



THORNTON O'CONNOR
TOWN PLANNING

Planning Report

Planning Application

In respect of a Build-to-Rent Residential Development

at

The former Aldi Site, Carmanhall Road, Sandyford
Industrial Estate, Dublin 18

Submitted on Behalf of Sandyford GP Limited (acting
in its capacity as general partner for the Sandyford
Central Partnership

November 2019

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An Bord Pleanála
No. 64 Marlborough Street
Dublin 1

Tuesday, 19th November 2019

Dear Sir/Madam

RE: STRATEGIC HOUSING DEVELOPMENT FOR THE CONSTRUCTION OF A BUILD-TO-RENT RESIDENTIAL DEVELOPMENT COMPRISING 564 NO. APARTMENTS (46 NO. STUDIOS, 205 NO. ONE BED APARTMENTS, 295 NO. TWO BED APARTMENTS AND 18 NO. THREE BED APARTMENTS), IN ADDITION TO A CRECHE AND CAFÉ AT THE FORMER ALDI SITE, CARMANHALL ROAD, SANDYFORD INDUSTRIAL ESTATE, DUBLIN 18

1.0 INTRODUCTION

1.2 Application for Development

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

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

The subject planning application which proposes a Build-to-Rent development at the former Aldi Site, Carmenhall Road, Sandyford Industrial Estate, Dublin 18 has been prepared by a multi-disciplinary team on behalf of Sandyford GP Limited (acting in its capacity as general partner for the Sandyford Central Partnership) (herein referred to as ‘the Applicant’) as set out in the Table below:

Consultant	Documents Prepared
Thornton O'Connor Town Planning No. 1 Kilmacud Road, Dundrum, Dublin 14.	→ Planning Report (this document) → Statement of Consistency → Material Contravention Statement → Response to the Opinion
Henry J. Lyons Architects Nos. 51-54 Pearse Street, Dublin 2.	→ Architectural Drawings → Architect's Design Statement → Response to the An Bord Pleanála Inspector's Report
Bernard Seymour Landscape Architects No. 4 Mary's Abbey, Dublin 7.	→ Landscape Drawings → Landscape Report
O'Connor Sutton Cronin Consulting Engineers No. 9 Prussia Street, Dublin 7.	→ Traffic Impact Assessment → DMURS Statement of Consistency → Mobility Management Plan → Engineering Services Report → Construction Management Plan → Drainage Drawings → Daylight/Sunlight Report → Site Lighting Report → Energy and Sustainability Statement
RPS No. 74 Boucher Road, Belfast, Co. Antrim.	→ Flood Risk Assessment
The Tree File Ashgrove House, Kill Avenue, Dun Laoghaire.	→ Arboricultural Report → Tree Survey Drawings
Visual Lab Killary House No. 13 Father Griffith Road, Galway, Ireland.	→ Photomontages → CGI's
Openfield Ecology No. 12 Maple Avenue, Castleknock, Dublin 15.	→ Appropriate Assessment Screening
Future Analytics No. 23 Fitzwilliam Square (South), Dublin 2.	→ Schools and Creche Demand Assessment

Bruton Consulting Engineers Glaspistol, Clogherhead, Drogheda, Co. Louth.	→ Stage 1 Quality Audit
Hooke and McDonald No. 118 Lower Baggot Street, Dublin 2.	→ Operational Management Plan

In addition to the aforementioned documents, this planning submission is accompanied by a Lifecycle Report and Environmental Impact Assessment Report document. The EIAR has been prepared by a competent multidisciplinary team as set out below:

EIAR Table of Contents and Relevant Qualified Consultant		
Chapter	Chapter Name	Consultant
1.0	Introduction and Methodology	Thornton O'Connor Town Planning
2.0	Site Location and Urban Context	Thornton O'Connor Town Planning
3.0	Project Description	Thornton O'Connor Town Planning
4.0	Examination of Alternatives	Henry J Lyons Architects and Thornton O'Connor Town Planning
5.0	Population and Human Health	Thornton O'Connor Town Planning
6.0	Archaeology and Cultural Heritage	Cathal Crimmins Architect
7.0	Biodiversity	Openfield Ecology
8.0	Landscape and Visual Impact	Mitchell + Associates Landscape Architects
9.0	Lands, Soils and Geology	O'Connor Sutton Cronin Engineers
10.0	Water-Hydrology	O'Connor Sutton Cronin Engineers
11.0	Air Quality and Climate	AWN
12.0	Noise and Vibration	AWN
13.0	Wind	B-Fluid
14.0	Material Assets Traffic and Transportation	O'Connor Sutton Cronin Engineers
15.0	Material Assets Waste Management	AWN
16.0	Material Assets Site Services (Civils)	O'Connor Sutton Cronin Engineers
17.0	Material Assets Site Services (Utilities)	O'Connor Sutton Cronin Engineers
18.0	Interactions and Cumulative Impacts	TOC/All
19.0	Mitigation and Monitoring	TOC/All
20.0	Difficulties Encountered	TOC/All



The subject lands have been purchased by our Client with the intention of developing a high-quality purpose-built Build-to-Rent development. The proposed development principally comprises the provision of 564 No. apartment units, in addition to a creche and café on a plot of land that is significantly underutilised in a highly accessible location which is directly adjacent to the Stillorgan Luas stop.

1.2 Extant Permission for 459 No. Units

There is an extant permission for a residential scheme containing 459 No. units on the subject site (ABP Ref. PLo6D.301428). Further detail on this extant permission is outlined in Section 4.1.4 of this Report. This planning application will provide a rationale for increased height and density at the subject site (above the extant permission pertaining to the site) in addition to architectural changes that are contained within the subject scheme.

1.3 Summary of the Proposed Development

The development, which will have a gross floor area of 49,342 sq m will principally consist of: the demolition of the existing structures on site and the provision of a Build-to-Rent residential development comprising 564 No. apartments (46 No. studio apartments, 205 No. one bed apartments, 295 No. two bed apartments and 18 No. three bed apartments) in 6 No. blocks as follows: Block A (144 No. apartments) is part 10 to part 11 No. storeys over basement; Block B (68 No. apartments) is 8 No. storeys over basement; Block C (33 No. apartments) is 5 No. storeys over lower ground; Block D (103 No. apartments) is part 16 to part 17 No. storeys over lower ground; Block E (48 No. apartments) is 10 No. storeys over semi-basement; and Block F (168 No. apartments) is 14 No. storeys over semi basement.

The development provides resident amenity spaces (1,095 sq m) in Blocks A, C and D including concierge, gymnasium, lounges, games room and a panoramic function room at Roof Level of Block D; a creche (354 sq m); café (141 sq m); a pedestrian thoroughfare from Carmanhall Road to Blackthorn Drive also connecting into the boulevard at Rockbrook to the west; principal vehicular access off Carmanhall Road with servicing and bicycle access also provided off Blackthorn Drive; 285 No. car parking spaces (254 No. at basement level and 31 No. at ground level); 21 No. motorcycle spaces; set-down areas; bicycle parking; bin storage; boundary treatments; hard and soft landscaping; lighting; plant; ESB substations and switchrooms; sedum roofs; and all other associated site works above and below ground.

2.0 RATIONALE FOR THE PROPOSED BUILD-TO-RENT DEVELOPMENT

The subject site benefits from a permission for 459 No. residential units which was granted permission by An Bord Pleanála (SHD) development on 17th July 2018 (and therefore may be implemented until 16th July 2023). That development was considered by An Bord Pleanála to represent the principles of proper planning and sustainable development of the area with the Board Order noting that the development would constitute an acceptable residential density in this accessible urban location, would not seriously injure the residential or visual of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety.

The subject site was subsequently purchased by the Applicant with the intention of developing a Build-to-Rent scheme which will address medium-long term accommodation demands on a key accessible site adjacent to a major transport corridor in South Dublin.

2.1 Understanding the Build-to-Rent Typology

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

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

'to date rental only developments at scale in Ireland have been limited.'

The Build-to-Rent typology is defined within the Guidelines as:

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

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

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

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

'The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU

average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity’ [Our Emphasis].

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

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

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

There is a change in the nature of housing demand, not just from a market perspective, but from a demographic shift. We note the following comments from the research completed by Knight Frank entitled ‘*The Dublin PRS¹ Report²*’ which states:

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

The research also notes the demographic shifts underlying these trends:

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

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

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

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

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

¹ Private Rented Sector (PRS) is an umbrella term for privately owned property that is offered to the market as a rented product including Build to Rent developments.

²www.content.knightfrank.com/research/1601/documents/en/the-dublin-prs-report-2018-5830.pdf

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

However, with the pressures on housing supply and the rental sectors, there is an increasing gap between affordability and appropriate living standards, when it comes to residential supply. To continue to balance the needs of a growing population and maintain sustainable planning practices we must be cognisant of the evolving nature of the rental sector. With foreign direct investment remaining crucial to Ireland Inc., it is imperative that action is taken to improve the supply of available stock to ensure Ireland does not lose out due to an inability to house new workers.

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

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

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

A key benefit of Build-to-Rent development is the potential to accelerate the delivery of new housing at a significantly greater scale than at present. This potential can make a substantial contribution to the required increase in housing supply nationally (identified by *Rebuilding Ireland, Action Plan for Housing and Homelessness 2016*) and the scale of increased urban housing provision envisaged by the National Planning Framework.

We note that the Rebuilding Ireland policy states that

‘there is a significant requirement to expand the build-to-rent sector which is not being catered for in current construction levels’.

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

2.2 Responding to Policy set out in the *Sustainable Urban Housing: Design Standards for New Apartments* (March 2018) and the *Dún Laoghaire-Rathdown Development Plan 2016-2022* Relating to Demographic Changes

We note that Section 8.2.3.3(iii) of the *Dún Laoghaire-Rathdown Development Plan 2016-2022* states:

'CSO results from the 2011 Census indicate that 55% of all private households are composed of one or two persons in the County, compared to the 53% Nationally. These 2011 results also indicated that 62% of private households in the County were residing in detached or semi-detached houses with 19.4% in a flat or apartment.'

The *Dún Laoghaire-Rathdown Development Plan 2016-2022* recognises that a wider mix of housing and apartment types are required within its functional area with Policy RES7 ('Overall Housing Mix') stating:

'The provision of a range of housing types and sizes in the County will increase in importance as trends show a decline in family housing and an increase in elderly and single person households. Many of the new households that will form in the County during the period of this Development Plan will be below the current average size and will often consist of one or two persons.' [Our Emphasis].

As result of the acute housing shortage prevailing and the recognised significant demand that exists in the Dún Laoghaire – Rathdown County area for apartment units, the subject lands have been identified as an eminently suitable location for 'Build-to-Rent' Accommodation which can provide purpose-built residential development to meet the housing needs of a greater number of persons.

The Apartment Guidelines identify 'Central and/or Accessible Urban Location' as sites:

- ***'within walking distance (i.e. up to 15 minutes or 1,000 -1,500m) of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;***
- ***within reasonable walking distance (i.e. up to 10 minutes or 800 – 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and***
- ***Site within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e min 10 minute peak hour frequency) urban bus service.'*** [Our Emphasis]

The subject site is located within the Sandyford Business District as discussed at Section 3.0 of this document. There are a significant number of large scale employers located in Sandyford, including the Beacon Hospital and it is considered the primary node of employment in Dún Laoghaire-Rathdown County as illustrated below at Figure 2.1.

