



THORNTON O'CONNOR
TOWN PLANNING

Statement of Consistency

Planning Application

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

Submitted on Behalf of
Ardstone Homes Limited

November 2019



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1.0 INTRODUCTION

1.1 Multi-Disciplinary Team

Thornton O'Connor Town Planning in association with John Fleming Architects, DBFL Consulting Engineers, O'Connor Sutton Cronin Engineers, Mitchell and Associates Landscape Architects, Openfield Ecological Services, Arborist Associates Limited, 3D Design Bureau, AWN Consulting, Integrated Environmental Solutions Limited, Archer Heritage Planning, Molloy and Associates, Aramark Property, Future Analytics Consulting, Brian Keeley and O'Herlihy Access Consulting have been retained by Ardstone Homes Limited to prepare a planning application for a proposed residential development with resident support facilities and commercial floorspace at a c. 5.35 ha site to the 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.

Our Client, Ardstone Homes Limited, intend to develop a high-quality residential development comprising 590 No. units on a plot of land that is significantly underutilised at a location in proximity to public transport, services and facilities. The proposed development includes 110 No. Build-to-Sell units and 480 No. Build-to-Rent units. The scheme also includes ancillary residential support facilities and commercial floorspace.

The *Planning & Development (Strategic Housing Development) Regulations 2017* specify that all SHD applications must be accompanied by a statement demonstrating that the proposal is consistent with the relevant National, Regional and Local policies. This Statement of Consistency Document demonstrates that the proposed scheme providing 590 No. residential units with ancillary resident support facilities and commercial units is fully consistent with national, regional and local planning policy.

The following documents are discussed throughout this Statement:

National

1. *Project Ireland 2040 – National Development Plan 2018-2027;*
2. *Project Ireland 2040 - The National Planning Framework;*
3. *National Spatial Strategy 2002 – 2020;*
4. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
5. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
6. *Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities;*
7. *Urban Design Manual – A Best Practice Guide (2009);*
8. *Design Manual for Urban Roads and Streets (2013);*
9. *The Planning System and Flood Risk Management (2011);*
10. *Retail Planning Guidelines (2012); and*
11. *Guidelines for Planning Authorities on Childcare Facilities (2001).*



Regional

- 12. Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022;*
- 13. Regional Spatial and Economic Strategy for the Eastern and Midland Region; and*
- 14. Retail Strategy for the Greater Dublin Area 2008 – 2016.*

Local

- 15. South Dublin County Council Development Plan 2016 – 2022.*

2.0 DESCRIPTION OF THE DEVELOPMENT

2.1 Development Description

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.

2.2 What is Build-to-Rent?

The recently adopted *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities March 2018* ('Apartment Guidelines') define 'Build-to-Rent' 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 provision of Build-to-Rent units will contribute to consolidated sustainable growth and towards meeting current housing demands. 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 accelerate the delivery of new housing at a time of an acute housing crisis. SPPR7 is discussed in further detailed at Section 4.6 of this document.

The Build-to-Sell element will offer a more standard residential tenure in this suburban location, with the overall scheme intended to provide a range of residential units to meet a variety of housing needs.

3.0 SITE LOCATION AND DESCRIPTION

3.1 Site Location

The subject site comprises a large site with a 'developable' area of c. 5.35 ha and is located on the northern side of the 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 east (as the crow flies) from the junction of the M50. The site has been enclosed by development in recent decades and remains a location of mature agricultural legacy, with many hedgerows and mature 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)

3.2 Site Description

The subject site contains 2 No. detached residential dwellings (Beechpark and Maryfield), a shed/garage to the rear of Maryfield and outbuildings to the north-west of the site. The dwellings are not considered to be of any architectural or historic significance that would preclude their demolition as shown in Figure 3.2 below and detailed in Chapter 6 of the EIAR

'Architectural Heritage' prepared by Molloy & Associates Architects submitted with this planning application.

The site is currently accessed from the R113 Scholarstown Road to the south via two vehicular entrances to the detached dwellings.



Figure 3.2: Photographs of the 2 No. Detached Dwellings at the Subject Site

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

The subject site comprises a 'developable' site area of 5.35 hectares which currently comprises 2 No. detached dwellings providing a density of just 0.37 units per hectare. This low density is completely unsustainable in this prime location with access to public transport. In this regard we refer to national policy which seeks increased residential density in settlements. National policy is discussed in detail at Section 4.0 of this document.

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' (along the southern boundary) is located within the boundary of the application site (upgrading works proposed), providing a total site area of 6.05 hectares. Directly opposite the site on Scholarstown Road is St Colmcille Community School. The north-east of the site abuts a public open space which provides an east-west pedestrian connection from Templeroan Road to Knocklyon Road. It is proposed to facilitate a connection through this boundary to enhance permeability in the area. A letter of consent has been received from South Dublin County Council in relation to the works proposed along Scholarstown Road and to the boundary wall at the north-eastern corner of the site (attached to the planning application form).

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 at Orlagh Grove (< 200 metres away) including a Spar convenience store.

3.4 Accessibility

3.4.1 Available Bus Services

The subject site is located immediately adjacent to 2 No. bus routes (No. 15 and 15b) which provide access to a range of locations. 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.

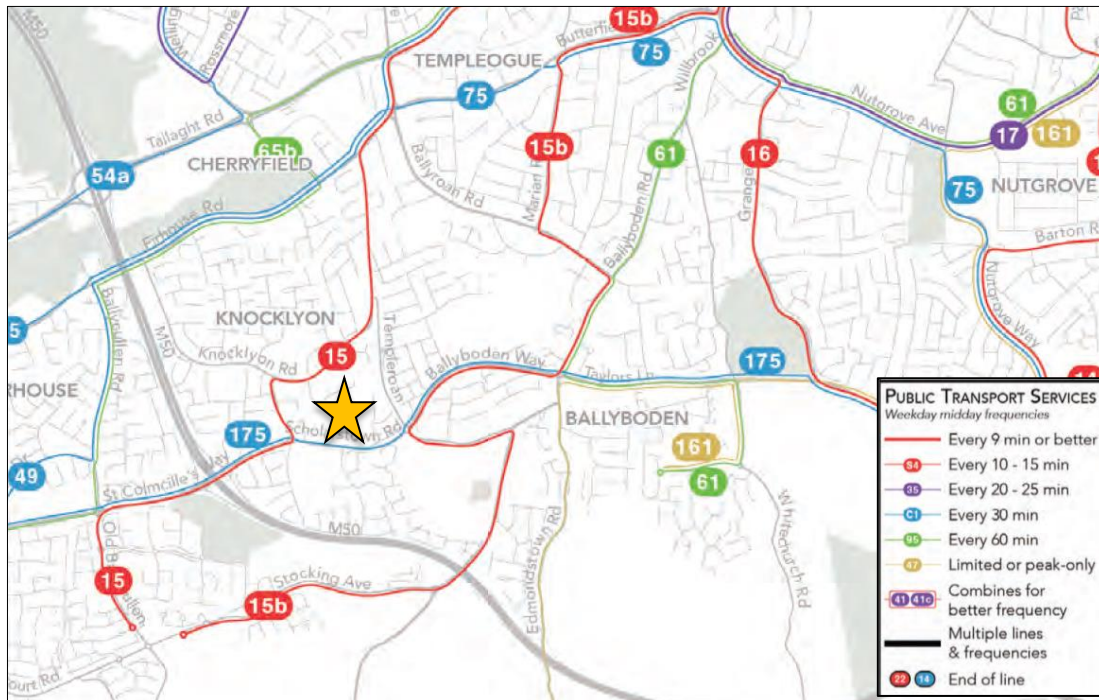


Figure 3.3: Existing Bus Routes in the Immediate Vicinity of the Subject Site (Indicative Location Denoted by Orange Star)

(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.

The Go Ahead Ireland No. 175 bus service provides access to Citywest, Tallaght, Dundrum and UCD for example. Please see Figure 3.4 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, 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 3.4: Proximate Bus Services and Frequencies

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

3.4.2 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 3.5 below 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.

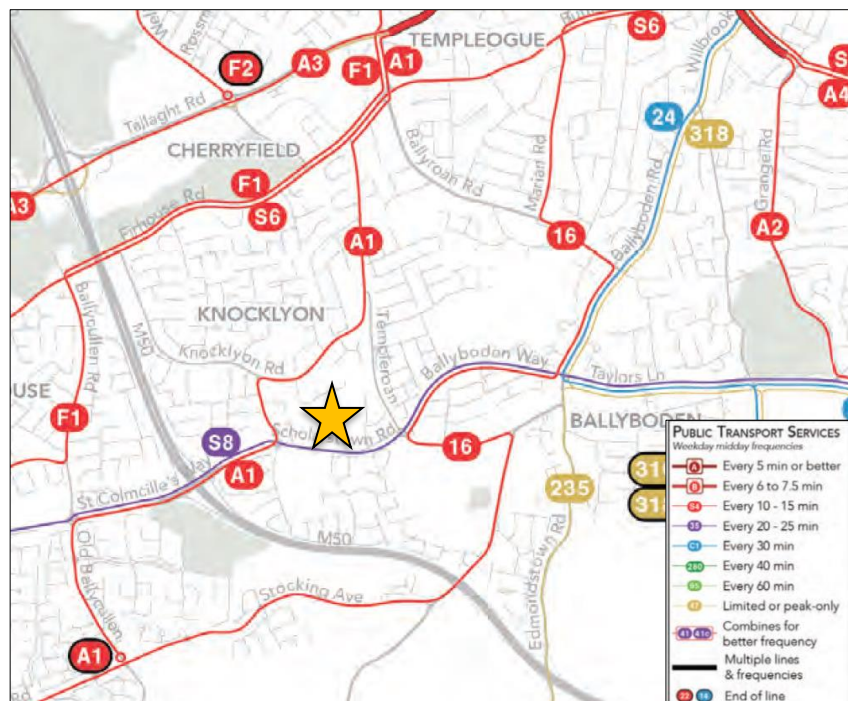


Figure 3.5: Emerging Preferred Network Options Surrounding the Subject Site (Indicative Location Denoted by Orange Star)

(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.

3.4.3 Employment Locations Available by Public Transport

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 and 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 site’s 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.

3.4.4 Greater Dublin Area Cycle Network Plan (2013)

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 the 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.

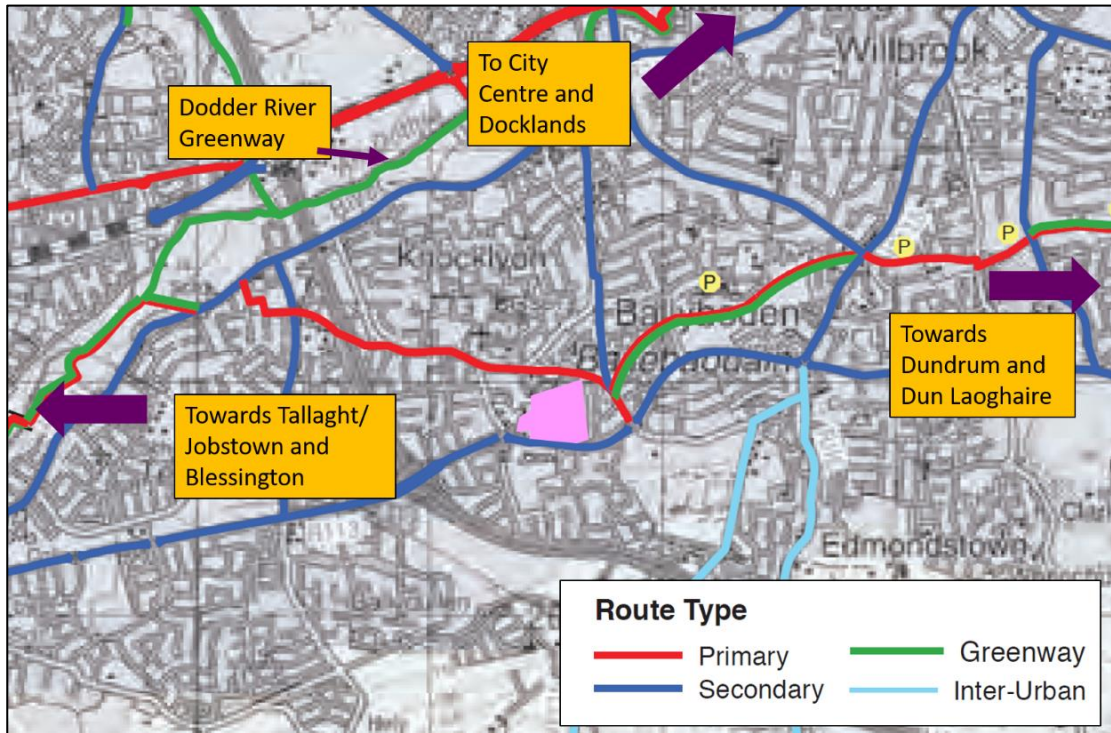


Figure 3.6: Proposed Cycle Network Surrounding Subject Site (Indicative Site Boundary in Pink)

(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* (Figure 3.7 below) both indicate an upgraded link to the north of the site running west-east which will provide connections onwards to Dundrum and Dun Laoghaire.

