits Housing Policy 8 from being achieved and in order to comply with Housing Policy 8 (promoting higher densities at appropriate location), strict adherence to Housing Policy 9 cannot be achieved (5 No. storey restriction).

It is the opinion of TOC Town Planning that the proposed building heights have been appropriately considered as part of the subject development, as the highest forms (part 5 to part 6 and part 4 to part 6 No. storeys) are located in the least sensitive positions within the

site (centre of the site and fronting Scholarstown Road) transitioning to 2 and 3 No. storeys around the perimeter of the site adjacent to existing dwellings.

We note that the adoption of the *Building Height Guidelines* supersedes the policies of the Development Plan. However, it is the opinion of TOC Town Planning that the heights proposed are acceptable as appropriate setbacks and transitions in height have been considered in detail as part of the proposed scheme in accordance with Objective 3 of Housing Policy 9 further sets out the following objective:

'To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing'

The *Building Height Guidelines* in addition to the *National Planning Framework* encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl. Therefore it is our opinion that the subject site has the potential for greater heights than 5 No. storeys to sustainably densify this strategic site (albeit only marginally above the 5 No. storey limit as part 6 No. storeys are proposed), having regard to the high quality architectural composition of the scheme, the receiving context and the appropriate transitions provided from neighbouring dwellings.

7.3.6 Dwelling Mix

Section 11.3.1 of the *South Dublin Development Plan 2016-2022* states that:

'The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality. With the exception of student accommodation, proposals that include a high proportion of one bedroom dwellings (more than 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. Design Statements for residential or mixed use development proposals with a residential element will be required to address the mix of dwelling types.'

As such, the provision of the Build-to-Rent apartments providing 480 No. units comprising 246 No. 1 bed units and 234 No. 2 bed units provides an alternative accommodation scale and typology in the County and meets the changing nature of household needs. We reiterate that the *Apartment Guidelines, 2018* notes under SPPR 8 (discussed in detail in Section 7.2.3 of this Report) that *'no restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise'* in relation to Build-to-Rent proposals. The Build-to-Sell element of the scheme also comprises 55 No. 2 bed units and 55 No. 3 bed units.

The proposed dwelling mix and types will provide an enhanced choice in tenure in the area, affording greater flexibility to those who may be seeking to rent an apartment in the area or looking to purchase a dwelling.

7.4 Minimum Residential Development Standards

The subject development has been designed to accord with residential development standards as prescribed in the *South Dublin County Development Plan 2016-2022* and the *Apartment Guidelines, 2018*.

John Fleming Architects has prepared 2 No. Housing Quality Assessments which are enclosed as separate documents with this planning application. This table provides a detailed breakdown of the quantitative standards affecting the development and includes an assessment of the size of the units, aggregate floor areas of living and bedroom spaces, storage areas and open space for examples.

As demonstrated in the HQAs prepared by John Fleming Architects, the proposed development meets the standards in all cases and exceeds the standards in many cases.

Therefore, the subject development is acceptable in relation to the standards outlined in the *South Dublin County Development Plan 2016-2022* and the *Apartment Guidelines, 2018*.

7.5 Communal Open Space

The '*Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities*' (Department of Housing, Planning and Local Government, March 2018) set the minimum floor areas for communal amenity space as:

Minimum Floor Areas for Communal Amenity	
One Bedroom	5 sq m
Two Bedroom (3 No. persons)	6 sq m
Two Bedroom (4 No. persons)	7 sq m
Three Bedroom	9 sq m

The development comprises 246 No. one bed units, 289 No. two bed units (32 No. 3 person and 257 No. 4 person units) and 55 No. three bed units which results in a total requirement for 3,716 sq m to accord with the minimum areas for communal amenity space set out in the Guidelines. The proposed development incorporates 4,018 sq m of communal open space within the scheme therefore exceeding the minimum communal amenity space standards.

In addition to the outdoor space provided, the development will also provide dedicated internal communal space of 414 sq m for the Build-to-Rent residents including gymnasium, lobby, lounges and kitchenette in addition to a roof terrace ensuring that high quality internal and external communal amenity space is provided for future tenants.

We note that 8,108 sq m of public open spaces are also provided for the residents of the scheme.

7.6 Dual Aspect

The subject scheme proposes 51% of the units as dual aspect. This fully accords with the *Apartment Guidelines*, which requires a minimum of 33% in more central locations where it is necessary to achieve a quality design in response to the subject site characteristics and

ensure attractive street frontage where appropriate, and 50% in intermediate locations. The Guidelines note that where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments as provided in the subject scheme. In this regard, a high-quality design is proposed that ensures the protection of surrounding residential amenity through appropriate set-backs with excellent frontage provided onto Scholarstown Road.

7.7 Car Parking

The following standards apply as per the *South Dublin County Development Plan 2016-2022*:

Land Use – Residential	Car Parking
1 No. bed unit	0.75 space
2 No. bed unit	1 space
3 No. bed unit	1.25 spaces

As the subject lands are located proximate to public transport services, the proposed development has been provided with 459 No. car parking spaces. Some 412 No. car parking spaces will serve the residential element of the development with the remaining serving the commercial elements of the scheme. In summary, some 288 No. spaces will serve the 480 No. Build-to-Rent apartments which represents a ratio of 0.60 spaces per Build-to-Rent unit and 1 No. space per 2 No. bed Build-to-Sell unit and 1.25 No. spaces per 3 No. bed Build-to-Sell units have been provided (124 No. spaces for the 110 No. units). The remaining 47 No. car parking spaces will be designated for the commercial elements of the scheme. We also note that 3 No. car share spaces are proposed. Please refer to the enclosed Traffic and Transport Report and Parking Strategy prepared by DBFL Consulting Engineers for further details. A Letter of Support from GoCar is included as Appendix A to the Parking Strategy.

Having regard to the site’s sustainable location in close proximity to excellent modes of public transport which will generate less parking demand than a standard residential development, it is considered that this level of reduced parking is appropriate for the Build-to-Rent element of the scheme, having regard to the *Apartment Guidelines, 2018*.

7.8 Planning Policy Conclusion

The proposed development to provide a residential development comprising 480 No. Build-to-Rent units and 110 No. Build-to-Sell units fully accords with the zoning objective pertaining to the site. The design of the proposed development fully complies with National and Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development and having regard to the location of the lands in close proximity to high-frequency public transport and a wide range of services. The design has sought to respond to the locational characteristics of the site proximate to low density houses yet provide a development that also responds to the site characteristics and opportunities presented by a very large underutilised plot that is positioned on a key arterial route within South Dublin.



8.0 CONCLUSION

Thank you for taking the time to consider the subject proposal.

We submit that the subject site is ideally suited to the provision of a residential development comprising a mix of Build-to-Sell and Built-to-Rent units with ancillary residential facilities, a small element of retail/café/restaurant and a crèche due to its position proximate to frequent bus services (bus services are also going to be upgraded under Bus Connects) which facilitates easy access to many employment locations.

The principal goal of the subject development, which seeks to provide 590 No. units on this key underutilised site in South Dublin is to increase housing supply on a strategically located large plot of underutilised land and contribute towards ameliorating the current housing crisis.

The development has been designed to accord with National and Local Level Planning Policy and will provide a high-quality living environment that provides opportunities for social interaction and integration. As such, it is considered that the proposed development represents the proper planning and sustainable development of the area.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Patricie Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning