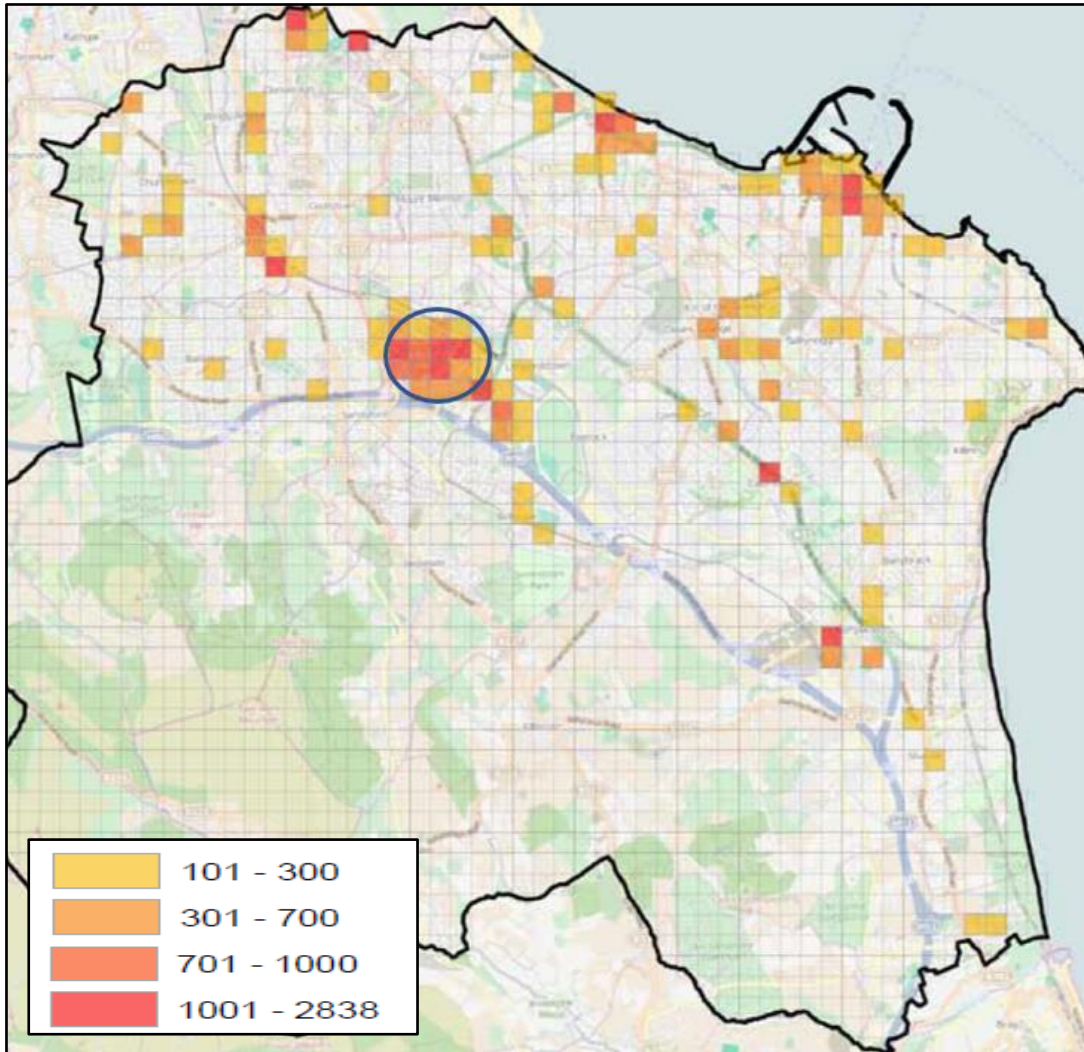


Figure 2.1: Map indicating Sandyford (circled in blue) as the major employment location in Dún Laoghaire – Rathdown County.

Source: *Dún Laoghaire – Rathdown County Development Plan 2016-2022, annotated by Thornton O’Connor Town Planning, 2019.*

Furthermore, the subject site is located adjacent to the green Luas line (Stillorgan stop) as illustrated in Figure 2.2 below which demonstrates the immediate proximity (c.100 m/ c. 1 min walk) of the application site to the Stillorgan Luas stop. This high capacity public transport node provides easy access from the application site to locations such as the City Centre, Cherrywood, Dundrum, St Stephen’s Green and O’Connell’s Street.

The subject site is thus one of the best serviced sites in Dublin with regard to high-quality public transport access.

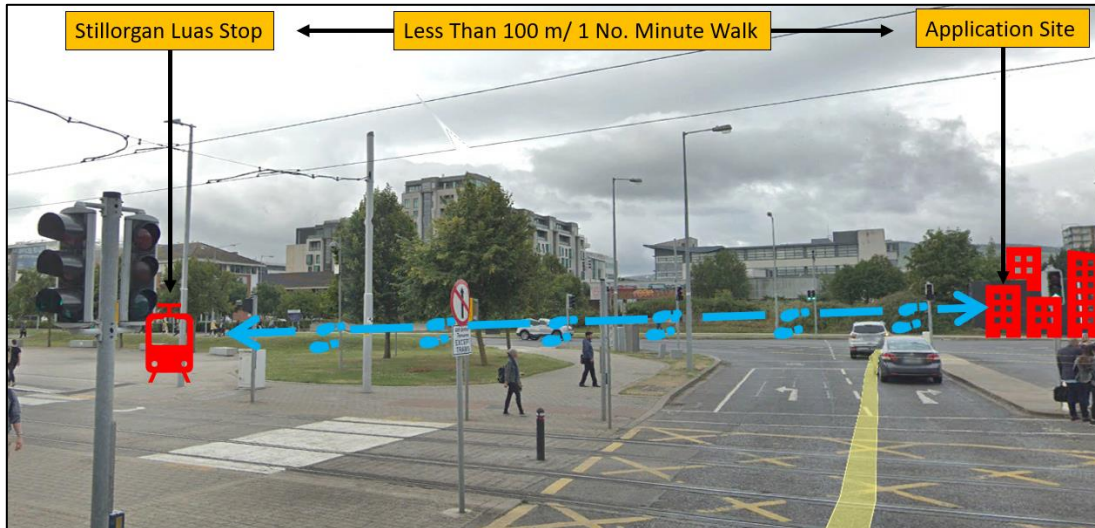


Figure 2.2: Image illustrating the immediate proximity of the Stillorgan Luas Stop to the Application Site.

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2019.

The Apartment Guidelines state that *'in more central locations that are well served by public transport, the default policy is for car parking provisions to be minimised, substantially reduced or wholly eliminated in certain circumstances.* It is considered that (private) car parking provisions may be reduced as part of the proposal given the future tenure, accessibility of the subject site. The provision of car parking will be discussed at Section 7.10 of this report.

The Guidelines acknowledge that *'ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- *Young professionals and workers generally;*
- *Those families with no children and 'downsizers';*
- *Older people, in both independent and assisted living settings.'*

The Guidelines outline that the available choice of suitable tenure plays a role in attracting skilled migrants to locate within urban centres, as such the proposed scheme directly responds to the housing demand for one and two bedroom units. The proposal is fully compliant with the Apartment Guidelines in terms of communal facilities, refuse storage, communal amenity space, bicycle parking and storage provided within the scheme which will be discussed throughout the report and the associated technical documents. As such, the provision of a Build-to-Rent scheme providing 564 No. units comprising 46 No. studio units, 205 No. one bed units, 295 No. two bed units and 18 No. three bed units provides a welcomed housing alternative in the County.

2.3 Location is Eminently Suitable for 'Built-to-Rent' Accommodation as the Site is Well Served by Public Transport

The subject site is well served by public transport with a range of bus routes and the green Luas route within close proximity. The bus and Luas provide frequent access throughout Dún

Laoghaire – Rathdown and to the city centre. The existing and proposed public transport options serving the site are discussed below:

2.3.1 Bus Services

The following bus services are provided within the immediate area of the subject site:

Bus Services				
Route No.	Direction/ Bus Stop	Distance to Stop	Peak Frequency	Off-Peak Frequency
11	Wadelai Park to Sandyford Business District	c. 50 m	10-20 mins	30 mins
47	Poolbeg Street to Belarmine	c. 115 m	30 mins	Hourly
116	Ticknock to Blackrock Dart Station	c. 115 m	-	Daily

It is noted that the Aircoach (Route No. 700) serves the Sandyford Luas stop (every c.15- 30 mins) which is located c. 445 m to the east of the site. We note that there are a number of additional bus routes accessible within a short distance as illustrated below.

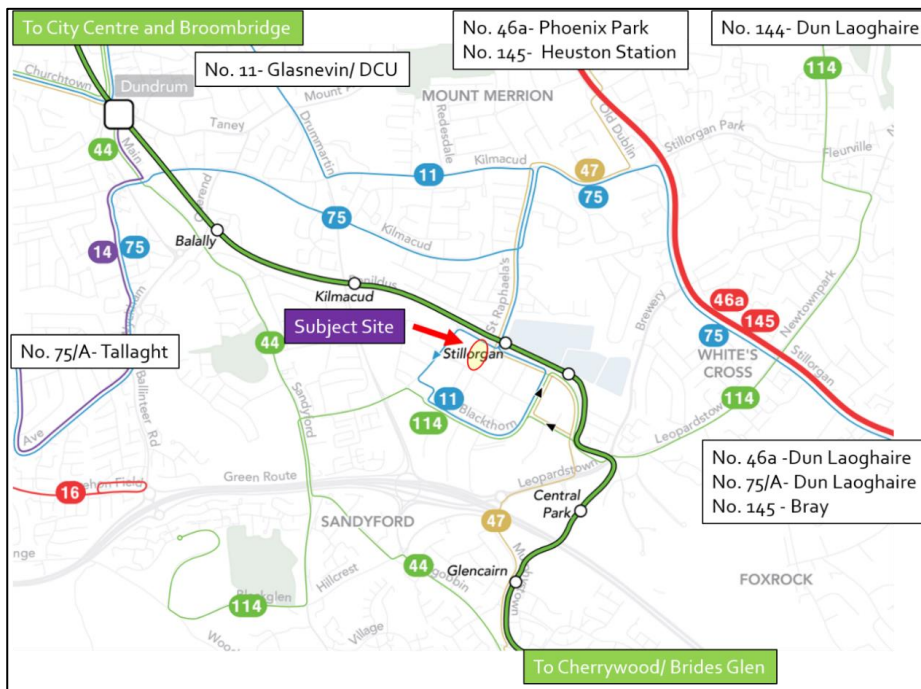


Figure 2.3: Existing Bus Services Surrounding the Subject Site.

Source: Busconnects.ie, Map No. 1 Existing Bus Network, annotated by Thornton O'Connor Town Planning, 2019.

The Transport Strategy for the Greater Dublin Area 2016-2035 and Rebuilding Ireland 2040: National Development Plan 2018-2027 outline the proposed provision for upgrades to the Greater Dublin Area bus network. Figure 2.4 below demonstrates the proposed new bus routes that will operate in the area surrounding the subject site following the upgrade works of Bus Connects:

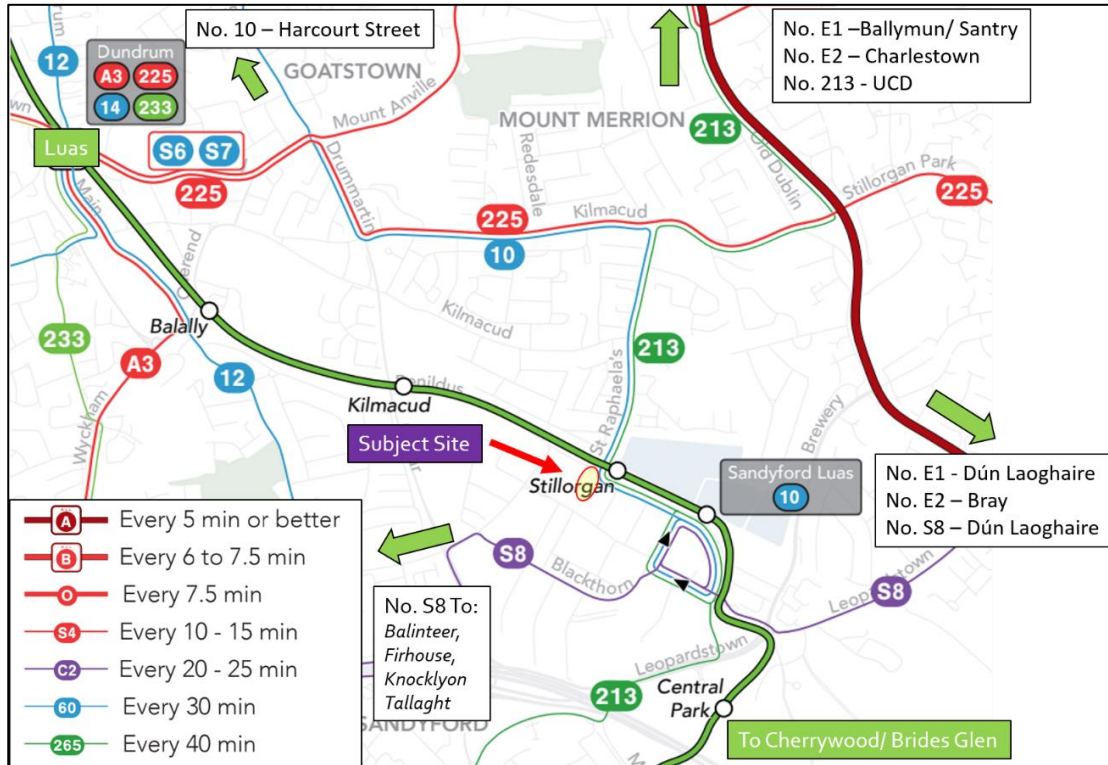


Figure 2.4: Proposed Bus Network New Routes Surrounding the Subject Site.

Source: Busconnects.ie, Map No.2 Proposed All Day Network, annotated by Thornton O'Connor Town Planning, 2019.

The existing bus network that serves the site, in addition to the proposed bus network improvements will provide for a high quality bus service for future residents of the scheme.

2.3.2 Luas Green Line

The subject site is located less than 100 m from the Stillorgan Luas stop, which also benefits from Park & Ride facilities. The stop is also in close proximity to the Sandyford stop which is an additional 445 m to the east. The Sandyford stop was originally the terminus of the line and still contains the main maintenance facility for the Luas green line.



Figure 2.5: Aerial Photograph Illustrating the Proximity of the Application Site to the Green Luas Line

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2019

The green Luas line features significant trip generators along its length and therefore it provides accessibility to a large number of employment, retail, services and entertainment/cultural institutions. We note that the Stillorgan stop benefits from some of the highest all-day frequency of services on the green line due to its proximity to the depot/ terminus and the interchange with the Brides Glen Branch³. The route of the green Luas line is provided in Figure 2.6 below.