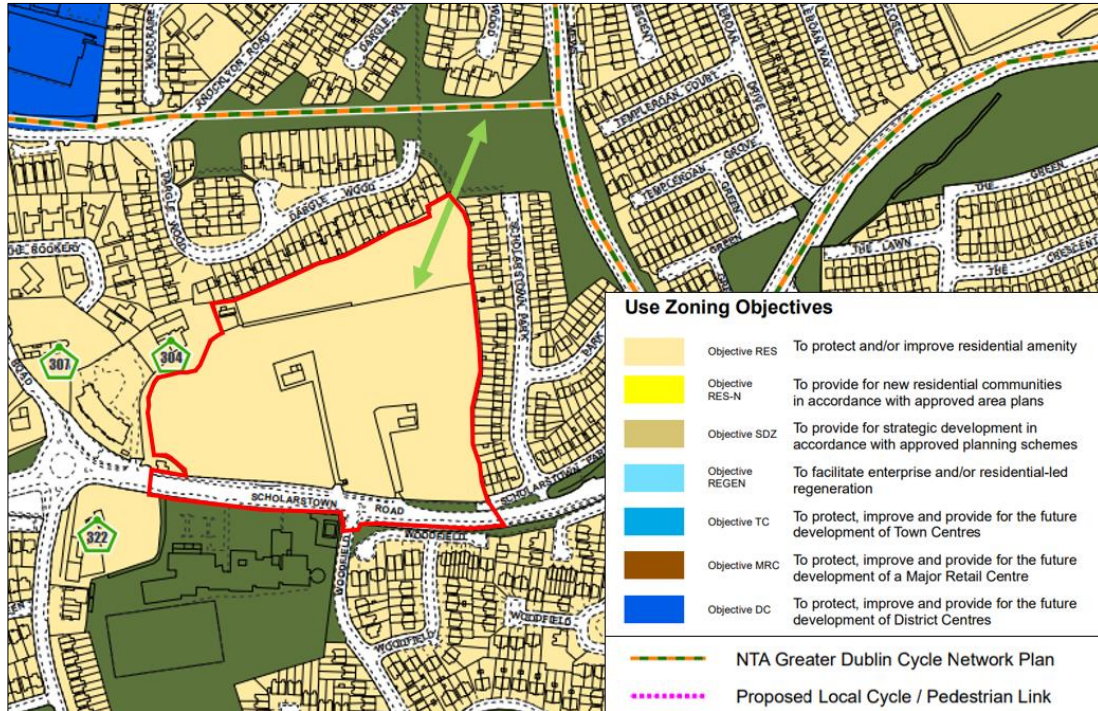


Figure 3.7: Site Permeability, as Indicated by the Green Arrow at the North-Eastern Boundary of the Subject Site (Indicatively Outlined in Red) may become an Important Permeable Connection to the Wider Cycling Network

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

Therefore, the facilitation of a pedestrian/bicycle connection from the subject site to the public open space to the north-east of the site will enhance the permeability of the area and encourage social cohesion within the wider area.

3.4.5 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 at 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 Primary School	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

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.

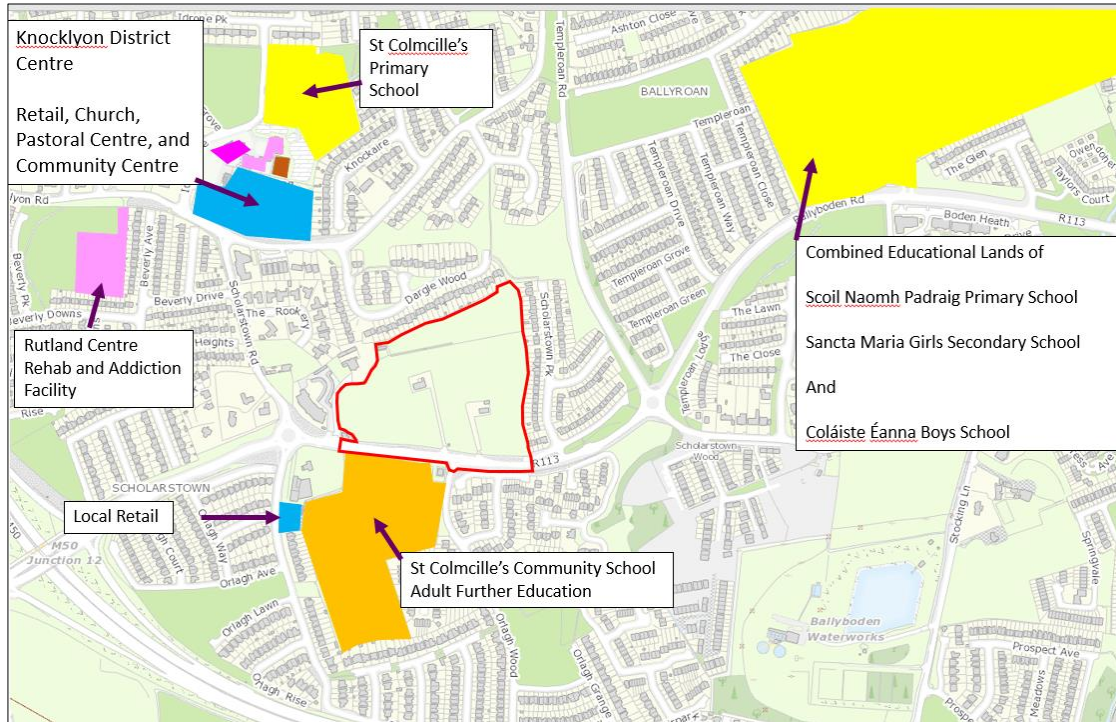


Figure 3.8: Map of the Surrounding Community Infrastructure Including Primary and Secondary Education (in Yellow), Further Education (in Orange), Local Retail (in Blue) and Other Facilities (Pink)

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

4.0 NATIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the policy and objectives of the respective policy documents. The following National Policy documents are discussed in this section:

1. *Project Ireland 2040: The National Development Plan 2018-2027;*
2. *Project Ireland 2040: National Planning Framework;*
3. *The National Spatial Strategy 2002-2020;*
4. *Action Plan for Housing and Homelessness; Rebuilding Ireland;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities;*
7. *Urban Design Manual – A Best Practice Guide (2009);*
8. *Design Manual for Urban Roads and Streets;*
9. *The Planning System and Flood Risk Management (2011);*
10. *Retail Planning Guidelines; and*
11. *Guidelines for Planning Authorities on Childcare Provision.*

4.1 ***Project Ireland 2040: The National Development Plan 2018-2027***

The *National Development Plan 2018 -2027* document underpins the overarching message of the *National Planning Framework*. The publication sets out how Strategic Investment Priorities are aligned with public capital investments over the next ten years to achieve each of the National Strategic Objectives as set out in the *National Planning Framework*. The context of the National Development Plan is illustrated in Figure 4.1 below.

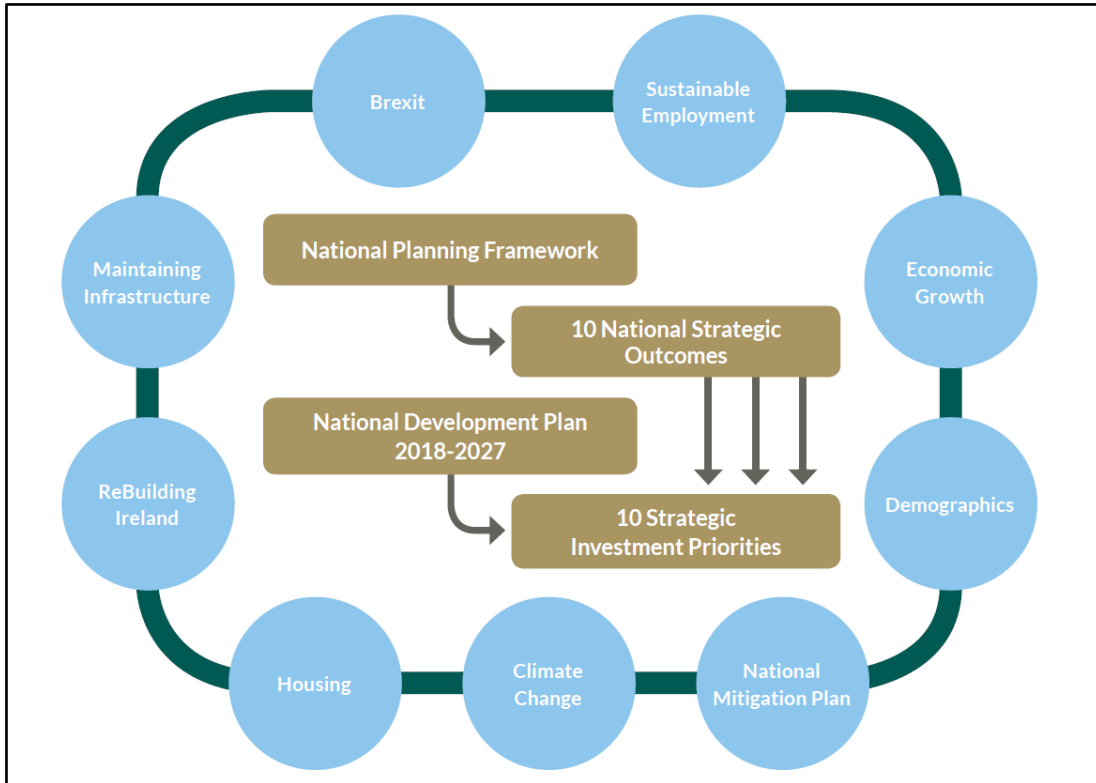


Figure 4.1: Context of the National Development Plan.

(Source: *Project Ireland 2040 National Development Plan 2018 – 2027*)

The National Planning Framework published alongside the National Development Plan has 10 No. National Strategic Outcomes. The relevant strategic outcomes and objectives are discussed below at Section 4.2 of this report.

4.2 *Project Ireland 2040: National Planning Framework*

4.2.1 Introduction

Project Ireland 2040: National Planning Framework (NPF) is the Government’s high-level overarching strategic plan that aims to shape the future growth and development of the country. The NPF is a long-term Framework that sets out how Ireland can move away from the current ‘business as usual’ pattern of development.

A core principle of the NPF is to:

‘Allow for choice in housing location, type, tenure and accommodation in responding to need’, in addition to tailoring ‘the scale and nature of future housing provision to the size and type of settlement where it is planned to be located’.

Therefore, we submit that the provision of high-quality residential units comprising a mix of Build-to-Sell and Build-to-Rent units at the subject site will contribute to achieving the objectives of the NPF. The scheme will provide choice for people who are searching for both permanent and temporary accommodation in Dublin, by providing both Build-to-Rent and Build-to-Sell units on a currently underutilised site.

The NPF states that

'while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments.'

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**' [Our Emphasis].*

Furthermore, it is noted that *'achieving this level of supply will require increased housing output into the 2020s to deal with a deficit that has built up since 2010.'*

The NPF highlights that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'*. The recently adopted policy document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it.'* [Our Emphasis]

The proposed development is a direct response to the housing shortage that is readily reported and identified in recent planning policy. The proposed application is consistent with the policy objectives as set out throughout this section, as it provides a significant proportion of one and two bedroom units in addition to a smaller number of three bedroom units with a range of supplementary resident facilities that meets the need of the mobile population and small scale retail/café/restaurant units to serve the needs of both the mobile and permanent population.

4.2.2 National Strategic Outcomes and Objectives

The NPF identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the NPF (to create a shared set of goals for every community across the country) as follows:

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

A number of key National Policy Objectives (NPO's) have been identified throughout the NPF in order to successfully deliver the 10 No. Strategic Outcomes.

We have carried out an assessment of the National Policy Objectives identified in the NPF and have identified the relevant objectives that are applicable to the proposed residential development. The relevant National Policy Objectives that are applicable to the proposed development are discussed under the following headings:

- *Population Growth and Employment;*
- *Current Trends in Tenure and Household Formation in Ireland;*
- *Sustainable Modes of Transport;*
- *Scale, Massing and Design;*
- *Justification and Housing Need;*
- *Waste and Environmental Issues; and*
- *Implementing the National Planning Framework.*

4.2.3 Population Growth and Employment

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the five main cities. The following objectives are considered relevant to the proposed residential development:

- **National Policy Objective 1b** projects an additional population of approximately 490,000 – 540,000 No. people in the Eastern and Midland Region.
- **National Policy Objective 1c** projects an additional 320,000 No. people in employment in the Eastern and Midland Region.
- **National Policy Objective 2a** sets a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a and National Policy Objective 3b** aim to deliver at least 40% of all new homes nationally, within the build-up of existing settlements and to deliver at least 50% of all new homes that are targeted in the five Cities within their existing built-up footprints.
- **National Policy Objective 4** aims to provide diverse and integrated communities ensuring the creation of attractive, livable, well designed, high quality urban places.
- **National Planning Policy 5** aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 8** aims to ensure the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1,173,000 No. (2016) to 1,408,000 No. (2040).

The development will facilitate the projected growth in population and persons in employment in the Eastern and Midland Region as identified in NPO 1b and 1c by providing suitable accommodation in an area designated for regeneration.

The NPF states that proposals should:

*'prioritise the location of **new housing provision in existing settlements** as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure'. [Our Emphasis]*

The NPF outlines that a *'preferred approach would be compact development that focuses on reusing previously developed, 'brownfield' land, **building up infill sites**, which may not have been built on before and either reusing or **redeveloping existing sites** and buildings.'* [Our Emphasis]

The proposed development is located on an underutilised plot adjacent to Scholarstown Road. As such the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide for 50% of future population and employment growth with the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The NPF recognises that to achieve the targets set out in NPOs 3a and 3b of the framework which relate to the delivery of new homes that housing outputs will undoubtedly necessitate a significant increase of apartment type development.

Furthermore, it is noted that *'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'*

As detailed at Section 3.0, the site is strategically located in close proximity to public transport which provides access to a number of employment locations, services and facilities. The site is also located close to many services and facilities in the local area such as Knocklyon Shopping Centre and many educational facilities which are accessible by foot.

The proposed residential development provides 590 No. units comprising a mix of Build-to-Rent and Build-to-Sell units. The scheme provides a two storey amenity block with a roof terrace within the central open space (including gymnasium, lobby, lounges and kitchenette) to serve the Build-to-Rent residents. These areas are high quality, attractive and liveable spaces where the residents will have the opportunity to interact with each other ensuring an integrated community within the scheme.

The scheme also provides a two storey retail/café/restaurant building fronting Scholarstown Road, a management suite and café/restaurant unit within Block C3 and a crèche within block C2. Therefore, it is considered that the proposal will contribute to creating an attractive, livable, well designed and high-quality urban place as set out in NPO 4.

In addition, the scheme provides 3 No. main public open space areas as follows: central open space, north-eastern pocket park and the western green space. The open space in the north-east corner facilitates the opportunity for a pedestrian/bicycle connection to the public open space in Dargle Park.

The proposed scheme involves the redevelopment of an existing underutilised site and therefore is fully in accordance with the preferred approach of the NPF. The development will encourage social interaction between the residents of the scheme particularly by providing attractive communal spaces within the development for the Build-to-Rent residents. The proposed development is consistent with the NPOs set out within this Section.

4.2.4 Current Trends in Tenure and Household Formation in Ireland

The NPF 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 following objectives respond to the changing nature of household formations and trends in tenure seen in current planning discourse.

- **National Policy Objective 6** acknowledges the need to regenerate and rejuvenate cities, towns and villages of all types and scale that can accommodate changing roles and functions in terms of their residential population, employment activity, levels of amenity and design quality in order to sustainability influence the surrounding area.
- **National Policy Objective 11** states that there will be a presumption in favor of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.
- **National Policy Objective 32** notes a target of delivering 550,000 No. additional households to 2040.

As previously detailed at Section 4.2.1 of this document, the proposed development is a direct response to current trends in tenure and household formation in Ireland by providing an alternative type of accommodation not readily seen in the surrounding area. As such the scheme provides for a significant proportion of one and two bedroom units in addition to a smaller number of three bedroom units.

The NPF highlights that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'*. The recently adopted policy document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it.'* [Our Emphasis]

The proposed development comprises 590 No. units providing a mix of Build-to-Rent apartments (246 No. one beds and 234 No. two beds) and Build-to-Sell duplexes and apartments (55 No. two beds and 55 No. three beds). The development offers high quality accommodation which exceeds minimum required areas standards at a time when the NPF acknowledges the constrained urban housing market. The scheme represents

sustainable development as the site is situated in a residential area, in close proximity to a range of employment locations and services and facilities accessible by foot, bike or public transport and will contribute towards alleviating the current housing crisis.

4.2.5 Sustainable Modes of Transport

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered relevant to the proposed residential development:

- **National Planning Policy Objective 26** outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with planning policy.
- **National Policy Objective 27** aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

As noted in Section 3.0, the scheme will front Scholarstown Road, a key artery through South Dublin leading from the M50 eastwards. The proposed development provides for 459 No. car parking spaces on site (288 No. designated to the 480 No. Build-to-Rent units which provides a ratio of 0.60 No. spaces per unit and 124 No. designated to the 110 No. Build-to-Sell units. Some 13 No. car parking spaces are designated for the retail units, 31 No. spaces for the café/restaurant and 3 No. spaces for the creche. Within the 459 No. total car parking spaces, some 3 No. car club spaces are provided. The proposal actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership, especially in relation to the Build-to-Rent element of the scheme. The development also includes a gym for the Build-to-Rent residents within the two storey amenity building to encourage occupants to engage in regular physical activity.

As detailed at Section 3.4 of this Report, the subject site is located in an area well served by public transport (which will be upgraded under the Bus Connects program) and within cycle distance of areas of employment in addition to a range of services and facilities accessible by foot. The proposed development includes 800 No. bicycle parking spaces to support and encourage cycling as a transport mode. The scheme will provide for local retail convenience/café/restaurant units and a creche for the benefit of all residents of the scheme, in addition to a resident amenity building to serve the Build-to-Rent residents.

The proposed development is consistent with the policy objectives as set out above.

4.2.6 Scale, Massing and Design

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the scale, massing and design of developments. The following objectives are considered relevant to the proposed mixed use development:

- **National Policy Objective 13** outlines that in urban areas, building height and car parking standards will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.
- **National Policy Objective 33** prioritises the provision of residential development at appropriate scales within sustainable locations.
- **National Policy Objective 35** notes the aim to increase residential density in settlements through a range of measures including (amongst others) in-fill development schemes and increased building heights.

The proposed scheme is considered to positively contribute towards meeting the housing need as identified by the NPF. The NPF sets out that *'to 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'*.

The proposed development has been subject to a high quality standard of design, siting and layout, innovatively created by John Fleming Architects, with the highest elements of the scheme located towards the centre of the site and fronting part of Scholarstown Road (7 No. part five to part six storey blocks and 1 No. part four to part six storey block) while providing 9 No. three storey blocks and a two storey retail/café/restaurant building around the periphery of the site adjacent to low density dwellings in order to protect the character of the surrounding area, providing strong frontage onto Scholarstown Road whilst also appropriately densifying this site which is currently insufficiently utilised, in accordance with the objectives of the NPF.

Having regard to the new policy context and increased housing demand, the subject scheme appropriately addresses criteria as set out in the *Apartment Guidelines, 2018*. In line with NPO 13, the *Apartment Guidelines, 2018* set out the specific standards for apartment developments, as discussed in Section 4.6 of this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33.

The Landscape and Visual Impact Assessment (Chapter 8 of the EIAR) and Daylight/Sunlight Assessment enclosed as a separate document both demonstrate that no material impacts will occur as a result of the proposed development. The layout of the development has been thoroughly considered and greater heights are provided towards the centre of the site, away from nearby residential dwellings. The proposed development is therefore in accordance with National Policy Objective 35 which seeks an increase in residential density in settlements through increased building heights.

4.2.7 Waste and Environmental Issues

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Waste and Environmental Issues. The following objectives are considered relevant to the proposed residential development:

- **National Policy Objective 52** sets out that the planning system must respond to the environmental challenges and have regard to relevant environmental legislation.

- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce the carbon footprint in the planning system.
- **National Policy Objective 56** sets out the intentions for sustainably managing waste.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure the efficient and sustainable management and conservation of water resources and water services infrastructures.
- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that *'all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.'*

As outlined at Section 3.1 and 3.2, the application lands containing 2 No. detached dwellings are completely underutilised in a prime sustainable location. The redevelopment of the subject site will provide a population in close proximity to public transport and encourage walking and cycling, in accordance with National Policy Objective 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The development also facilitates a link through the north-east of the site facilitating enhanced permeability through the site and surrounding areas, on foot or by bicycle. Section 3.4.2 and 3.4.4 of this report provide details of planned public transport improvements.

The proposed scheme provides a reduced number of car parking spaces than set out in the *South Dublin County Development Plan 2016 – 2022* for the Build-to-Rent element having regard to the accessible location of the site.

The scheme provides 480 No. car parking spaces which includes 3 No. car club spaces (Letter of Support received from GoCar located in Appendix A of the DBFL Parking Strategy). Some 800 No. bicycle parking spaces will also be provided as part of the proposed development and we note that the site is located in close proximity to a variety of proposed upgrades to the cycle network, with the facilitation of a pedestrian connection providing easy access to an upgraded primary route through the public open space to the north east of the site.

The car parking standards set out in the *South Dublin County Development Plan 2016 – 2022* are maximum parking standards and as such the proposed scheme located in Zone 2 provides a reduced number of car parking spaces than set out in standards in the *South Dublin County Development Plan 2016 - 2022* and the *Apartment Guidelines, 2018* having regard to the accessible location of the site. The criteria set out within the *Apartment Guidelines* indicates that the subject site is located in an 'Intermediate Urban Location' and notes that in such locations 'planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.'

The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with National Policy Objective 54.

The proposed development is supported by the following reports/drawings which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues:

- Landscape Masterplan prepared by Mitchell and Associates Landscape Architects;
- Traffic and Transport Assessment prepared by DBFL Consulting Engineers;
- Infrastructure/ Engineering Services Report prepared by DBFL Consulting Engineers;
- Flood Risk Assessment prepared by DBFL Consulting Engineers;
- Environmental Report by Thornton O'Connor Town Planning;
- Tree Survey and Tree Impact Assessment prepared by Arborists Associates Limited;
- Appropriate Assessment Screening prepared by Openfield Ecology; and
- Energy and Sustainability Report prepared by O'Connor Sutton Cronin Consulting Engineers.

The following chapters form part of the EIAR and relate to waste and environmental issues:

- Waste Management Chapter prepared by Awn Consulting (Chapter 13); and
- Biodiversity Chapter prepared by Openfield Ecological Services (Chapter 7).

It is considered that the proposed development is consistent with the environmental objectives as set out in the NPF.

4.2.8 Implementing the National Planning Framework

In regard to implementing the National Planning Framework, the following objective is considered applicable to the proposed scheme:

The **National Policy Objective 74** states that proposals should 'secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.'

This section has set out how the proposed development is consistent with the relevant objectives of *Project 2040: National Planning Framework* which will contribute towards achieving the 10 No. National Strategic Outcomes also identified in the NPF as follows:

Consistency with National Strategic Outcomes			
No.	Objective:	How it is Addressed by this Development	Does it meet the criteria:
1:	Compact Growth;	Sustainable and efficient redevelopment of land in an existing residential area.	Yes
2:	Enhanced Regional Accessibility;	Proximity to bus stops (bus routes will be upgraded under Bus Connects), urban cycling routes and national road network.	Yes
3:	Strengthen Rural Economies and Communities;	N/A – Urban Area	N/A
4:	Sustainable Mobility;	459 No. Car Spaces (including 3 No. Car Club Spaces) - a provision of 288 No. spaces (0.60 No. spaces per unit) for the 480 No. Build-to-Rent units and 124 No. spaces for the 110 No. Build-to-Sell units). The remainder is provided for the retail units, cafe/restaurant units and the crèche. The scheme also provides 800 No. bicycle parking spaces. Facilitation of a pedestrian connection through the north east of the site providing increased permeability through the site.	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	Close proximity (by public transport/bicycle and foot) to many employment locations providing access to much sought-after residential accommodation for employees.	Yes
6:	High Quality International Connectivity;	N/A – Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a large quantum of high quality internal and external amenity space for future residents. The scheme provides also provides ancillary retail/café/restaurant and a creche.	Yes
8:	Transition to a Low Carbon and Climate Resilient Society;	The scheme provides for a greater population in proximity to public transport. Sedum Roofs are included, as well as SuDS throughout the development. High energy rating and compliance with building standards.	Yes
9:	Sustainable Management of Water, Waste and other	Sustainable modes of transport are encouraged, through significant provision of bicycle parking spaces, new potential pedestrian connection to the public open	Yes

	Environmental Resources;	space in Dargle Park, along with sustainable management of water use and waste output through measures such as SuDS.	
10:	Access to Quality Childcare, Education, and Health Services;	The proposed scheme provides for a crèche (438 sq m). There are a number of primary, secondary schools and Further Education facilities in close proximity to the subject site. Tallaght Hospital is located south-west of the application site. In relation to health services, Knocklyon Medical Centre and Scholarstown Family Practice are located within walking distance of the subject lands.	Yes

4.3 National Spatial Strategy 2002-2020

The National Spatial Strategy (NSS) is a twenty-year planning framework which aims to sustain the following through informing the spatial development of the country as a whole:

- a better quality of life for people;
- a strong, competitive economic position; and
- an environment of the highest quality.

It is noted that South Dublin County forms part of the Greater Dublin Area (GDA). The NSS notes in relation to the GDA that:

'Population growth within and in many areas adjoining the GDA is being driven primarily by the investment dynamics of natural increase and high migration combined with a very high proportion of new jobs and investment continuing to be attracted to the Dublin area.' [Our Emphasis].

It is widely recognised that the GDA has experienced a rapid rate of growth in recent years that has been primarily accentuated by the country's economic successes. The NSS acknowledges that strong growth results in a *'particularly heavy burden of development pressures, such as housing supply difficulties and traffic congestion, on the city and its surrounding area.'*

As result, the NSS states that

'up to four-fifths of the population growth in the State could take place in or in areas adjoining the Greater Dublin Area over the next twenty years.' In doing so, *'Dublin will continue to grow in population and output terms. However, it is not desirable for the city to continue to spread physically into surrounding counties. The physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin'.*

As the proposed higher density development is located on land in an existing residential area, the scheme is in accordance with the aims of the NSS to restrict the sprawl of the city outwards into the surrounding counties. The development will increase the supply of housing at a time of acute demand and aims to reduce traffic congestion by encouraging sustainable modes of transport.

The NSS reiterates NPO 32 of the NPF stating that:

'it has been estimated that it will be necessary to provide some 500,000 additional dwellings to meet likely demand in the period up to 2010. Ireland's housing stock per thousand of population is the lowest in the EU at 327 housing units per thousand population as compared to 435 per thousand in the UK and a European average of 450 per thousand'.

Whilst outdated, the critical demand for housing still exists in the current housing crisis and therefore a significant quantum of additional housing is required to contribute towards alleviating the housing crisis.

The proposed development comprising 590 No. residential units (480 No. Build-to-Rent units and 110 No. Build-to-Sell units) will provide an accommodation mix of one, two and three bed apartments and duplexes. The development will contribute towards alleviating the housing crisis by providing accommodation in close proximity to centres of employment.

The NSS sets out criteria for the location of housing within urban areas as set out below:

- The Asset Test - Are there existing community resources, such as schools etc., with spare capacity?

The application lands are located within a suburban area with many services and facilities in close proximity, which will be supplemented by the amenity spaces for the Build-to-Rent residents provided within the proposed scheme including gymnasium, lounges and kitchenette. In addition, an ancillary retail/café/restaurant block, a second café/restaurant unit, a management suite and a creche are also provided.

The subject site is zoned objective 'RES' in the *South Dublin County Development Plan 2016-2022*, where the stated objective aims *'to protect and/or improve residential amenity'*. As illustrated on the below extract the surrounding the area is primarily residential in nature.



As set out in detail in Section 3.4.5 of this report, there is a range of services and facilities in proximity to the subject site most notably Knocklyon Shopping Centre. In addition, the scheme provides a 657 sq m retail/café/restaurant block (Block D2) and another café/restaurant unit (288 sq m) to serve the residents of the scheme and existing local residents.

The Childcare Guidelines 2001 stipulate that planning authorities should require the provision of a childcare facility for every 75 No. residential units. The scheme provides a creche (438 sq m) which will cater for the childcare needs of the proposed development.

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.

- The Carrying Capacity Test - Is the environmental setting capable of absorbing development in terms of drainage etc.?

Please find enclosed an Infrastructure Design Report, prepared by DBFL Consulting Engineers which details the proposed foul water drainage arrangements, storm water drainage arrangements, water supply, and the inclusion of sedum roofs and SuDS demonstrating that the development can be appropriately absorbed.

- The Transport Test - Is there potential for reinforcing usage of public transport, walking and cycling?

The proposed development will promote and encourage sustainable modes of transport. As detailed previously in this document, a wide range of bus services are available in close proximity to the site, in addition to opportunities for residents to walk and cycle to places of employment and other services and facilities.

It is re-iterated that the existing bus services available in proximity to the subject site offer high frequency 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 is considered to be a major location for the attraction of inward investment to the Irish economy. 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

In addition, Tallaght contains major employment centres such as the Tallaght Hospital and Children’s Hospital, South Dublin County Council and several offices and hotels, as well as significant industrial estates therefore providing significant employment opportunities within a reasonable commuting distance from the site. As discussed in Section 3.4.2 of this Report, the emerging changes to the Dublin Bus network is likely to improve in the future. Tallaght also contains Third Level education with Institute of Technology Tallaght, which is now part of the Technical University of Dublin.

To the east of the site is the Sandyford Business District which 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 as detailed at Section 3.4.2 of this report.