³ www.luas.ie

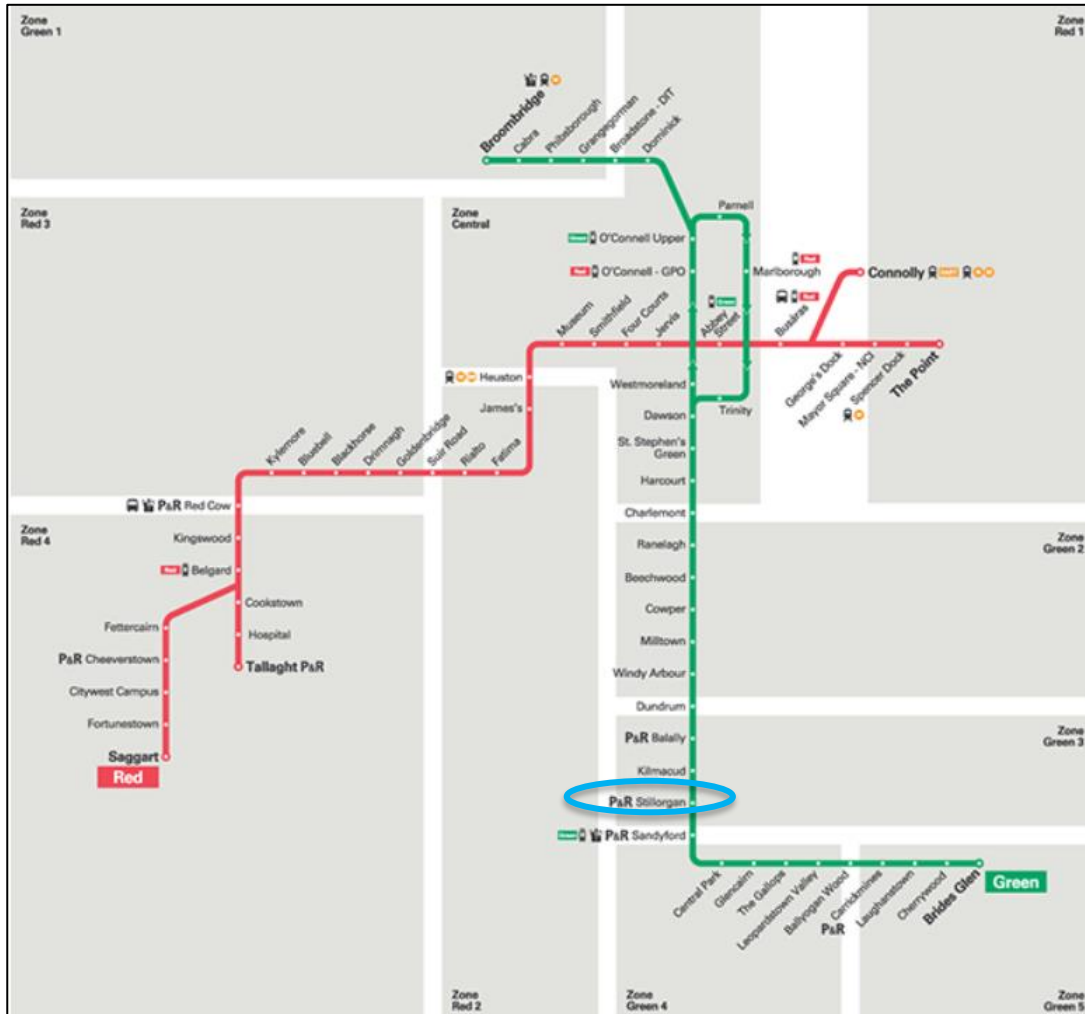


Figure 2.6: Luas Network Map, 2019 with the Stillorgan Stop circled in Blue

Source: Luas.ie

The high frequency and capacity of the green Luas line facilitates excellent connectivity with a wide range of locations throughout the city for future residents of the scheme. A comprehensive Traffic Impact Assessment and Mobility Management Plan have been prepared by O'Connor Sutton Cronin Consulting Engineers and are submitted as part of this planning application.

2.4 The Application Site is Located within an Extensive Cycle Network

The National Transport Authority – Greater Dublin Area Cycling Network (2013) proposes regional cycle network upgrades for Dublin City and satellite settlements. We refer to the existing and proposed cycle networks as illustrated in Figure 2.7 below which clearly demonstrate that the subject site and the surrounding locale will benefit from significantly improved cycling infrastructure which will further reduce car dependency.



Figure 2.7: GDA Cycle Network Plan Illustrating the Existing Cycle Facilities Surrounding the Subject Site

Source: *NTA Greater Dublin Area Cycle Network Plan (2013)*, annotated by Thornton O'Connor Town Planning, 2019



Figure 2.8: GDA Cycle Network Plan Illustrating the Proposed Cycle Facilities Surrounding the Subject Site

Source: *NTA Greater Dublin Area Cycle Network Plan (2013)*, annotated by Thornton O'Connor Town Planning, 2019

On a local level, the *Dún Laoghaire-Rathdown Development Plan 2016-2022* sets out a plan to provide radial and orbital cycle routes through the County as shown below:

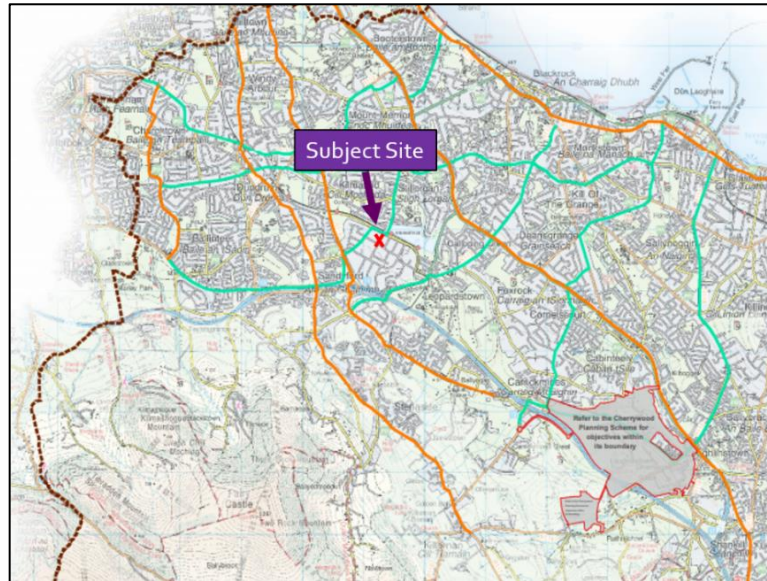


Figure 2.9: Map Illustrating the Existing Radial Cycle Route (orange) and Orbital Cycle Route (teal) Surrounding the Site (Red X) (Indicative Only)

Source: *Dún Laoghaire-Rathdown Development Plan 2016 -2022*

The *Sandyford Urban Framework Plan 2016-2022* (SUFP) has also made provisions for improvements to the walking and cycling facilities of the area as illustrated at Figure 2.10. The SUFP proposes improvements and connections which will make the environment safer for pedestrians, including elements of traffic calming and a 30 Km/h zone which encompasses the subject site.

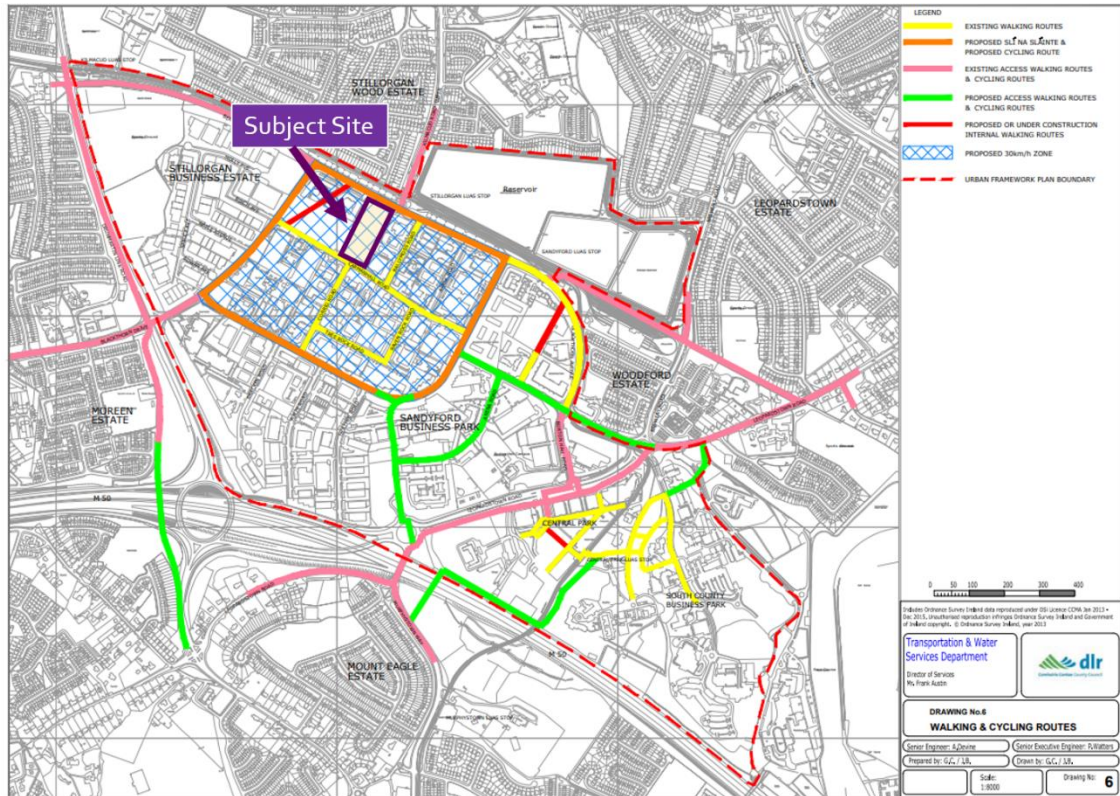


Figure 2.10: Local Level Walking and Cycling Improvements Proposed within the SUFP

Source: *Sandyford Urban Framework Plan 2016-2022, Walking & Cycling Routes, annotated by Thornton O’Connor Town Planning, 2019*

It is considered that the existing and proposed cycle networks that serve the site will allow for residents to easily commute to their place of employment and/or utilise existing services and amenities in the surrounding area whilst promoting a healthy and active lifestyle.

2.5 There are Significant Employment Locations within Easy Walking / Cycling Distance of the Subject Site

The proposed development will promote and encourage sustainable modes of transport as previously discussed at Sections 2.3 and 2.4. As such the highly accessible location allows the opportunity for residents to walk and cycle to places of employment and other services and facilities.

As previously identified at Figure 2.1, Sandyford is one of the largest employment hubs within the Dún Laoghaire – Rathdown County Council functional area. In the 2018 annual review conducted by the Business Improvement District (BID) company for Sandyford there is now an estimated 26,000 No. employees spread amongst approximately 1,000 No. companies. This is in conjunction with a population within the Business District of some 5,000 No. people.

Notwithstanding the quantum of employers within walking distance, we note that existing bus and Luas services are available in close proximity to the subject site which offer frequent services to a wider range of employers in the city centre and the wider area of Dún

Laoghaire-Rathdown County. Notwithstanding the above, a sample of some of the significant employers within walking and cycling distance are provided below:

Local Employment in the Sandyford Business District		
Employer	Location	Distance by Foot/ Bicycle
Beacon Private Hospital	Blackthorn Drive, Beacon South Quarter, Sandyford	550 m 7 No. minute walk 2 No. minute cycle
Chill Insurance	Blackthorn Road, Sandyford	500 m 6 No. minute walk 2 No. minute cycle
Verizon Connect Ireland	Blackthorn Road, Sandyford	550 m 7 No. minute walk 2 No. minute cycle
Prepay Power	Corrig Road, Beacon South Quarter, Sandyford	250 m 3 No. minute walk 1 No. minute cycle
Alstrom Sandyford Luas Depot	Blackthorn Avenue, Sandyford	1 km 13 No. minute walk 5 . minute cycle
JCDecaux	Burton Hall Road	750 m 9 No. minute walk 3 No. minute cycle
Dalata Hotel Group	Burton Court, Leopardstown Road	1 km 13 No. minute walk 6 No. minute cycle
Sage Ireland	Central Park, Leopardstown	1.2 km 15 No. minute walk 7 No. minute cycle
Dyson	Central Park (adjacent to Luas Stop)	1.5 km 19 No. minute walk 8 No. minute cycle
Bank of America Merrill Lynch Ltd.	Central Park, Leopardstown Road	1.3 km 17 No. minute walk 8 No. minute cycle
Salesforce	Central Park, Leopardstown Road	1.2 km 15 No. minute walk 5 No. minute cycle
ESB Networks (Maintenance Division)	Heather Road, Arena Road, Sandyford	1.2 km 11No. minute walk 6 No. minute cycle
ICON	South County Business Park	1.5 km 20 No. minute walk 8 No. minute cycle
Microsoft HQ	Microsoft Campus, South County Business Park, Leopardstown	1.7 km 22 No. minute walk 9 No. minute cycle
Mastercard	Central Park, Leopardstown Road	1.3 km 17 minute walk 7 minute cycle

SSE Airtricity	South County Business Park	1.6 km 21 minute walk 9 minute cycle
Vodafone	Central Park, Leopardstown Road	1.8 km 17 minute walk 8 minute cycle
Leopardstown Racecourse	Leopardstown Racecourse	2.1 km 26 No. minute walk 8 No. minute cycle

In our professional planning opinion, the subject site is exceptionally well located in terms of access to the wider employment and enterprise areas of the Greater Dublin Area. We note that 1,178 No. bicycle parking spaces are proposed as part of the development which will reinforce the use of cycling as a principal mode of transport.