In our professional planning opinion, the subject site is well located in terms of access to the wider employment, enterprise and education of the Greater Dublin Area. The site is located in close proximity to the emerging growth areas of Sandyford and Tallaght and there is also scope for increased employment prospects in the near future having regard to the improvement of bus services.

We also note that the proposed layout of the development provides the opportunity for a pedestrian/bicycle connection to the public open space in Dargle Park to the north-east of the site (letter of consent from South Dublin County Council attached to the planning application form), thereby enhancing permeability for existing residents in surrounding dwellings and future residents of the scheme to navigate easily to and from public transport, services and facilities, and improved future bicycle infrastructure.

We note that 800 No. bicycle parking spaces are proposed as part of the development which will reinforce the use of cycling as a principal mode of transport.

This planning application includes an EIAR Traffic and Transport Chapter (Chapter 14) and a separate Traffic and Transport Assessment, both prepared by DBFL Consulting Engineers.

- The Economic Development Test - Is there potential to ensure integration between the location of housing and employment?

The proposed development is a direct response to the housing shortage of suitable accommodation within Dublin, an area of high demand as evidenced by the demographic, economic and societal changes in recent years. As set out in Section 3.4.3, there are a range of employment locations within South Dublin and Dublin City Centre that are easily accessible from the subject site by public transport, bicycle and walking. We also note that the site is identified in the *South Dublin County Development Plan 2016 – 2022* as a 'Housing Capacity Site', discussed at Section 6.1.2. Therefore, it is clear that the site is suitable for housing development within an existing residential area in close proximity to employment.

- The Character Test- Will the proposal reinforce a sense of place and character?

The proposal will result in the sustainable development of an underutilised site in a prime location which has been designated for residential development in the *South Dublin County Development Plan 2016-2022*. The facilitation of a connection through to the public open space in Dargle Park at the north-east of the site enhances the integration and connectivity of the scheme with the established character of the surrounding area. The development will also contribute to a sense of place along Scholarstown Road through the built form flanking the route with high quality and attractive elevations. We note that the higher building forms are located to the centre of the site and fronting part of Scholarstown Road enclosing a large area of high quality public open space while also providing opportunities for light infiltration to the open space ensuring that this space will be attractive and useable for future residents.

- The Community Test - Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?

The proposal will result in the redevelopment of an underutilised site. The positioning of the development comprising a mix of Build-to-Rent and Build-to-Sell units will provide active surveillance of the outdoor spaces and pedestrian routes through the site. We note that communal residential facilities are provided for the Build-to-Rent residents, which will instill a community ethos. In addition, ancillary small scale retail/café/restaurant facilities to serve both existing and future residents are provided consolidating the community ethos within the scheme and wider community.

- The Integration Test - Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?

As previously noted, there is an acute housing shortage currently present in Ireland and a significant demand existing for accommodation. The proposed application is considered to respond to the local need for high quality and suitable accommodation.

In relation to the Build-to-Rent element of the scheme, we note that the *Apartment Guidelines, 2018* states 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.'

The Build-to-Rent typology will provide alternative and affordable purpose-built accommodation to meet the housing needs of a greater number of persons, while the Build-to-Sell units will provide the opportunity for people seeking to purchase a home in the area.

We highlight that the scheme will provide 10% social and affordable housing in accordance with Part V of the *Planning and Development Act 2000*.

The proposed scheme provides high quality landscaped external amenity areas in addition to extensive internal communal amenity areas which meet the housing needs of a greater number of persons.

Furthermore, the NSS states that:

*'efficient use of land by **consolidating existing settlements**, focusing in particular on development capacity within central urban areas through **re-use of under-utilised land** and buildings as a priority, rather than extending green field development.'* [Our Emphasis]

The subject development proposes the densification of an underutilised site in proximity to high quality public transport which offer frequent services to the city centre employment areas as previously detailed.

The continued growth of employment areas such as Tallaght and Sandyford which contain employment centres such as Tallaght Hospital, South Dublin County Council and significant industrial estates provide significant employment opportunities within a reasonable commuting distance from the site via public transport. We note that the Beacon Private Hospital is located in Sandyford Industrial Estate, in addition to a vast range of employers. As noted previously in Section 3.4.2, the Dublin Bus network will be improved under the Bus Connects program resulting in less commuting times for employees. We also note that Tallaght is within reasonable cycle distance (ranging from 15 – 26 No. minutes) from the subject site.

As a result of increased growth in employment in proximity to the subject site, there is continued pressure and demand for accommodation within the area. Therefore, the proposed development can simultaneously assist in addressing this demand and represents the proper planning and sustainable development of the area.

The development is consistent with the policy guidance as set out within the *National Spatial Strategy 2002 – 2020*.

4.4 **Action Plan for Housing and Homelessness, Rebuilding Ireland**

The *Action Plan for Housing and Homelessness – Rebuilding Ireland* is the Government’s publication which recognises that a significant increase in new homes is needed. The Action Plan outlines a five pillar approach:

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2, Pillar 3 and Pillar 4.

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.
- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.
- Pillar 4: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save. In an attempt to manage this societal and economic shift, the document encourages development in the Build-to-Rent sector such as providing:

‘equal sized bedrooms clustered around a central shared space, or the inclusion of amenities such as gyms and creches and shared entertainment facilities’.

The document also identifies that *‘affordable rental is suited to; low to moderate incomes, do not qualify for social housing and need some level of support in housing costs.’*

The publication stipulates in relation to the delivery of housing that:

‘the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time.’

As previously discussed throughout this document, the proposed development will comprise 480 No. Build-to-Rent units (246 No. one bed units and 234 No. two bed units) and 110 No. Build-Sell duplex units (55 No. two bed units and 55 No. three bed units). The development will directly address the evident housing need by significantly increasing

housing accommodation in this location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2, 3 and 4.

The Build-to-Rent accommodation will provide alternative, affordable residential accommodation whilst the Build-to-Sell units will benefit those seeking to purchase a home. Some 60 No. leased social housing units will also be provided as part of the development.

It has been demonstrated that the proposal subject of this statement is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland*.

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

The *Urban Development and Building Heights Guidelines for Planning Authorities* were adopted in December 2018. The Guidelines set out that a key objective of the NPF is to significantly increase the building heights and overall density of developments.

The Minister's foreword to the *Height 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 which is an unsustainable model. 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 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 *Height Guidelines 2018* denote that the:

'Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.'

The *Building Height Guidelines* also note that increasing prevailing building heights have 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 it notes that the planning process must actively address how this objective will be secured.

The *Height Guidelines* expressly seek increased building heights in urban locations:

*'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 highest building forms within the scheme comprise the Build-to-Rent apartments which are positioned at the least sensitive positions within the site (4, 5 and 6 No. storey elements towards the centre of the site and fronting part of the Scholarstown Road) with the lower structures (3 No. storey Build-to-Sell duplex and apartment units and 2 No. storey ancillary retail/café/restaurant block) located around the boundaries of the site, which provide a sensitive transition to the neighbouring residential dwellings.

It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a significantly scaled, strategically positioned and underutilised plot is maximised. The Daylight/Sunlight Assessment submitted with planning application demonstrates that no material impact will occur on neighbouring properties or internally within the scheme. In summary the report concludes that:

- All neighbouring residential dwellings considered on Dargle Wood and Scholarstown Park are compliant with BRE recommendations in relation to vertical sky component.
- As the proposed development sits to the south of the existing residential dwellings on Dargle Wood and west of those on Scholarstown Park, a minimal degree of overshadowing is visible to the rear gardens at some periods throughout the year, in particular the winter months.
- On the 21st of March all of the existing amenity garden spaces, would continue to receive at least 2 hours of sunlight in line with the BRE recommendations.
- All of the proposed public/communal amenity areas exceed the BRE recommendations of at least receiving at least 2 hours of sunlight on the 21st of March.
- All but one of the rear garden/terraces of the duplexes achieve the recommended 2 hours of sunlight over at least half of the area provided on the 21st of March. Out of 53 front terrace amenity areas at ground level, the majority of them achieve the recommended 2 hours of sunlight on the 21st of March, 48 in total. Out of 53 balcony spaces, the majority of them achieve the recommended 2 hours of sunlight on the 21st of March, 48 in total. Overall, taking into consideration the occupants of the duplexes that have access to further private amenity spaces (as outlined on Page 68-69 of the Daylight Report), 97% of the properties have access to amenity spaces that exceed the BRE recommendations.
- The results highlight 81% of the balconies (in the Build-to-Rent apartments) would receive at least 2 hours of sunlight on the 21st of March exceeding the BRE recommendations, 250 No. in total. The majority of these spaces are almost measuring 100% of the area exceeding the BRE recommendation. The remaining balconies (19%) that do not achieve this target are north facing amenity spaces and are performing as expected due to the orientation of the buildings within the development. The majority of these balconies are overlooking a large open space and as such, they would continue to provide a positive outlook and quality private outdoor amenity space for the occupants. Further to this, the additional images from section 6.4 highlight that these balcony spaces perform well in the warmer months when occupants of the dwellings will more frequently use these spaces.
- All tested rooms in the scheme are projected to have an Average Daylight Factor (ADF) above recommended ADF in line with BRE Guidelines.
- Overall, the results demonstrate that the proposed development performs in line with BRE recommendations in the BRE 'Site Layout Planning for Daylight and Sunlight' guide.

We note that private spaces to balconies are generally not assessed under the remit of Daylight/Sunlight Reports however this exercise has been completed for this application as requested by An Bord Pleanála in their Opinion. (See details in separate Response to ABP Opinion report).

Chapter 3 of the *Height Guidelines, 2018* expressly seeks increased building heights in urban locations:

*'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 Guidelines further note that *'Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:*

- 1. Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?***

As noted in Section 4.1, the proposed scheme involves the redevelopment and infilling of an existing underutilised sustainable site on residentially zoned lands which is specifically designated as a Housing Capacity Site within the Development Plan. The subject development will contribute to delivering compact growth in our urban centres. The scheme is therefore fully in accordance with the preferred approach of the National Planning Framework.

- 2. Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?***

SPPR 1 within Chapter 2 of the Guidelines sets out that blanket numerical restrictions on building heights shall not be provided for in plans, in order to support building height and density in locations with good public transport accessibility and particularly in town/ city cores.

As previously noted, the *South Dublin Development Plan* specifically sets a numerical limitation on height in certain locations, by virtue of Housing Policy 9 Objective 4 which stipulates that development should:

'direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Regeneration and Strategic development Zones, and subject to an approved Local Area Plan or Planning Scheme.'

We re-iterate that it is our professional planning opinion that imposing height restrictions at the subject site through the Development Plan is contrary to Specific Planning Policy

Requirement 1 of the *Height Guidelines, 2018* which notes that blanket numerical limitations on building height shall not be provided for through statutory plans. We consider that the heights proposed ranging from 2 No. storeys to part 6 No. storeys are suitable at the subject lands having regard to the positioning of the highest forms at the least sensitive locations throughout the site (centre of the site and along Scholarstown Road). The heights proposed provides architectural interest across the site and are appropriate in this location in order to accord with Government policy to increase building heights in sustainable locations.

3. Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

This material contravention statement has clearly demonstrated that the height policies of the *South Dublin Development Plan* restrict development at the subject site to 5 No. storeys in height and is outdated in terms of the progression of National Policy. Implementing such objectives as prescribed in the current local planning policies would be contrary to SPPR₁ of the *Height Guidelines, 2018* as discussed above. It is our opinion that the subject site has the potential for greater heights than 5 No. storeys to sustainability 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 and the receiving context. We note that an LVIA and Daylight/Sunlight Analysis have been carried out in conjunction with the design of the subject development and demonstrate that the proposed development will not have an undue negative impact on its receiving environment.

SPPR₃ of the Building Height Guidelines, 2018 sets out that:

'It is a specific planning policy requirement that where;

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria [below]; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.'

We have demonstrated below how the proposed development satisfies the specified criteria set out in Section 3 of the Building Height Guidelines.

At the scale of the relevant city/town

The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

The accessibility of the subject site via public transport has been extensively detailed at Section 3.4 of this report and within the Planning Report prepared by Thornton O'Connor Town Planning submitted with this planning application. In summary, the site is well

served by public transport No. 15, No. 15b and No. 175 bus routes particularly) with many bus stops located within walking distance of the site, providing opportunities for residents of the scheme to travel to places of work, including Dublin City Centre. We highlight that the site is located in close proximity to the Sandyford Business District which contains several large-scale employers such as Microsoft, Vodafone Ireland and SSE Airtricity in addition to Tallaght which provides significant employment opportunities e.g. Tallaght Hospital, an academic teaching hospital which employs c. 3,000 No. people.

The site will benefit from improved bus services as part of the Bus Connects program, a national program of investment in the Greater Dublin Area bus network. The program aims to make more of the city accessible to passengers within a reasonable time span, through simple connections and transfers between public transport services.

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

It has been detailed in the Architect’s Design Statement and Thornton O’Connor Town Planning documents how the development will be assimilated into its surrounding context. We note that the subject site is not located within an architecturally sensitive area and is not generally surrounded by any unique locational characteristics, having regard to its position fronting Scholarstown Road and adjacent to typical low density housing. However, we do note that a Protected Structure is located adjacent to the site to the north-west. A key priority during the detailed design stage was to provide sufficient setbacks from the structure by providing an area of green open space at this boundary in addition to 3 No. storey duplexes/apartments which subsequently transition to part 5 to part 6 No. storey apartment structures and 1 No. part 4 to part 5 No. storey structures towards the centre of the site and fronting part of Scholarstown Road. We highlight that the Protected Structure is subject to extensive screening by mature trees which will be retained and reinforced by further landscaping.

Whilst the general context has no particular unique features, the subject site is unique in nature as it facilitates a significant planning gain through the provision of a pedestrian connection through the north-east of the site to the public open space in Dargle Park. The provision of this connection will encourage permeability through the site benefiting the wider public while also assisting with the integration of the proposed scheme into the surrounding area.

From the outset, the Design Team has sought create a scheme that complies with daylight requirements with respect to neighbouring properties, the public open spaces and the apartments themselves (tallest elements to the centre of the site away from surrounding dwellings). The enclosed Daylight/Sunlight Assessment prepared by Integrated Environmental Solutions Limited concludes that the proposed development performs in line with BRE recommendations. A Landscape and Visual Impact Assessment prepared by Mitchell and Associates Landscape Architects has been carried out and submitted as part of this planning application (Chapter 8 of the EIAR) and notes that the proposed scheme is of high-quality design, is elegant, contemporary and stylish; and where relevant it makes an appropriate positive contribution to the existing skyline.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The proposed scheme is presented in various forms and heights across the site, transitioning from the highest forms at the centre of the site and fronting Scholarstown Road with lower heights positioned towards the boundaries of existing residential dwellings. The proposed design and strategic layout provide visual relief through the blocks and concentrates on providing high quality open spaces throughout the scheme, therefore creating play opportunities and functional public space for the future residents to utilise.