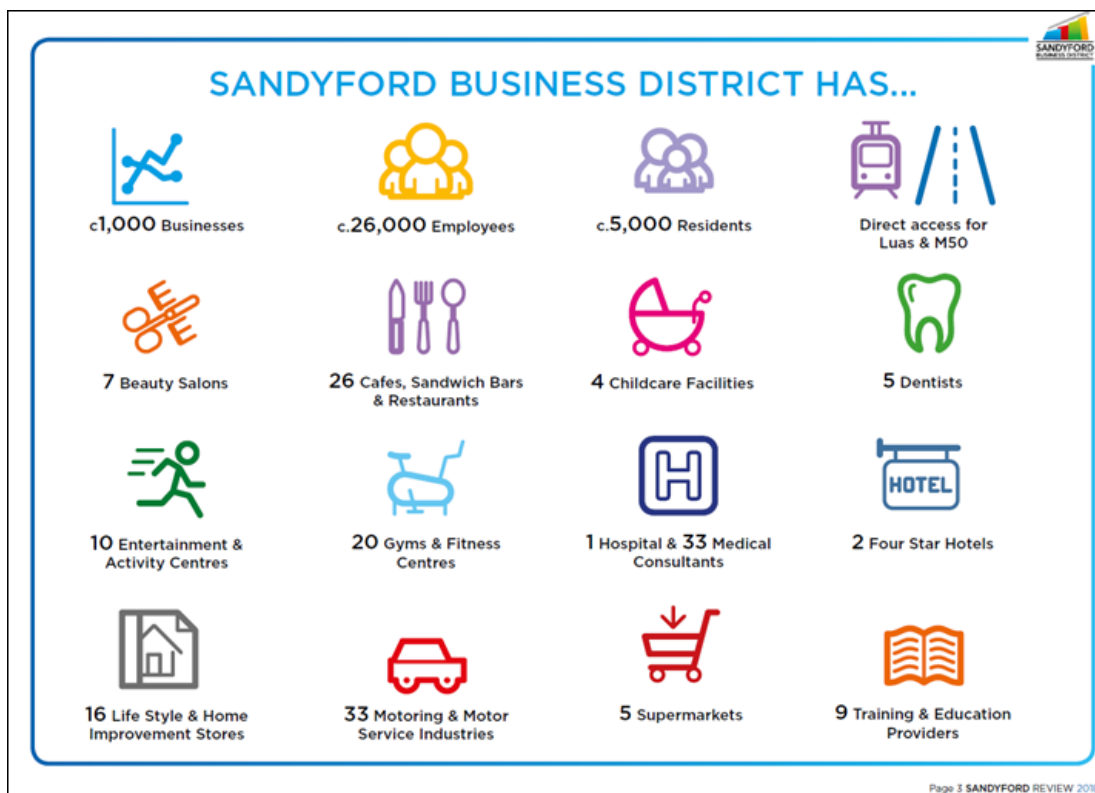


Figure 2.11: Infographic Showing Key Statistics for the Sandyford Business District

Source: Sandyford Review 2018

2.6 Wide Range of Existing Services, Social and Community Facilities Within Walking/Cycling Distance of the Site that will Serve the Needs of Future Residents

In addition to the resident facilities and communal amenity spaces provided within the scheme, there are many services in proximity to the application site. There are a number of supermarkets, restaurants, cafés and gyms within walking and cycling distance of the subject site as illustrated on the aerial photograph below illustrating the site’s sustainable location and support of local infrastructure. We note that the Beacon South Quarter

comprises a number of services and facilities including health and wellbeing; food and wine; entertainment; and interior and lifestyle.



Figure 2.12: Aerial Photograph Demonstrating the Location of Supermarkets, Restaurants, Cafés and Gym within Close Proximity of the Subject Site

Source: Google Maps, annotated by Thornton O’Connor Town Planning, 2019

There are a number of sports clubs operating in the area including Sandyford Badminton Club and Kilmacud Crokes GAA. It is evident that there are a variety of facilities and services located in close proximity to the subject site that the future residents of the scheme can utilise on foot or bicycle. In addition, resident facilities will be provided on site as discussed at section 6 of this report.

2.7 Acute Shortage of Rental Units Available in the Local Area

It is well documented that there is a critical shortage of residential accommodation in Ireland and it is considered that the development of Build-to-Rent schemes have the potential to emerge as a distinct segment within the overall accommodation sector. On 25th June 2019 Thornton O’Connor Town Planning conducted a search of rental properties (studio, 1 bed and 2 bed and 3 bed apartments) available to rent in the surrounding area (using daft.ie). The search provided the following results relating to availability and price:

Accommodation Type	Availability	Average Price
Studios	None available	
One Bed Apartments	5 No.	€2,163.20
Two Bed Apartments	17 No.	€2,477.40
Three Bed Apartments	4 No.	€2,836.25

Thornton O'Connor Town Planning repeated this exercise on the 8th November 2019 and found the following results

Accommodation Type	Availability *	Average Price
Studios	None available	
One Bed Apartments	5 No.	€2,007.60
Two Bed Apartments	15 No.	€2,554.80
Three Bed Apartments	4 No.	€2,710.00

*It is noted that a number of these properties are advertised as Short Term Lets and/or Short Term Contracts (less than 6 No. months duration.)

The results demonstrate that there is a lack of affordable studios, one and two bed apartments in the area and therefore there is strong demand for a scheme such as the subject Build-to-Rent development which will provide a rental option that delivers high quality social interaction/amenity spaces. As noted above, rental properties are in scarce supply in this area of Dublin. As a result of the disparity between supply and demand in rental accommodation, the price of available properties has become unaffordable for many workers as discussed in Section 2.8 below.

2.8 The Shortage of Housing Units in Dublin 18 Has Resulted in Rental Accommodation Price Surges

As documented in an article in *The Journal* entitled 'The Average cost of renting a property in Dublin is now over €2,000', as published on 12th May 2019, rental prices across the State are now 33% higher than Celtic Tiger peak. The article states that in Dublin, average rents have risen above €2,000, increasing for the 31st quarter in a row and up 6.8% since the 1st quarter of 2018.

At a more micro level analysis, the subject lands are located in Dublin 18. The Daft.ie Rental Price Report entitled 'An analysis of recent trends in the Irish rental market 2019 Q1'⁴ documents the very significant increase in rents for housing options in the recent past. The report states the following with regard to the Dublin rental market:

'The level of supply needed for rents to not change is about 13,000 per quarter, or 1,000 per week. Currently, the Dublin market is getting half that – about 500 per week. To close that gap, Dublin needs to build tens of thousands more rental homes.'

As documented at Figure 2.13 below, the average monthly rental cost for a one bed apartment in Dublin 18 in Q2 2019 was €1,626, representing an increase of 6.3% from the same time the previous year. However as documented in Section 2.7 above, there were no studio apartments and only 5 No. one bed apartment available to rent in either June or November within the entire Sandyford area on the day of the searches. The 2019 Q2 Rental Report⁵ states that the on 'May 1st 2019 there were just 2,700 homes available to rent nationwide, the lowest number on record since 2006'. The continuous price surges in rental accommodation is illustrated at Figure 2.14.

⁴ <https://www.daft.ie/report/2019-Q1-rentalprice-daftreport.pdf>

⁵ <https://www.daft.ie/report/2019-Q2-rental-daftreport.pdf>

	1 Bed Apartments	2 Bed House	3 Bed House	4 Bed House	5 Bed House
Dublin 18 2019 Q2 ⁶	€1,626	€1,871	€2,168	€2,387	€2,521
Percentage Change from Q2 2018	+6.3%	+6.1%	+5.0%	+5.0%	+1.1%
Dublin 18 2019 Q1 ⁷	€1,597	€1,838	€2,140	€2,331	€2,517
Percentage Change from Q1 2018	+7.9%	+7.3%	+5.9%	+4.9%	+8.4%

Figure 2.13: Average Rental Prices in Dublin 18

Source: Daft Rental Price Reports – (www.daft.ie/report/2019-Q1-rentalprice-daftreport.pdf, www.daft.ie/report/2019-Q2-rental-daftreport.pdf).

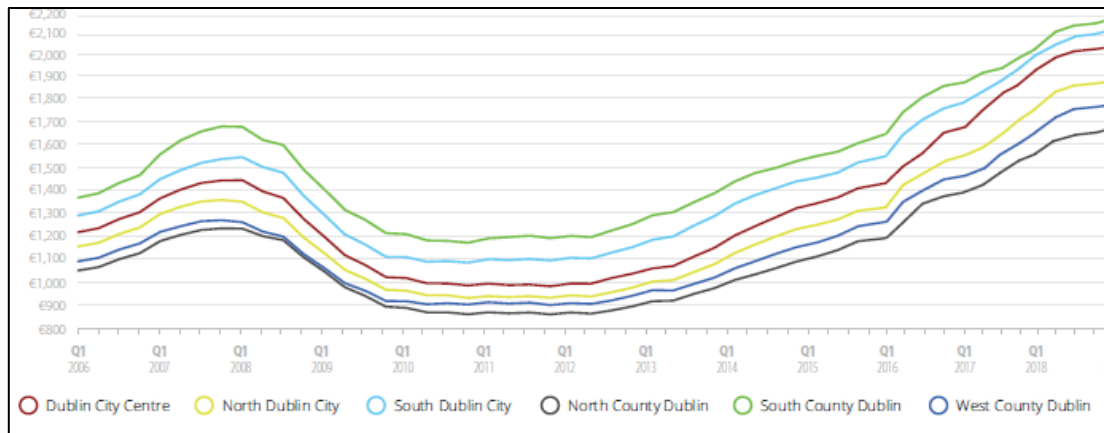


Figure 2.14: Continuous Increase in Rents with South Dublin indicated in Green

Source: <https://www.daft.ie/report/2019-Q1-rentalprice-daftreport.pdf>

The proposed Build-to-Rent scheme will provide an accommodation typology for persons looking to rent close to services and employment opportunities on excellent public transport routes. In addition, the provision of amenities and facilities for social interaction and integration within the site will ensure a high-quality standard of living for the residents of the scheme. The provision of a Build-to-Rent scheme at the subject site will therefore significantly contribute to addressing the acute shortage of residential accommodation within Dublin 18 which has had associated impacts on rental costs and housing affordability.

6 <https://www.daft.ie/report/2019-Q2-rental-daftreport.pdf>

7 <https://www.daft.ie/report/2019-Q1-rentalprice-daftreport.pdf>

3.0 SITE LOCATION AND DESCRIPTION

3.1 Site Location

The subject site is located between Blackthorn Drive and Carmanhall Road and has an area of 15,426 sq m (1.542 Hectares). The wider surrounding area is referred to as the Sandyford Business District which comprises Stillorgan Business Estate, Sandyford Business Estate, South County Business Park, Central Park, Legionaries and Leopardstown Park Hospital.

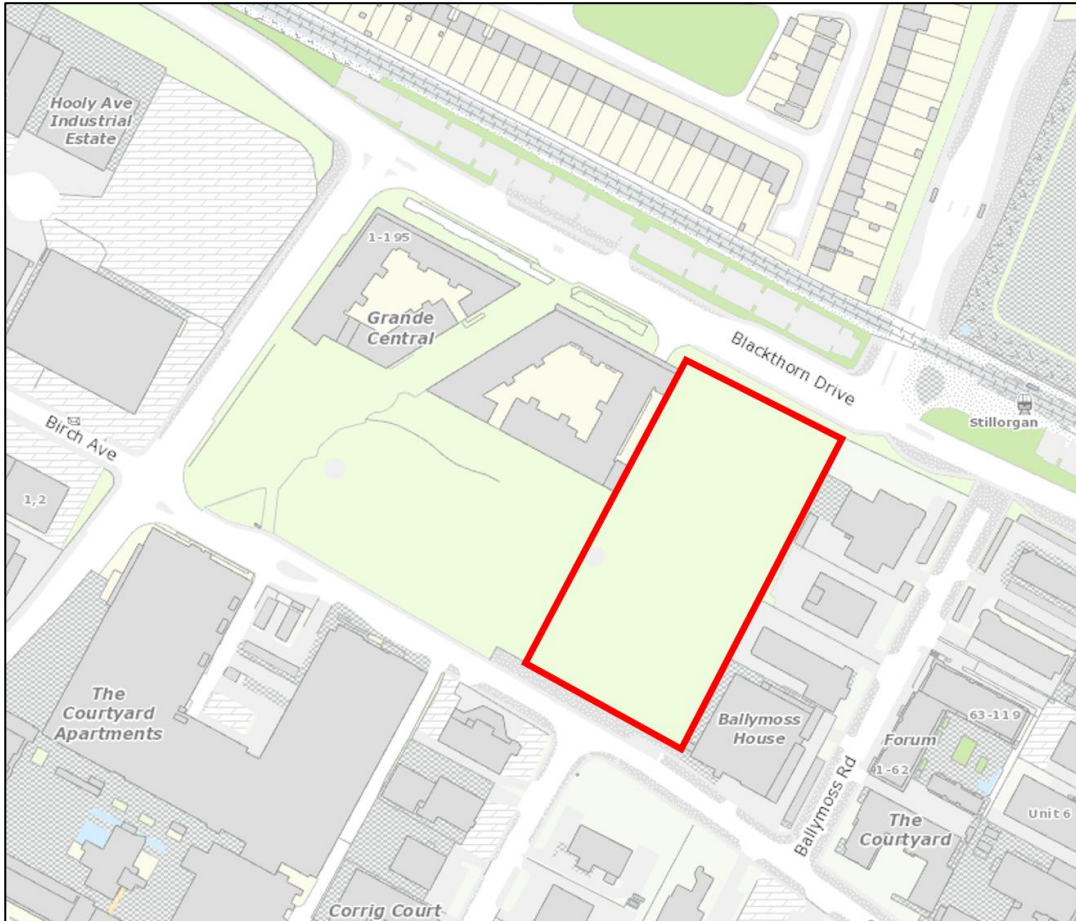


Figure 3.1: The Location of the Subject Site which Fronts Blackthorn Drive and Carmanhall Road

Source: Myplan.ie, OSI Map, Indicative Location annotated by Thornton O'Connor Town Planning, 2019

The subject site is bound by a mixed use residential scheme (Rockbrook Phase I) and a brownfield site (Rockbrook Phase II) which has recently been granted planning permission (Ref.: ABP304405-19) for a mixed use development to the west as indicated at Figure 3.2 below and discussed in detail at Section 4.3.