At the scale of district/ neighbourhood/ street

The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.

The high-quality design and strategic layout of the proposed development provides an appropriate transition with surrounding residential dwellings having regard to clear guidance provided in national planning policy which seeks the densification of residentially zoned sites in close proximity to public transport such as the subject site. We submit that no material impacts on surrounding residential dwellings will occur as a result of the proposed development, having regard to the positive results of the Daylight/Sunlight assessment and the LVIA and express design intent to provide 2 and 3 No. storeys at the boundaries adjacent to existing residential dwellings.

The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.

The scheme has been designed to ensure interesting and relieved facades which reduce the perceived mass and scale of the blocks. It is noted that the retail/café/restaurant units and creche provide an active frontage and commercial presence to the street. Furthermore, the high quality open spaces provide visual relief throughout the scheme.

The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

The provision of pedestrian/bicycle routes throughout the site and fronting Scholarstown Road represent key planning gains for the wider neighbourhood in addition to provision of the connection through the north-east of the site and the proposed upgrading works to Scholarstown Road. The development has been subject to a sensitive detailed design process creating significant central open space positioned at the heart of the scheme. The design concept behind the landscape is to create a functional yet calm, tranquil, lush 'green' environment for the residents to enjoy.

The Specific Site Flood Risk Assessment prepared by DBFL Consulting Engineers identifies the site to be located within Flood Zone C and concludes that:

'the proposed mixed use development is appropriate for the site's flood zone category'.

The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

The high quality design of the scheme will ensure the development will be a legible and attractive addition to this area of South Dublin. As previously noted, the provision of a pedestrian/bicycle connection to the public open space in Dargle Park will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area. The assumed route will be assimilated into the environment through shrewd landscaping of wildflower meadow and reinforced through the provision of natural play opportunities.

The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

As set out in the Thornton O'Connor Planning Report, the *South Dublin County Development Plan 2016-2022* recognises the need to provide appropriately sized households. Policy H10 stipulates that a wide variety of adaptable housing types, sizes and tenures must be provided stating that:

'It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.'

Furthermore, the NPF states that:

'the 2016 Census indicates that if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2-person homes.'

Therefore, it is clear that the mix of primarily 1 and 2 No. bed units proposed are urgently required in order to provide an appropriate mix of dwelling typologies in Scholarstown and in the wider area, as is recognised in the *South Dublin County Development Plan 2016 – 2022*.

At the scale of the site/building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The results of the enclosed Daylight/Sunlight Assessment demonstrate that the proposed development performs in line with BRE recommendations in the BRE 'Site Layout Planning for Daylight and Sunlight' guide.

The inclusion of large open plan floorplates and large external open spaces will ensure high quality residential amenity is provided for the future tenants.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

The Daylight/Sunlight Assessment enclosed concludes the following:

- All residential dwellings considered on Dargle Wood and Scholarstown Park are compliant with BRE recommendations in relation to vertical sky component.
- As the proposed development sits to the south of the existing residential dwellings on Dargle Wood and west of those on Scholarstown Park, a minimal degree of overshadowing is visible to the rear gardens at some periods throughout the year, in particular the winter months.
- On the 21st of March all of the existing amenity garden spaces, would continue to receive at least 2 hours of sunlight in line with the BRE recommendations.
- All of the proposed public/communal amenity areas exceed the BRE recommendations of at least receiving at least 2 hours of sunlight on the 21st of March.
- All but one of the rear garden/terraces of the duplexes achieve the recommended 2 hours of sunlight over at least half of the area provided on the 21st of March. Out of 53 front terrace amenity areas at ground level, the majority of them achieve the recommended 2 hours of sunlight on the 21st of March, 48 in total. Out of 53 balcony spaces, the majority of them achieve the recommended 2 hours of sunlight on the 21st of March, 48 in total. Overall, taking into consideration the occupants of the duplexes that have access to further private amenity spaces (as outlined on Page 68-69 of the Daylight Report), 97% of the properties have access to amenity spaces that exceed the BRE recommendations.
- The results highlight 81% of the balconies (in the Build-to-Rent apartments) would receive at least 2 hours of sunlight on the 21st of March exceeding the BRE recommendations, 250 No. in total. The majority of these spaces are almost measuring 100% of the area exceeding the BRE recommendation. The remaining balconies (19%) that do not achieve this target are north facing amenity spaces and are performing as expected due to the orientation of the buildings within the development. The majority of these balconies are overlooking a large open space and as such, they would continue to provide a positive outlook and quality private outdoor amenity space for the occupants. Further to this, the additional images from section 6.4 highlight that these balcony spaces perform well in the warmer months when occupants of the dwellings will more frequently use these spaces.
- All tested rooms in the scheme are projected to have an Average Daylight Factor (ADF) above recommended ADF in line with BRE Guidelines.

- Overall, the results demonstrate that the proposed development performs in line with BRE recommendations in the BRE 'Site Layout Planning for Daylight and Sunlight' guide.

Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required, and these may include:

Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

In our professional planning opinion, the proposed buildings heights are not considered to be a height requiring such an assessment.

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

The AA Screening Report prepared by Openfield Ecological Services has found that significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network.

A Bat Assessment has been prepared by Brian Keeley and is enclosed as a separate document which concludes that none of the buildings on site have been shown to be a bat roost. Some 12 No. bat boxes are proposed to provide bat roost opportunities in line with the recommendations of the Bat Assessment Report (6 No. on trees and 6 No. on buildings). All the mature trees within the site shall be examined for the presence of bats prior to felling by a bat specialist. Should bats be noted in any tree, it is a protected structure and a derogation must be sought.

The Bat Assessment Report notes that *'it is predicted that this development will have no direct impact upon the conservation status of bats.'*

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

N/A

An assessment that the proposal maintains safe air navigation.

It is considered that there is sufficient distance from the subject site to Tallaght Hospital helipad, Baldonnel Aerodrome, Weston Airport and Dublin Airport and as such the development is not anticipated to have a resultant impact on air safety.

An urban design statement including, as appropriate, impact on the historic built environment.

The site comprises 2 No. residential buildings which are not of architectural merit. We note that the 'Architectural Heritage' Chapter of the EIAR (Chapter 6) carried out by Molloy & Associates states that:

'The demolition of both dwellings is proposed to facilitate the redevelopment of their combined lands.

Notwithstanding the tenuous social connection of 'Beechpark', the structure's demolition is justifiable given that it does not possess architectural merit, is positioned central to the subject lands and inevitable development of same lands.

Potential impact of proposed demolitions

The proposed demolition of two mid-20th century dwellings, neither of which possess architectural character of significance, will not arise in an adverse impact.

Potential impacts for Ros Mor

Notwithstanding measures taken to mitigate impacts, the proposed scheme will alter the current character of lands and consequentially, outward vistas from upper rooms of Ros Mor. In response, the landscaping design concentrates on supplementing existing vegetative buffers between the protected structure and the subject lands. It has also benefitted from the naturally lower topography of the site, further reducing visual impacts.

Principal reception rooms are likely to be positioned at garden level. Present vistas are therefore likely to be culminated by the vegetative buffer along the proposed site boundary. It is assumed that existing tall trees along this buffer were planted to inhibit a clear view of the presently uncultivated subject site, and instead direct a vista towards cultivated formal gardens in the foreground. The setting of Ros Mor is therefore defined by the character of its own, introverted gardens, the character of which will remain unchanged by the proposed development.

Potential impacts associated with the proposed development are therefore inherently reduced by existing screening measures.

Potential impacts associated with the construction phase of the development will be considered by way of introducing a range of mitigating measures to protect boundaries and a Gate Lodge attached to Ros Mor, such as boundary screening, monitoring and provision of security.

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

A comprehensive EIAR has been submitted separately as part of this planning application. An Appropriate Assessment Screening Report and Biodiversity EIAR Chapter (Chapter 7) prepared by Openfield Ecological Services have been submitted in conjunction with the application.

4.6 ***Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2018***

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

These 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.

The 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'.

It is considered that the subject site is located within an intermediate urban location as set out in the Apartment Guidelines, which states:

- ***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.***

The subject site fronts Scholarstown Road and is served by the No. 15 bus route which is located c. 300 m to the west. As detailed at Section 3.4.1 of this report, the No.15 bus route is a high frequency bus route with peak frequency services of 8 – 12 No. minutes. The No. 15b bus route has a peak frequency of 15 No. minutes.

Furthermore, we re-iterate that the subject site will benefit from planned national bus network investments i.e. bus connects as detailed at Section 3.4.2 of this report.

In terms of meeting future housing need, the publication set out that '*demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2-person, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type*', furthermore, the 2016 Census indicates that '*if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2-person homes.*'

The Apartment Guidelines recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand. The proposed application comprising 480 No. Build-to-Rent units and 110 No. units Build-to-Sell units will therefore provide suitable housing accommodation type for people seeking residential accommodation in Dublin. In addition, it is highlighted that the development provides 60 No. leased social housing units.

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.

Specific Planning Policy Requirement 7

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 relation to part (b) of SPPR7, the proposed scheme will provide high quality communal and recreational amenity areas such as a gymnasium, lounge, kitchenette and rooftop 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 totaling 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 Build-To-Rent element of the scheme is fully in accordance with SPPR8 as set out in the *Apartment Guidelines, 2018*.

1. The scheme provides 246 No. one bed apartments and 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 in addition to 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 urban location as discussed earlier in this section therefore reduced car parking is proposed (459 No. car parking spaces to serve the development); and
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 elements of the scheme is fully in accordance and consistent with the criteria set out in the Apartment Guidelines, 2018.

4.7 *Urban Design Manual – A Best Practice Guide (2009);*

Housing Location in Urban Areas

The Urban Design Manual sets out 12 No. key indicators for developments in urban areas:

- 1) Context – How does the development respond to its surroundings?

The proposed development has been subject to a high-quality design by John Fleming Architects. The comprehensive Design Statement prepared by John Fleming Architects details the below:

'The current design solution consists of two principal typologies: low-level buildings around the northern, eastern and western perimeter, where the development will abut the existing low-density housing; and taller more substantial apartment blocks in the centre of the site, and fronting onto Scholarstown Road, arranged around a large central open space. Lower three-storey units are located on the perimeter at the interface with Rosmore House and existing housing on the northern, eastern and western boundaries. This placement of three-storey duplexes and apartments along the northern and eastern boundaries allows for a gradual transition from the existing two-storey developments to the taller six-storey apartment buildings of the proposed development. The new layout has been considered carefully and audited to ensure it complies with the design principles, policies and objectives laid out in the various guidelines. The design solution allows us to achieve a high-density layout while respecting the setting and amenity of the adjacent residential amenity.

The proposal creates a series of public open spaces that provide variety within the development, allowing it to retain a parkland character even while achieving a high number of units. The use of a substantial green area (over 90m wide), complete with an existing mature oak tree at its centre, provides a pleasing central focus for the apartment blocks. Additional areas of open space are provided across the site, reinforcing the parkland nature of the proposed development. There is a more formal garden square provided to the west of the site, creating a suitable setting adjacent to Rosmore House, a protected structure. (although the house is substantially screened by the mature trees on its own grounds). In the northeast corner the open

space is planned in the form of a natural meadow, which provides for a less formal character with the potential for linking up with the existing Dargle Wood. Along Scholarstown Road the mature trees are retained, with the buildings set back in excess of 7m - 19m from the existing wall to create a linear open space with a sylvan aspect.'

In regard to the material palette for the scheme, John Fleming Architects note:

'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. 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.'

Please refer to the Architectural Design Statement prepared by John Fleming Architects and a Landscape Design Statement and Masterplan by Mitchells and Associates Landscape Architects enclosed with this pre-application submission for more details.

2) Connections – How well connected is the new neighbourhood?

As previously noted, the application site is located on Scholarstown Road and is served by a high frequency bus service as identified at Section 3.4.

As previously noted, the scheme is located within walking and cycling distance of many employment locations, services and facilities and is well served by public transport. It is evident that the site is well connected and sustainable modes of transport are encouraged within the proposed scheme.

3) Inclusivity – How easily can people use and access the development?

As previously noted, the proposed development has been designed to encourage sustainable modes of transport e.g. walking, cycling and public transport.

The DMURS Design Statement prepared by DBFL Consulting Engineers states that:

'it is DBFL's opinion that the proposed residential scheme is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013.'

The site layout allows efficient refuse collection from the designated bin storage areas. Emergency vehicles can also safely access the site via the secondary access to the south-

western side of the development as illustrated on the accompanying architectural drawings.

There are a number of access points for residents of the scheme both from the public footpath and the internal communal open spaces. We note that significant efforts have been made to ensure accessible routes have been provided throughout the scheme, particularly with the facilitation of a pedestrian/bicycle connection through the north-east of the site. We note the c. 320 m pedestrian pathway through Dargle Wood runs east to west and the proposed connection with the subject site will provide a valuable north-south connection improving permeability for existing and future residents of the surrounding area.

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

The development provides 590 No. residential units comprising 480 No. Build-to-Rent apartments and 110 No. Build-to-Sell units. It is our professional opinion that the proposed mix of primarily one and two bed units directly respond to the need of this type of tenure, furthermore the mix of Build-to-Rent and Build-to-Sell units within the scheme reflects the societal and demographic trends. Build-to-Rent units are particularly attractive to the cohort of the population who do not have the financial means or desire to get on the property ladder.

We note the provision of Build-to-Rent units is supported by the provision of a two storey ancillary amenity block (414 sq m) comprising gymnasium, lobby, lounges and kitchenette in addition to a roof terrace. A management suite is also provided in Block C3. The retail/café/restaurant units will provide convenience services for future residents of the proposed scheme and the existing neighbouring residents.

The proposed scheme has been designed ensuring that a wide variety of amenities and facilities are available for future residents to utilise within the development.

5) Efficiency – How does the development make appropriate use of resources, including land?

National policy expressly seeks the densification of underutilised lands such as the subject site. The 5.35 hectare developable site area currently comprises 2 No. detached dwelling houses on a highly accessible location in South Dublin in close proximity to high frequency public transport, a density of 0.37 units/Ha. The proposed scheme will provide a density of 110 units/Ha.