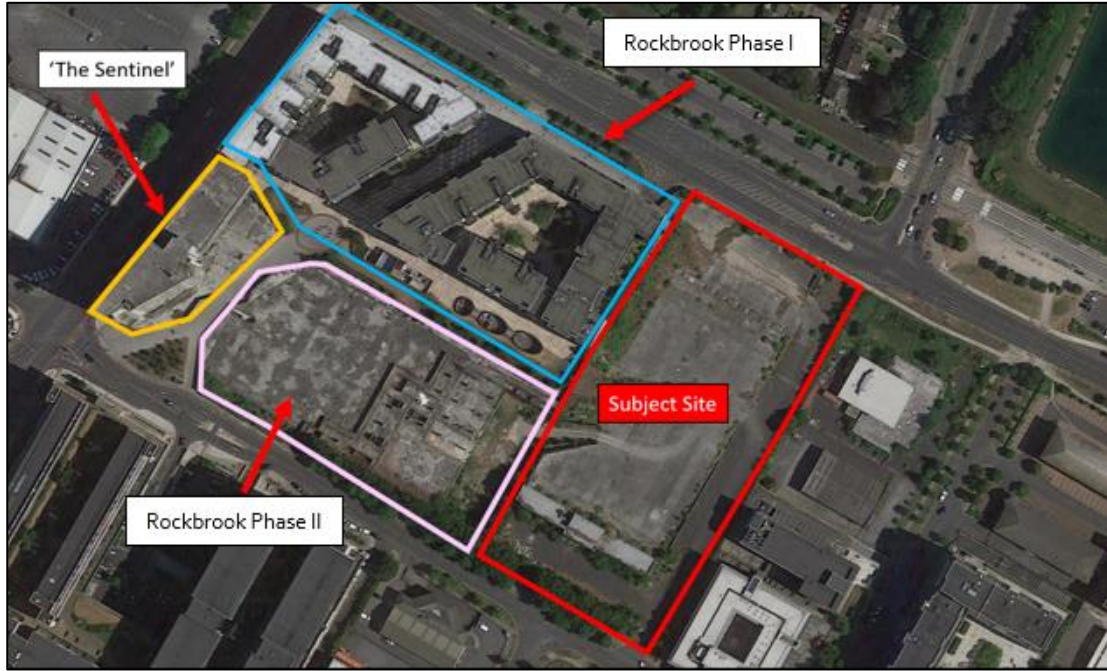


Figure 3.2: Immediate Area of the Subject Site with Constructed, Part Constructed and Permitted Developments

Source: Google Earth, Annotated by Thornton O'Connor Town Planning, 2019

The site is bound to the north by Blackthorn Drive, a large distributor road and the green Luas line. Further north is characterised by suburban low density housing (typically 3 No. bed semi-detached dwellings), with the Stillorgan reservoir located to the north-east. South of the subject site is primarily commercial in nature with more recent mixed-use developments located within the Beacon Quarter as shown on the aerial photograph below.



Figure 3.3: Wider Surrounding Context of the Subject Site.

Source: Google Earth, annotated by Thornton O'Connor Town Planning, 2019.

3.2 Site Description

The vacant brownfield site previously contained an industrial warehouse and office structure. In its current form the site is extensively paved with a remaining structure to the southern side. The principle of demolishing the remaining structure on site has been established through the extant permission on the site. We note that the subject site was utilised as hard surfacing for the construction of Rockbrook Phase I, as illustrated on the aerial photograph below.

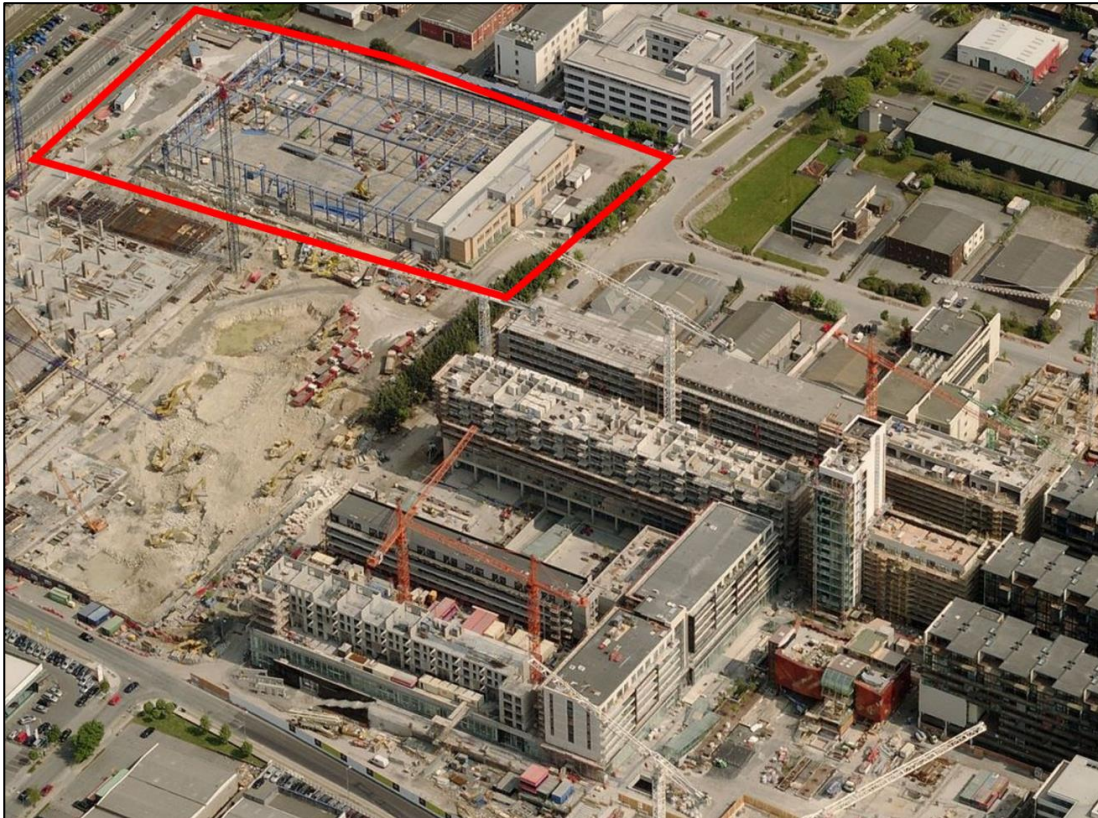


Figure 3.4: Aerial View of the Subject Site (Outlined in Red) c. 2004/2005 prior to the construction of Rockbrook Phase I.

Source: Bing Maps, Annotated by Thornton O'Connor Town Planning, 2019.

3.3 Site Accessibility

The subject site is located within a dense mixed-use district in Dún Laoghaire - Rathdown and is accessible by multiple modes of transport as discussed at Sections 2.3 and 2.4. We note that the area has experienced successive periods of inward investment in recent years and several changes to movement and access have occurred throughout this time.

The road layout of the area is mostly grid like in design with elements of suburban features such as cul-de-sac's and generous grass verges. Blackthorn Drive is a more modern distributor road with cycle lanes, toucan crossings and elements of bus interchange with the Luas stops at Sandyford and Stillorgan. Carmanhall Road is a two lane internal road which has received upgraded pedestrian facilities since the completion of the mixed-use scheme to the south-west.



The Sandyford Business District is accessible to the Dublin region by the green Luas line, the M50 motorway, local bus services and express coach services. A comprehensive Transport Impact Assessment has been carried out by O'Connor Sutton Cronin Consulting Engineers as part of this application.

4.0 PLANNING HISTORY

4.1 Planning History of the Subject Site

According to a search of Dún Laoghaire Rathdown County Council's online planning database, there have been 4 No. planning applications on the subject site.

4.1.1 DLRCC Reg. Ref. Do7A/0619 – Historic Residential Application

Applicant:	JJ Fleming Holdings
Description:	<p>Permission is sought for development on this site of 1.56ha (the former Aldi site), Carmanhall Road, Sandyford Industrial Estate, Dublin 18, which is bounded generally by Blackthorn Drive to the north, the former Siemens site, the O'Dwyer Property Management Building, the Agilant Technologies building, and the Sheehan Quinn Building all to the east; Carmanhall Road to the south; and the former Allegro site to the west. The development will consist of a mixed use scheme which will be accommodated in 6 No. blocks (ranging in height from 6-14 storeys all over a three level basement) all arranged around a new pedestrian boulevard and plaza. The scheme will comprise of:- A) 471 No. apartment units (comprising of 84 No. 1 bed apartment units; 317 No. 2 bed apartment units; 54 No. 3 bed apartment units; 8 No. 2 bed duplex apartment units; and 8 No. 3 bed duplex apartment units) which will be provided within each of the 6 No. blocks. Total GFA of residential floorspace is 46,008 sq m (All residential units have balconies). B) 15,704 sq m GFA of commercial floorspace (comprising of 6,020 sq m of office floorspace; 9,015 sq m of retail floorspace; and a 669 sq m crèche). The retail floorspace (comprising of 20 No. retail units and a retail delivery service yard) will be provided at lower ground and ground floor levels within each of the 6 No. blocks. The proposed office floorspace and crèche will be provided within Block J. C) The total gross floor area of the proposed development is c. 61,712 sq m D) A total of 1,005 No. car parking spaces will be provided at basement level. Vehicular access to the proposed new basement will be facilitated via a new ramp at the existing access to the site off Carmanhall Road. E) A separate and new access to the retail delivery service yard will also be provided off Carmanhall Road. F) The proposed new boulevard (c. 100 metres in length) will link Blackthorn Drive with the permitted development at the former Allegro site(per Reg Ref Do5A/1159 and which is proposed to be modified under concurrent planning applications Reg Ref Do6A/1704 and Do7A/0069). Vehicular access to this boulevard is restricted to early morning service deliveries and emergency vehicles only. G) Associated site development, landscaping works and boundary treatments including the provision of residential courtyards and roof terraces. H) Block G of the proposed scheme will tie in to permitted Block D per Reg Ref Do5A/1159 (as modified per concurrent planning application Reg Ref Do7A/0069). Block L of the proposed scheme will tie in to Block E per Reg Ref Do5A/1159. An Environmental Impact Statement has been prepared in respect of the proposed development and has been submitted as part of the planning application.</p>
DLR Decision:	Grant subject to Conditions
Decision Date:	3 rd July 2007

4.1.2 DLRCC Reg. Ref. D13A/0015 – Advertising

Applicant:	Tivway/Picerno Ltd (In Receivership)
Description:	Permission for development comprising the erection of 5 No. advertising panels totalling c.93 sq m onto the existing boundary hoarding fronting Blackthorn Drive, for a temporary period of 3 years.
Decision:	Grant subject to Conditions
Decision Date:	5 th March 2013

4.1.3 DLRCC Reg. Ref. D16A/0362 - Advertising

Applicant:	Tivway/Picerno Ltd (In Receivership)
Description:	Retention permission of a previously approved planning permission Ref: D13A/0015 on a site of c.1.56Ha. The development will comprise the retention of 5 No. advertising panels totalling c.93 sq m onto the existing boundary hoarding, for a temporary period of 3 years.
Decision:	Grant subject to Conditions
Decision Date:	7 th July 2016