The proposed development is consistent with the zoning as set out in the *South Dublin County Development Plan 2016-2022* which includes residential units as a permitted in principle use. The proposed development represents the appropriate densification of this underutilised site while having regard to the need to protect the amenity of surrounding residential properties. The proposed scheme provides for high quality and valuable landscaped areas which will provide amenity and biodiversity.

An Operational Waste Management Plan has been prepared by Awn Consulting as part of the EIAR (Chapter 13 – Appendix 13.2) which details that:

'Dedicated shared Waste Storage Areas (WSAs) have been allocated within the development design for the residential units. The shared residential WSAs for blocks B1-B2 and C1-C3 are located on the ground floor of their respective buildings, in close proximity to the access cores, while the WSAs for block B3-B5 are located in the shared basement of these buildings.

The shared WSAs for blocks A1 – A9 are located externally at the end of each block. Retail and café units will have a shared WSA located in a small service yard near block D2, while amenity areas and centre will also store waste in a small external WSA at the rear of the commercial block in D2. The crèche unit will have their own WSA allocated in block C2.'

6) Distinctiveness – How do the proposals create a sense of place?

As set out in the Architectural Design Statement by John Fleming Architects which is enclosed, a key tenet in considering the design of the elevations for the proposed scheme was retaining the parkland character and respecting the setting and amenity of surrounding houses.

7) Layout – How does the proposal create people friendly streets and spaces?

A 2 No. storey retail/café/restaurant block is located at the south-east corner of the site fronting Scholarstown Road (Block D2) providing active frontage, in addition to a 2 No. storey resident amenity building in the centre of the site.

The scheme is principally 3 No. storeys in height around the perimeter of the site with the taller 6 No. storey blocks positioned more centrally in less sensitive locations. A single orbital vehicular route is proposed with multiple pedestrian and bicycle routes throughout the scheme responding to the anticipated desire lines of future residents of the scheme.

In addition to the private amenity spaces serving individual units, extensive public open space is provided (15 % of the overall site).



**Figure 4.2:
Public Open Space**

**(Source:
Mitchell + Associates
Landscape Architects -
Landscape Design
Statement, September
2019)**

There are 3 No. primary pockets of open space identified above, Mitchell + Associates have prepared a Landscape Design Report detailing the below:

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.

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 (200-400m²) 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.

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.

The proposal is 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:

'The streets are designed in accordance with the principles contained in the Design Manual for Urban Roads and Streets. To this end 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.'

8) Public Realm – How safe, secure and enjoyable are the public areas?

The outdoor residential amenity spaces will be subject to a high level of passive surveillance as they will be overlooked by the apartments and duplexes, ensuring that these areas are safe and secure.

The proposed development includes a comprehensive Landscape Plan and Landscape Design Report prepared by Mitchell + Associates Landscape Architects which sets out the strategy for the provision of safe, secure and enjoyable public spaces.

9) Adaptability – How will the buildings cope with change?

The ground floor level of the development allows for greater floor to ceiling heights which are capable of internal modification where deemed necessary as per SPPR 5 of the *Sustainable Urban Housing: Design Standards for New Apartments (2018)*.

10) Privacy and Amenity – How does the scheme provide a decent standard of amenity?

The contemporary design provides for versatile private units. The scheme has been developed to maximise open plan apartment layouts facilitated through the use of sprinklers which will result in larger and brighter living room / kitchen spaces and equal bedroom sizes. 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.

South Dublin County Development Plan 2016-2022 requires 10 % of the total site area as public open space, this equates to 5,350 sq m.

Furthermore, according to the *Apartment Guidelines 2018*, 3,716 sq m of communal amenity space is required to meet the minimum standards.

The open space requirements for the scheme are summarised below. We highlight that the proposal significantly exceeds the minimum requirements.

Open Space	Required	Provided	
Public Open Space	5,350 sq m	8,108 sq m	12,126 sq m of open space is provided, representing 23% of the site area.
Communal Open Space	3,716 sq m	4,018 sq m	
Total	9,066 sq m	12,126 sq m	

Some 414 sq m of indoor communal amenity space is also provided for the sole use of Build-to-Rent residents enabling social interaction between Build-to-Rent residents within the development, if desired. Therefore, the provision of significant high-quality areas of open space are considered to offset the absence of private balconies on 47 No. Build-to-Rent apartments.

The proposed scheme provides for a high-quality residential development as detailed in the accompanying Planning Report prepared by Thornton O'Connor Town Planning and Architectural Design Statement by John Fleming Architects.

11) Parking – How will the parking be secure and attractive?

The scheme proposes 459 No. Car Spaces within the development comprising 178 No. at basement level and 281 No. at ground level. Some 25 No. disabled spaces are included in this figure along with 3 No. Car Club spaces, 3 No. space designated for the crèche, 31 No. for the café/restaurants and 13 No. for the retail units.

Sustainable modes of transport such as cycling and walking are promoted within the scheme, with the provision of 800 No. cycle parking spaces.

12) Detailed Design: How well thought through is the building and landscape design?

A detailed Architectural Design Statement prepared by John Fleming Architects and Landscape Design Report by Mitchell + Associate Landscape Architects are submitted as part of this planning application which sets out the design rationale of the proposed development providing a high-quality innovative scheme.

The proposed mixed use scheme is consistent with the guidance as set out in the *Urban Design Manual – A Best Practice Guide (2009)*.

4.8 Design Manual for Urban Roads and Streets (2013)

The *Design Manual for Urban Roads and Streets (DMURS)* sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

4.8.1 Policy Background

The *Design Manual for Urban Roads and Streets* references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

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

Given the accessible location of the application site in proximity to a high frequency public transport, it is projected that tenants of the scheme would largely rely on walking, cycling or utilising existing public transport routes to reach their place of work. There will be 459 No. car parking spaces available on site (including 3 No. Car Club Spaces). The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

4.8.2 Site Layout and Legibility

The proposed development scheme provides active frontage onto Scholarstown Road by virtue of the two storey retail/café/restaurant building and creche. Carparking is provided at both ground and basement level which is accessed from an internal road. The site also benefits from a secondary vehicular access to the west of southern boundary in the event of an emergency.

The proposed high-quality designed layout of the scheme by John Fleming Architects will ensure that the scheme will be legible in the streetscape while also sitting comfortably within its immediate context. We note that the development has been designed in accordance with DMURS.

4.8.3 Sustainable Transport

The site is well served by public transport with particular emphasis on the high frequency bus route (No. 15) serving the site. As noted at Section 3.4.1 and 3.4.2 of this document the planned national bus network investments will further enhance the accessibility of this key site in South Dublin.

The DMURS publication references that the Smart Travel document includes a '*vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips.*' The proposed scheme provides for 800 No. cycle parking spaces in total ensuring that sustainable modes of transport are encouraged and would accommodate a connection to the proposed River Dodder Greenway as discussed previously at Section 3.4.4 of this report.

As established in the above commentary, it has been demonstrated that the proposed mixed use scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2013)*.

In respect of achieving DMURS objectives, the DMURS statement prepared by DBFL Consulting states that:

'The implementation of self-regulating streets actively manages movement by offering real modal and route choices in a low speed / high quality residential environment. Specific attributes of the schemes design which contribute to achieving this DMURS objective'.

4.9 ***The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)***

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Flood Risk Assessment has been prepared by DBFL Consulting Engineers and concludes the following:

'Following the Flood Risk Assessment, it has been determined that it is located in Flood Zone C as defined by the Guidelines.

It is concluded that the:

- *Proposed mixed use development is appropriate for the site's flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.*

In conclusion, the proposed development is considered to have the required level of flood protection up to and including the 100 year return event.

Overland flow paths have been identified for pluvial flooding exceeding the capacity of the surface water drainage network.'

Thus, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

4.10 ***Retail Planning Guidelines (2012)***

The development management process must support applications for retail development which are in line with the role and function of the city or town in the settlement hierarchy of the relevant development plan and accord with the scale and type of retailing identified for that location in the development plan and relevant retail strategy.

The proposed scheme provides for 2 No. small scale retail units (total 328.5 sq m) to serve the residents of the scheme and neighbouring existing residents. Local shops are described within the guidelines as:

'Corner shops or shops located in local or neighborhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.'

The proposed retail units are located at the south-east corner of the site and will provide active frontage and activity to the streetscape. The retail element at this location will aid the integration of the development into the existing environment and will provide small local convenience type services for the residents of the scheme.

4.11 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Guidelines on the provision of childcare facilities sets out that:

'Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate.'

In response the Guidelines set out that the:

'The Planning and Development Act, 2000, makes it a mandatory requirement on planning authorities to include in their Development Plan objectives on the provision of services for the community, including creches and other childcare facilities.'

As a result, the Guidelines outline the objectives to:

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
 - Residential areas;
 - Places of employment;
 - Educational establishments;
 - City and town centres, neighborhood and district centres;
 - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

The Guidelines identify appropriate locations for childcare facilities as identified below:

- **New communities/Larger new housing developments** - *'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary.*
- **The vicinity of concentrations of work places**, such as industrial estates, business parks and any other locations where there are significant numbers working – *facilitating safe and efficient journeys to/from the workplace of parents/guardians.*
- **In the vicinity of schools** – *facilitating parents dropping off school-going children and children attending childcare facilities on route to their place of employment;*
- **Neighbourhood, District and Town Centres** – *combating competitive pressure from larger commercial areas.*
- **Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.**

The Childcare Guidelines, 2001 stipulate that planning authorities should require one childcare facility (providing for a minimum 20 childcare places) per approximately 75 No. dwellings. A childcare facility will be located at ground floor level of Block C2 within the scheme to serve the 590 No. residential units and will cater for 101 No. children which is considered appropriate having regard to the mix of unit types provided in the scheme e.g. higher quantum of one and two bed units. In calculating the provision, it is noted from the Apartment Guidelines, 2018 that:

'One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.'

The scheme provides 246 No. one bed units and 289 No. two bed units therefore the provision of 101 No. childcare spaces is considered appropriate for the proposed scheme.

The childcare facility is conveniently located along the southern boundary fronting Scholarstown Road. For the minority of children being dropped to the facility by car, 3 No. designated car parking spaces are provided. Additionally, the childcare facility is suitably located in close proximity to a wide range of employment bases (e.g. Tallaght Hospital, Tallaght IT, Sandyford Industrial Estate) in addition to a variety of primary and secondary schools which will allow for efficient drop off/collection for parents with multiple children.

Regardless of the locations identified above, the Guidelines state that proposals should:

- *Have regard to the Child Care (Pre-School Services) Regulations, 1996, in relation to the planning implications of these regulations;*
- *Suitability of the site for the type and size of facility proposed;*
- *Availability of outdoor play area and details of management of same;*
- *Convenient to public transport nodes;*
- *Safe access and convenient parking for customers and staff;*
- *Local traffic conditions;*
- *Number of such facilities in the area; and*
- *Intended hours of operation.*

The proposed childcare facility provides for 6 No. classrooms facilitating different age groups, staff room, office and reception and will incorporate an outdoor play area. As detailed at Section 3.4 of this report the subject site is well served by public bus services. We note that car parking has also been provided and the new future residents will benefit from the provision of such a facility. The details of the creche will be dependent on the proprietor the unit.

5.0 REGIONAL POLICY

This section will demonstrate that the proposed development has been brought forward with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and the *Regional Spatial and Economic Strategy for the Eastern and Midland Region*.

5.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* (RPG's) provides a long term sustainable planning framework for the GDA. The Regional Planning Guidelines (RPGs) is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term.

The RPG's set out that '*quality housing should be reflected equally in terms of the overall layout of the scheme and its urban design characteristics, the internal layout, form and design of housing and the external architectural form of housing which should relate to the wider urban area of which it is part while facilitating the creation of areas of distinct character.*'

In relation to South Dublin, the RPG's states that '*the Council has two high profile and critical SDZ areas providing for new housing, as well as **areas with significant potential for brownfield redevelopment which support the consolidation of the metropolitan area, particularly along the Luas and Kildare Route corridor. Housing policy in the Development Plan needs to continue to focus housing growth into the existing built envelope to support falling population in existing services suburbs and to achieve success for the SDZs***'.

The following Strategic Policies are considered relevant and have been assessed in respect to the consistency of the proposed development:

Strategic Policy EP1 outlines the importance of the integration of climate change considerations into Development Plans, Flood Risk Assessments and Bio-diversity and Heritage plans.

The proposed development has had due regard to climate change, flood risk and biodiversity. A comprehensive Environment Impact Assessment Report is submitted with the application incorporating chapters such as Biodiversity (Chapter 7) prepared by Openfield Ecological Services and Water-Hydrology (Chapter 10) prepared by DBFL Consulting Engineers, in addition to an AA Screening Report by Openfield Ecology, a Flood Risk Assessment by DBFL Consulting and Energy and Sustainability Report prepared by O'Connor Sutton Cronin which assess the specific environmental issues.

Therefore, the proposal is consistent with Strategic Policy EP1.

Strategic Policy EP2 refers to the need to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long distance commuting.

The proposed residential scheme will assist in addressing the housing shortage for 1, 2 and 3 No. bed units in the South Dublin area. The availability of affordable, high quality and suitable tenure close to a number of significant employment nodes will allow employees to live closer to their place of work and reduce commuting distances and will allow new employers to have confidence that adequate residential development is available.

Strategic Policy SP1 stipulates that the delivery of new housing in the GDA shall support the NSS, Smarter Travel and the DoEHLG Guidelines on Sustainable Residential Development. The RPG Settlement Strategy encourages the focusing of new housing development on:

- (i) *consolidation within existing built footprint with particular focus on the metropolitan area;*
- (ii) *supporting the achievement of sustainable towns;*
- (iii) *supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of land use and high quality public transport provision, and*
- (i) *build up economics of scale for services in identified growth towns.*

The proposed scheme will positively address each of the criteria as set out above. As noted at Section 3.4 and throughout this report, the subject lands are located in a sustainable location and will promote the increase in population at a location designated as having capacity for housing.

The scheme is considered to be consistent with Strategic Policy SP1.

Strategic Policy PIP5 relates to waste management and aims to ensure environmental, business and public health needs are met. It also sets out to promote and facilitate reuse and recycling.

The Operational Waste Management Plan states the following in relation to the operational production of waste:

'Residents will be required to segregate waste into the following main waste streams:

- *Dry Mixed Recyclables (DMR);*
- *Mixed Non-Recyclables (MNR);*
- *Organic waste; and*
- *Glass.*

Residents will be required to take their segregated waste materials to their designated residential WSA and dispose of their segregated waste into the appropriate bins.