4.1.4 ABP Ref. PLo6D.301428 - Extant Permission for 459 No. Residential Unit Scheme

Applicant:	Pearse Farrell, Statutory Receiver to Certain Assets of Tivway Ltd (in receivership) and Picerno Ltd (in receivership)
Description:	<p>The demolition of all buildings and structures on the site and construction of 460 No. apartments in 6 No. five to fourteen storey blocks. The development proposed consisted of:</p> <ul style="list-style-type: none"> a) A total of 139 No. apartments (22 No. one bedroom, 98 No. two bedroom (including 10 No. duplex units) and 19 No. three bedroom units (including 2 No. duplex units) in the eleven storey Block A; b) A total of 58 No. apartments (22 No. one bedroom, 23 No. two bedroom, including 12 No. duplex units and 13 No. three bedroom) in the eight storey Block B; c) A total of 35 No. apartments (12 No. one bedroom and 19 No. two bedroom (including 14 No. duplex units) and 4 No. three bedroom (including 2 No. duplex units) in 5 storey Block C; d) A total of 64 No. apartments (1 No. studio unit, 47 No. two bedroom and 16 No. three bedroom) in the fourteen storey Block D; e) A total of 74 No. apartments (16 No. one bedroom, 52 No. two bedroom (including 7 No. duplex units) and 6 No. three bedroom (including 1 No. duplex unit)) in the ten storey Block E; f) A total of 90 No. apartments (20 No. one bedroom, 64 No. two bedroom (including 7 No. duplex units) and 6 No. three bedroom (including 1 No. duplex unit)) in the twelve storey Block F;

g) The provision of ancillary on-site facilities including: a gymnasium (149.6 sq m) and yoga/ spin studio (85.3 sq m) (with associated changing rooms and toilets 69 sq m); a movie room (64.1 sq m) on the Blackthorn Drive level of Block C; a crèche (231.9 sq m) on the boulevard level of Block C; an administration office (36.9 sq m); a meeting/events room (33.4 sq m) and a reception area/entrance lounge (75.8 sq m) on the Blackthorn Drive level of Block D; a lounge / café (153.1 sq m), a bar/kitchen (18 sq m) and a games room (40.8 sq m) on the boulevard level of Block D; and a communal meeting room (59.4 sq m) on the second floor of Block A

h) The construction of a two-level basement providing 454 No. car parking spaces, 516 No. bicycle parking spaces, service and plant areas. waste management areas and storage areas;

i) The construction of 2 No. new vehicular accesses -to the two-level basement car park and to the 45 No. space car park under the podium of Block A from Carmanhall Road, and 2 No. pedestrian accesses, one from Blackthorn Drive and one from Carmanhall Road;

j) The provision of landscaped courtyards and an internal pedestrian boulevard connecting to the existing boulevard in the Rockbrook development to the west; and

k) All other associated works required to facilitate the proposed development including the paving of and tree planting on the footpaths and provision of vehicle drop off areas on the Blackthorn Drive and Carmanhall Road frontages.

Decision: Grant subject to Conditions

Decision Date: 17th July 2018

The Inspector's report recognised the sustainable location of the application site in respect of the extant scheme which was a SHD application that:

'The development site has a highly accessible location adjacent to the Stillorgan Luas stop and planned public transport interchange and the planned Blackthorn Drive QBC. It is also within walking distance of a wide range of retail and community facilities at the beacon shopping centre and as provided for within the proposed scheme.'

Furthermore, the Inspector acknowledged that the sustainable location is:

'suitable for higher residential densities in accordance with the 'Guidelines on Sustainable Residential Development in Urban Areas' due to its proximity to the existing Luas stop and proposed public transport interchange.'

In determining the application, the Inspector stated that:

'Having inspected the site and viewed it from a variety of locations in the area and with regard to the submitted photomontages, I consider that while the development will undoubtedly change the outlook from adjoining areas, this impact is acceptable in the context of the ongoing evolving, mixed character of the Sandyford Business District. The potential visual impacts on the wider area are considered acceptable on this basis.'

Having regard to the above assessment, it is considered that the development will be satisfactory in terms of visual impacts, interaction with the public realm and the quality of amenity spaces provided as balconies and at ground floor level. The height and design of the scheme are therefore acceptable.'

In regard to the proposed dwelling mix the Inspector makes reference to the typical 3 No. bed semi-detached dwelling housing seen throughout the Dún Laoghaire – Rathdown County jurisdiction. The Inspector in their assessment stated that:

'whilst there is a high proportion of apartment units in Sandyford Business District, the surrounding south Dublin suburbs are overwhelming characterised by single family houses. The proposed provision of smaller 1 and 2 bed units is therefore to be welcomed.'

In concluding the assessment of the extant scheme, the Inspector's Report stated that:

'The development is acceptable in principle with regard to the zoning of the site under the Sandyford Urban Framework Plan 2016-2022. The housing density and mix are acceptable with regard to the zoning objective and to the location of the site in an established area adjacent to the Stillorgan Luas stop and close to a wide range of services and facilities. The proposed residential design and layout are in accordance with relevant national and local policies on residential development and will provide a satisfactory standard of residential accommodation, while achieving a residential density reflecting the strategic nature of the site and the importance of sustainable development of zoned and serviced lands. I am satisfied that the development would not have any significant adverse impacts on visual or residential amenities. It is considered that the development will enhance pedestrian and cycle connectivity in the area and would not result in undue adverse traffic impacts. I am also satisfied that the development does not result in a significant flood risk at the development site or upstream or downstream'.

The Board decided to Grant Permission for the proposed scheme subject to 28 No. conditions and ultimately granted permission for 459 No. apartments.

4.3 Planning History of Recent Developments in the Vicinity of the Subject Site

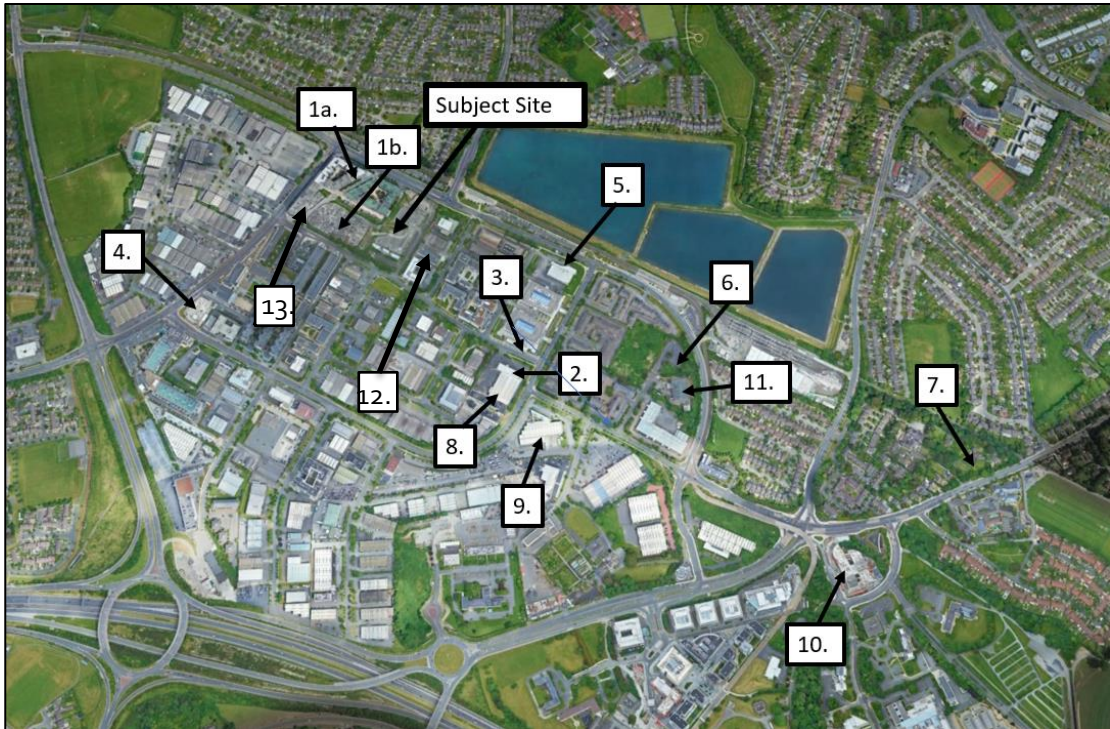


Figure 4.1: Map Indicating Location of Decided/Pending Applications which are Labelled 1 – 11 No.

Source: Google Maps – annotated by Thornton O’Connor Town Planning, 2019

- 1a. Rockbrook: D16A/0697 ABP Ref.: PL06D.248397 (Completion of Phase I and Proposed Phase II)**

The following application relates to Rockbrook Phase I and II as illustrated at Figure 4.2:

Date:	23 rd September 2016
Applicant:	IRES Residential Properties Limited
Description of Development:	Permission for completion of the development (as originally permitted under D05A/1159) and will provide for the following: 3No. 14 storey residential blocks comprising a total of 492 No. apartments (410 No.2-beds and 82No. 1-beds ranging in size from c.51 sqm. to c.89 sqm.). 1 No. retail unit (c.152 sq m.), 1 No. cafe (c.148sq m.) and 1 No. crèche (c.374 sq m.) with outdoor play area at Block 1. Modifications to and completion of basement (3 levels) now providing a total of 1,551 car spaces, 849 No. bicycles spaces apartment storage, bin storage and plant/service areas. New basement ramp access from Carmanhall Road and modifications to existing access from Blackthorn Drive with removal of temporary ramp to Level -2. Landscape works including completion of boulevard/civic space and provision of 3 No. communal courtyards. Provision of substation and LV/meter rooms (total floor area 105 sq m.) and 108 short term bicycle parking spaces at ground level. All associated

site development works, services provision, and boundary treatment works. Total gross floor area of the new development is c.57,256 sqm. An Environmental Impact Statement (EIS) has been submitted with this application.

DLR Decision: Refuse Permission
 Decision Date: 30th March 2017
 ABP Decision: Refuse Permission
 Decision Date: 28th September 2017



Figure 4.2: Site Boundary of the above Application (enclosing Phase I and II).

Source: DL RCC Online Planning File Reg.Ref.: D16A/o697.

Dún Laoghaire – Rathdown County Council refused permission for 2 No. reasons, as follows:

'Having regard to the design of the proposed development, in particular its height, massing, scale and bulk, it is considered that the proposed development would not relate positively to its receiving environment and that it would dominate the larger Rockbrook site and would also detract from the visual dominance of the Sentinel building, while as yet unfinished is the visual entry point to the overall site. The proposed development would compete with this building. The proposed development would have an overbearing impact, would result in an oppressive built environment and would be visually unacceptable at this location. The proposed development would set an undesirable precedent, seriously injure the amenities of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.'

'Having regard to the wind impact on the site and the effects of the microclimate created by this development, in particular the level of amenity upper floor balconies would provide to future residents, coupled with the proposed access arrangements to

the lobbies of these buildings through a lift shaft, creating both amenity and personal security concerns, along with the excessive length and minimal width of internal access corridors, it is considered that the proposed development would not provide for a high quality living environment for future residents of the scheme, would fail to create a positive 'sense of place' and therefore would be contrary to the zoning of the site, 'To consolidate and complete the development of the Mixed Use Inner Core to enhance and reinforce sustainable development', and the proper planning and sustainable development of the area.'

NOTE: The Applicant is advised that there are a number of significant issues in addition to the above reasons for refusal that need to be addressed in any future planning application for this site. These include – Parks and Landscape issues, Drainage Planning issues, Transportation Planning issues, Architects Section issues, residential amenity issues, ownership, all of which are outlined in the planner's report.'

The application was appealed to the Board by the First Party, IRES Residential Properties Ltd. In assessing the scheme, the Inspector in their recommendation stipulated that:

'In the light of my assessment, I conclude that the Planning Authority's second reason for refusal can be set aside. However, the essence of its first reason still stands, insofar as I consider that the proposal would be of an excessive height and scale in relation to existing Blocks A, C (the Sentinel Building) and D and that this excess would manifest itself in the visual dominance of the proposed blocks and in an undue deterioration in the lighting that would be available to residents of the apartments in Blocks A and D.'

As such the Board refused permission for 3 No. reasons:

1. *Having regard to the existing pattern of development on the site, including Blocks A, C, and D and their accompanying pedestrian boulevards, and by reason of the location in particular of Block 1, which would encroach upon both the existing north/south boulevard and the site of a proposed urban plaza identified in Drawing No. 10 of Appendix 15 of the Dun Laoghaire-Rathdown County Development Plan 2016 – 2022, it is considered that the proposed development would compromise the legibility and associated permeability of this boulevard and negate the opportunity to have a centrally placed urban plaza as a focal point to the overall development, as envisaged in the Sandymount Urban Framework Plan. The proposed development would, therefore, be contrary to the provisions of the statutory Development Plan for the area and would be contrary to the proper planning and sustainable development of the area.*
2. *By reason of the monolithic nature of the design of the proposed apartment blocks, and their massing, scale and bulk, and by reason of the lack of an appropriate level of supporting community facilities and the limited range of apartment sizes and types to be provided, it is considered that the proposed development would fail to comply with the principles and requirements set out in the "Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities", issued by the Department of the Environment, Heritage and Local Government in May 2009, and the accompanying Best Practice Design Manual, and would fail to provide a high quality living environment for future residents of the scheme. The proposed development would, therefore, be contrary to these Ministerial Guidelines and be contrary to the proper planning and sustainable development of the area.*

3. *It is considered, by reason of their design, siting, location and layout, that the proposed apartment blocks would result in an undue diminution in the availability of light to the existing apartments to the north, Blocks A and D, as compared to the previously approved development on this site, and would, therefore, seriously injure the residential amenities of neighbouring property and be contrary to the proper planning and sustainable development of the area.*

We note that a subsequent application was granted for Rockbrook Phase II as detailed below.

1b. Rockbrook Phase II: SHD Ref: ABP PLo6D.304405

Date:	8 th May 2019
Applicant:	IRES Residential Properties Limited
Description of Development:	<p>Permission for a strategic housing development with an application site area of c. 2.02 ha (excluding basements), including the extent of Carmanhall Road required for proposed flood mitigation works, on lands forming part of a development generally known as Rockbrook, located at the junction of Blackthorn Drive and Carmanhall Road, Sandyford Business District, Sandyford, Dublin 18, principally bounded by existing mixed use and residential development to the north (Grande Central and South Central); Carmanhall Road to the south; undeveloped lands to the east (known as the Tivway site) and an existing part-constructed office development to the west (The Sentinel). The development, which is known as RB Central with a total gross floor area of c. 41,347 sq m (excluding basements) will consist of 428 No. apartments comprising two blocks arranged around two courtyards ranging in height from five to fourteen storeys (including ground floor mezzanine, all over three existing part-constructed basement levels) comprising 32 No. studio apartments; 122 No. 1 bedroom apartments; 251 No. 2 bedroom apartments and 23 No. 3 bedroom apartments. The development will also include a crèche (486 sq m) with ancillary outdoor play areas; 4 No. ground floor local/neighbourhood retail units (862 sq m); communal community residents' facilities (934 sq m in total) including a multi-purpose space (184 sq m), laundry and community co- working area (97 sq m) at ground floor level, and residents' exercise area, break-out/meeting areas, book and media sharing areas, reading/seating areas, play area and TV/games area located at various levels throughout the proposed development (653 sq m); entrance halls; private, communal and public open space provision including balconies, winter gardens and terraces to be provided on all elevations at all levels as required; roof gardens; courtyards; boulevards; urban plaza; amenity lawn and play areas; basement car parking (508 No. spaces in total); 3 No. surface crèche drop-off parking spaces; car club spaces; 593 No. cycle parking spaces (long and short stay spaces including secure stands); motorcycle parking; storage areas;</p>

internal roads and pathways; pedestrian access points; hard and soft landscaping, street furniture and boundary treatments; changes in level; services provision and related pipework including diversions; plant (including rooftop plant); electric vehicle charging points; ESB substations and switchrooms; waste management areas; green roofs; attenuation tank; flood mitigation measures to Carmanhall Road including footpath upgrade and flood wall; car park ventilation areas; set-down areas; signage; completion and re-configuration of the existing basement levels including related site clearance works and removal of services; public lighting and all site development and excavation works above and below ground. Vehicular access to the site will be from Blackthorn Drive and Carmanhall Road with dedicated bicycle access from Blackthorn Drive. The application contains a statement setting out how the proposal will be consistent with the objectives of the Dun Laoghaire-Rathdown County Development Plan 2016-2022. An Environmental Impact Assessment Report has been prepared in respect of the proposed development. The application, together with the Environmental Impact Assessment Report may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dun Laoghaire-Rathdown County Council. The application may also be inspected online at the following website set up by the applicant: www.rbcentralplanning.ie

Decision:

Granted subject to 29 No. conditions.

The Inspector in their report to the Board stated the following in regard to the quantum of development proposed for the Rockbrook Phase II development:

'the site is at a location suitable for higher residential densities in accordance with the 'Guidelines on Sustainable Residential Development in Urban Areas' and ReS3 of the Development Plan due to its proximity to the existing Stillorgan Luas stop and proposed public transport interchange. The proposed residential density exclusive of the proposed retail, commercial and community uses is 255 units/ha. This is acceptable given the location and the established and permitted pattern of development in the immediate vicinity on the Rockbrook site, the former Aldi site to the immediate east and the Beacon South Quarter site to the immediate south.'

In response to the Planning Authority's concerns that the development will provide a low proportion of 3 No. bed units and absence of larger units the Inspector stated the following in respect of the Build to Sell development proposal:

'the proposed development meets the standards set out in national guidance with regard to housing mix and that there is a predominance of larger 3 bed + units within the wider suburbs. The proposed housing mix is, therefore, acceptable in my view.'

In respect of the impacts on traffic and transportation, the Inspector stated their opinion that:

'the development will have a limited impact on the established traffic conditions at this suburban location, given its proximity to public high capacity transport services. In addition, the development provides satisfactory cycle and pedestrian facilities and will improve pedestrian / cycle permeability in the area and thus encourage sustainable forms of transport.'

The Rockbrook Phase II development has been considered throughout the design process and in the preparation of the accompanying Environmental Impact Assessment Report.

2. SHD Ref: ABP Ref. PLo6D.303467

Date:	14 th January 2019
Applicant:	Prime Living Sandyford Ltd
Description of Development:	706 No. bed space student accommodation and all associated site services.
DLR Decision	Grant Permission
Date:	30 th April 2019

3. Reg. Ref: D18A/1080

Date:	16 th November 2018
Applicant:	Dublin & Oriental Properties Ltd
Description of Development:	Permission for the construction of two No. single storey pavilion buildings to the west and east of the existing single storey retail and café building . Pavilion building 1 is for Class 1 Shop use (GFA of c.140 sq m) and Pavilion building 2 is for café/restaurant use (GFA of c.140 sq m). The proposal includes 2 No. signage zones for each unit, associated outdoor seating/terrace area, cycle parking and all associated site works.
DLR Decision:	Grant Permission
Date:	17 th January 2019

4. Reg. Ref: D18A/0785 ABP Ref.: PLo6D.303738

Date:	15 th August 2018
Applicant:	Irish Residential Properties REIT PLC
Description of Development:	Permission for development. The proposed development will substantially complete the Beacon South Quarter scheme and will be constructed over 3 No. existing basement levels which extend beneath the subject site as permitted under Dun Laoghaire-Rathdown County Council Planning Reg. Ref. Do4A/0618 as amended. The proposed development comprises a mixed-use scheme (c. 13,076 sq m) ranging in height from 1 – 14 No. storeys, including a ground floor mezzanine level, arranged around a communal area of open space of c. 1,014 sq m. The proposed development will include; 3 No. neighbourhood retail units at ground floor level (c. 781 sq m, c.559 sq m and c.181 sq m respectively), plant and refuse store rooms; a two-storey crèche unit at the ground and mezzanine floor levels (c. 390

m²); and **84 No. apartment** units arranged across the 1st to 13th floors (12 No. 1-bedroom units, 59 No. 2-bedroom units and 13 No. 3-bedroom units) with balconies, terraces or winter gardens provided to all elevations. The proposed development will include the provision of **65 No. car parking spaces** in lieu of the previously permitted storage use at the existing basement level -3; 5 No. motorcycle spaces in the permitted, existing basement level -2; and, 136 No. bicycle parking spaces and 3 No. dedicated crèche car parking spaces in the permitted existing basement level -1. A new lift access is proposed in basement level -1 to serve the proposed apartment units. Vehicular access to the basement levels will be from the existing ramp to the east of the site via Blackthorn road, with pedestrian access to the proposed development provided from Blackthorn Drive and Blackthorn Road. The development will also include piped infrastructure and ducting; green roofs; 84 No. solar panels and plant at roof level; site landscaping; on-street cycle parking facilities; boundary treatments; and, all associated site development and excavation works above and below ground. The development will also include minor hard and soft landscaping works to the public footpaths adjoining the site at Blackthorn Drive and Blackthorn Road.

Decision:	Grant Permission
Date:	25 th January 2019
ABP Decision:	Granted with Revised Conditions
Date:	13 th June 2019

In assessing the development proposed in Reg. Ref. D18A/0785, the Dún Laoghaire – Rathdown County Council Planner’s Report noted that:

‘The proposed apartments including the revisions proposed as part of the Further Information submission is in accordance with the Design Standards for New Apartments (March 2018). In addition, the proposed development, in particular the heights of up to 14 storeys and density of 84 dph, is considered to be in accordance with the newly published Urban Development and Building Heights Guidelines for Planning Authorities (December 2018).

Having regard to the design and layout of the proposed development and distance from adjoining properties, it is considered that the development would relate positively to the receiving environment and would not significantly impact on the visual or residential amenities of the adjoining residential area and is therefore considered acceptable’.

On the 25th January 2019, Dún Laoghaire Rathdown County Council granted permission for the development subject to 33 No. conditions.

The Decision of the Planning Authority was the subject of a Third-Party Appeal to An Bord Pleanála for reasons relating to traffic. The Board decided not to undertake a ‘de novo’ assessment and assessed the matters included in the appeal only. Ultimately the Board decided to grant permission for the scheme.



Figure 4.3: Photomontage of the Development as seen from the Junction of Blackthorn Drive and Blackthorn Road.

Source: DLRCC Reg. Ref.: D18A/0785.

5. Reg. Ref: D18A/0212

Date: 9th March 2018
 Applicant: BHR Arkle Ltd
 Description of Development: Permission for **modifications to the permitted 6 storey over basement office development** (with access off Arkle Road) granted under D15A/0827. Modifications include redesign and re-siting of the permitted office building on the application site. The revised office building to remain 6 storeys over basement with a total gross floor area of c.20,307 sq m (previously permitted c.20,264 sq m). Provision of a café (c.390 sq m) (with outdoor seating area) and management suite (c.85 sq m) at ground floor. Relocation of permitted basement ramp and loading bay. **165 No. car parking spaces, 8 No. motorbike spaces** and 102 cycle spaces provided at basement. Visitor car spaces (9 No.) and cycle spaces (53 No.) and bin storage area provided

at surface level. All ancillary areas including office reception area, circulation, WCs, substation/switch rooms, shower/changing facilities, plant and security areas. Revised elevational treatments. The demolition of Innovation House is permitted under D15A/0827. All associated site development, services provision and landscaping works.

DLR Decision: Grant Permission
 Date: 10th September 2018

6. Reg. Ref: D15A/0560

Date: 31st May 2017
 Applicant: ASOF Blackthorn Developments Limited
 Description of Development: Permission for amendments to the office development approved under Register Reference D15A/0560, comprising:

1. **The omission of the single level basement** (car and bicycle parking, staff changing/shower/toilet areas, service and plant areas, waste management areas and storage areas) and associated ramp accesses from under Blocks A and E.
2. The redesign of the approved ground floor of Block A to facilitate a surface level vehicle access route resulting in a decrease in office floor space from 11,980 sq m as approved to 11,748 sq m
3. The replacement of the approved 13,850 sq m (gross) Block B with a five storey 5,713 sq m office building and a **350 No. space multi storey car park** (Block F, including 17 No. disabled spaces) with 82 No. cycle parking spaces and 14 No. motorcycle parking spaces at ground level and a multi-use games area on the roof with associated fencing and lighting.
4. The redesign of the approved floor plan of Block C resulting in a decrease in office floor space from 6,570 sq m as approved 6,437 sq m and the repositioning of the block to the east from that approved.
5. the redesign of the approved floor plan of Block D resulting in a decrease in office floor space from 6,745 sq m as approved to 6,704 sq m
6. The redesign of the approved ground floor of Block E incorporating the area of the car park access ramp to be omitted resulting in an increase in the floor area from 2,996 sq m as approved to 3,198 sq m
7. Provision of roof top plant areas enclosed by 2.6m high screens.
8. Amendments to the hard and soft landscaping within the approved public plaza between blocks B and C and public park.
9. The formation of an internal access route from the proposed multi-storey car park to the approved vehicular exit onto Blackthorn Avenue to the south of Block C and between Blocks C and D.
10. Omission of the approved off-road cycle works to Burton Hall Avenue.