Each bin/container in the WSAs will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which waste types can be placed in each bin.

Access to the shared residential WSAs will be restricted to authorised residents, facilities management and waste contractors by means of a key or electronic fob access..'

Furthermore, in respect to the commercial units, it states that:

'The commercial tenants and management suite will have a WSA located in a small service yard near block D2. The crèche tenant will have their own WSA allocated on the ground floor, in block C2.

Suppliers for the tenants should be requested by the tenants to make deliveries in reusable containers, minimise packaging or to remove any packaging after delivery where possible, to reduce waste generated by the development.

All bins/containers in the tenants areas will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which wastes can be put in each.

All residential and commercial waste from shared WSAs, requiring collection by the appointed waste contractor will be collected from the WSA by the waste contractor and taken to the temporary collection points. Residential waste receptacles in the basement WSAs under Blocks B3-B5 will be brought to the surface for collection by facilities management or the waste contractor immediately prior to collection.

The commercial tenant's waste receptacles from the commercial will be collected directly from the commercial WSA and taken to the waste vehicle for emptying, receptacles will be promptly returned to the WSAs.'

The proposal is consistent with Strategic Policy PIP5.

Strategic Policy GIP1 is concerned with the protection of built heritage and protected species.

The site comprises 2 No. dwellings which are not of any architectural merit. Chapter 6 of the EIAR prepared by Molloy & Associate Architects states that:

'The proposed demolition of two mid-20th century dwellings, neither of which possess architectural character of significance, will not arise in an adverse impact'

Furthermore, in regard to the nearby Protected Structure, Molloy & Associate Architects outline that the development will comprise the following:

'Avoidance of damage to the entrance, avenue and all lands pertaining to the protected structure Ros Mor, is included in a protection plan forming part of a construction management plan.

Remedial measures to supplement existing fencing to the shared boundary between Ros Mor and the subject development site will ensure that the characteristics of the boundary condition are restored to their present character on completion of the development. These will include protection of mature trees and planting during the construction phase that contribute to the sylvan character of the protected fabric of Ros Mor, which will be unaffected by the consolidation of fenced boundaries.'

The site is not located within any statutory designated areas. An Appropriate Assessment Screening Report prepared by Openfield Ecological Services is enclosed and concludes that no significant effects are likely to arise from the proposed development.

The subject site is not located within or directly adjacent to any Special Protection Areas (SPA), Special Areas of Conservation (SAC) or National Heritage Areas.

The proposal is consistent with Strategic Policy GIP1.

Strategic Policy GIP2 aims to protect and conserve the natural environment, in particular EU designated sites.

The site is not located on or in close proximity to any EU designated sites. As noted above in GIP1, the AA Screening Report concludes that no significant effects are likely to arise from the proposed development.

The proposal is consistent with Strategic Policy GIP2.

Strategic Policy GIP6 sets out to ensure the protection, enhancement and maintenance of the natural environment with specific emphasis on the value of green spaces.

The proposed scheme has been designed with due regard for the natural environment and the value of green space. Outdoor public open spaces, communal open spaces, balconies and green roofs have been provided. A comprehensive Landscape Design Report has been prepared by Mitchell & Associates Landscape Architects and is submitted in conjunction with the application.

The proposed Landscape Plan has due regard for the existing landscape character of the site and surrounding area. The report stipulates that:

'The proposed planting plan will thus provide significantly more new trees than those proposed to be felled (approximately three and a half times as many). Moreover, the new tree structure and planting mix is designed to grow and mature within the context of the proposed development ensuring the continuity of the tree lined character of the site into the future.'

The proposal is consistent with Strategic Policy GIP6.

Strategic Policy SIP1 is in relation to planning for communities and outlines the need to identify and respond to the most vulnerable in planning for growth, for change or regeneration.

The scheme responds to the housing shortage for suitable tenure by primarily providing 1 and 2 No. bed units. The proposed supply of Build-to-Sell residential accommodation will contribute to alleviating the housing crisis which currently constrains first time homeownership, whilst the Build-to-Rent units will accommodate those who do not have the financial means to purchase their own property or who wish to rent a dwelling. It is also noted that the scheme provides 10% social housing as per Part V of the *Planning and Development Act, 2000*.

The proposal is consistent with Strategic Policy SIP1.

Strategic Policy SIP2 acknowledges planning policy as a tool in creating a quality of life.

The proposed scheme will provide for 590 No. high quality apartments and duplex units as illustrated in the supporting Design Statement and CGIs in addition to various amenity spaces. It is considered that the proposal will provide for a high quality of life.

The sustainable location will reduce commuting times, in addition to the provision of a gym for the residents of the Built-to-Rent units and the promotion of public transport, walking and cycling as main modes of transport will contribute to the quality of life of tenants.

The proposal is consistent with Strategic Policy SIP2.

Strategic Policy FP1 states that flood risk requires active management throughout the planning process.

The proposal has had due regard of flood risk and it is noted that the application site is located within Flood Zone C. A Flood Risk Assessment has been prepared by DBFL Consultants for the application site which concludes that the:

- *Proposed mixed use development is appropriate for the site’s flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the ‘Avoid’ principal has been achieved.*

The proposal is consistent with Strategic Policy FP1.

This section has clearly demonstrated that the proposed residential development with supporting resident amenities and ancillary retail/café/restaurant uses is consistent with the relevant strategic policies set out in the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*.

5.2 Regional Spatial and Economic Strategy for the Eastern and Midlands Region

The Regional Spatial and Economic Strategy (or RSES) for the East and Midland Regional Assembly was adopted on 28th June 2019. From this document a number of core Regional Policy Objectives have emerged to work in concert with the National Planning Framework (NPF), and to guide all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

Under RPO 4.3 ‘Consolidation and Re-intensification’ the following objective is set:

‘Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and

suburbs and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.’

The subject scheme will consist of 590 No. unit residential development comprising 480 No. Build-to-Rent apartment units and 110 No. Build-to-Sell duplex units and apartments. The 480 No. ‘Build-to-Rent’ units will be provided in 7 No. five-six storey blocks and 1 No. four-six storey block and will comprise 234 No. one bed units and 289 No. two bed units with a resultant density of 110 No. units per hectare in the overall scheme. Therefore, the proposed development will result in the intensification of a underutilised site in an established residential area.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES states the following:

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

As stated previously in this Statement, the proposed development fully responds to the National Planning Policy, in particular Section 4.6 - *Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines* and Section 4.5 - *Urban Development and Building Heights Guidelines for Planning Authorities*.

MASP Housing and Regeneration:

RPO 5.5 states:

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

The subject site is contained within an area designated for residential development with an objective to *‘protect and/or improve residential amenity’* and the site is a designated ‘Housing Capacity Site’ (see Section 6.1.2 below). The scheme subject to this application is located on a large and underutilised plot fronting Scholarstown Road.

It is our professional opinion that the subject site will assimilate into the established residential land uses as per the *South Dublin Development Plan 2016-2022*. The currently underutilised site comprises 2 No. detached dwelling houses that are not of architectural merit. We note that the accompanying Planning Report prepared by Thornton O’Connor Town Planning provides a robust rationale for the provision of a high density residential development with ancillary commercial floorspace at this location.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'* [Our Emphasis].

The proposed development is located on appropriate lands designated for residential development. Furthermore, it is reiterated that the subject lands are in close proximity to a range of public transport and major centres of employment including Sandyford Industrial Estate and Tallaght Hospital which reinforce sustainability principles. The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the high quality design and higher density residential development preventing urban sprawl. Appropriately located residential accommodation within South Dublin is important to the continued growth and maintenance of Ireland's competitiveness in both the private residential market and Build-to-Rent sector and its response to the evolving needs of the workforce.

Under Section 8.1, the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

The subject development contributes to consolidated growth and the reduction in carbon emissions through lower parking standards (and provision of 800 No. bicycle parking spaces).

Through the provision of green roofs, landscaping, and tree protection, retention and replacement, the development also helps maintain a high standard of natural and green infrastructure within an intensified and more dense residential setting.

By locating on a key public transport corridor and in close proximity to employment the subject development can be seen as a sustainable development pattern, which seeks to increase density, reduce car dependency, and provide permeability throughout the scheme.

Under Section 8.2, the RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework to **promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a*

resultant negative impact on the environment and people’s health and wellbeing due to increased commuting and loss of family and leisure time.’

The subject development seeks to provide a welcoming and attractive alternative to car dominated development, which is well located on a high-quality public transport corridor and is locally and regionally accessible by foot and by bicycle. A proportion of the car parking facilities are provided at basement level allowing for maximum use of the available ground level outdoor amenity space.

Additionally, the provision of green roofs, amenity spaces, and communal facilities aides in the facilitation and promotion of healthy lifestyles and social-cohesion between residents. Similarly, the location of this higher density development on public transport and proximate to major employers allows for reduced commuting time and greater work life balance for future residents.

The RSES Objective RPO 9.4 states that in relation to new apartment developments:

*‘Design standards for new apartment developments **should encourage a wider demographic profile which actively includes families and an ageing population.**’*
 [Our Emphasis]

Currently the surrounding area of the subject site is predominantly low density semi-detached dwellings. There is a lack of diversity and few examples of apartments and duplexes in the immediate area of the subject site. The proposed scheme will provide an alternative provision of tenure in this area of Scholarstown.

6.0 LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and is consistent with the objectives and guidance as set out within the *South Dublin County Development Plan 2016-2022*.

6.1 *South Dublin County Development Plan 2016 – 2022*

This section assesses the consistency of the proposed scheme with the relevant policies and objectives of the *South Dublin County Development Plan 2016 – 2022*.

The development plan is required to be consistent with the targets set out in the Regional Planning Guidelines. The RPGs define the settlement hierarchy for the Greater Dublin Area (GDA) by identifying key growth areas within the Metropolitan and Hinterland. The *South Dublin Development Plan 2016 – 2022* indicates that the subject site is located in a 'Consolidation Area within the Gateway':

'Considered necessary to address the established inner suburbs that are adjacent to the Gateway Core. Opportunities to strengthen and consolidate through infill and brownfield redevelopment.'

Furthermore, stipulating that 'Consolidation Areas within the Gateway' are:

'established areas located to the east of the M50 and south of the River Dodder. They are suburban areas with established identities and communities with distinct heritage and character. These areas have a range of urban services such as transport, retail, medical and community facilities. Recent Census data identifies an aging population and stagnant or falling populations, which presents a serious risk for the viability of services and facilities into the future.'

A key element of the overall Settlement Strategy is to promote the consolidation and sustainable intensification of the existing urban/suburban built form to the east of the M50 and south of the River Dodder, thereby maximising efficiencies from established physical and social infrastructure.

As noted throughout this statement, the proposed development will provide for 590 No. high quality residential units in addition to a two storey ancillary residential amenity block, a two storey retail/café/restaurant block (D2), café/restaurant and management suite (C3), a creche (C2) and 12,126 sq m of open space. The provision of this typology providing one, two and three bed apartments will contribute towards the development of a balanced sustainable community responding to the need for suitable tenure.

6.1.1 Zoning

The subject lands are zoned Objective "RES" in the *South Dublin County Council Development Plan 2016-2022*, where the stated aim is 'to protect and/ or improve residential amenity'.

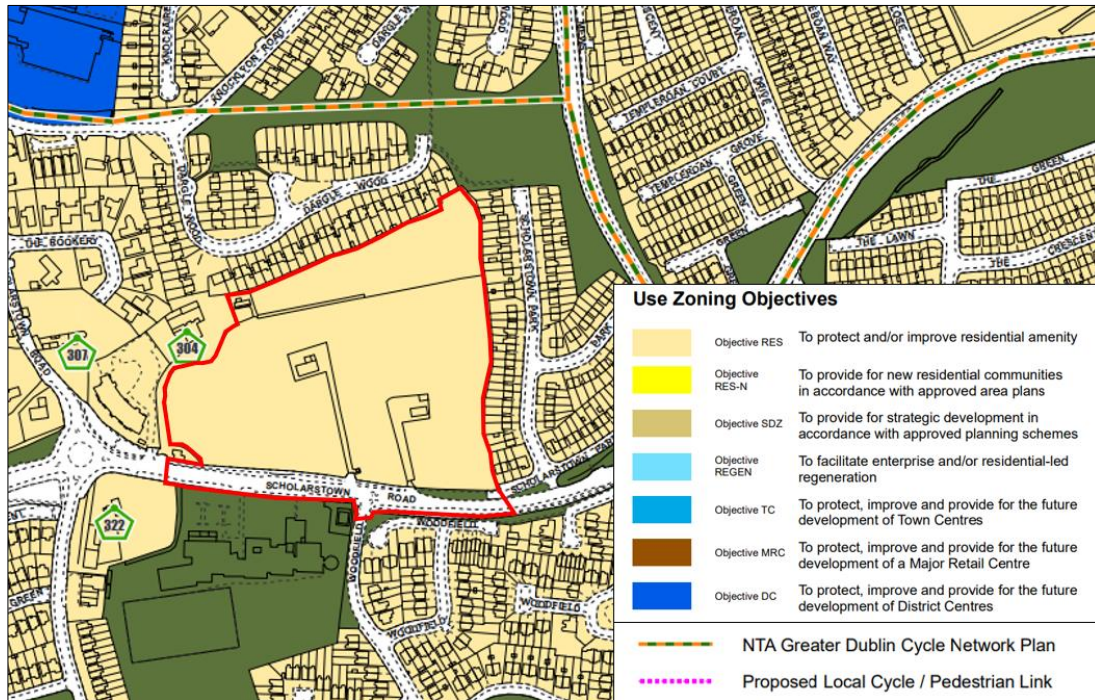


Figure 6.1: Zoning Map with Subject Site Outlined Indicatively in Red

(Source: Zoning Map Extract from *South Dublin County Development Plan 2016-2022*)

The site does not contain any Protected Structures or any other conservation designations, although it is proximate to a protected structure which has been addressed by Molloy & Associates Architects in Chapter 6 of the EIAR.

Under this zoning, residential use is permitted in principle and café/restaurant and shop-local are both open for consideration. The proposed development which comprises 590 No. residential units with ancillary resident facilities and commercial floorspace is consistent with the above policy guidance.

6.1.2 Housing Capacity

The development hierarchy set out by the “Core Strategy” are considered to be of greater importance for planning permission than greenfield or newly zoned land. In the course of preparing the current *South Dublin Development Plan 2016-2022*, the Council identified the subject site to have capacity for housing development, as illustrated on the map below in Figure 6.2.

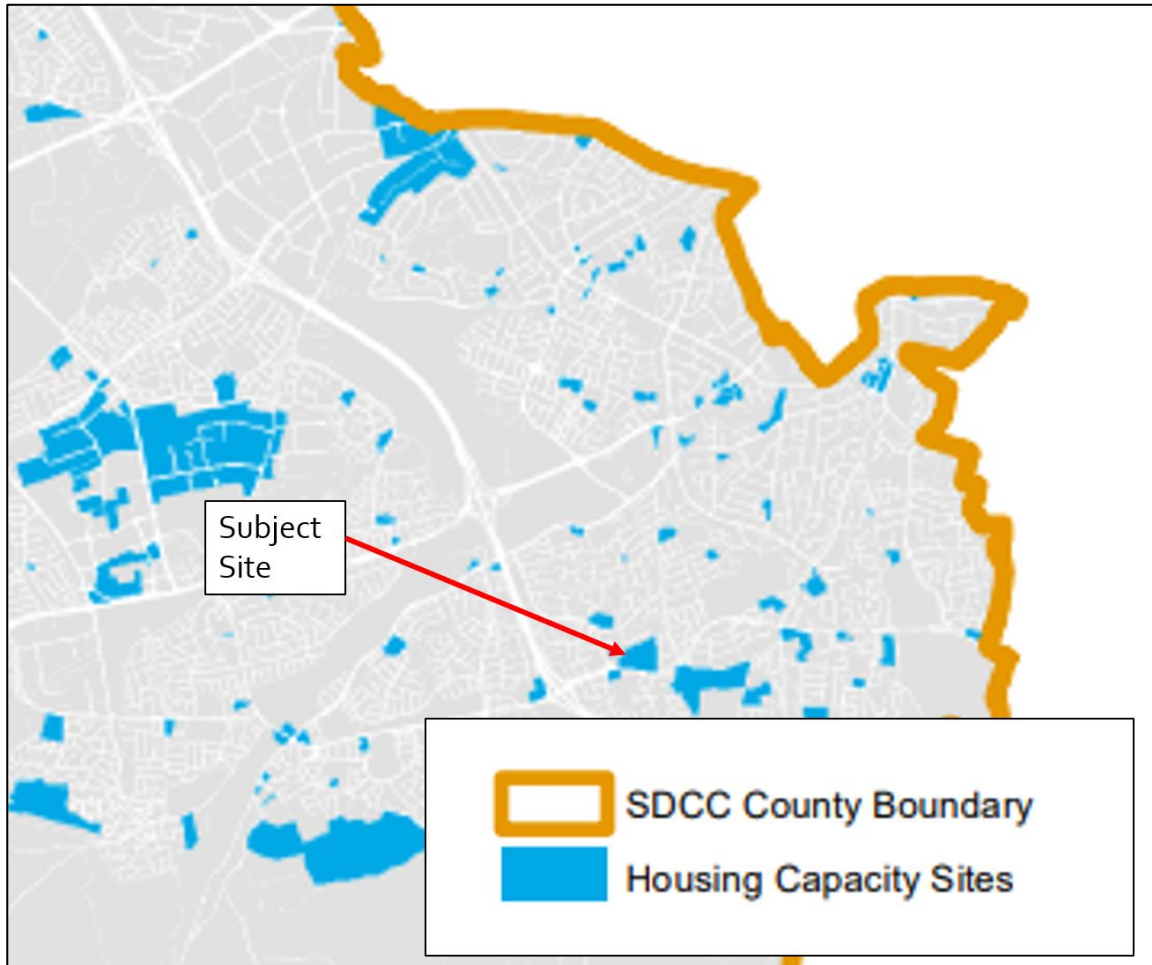


Figure 6.2: Housing Capacity Sites within South Dublin County Council

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

Thus, it is evident that the underutilised site subject to this Strategic Housing Development planning application is clearly intended for development. The detailed design of the proposed residential and commercial development is contained within the Architectural drawings and the Design Statement prepared by John Fleming Architects in addition to a comprehensive Planning Report prepared by Thornton O'Connor Town Planning.

6.1.3 Building Height

Housing Policies 8 and 9 refer to Residential Building Densities and Heights across residential and mixed use areas in South Dublin County.

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]*

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.'

As set out in the Material Contravention Statement 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.

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 subject scheme is fully in accordance with Housing Policy 8 as the proposed 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'* and the scheme is also fully in accordance with Objective 3 of Housing Policy 9 as the proposed development provides a sensitive transition from neighbouring 2 No. storey dwellings as set out below.

The proposed development comprises 3 No. storey blocks located to the periphery of the site adjacent to the north, east and west boundaries which provides a sensitive transition adjacent to neighbouring 2 No. storey dwellings. Some 7 No. part 5 to part 6 No. storey blocks are located to the centre of the site around a central open space and fronting Scholarstown Road in addition to a part 1 to part 2 No. storey amenity building and appropriate separation distances are provided which allows for sufficient breathing space between the blocks.

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). The maximum height of the apartment blocks is 18.53 No. metres. 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 maximum height of the duplex blocks is 13.26 No. metres. Furthermore, a 2 No. storey commercial building is provided at the south-east corner of the site and a part 1 to part 2 No. storey amenity building is located towards the centre of the site.

It is considered that appropriate heights have been provided responding to the recently adopted Height Guidelines as illustrated on the accompanying Architectural Drawings prepared by John Fleming Architects.

The proposed development is not consistent with Housing Policy 9 which stipulates that tall buildings exceeding 5 No. storeys in height should be directed *'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 this respect, a Material Contravention Statement has been prepared by Thornton O'Connor Town Planning which notes that it is our opinion that the subject site has the potential for greater heights than 5 No. storeys to sustainability 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 and the receiving context.

6.1.4 Housing Policies

Policy H1 outlines that:

'It is the policy of the Council to implement the Interim South Dublin County Council Housing Strategy 2016 -2022 (and any superseding Housing strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two Year Development Plan Review.'

Objective 2 of this policy requires 10% social housing requirement as set out within Part V of the *Planning and Development Act 2000 (as amended)*.

The application has been submitted with Part V Costings allocating 10% of the units to social housing in accordance with the Part V of the *Planning and Development Act 2000*. Some 60 No. social housing units are provided comprising 26 No. one bed and 34 No. two bed units.

Policy H6 sets out the Sustainable Community objective for proposed residential developments in South Dublin stating that:

'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.'

The proposed residential and commercial development has been designed with due diligence of sustainability principles. The application is supported by an Energy and Sustainability Report prepared by O'Connor Sutton Cronin which states that:

'A number of sustainable design features have been considered within the design to achieve the sustainability targets of the proposed refurbishment. These include:

- *The proximity of the development to public transportation networks;*
- *Natural daylight;*
- *Water efficiency measures such as low consumption sanitary fittings; and*
- *Improved indoor environmental quality.*

This report confirms that if the energy and sustainability strategy is successfully implemented, the proposed Two Oaks development will satisfy all Part L and BER requirements.'

Policy H7 has been adopted to ensure a high quality design is achieved for all new residential developments stating that:

'It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).'

We note that an Architectural Design Statement has been prepared by John Fleming Architects accompanying the application which details materials that will be utilised within the scheme such as a sympathetic mix of red/orange brick and buff brick facade with metal and grey cladding detailing to create verticality. The proposed development has been subject to a sensitive, high-quality design.

The scheme has been designed in compliance with the *Urban Design Manual – A Best Practice Guide, DEHLG (2009)* and the *Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013)*.

Policy H8 relates to Residential Densities and promotes higher residential densities at appropriate locations and states 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'

Furthermore, it is considered that Objectives Nos. 1 and 2 are most applicable to the subject site and state that developments should:

- Objective 1: *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);

Objective 2: 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);

The proposed residential density is 110 No. units per Ha. This density is considered appropriate to the application site which is located on the Scholarstown Road. The scheme makes efficient use of the residentially zoned lands, without feeling overdeveloped due to the quantum of open spaces provided throughout the site. With regard to the efficient use of zoned serviced land, the subject site is located in close proximity to services and facilities that are within walking and cycling distance for residents of the scheme, in addition to the retail/café/restaurant units provided within the development. The subject site is ideally located in a highly sustainable location by virtue of the site being served by a number of bus routes including No. 15 service – c.300 No. metres away) at both peak and off peak times. We highlight that the existing and planned infrastructure and services in the surrounding environs have the capacity to facilitate the development subject to this report. We note the Traffic and Transport Assessment prepared by DBFL Consulting Engineers concludes that:

'There are no overriding adverse transport impacts that result from this development.'

It is considered that the residential development at the subject site will not result in a material impacts on surrounding properties. It is our professional opinion that the residential density proposed is appropriate to the subject site.

Policy H10 stipulates that a wide variety of adaptable housing types, sizes and tenures must be provided stating that:

'It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.'

The proposed scheme provides for 110 No. Build-to-Sell units (55 No. 2 beds and 55 No. 3 beds) and 480 No. Build-to-Rent units (246 No. 1 bed and 234 No. 2 bed apartments) which responds to the demand for such accommodation on appropriately zoned lands. Currently, Scholarstown is largely dominated by 3 and 4 No. bed semi-detached houses and the introduction of principally 1 No. bed and 2 No. bed units will be welcomed providing a greater mix into the area. It is highlighted that all proposed units exceed the minimum required space standards, as set out in the Housing Quality Assessments prepared by John Fleming Architects. We note that 60 No. social housing units are provided comprising 26 No. one bed and 34 No. two bed as detailed within the accompanying document.

Policy H13 relates to the provision of private and semi-private open spaces within new residential schemes stating that:

'It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.'

A Landscape Masterplan has been prepared by Mitchell + Associate Landscape Architects and is supported by a comprehensive Landscape Design Report submitted with this planning application. It is noted that the landscape plan provides for a functional and adaptable space for use by the future residents of the scheme. The proposed connection through the north-east of the site to the public open space in Dargle Park is an integral element of the schemes landscaping providing legibility to future residents and existing neighbouring residents. The provision of private balconies for the majority of the Build-to-Rent units is discussed at Section 4.7 of this report and within the accompanying Planning Report prepared by Thornton O'Connor Town Planning.

Policy H14 states that *'all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long term needs of a variety of household types and sizes.'*

The proposed residential scheme has been designed to a high standard with local convenience type retail/café/restaurant units provided to meet the needs of the residents. It is also noted that the scheme provides for 414 sq m of internal communal amenity areas comprising a kitchenette, lounges and gymnasium for residents of the Build-to-Rent apartments. The provision of such additional resident amenity caters for the changing needs of the future residents of the scheme, for instance a resident working from home can utilise the lounge for 'working at home' days.

6.1.5 Community Infrastructure Policies

Policy C8 refers to childcare facilities which requires good quality and accessible facilities in suitable locations.

Policy C8 states:

- (a) *It is the policy of the Council to support and facilitate the provision of good quality and accessible childcare facilities at suitable locations in the County; and*
- (b) *It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.*

The proposed scheme provides for a creche servicing the needs of future residents of the scheme as illustrated on the architectural drawings prepared by John Fleming Architects. Some 3 No. designated car parking spaces for the creche are provided. The proposed creche will provide a vital service facilitating the childcare needs of future occupants of the development.

Policy C12 outlines that *'a hierarchical network of high quality open space is available to those who live, work and visit the County, providing both passive and active recreation'.*

With regard to squares and plazas which provide civic amenity, the Development Plan outlines that they provide a forum for social interaction and an opportunity to strengthen biodiversity corridors to and from these spaces.

The proposed central open space, north-eastern pocket park, western green space and the 2 No. storey amenity building will act as focal points of the development by virtue of their location within the site.

6.1.6 Retail Policy

The Retail Strategy for the *Greater Dublin Area 2008 – 2016* sets out a five tier retail hierarchy for the Greater Dublin Area which forms the basis for retail development in the county during the period 2016 - 2022.

The retail provision within the proposed scheme comprises local convenience retail which would be Level 5 on the hierarchy. The proposed retail/café/restaurant units will serve the needs of the future occupants of the scheme. We note that the *Retail Planning Guidelines (2012)* are discussed at Section 4.10 of this report.

6.1.7 Transport Policy

With regard to Car Parking policy TM7 stipulates that a balanced approach to the provision of car parking must be taken encouraging a more sustainable modes of public transport stating that:

'It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation.'

The subject site is located at an intermediate urban location on Scholarstown Road. We note that the Apartment Guidelines state that in these locations, car parking can be reduced.

The proposed scheme provides 459 No. car parking spaces and 800 No. cycle parking spaces in an attempt to encourage sustainable modes of transport. We note that a Letter of Support from Bleeperbike is included as Appendix A of the DBFL Parking Strategy. It has been noted throughout that the subject site is served by a range of services and facilities that are in walking/cycling distance for future residents of the scheme.

6.1.8 Green Infrastructure

Policies G1 and G6 are concerned with protecting, enhancing and further developing, multifunctional Green Infrastructure networks.

Mitchell & Associates have prepared a Landscape Masterplan which aims to encourage and support the development of green infrastructure within the scheme. The Landscape Design Report notes the following:

'The planting palette has been selected for the creation of a high visual amenity environment appropriate to the new residential context. The planting structure will create character areas within the development providing for visual legibility to place residents within the area and help with wayfinding through the movement network.'

The differing scales of tree planting will also create differing atmospheres of external space from small intimate relaxing areas to large scale open active spaces. Medium to large scale parkland trees are selected for the public open spaces, green boulevard links and primary roads, whilst the quiet streets and courtyard spaces are proposed to be planted with small to medium scale trees with upright canopies and light feathery foliage such as Birch or Rowan. The scale of the trees to be appropriate to the scale of the adjacent buildings and streetscape width.'

7.0 CONCLUSION

This Statement of Consistency document has comprehensively reviewed all relevant national, regional and local planning policy documents which are considered to be of relevance to the proposed development on an underutilised site on Scholarstown Road.

We submit that the proposed development is in accordance with all relevant policy documents discussed throughout this report and therefore the proposed development represents the proper planning and sustainable development of the area. National planning policy expressly seeks the densification of underutilised sites such as the subject site through increased building heights. Overall it is considered that the proposal represents an innovative and creative design solution which will contribute towards alleviating the housing crisis while also contributing to the urban fabric of this area designated for residential development.