<p>DLR Decision: Date:</p>	<p>11. Construction of 2 No. single storey bicycle parking (total 54 spaces)/bin store buildings to the south of blocks C and D. 12. Construction of single storey bin store to the south of Block A. The proposed development will result in a reduction in the total floor from 41,871 sq m as approved, to 33,800 sq m and a reduction in the total office floor area from 41,562 sq m as approved, to 33,491 sq m Grant Permission 31st October 2017</p>
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7. Reg. Ref.: D17A/0337 ABP Ref.: PL o6D.24928

<p>Date: Applicant: Description of Development:</p>	<p>11th April 2017 Homeland Silverpines Limited Permission for a 7 year permission for the demolition of 3 No. existing residential dwellings known as 'Annaghkeen', 'Dalwhinnie' and 'Marian Villa' and associated outbuildings (combined demolition c.662.2 sq m GFA) and the material change of use of St Joseph's House from residential care facility to residential use to provide for an overall development of 139 No. residential units (133 No. apartments and 6 No. houses) all in a scheme of 2-5 storeys partly over dual access basement level. The proposal shall provide for a new residential scheme (Blocks A-E) including: A. The construction of Blocks A-c (3-5 storeys) over dual access basement level (c.4,311 sq m) comprising 122 No. apartment units. B. The Construction of 6 No. townhouses in the form of Block D. C. The refurbishment and separation of St Joseph's House (2 storeys) into 11 No. residential units to form Block E, which shall include the demolition of a single storey extension and associated outbuildings (demolition total c.172.82 sq m GFA), the removal of external gates, modifications to elevations including new windows, doors and glazed balcony, new external steps and ramps, modifications to internal layout including the removal of walls and partitions and the addition of new dividing walls and part new roof. Block A (5 storeys) shall provide for 53 No. apartment units (13 No. 1 beds, 37 No. 2 beds and 3 No. 3 beds); Block B (5 storeys) shall provide for 58 No. apartment units (7 No. 1 beds, 49 No. 2 beds and 2 No. 3 beds); Block C (3 storeys) shall provide for 11 No. apartment units (7 No. 1 beds, 3 No. 2 beds and 1 No. 3 beds); Block D (2-3 storeys) shall provide for 6 No. townhouses (5 No. 3 bed terrace houses - Type T1 and 1 No. 4 bed detached house - Type T2) and Block E (2 storeys) shall provide for 11 No. apartment units (8 No. 2 beds and 3 No. 3 beds) in the former St Joseph's House building all with associated balcony/terrace/private garden areas. The development shall also consist of the amalgamation of 3 No. existing access points along Leopardstown Road (R113) to provide for 1 No. vehicular and pedestrian access point. The existing access point from</p>
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Brewery Road (N31) to St Joseph's House via Silverpines will be maintained and the existing access serving the Anne Sullivan Centre for the Deaf Blind will be maintained with minor revisions to the point of access. Permission is also sought for **166 No. car parking spaces** (139 No. at basement level, 27 No. at surface level), 200 No. bicycle parking spaces, bike stores (at basement and surface level), bin storage areas (at basement and surface level), plant areas, c.5,960 sq m of public open space (including new tree walk, courtyard spaces and new play area), new boundary treatment, green roofs associated with Blocks A-C, provision for pedestrian connections to the adjoining park, site services and all associated site development service connections and landscape works. A protected structure.

DLR Decision: Grant Permission
 Date: 24th August 2017
 Decision: Grant Permission
 Date: 11th May 2018

8. Reg. Ref: D16A/0158

Date: 11th March 2016
 Applicant: Development Securities Avid Limited
 Description of Development: The development will consist of the demolition of the existing two-storey warehouse/production building with ancillary offices on the site (approximately 3,890 sq m (gross internal) and the construction of a **5 to 8 storey mixed use development** in two blocks comprising: 1) **147 No. apartments** (29 No. one bedroom, 102 No. two bedroom; and 16 No. three bedroom (including 5 No. duplex units); 2) a 216 sq m crèche; 46 sq m gymnasium; 93 sq m media suite; and 141 sq m cafe at ground level fronting onto Blackthorn Road; 3) a single level undercroft providing **151 No. car parking spaces**, 158 No. bicycle parking spaces, service and plant areas, waste management areas and storage areas; 4) the construction of a new vehicular entrance from Carmanhall Road and a fire tender/cycle access from Blackthorn Road; 5) the provision of an internal landscaped courtyard; 6) and all other associated works including the provision of 32 No. surface bicycle parking spaces and the relocation of the existing pedestrian crossing on Carmanhall Road required to facilitate the proposed development.

DLR Decision: Grant Permission
 Date: 29th July 2016

9. Reg. Ref.: D16A/0076

Date:	9 th February 2016
Applicant:	ASOF Highfield House Limited
Description of Development:	Permission for development on a 1.37 hectare site. The development will consist of: 1) the demolition of the existing office/warehouse building on the site (approximately 3,150 sq m (gross)); 2) the construction of a 27,751 sq m (gross) development over a single level basement comprising 4 No. six storey buildings: Block A - 6,185 sq m (gross) offices; Block B - 6,185 sq m (gross) offices; Block C - 6,185 sq m (gross) offices; Block D - 9,170 sq m (gross) (9,004 sq m offices and a 166 sq m cafe at ground floor); a 11,048 sq m a single level basement providing 277 No. car parking spaces , 168 No. bicycle parking spaces, staff changing/shower/toilet areas, service and plant areas, waste management areas and storage areas; 3) the construction of a vehicular access to the site on Arena Road; 4) the provision of a public plaza incorporating soft and hard landscaping and water features and 80 No. cycle parking spaces; 5) and all other associated site works required to facilitate the proposed development including a 26sq m electricity substation and switch room building.
DLR Decision:	Grant Permission
Date:	29 th July 2016

In assessing the development, the Planner's Report concluded that:

'The current application is welcomed and it is considered that the redevelopment of this site, which is located at a prominent junction within the Sandyford Business District, to accommodate a high quality modern office development will encourage future clustering of similar type development, will promote Sandyford Industrial Estate as a vibrant and attractive place to located businesses and will, therefore promote employment opportunities in the County.'

10. Reg. Ref: D15A/0695

Date:	5 th November 2015
Applicant:	Cyril McGuire
Description of Development:	Permission for development. The development will consist of: the demolition of all existing structures on the site (3,000 sq m approximately) and the provision of 3 No. new 5 storey office buildings (with rooftop plant and access set back from the building edge) known as Blocks A, B, and C including undercroft and surface car parking (298 No. spaces) with a total gross floor area of 26,525 sq m approximately. The development will also include ground floor cafes in Blocks A and B (830 sq m); ancillary staff gymnasiums; all hard and soft landscaping; boundary treatments including pedestrian access; bicycle parking;

changes in level; attenuation works; pedestrian paths; plant and ESB substations and all site excavation and development works above and below ground.

DLR Decision: Grant Permission
Date: 8th January 2016

11. Reg. Ref.: D15A/0560

Date: 2nd September 2015
Applicant: ASOF Blackthorn Developments Ltd
Description of Development: Permission for: 1. The demolition of the existing two-storey office/storage building on the site (approximately 2,720 sq m (gross internal)). 2. The construction of a **41,871 sq m (gross) office development** over a single level basement comprising five buildings; Block A - 11,980 sq m (gross) office space over five floors; Block B - 13,580 sq m (gross) office space over five floors; Block C - 6,570 sq m (gross) office space over four floors; Block D - 6,745 sq m (gross) office space over 4 floors; Block E - 2,996 sq m (gross) over four floors incorporating two cafés (212 sq m and 97 sq m) on ground floor and 2,687 sq m of office accommodation on the floors above; a 16,826 sq m single level basement providing **419 No. car parking spaces**; 370 No. bicycle parking spaces, staff changing/shower/toilet areas, service and plant area, waste management areas and storage areas. 3. The construction of a separate vehicular entrance from and exit into Blackthorn Avenue. 4. The provision of a public park incorporating soft and hard landscaping and water features and a pedestrian plaza. 5. All other associated site works including required to facilitate the proposed development. An Environmental Impact Statement (EIS) will be submitted to the Planning Authority with the application and the EIS will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy during office hours at the offices of the Planning Authority.

Decision: Grant Permission
Date: 23rd September 2016

12. Reg. Ref.: D18A/1210 – Temporary School

Date: 20th December 2018
Applicant: The Minister for Education & Skills
Description of Development: Permission for development. This is a new primary school opening in September 2019 and this start-up accommodation is required to enable the school to commence operation. The development will consist of the temporary change of use of the existing building to a temporary two storey primary school (c.822.10 sq m) with required internal and elevation modifications necessary to accommodate the proposed education use. The development will involve minor revisions to property

Decision:	boundaries to include the erection of 2m high welded mesh fencing and required access gates. Temporary permission for a period no longer than 5 years is being sought.
Date:	Grant Permission subject to 10 No. conditions. 23 rd May 2019

The 5 No. year temporary school permission has been duly considered throughout the preparation of the accompanying Environmental Impact Assessment Report.

13. Reg.Ref.: D16A/0991

Date:	14 th September
Applicant:	Dante Property Company
Description of Development:	The development will consist of: completion of internal configuration of permitted office floor space to comprise 294 office suites and 28 meeting rooms; the provision of two additional floors (1490 sqm) to the existing 6 storey part of the building adjoining Block A; the provision of the ground floor cafe/restaurant use (198 sqm); new entrance to Blackthorn Drive; elevational amendments; ancillary areas and all development works. Car and cycle parking provision will be as previously permitted on reg ref D05A/0159 .Vehicular access to the site will be as previously permitted from Blackthorn Drive (An Bord Pleanála Ref. PL06D 23756).
Decision:	Grant Permission subject to 20 No. conditions.
Date:	23 rd May 2019

4.3 Planning History Analysis

From an examination of the planning history of the subject site and surrounding area, it is evident that the principle of high-density residential and mixed-use developments within the Sandyford Business District are being favourably considered by both Dún Laoghaire - Rathdown County Council and An Bord Pleanála.

Dún Laoghaire Rathdown County Council’s decision to grant permission for a mixed-use development (DLRCC Reg. Ref. D07A/0619) of 6 No. blocks ranging in height from 6 to 14 No. storeys provides a strong precedent for development on the subject site. More recently, An Bord Pleanála’s decision to grant permission for a mixed use scheme comprised of 459 No. apartments in 6 No. blocks ranging in height from 5 to 14 No. storeys at the subject site is evidence that the height, quantum, scale and massing of a substantial development is acceptable to the Board. It was noted in the Inspector’s Report that the proposed development would not seriously injure the residential or visual amenity of the area and would be in accordance with the proper planning and sustainable development of the area.

The development now proposed at the subject site is similar in scale and nature to those previously granted on the subject site, albeit with additional verticality proposed in some locations, in addition to the provision of more compact ‘Build to Rent’ units within the existing permitted forms thus increasing the overall number of units from the previously granted scheme, which in our opinion should be seen as a positive amendment amidst a national housing crisis.

There are also a number of planning applications in the vicinity of the subject site which are of relevance to the subject scheme. One example is the recent application for a Strategic Housing Development (ABP Ref. PLo6D.303467) which proposed a 706 No. bedroom (facilitating 817 No. bed spaces) student accommodation scheme along the Carmanhall Road which was granted by An Bord Pleanála. Another key application of relevance is the Rockbrook Phase II development (ABP Ref. PLo6D.304405) which was recently granted by the Board and comprises a mix of 32 No. studios, 122 No. 1 bed units, 251 No. 2 bed units and 23 No. 3 bed units. The subject development proposes physical linkages and connections to provide a strong urban relationship with the Rockbrook scheme.

An examination of the planning history in the vicinity of the subject site confirms the Planning Authority and An Bord Pleanála are of the view that mixed-use development within the vicinity of the subject site can serve to enhance the residential community of Sandyford and thus contribute towards achieving the objectives of the Development Plan and Sandyford Urban Framework Plan.

We note that of the aforementioned planning applications, there are no Build-to-Rent developments proposed. The design team have made a concerted effort to ensure the development positively contributes to the unit mix in Sandyford. We note that the proposed unit mix provides an alternative option to the predominant traditional 3 No. bed semi-detached dwellings in the area and the recent permission for Build to Sell units at the adjacent Rockbrook Phase II site.

5.0 PRE-PLANNING CONSULTATION

5.1 Pre-Planning Meeting No. 1 with Dún Laoghaire-Rathdown County Council

A Section 247 pre-planning meeting took place on Tuesday, 30th April 2019 at the offices of Dun Laoghaire – Rathdown County Council and was attended by the following:

Dun Laoghaire Rathdown County Council	
Naoimh Fleming (HC)	Senior Executive Planner
Marguerite Cahill (MC)	Executive Planner
Bernard Egan (BE)	Drainage and Water Services
Ruairi O’Dulaing (ROD)	Parks Department
Applicant and Design Team	
Amy Lee (RH)	Richmond Homes
Kenneth Beirne (KB)	Richmond Homes
Derek Byrne (DB)	Henry J Lyons Architects
Roldan Jacoby (RJ)	Henry J Lyons Architects
Patrice McVeigh (PMV)	O’Connor Sutton Cronin
Patrick Raggett (PR)	O’Connor Sutton Cronin
Anthony Horan (AH)	O’Connor Sutton Cronin
Bernard Seymour (BS)	Bernard Seymour Landscape Architect
Sadhbh O’Connor (SOC)	Thornton O’Connor Town Planning

The Design Team provided an overview of the scheme with a focus on the rationale for the key changes from extant permission which are directed by a changed planning policy context. The changes include increased verticality at 2 No. blocks (D and F) and a reduction in height of 3 No. blocks arising from a revised construction detail and reduced floor to ceiling heights. Modifications to the building footprint at Block F were also highlighted and it was explained that this change is predicated on creating a visual break at the termination of the boulevard and to reduce wind impacts by design (consequently reducing the number of apartments that require winter gardens).

Furthermore, an overview of the landscape masterplan was presented with a focus on the rationale for a new ‘water-based’ concept which is predicated by the podium design of the scheme which cannot readily accommodate a significant number of mature trees.

Open Space

The Local Authority advised that there is significant pressure for publicly accessible open space in Sandyford including public play facilities. The Sandyford Business Improvement District (BID) has been vocal in seeking more spaces for employees to eat outside etc.

SUPF Indicative Unit Limitation

The Design team queried the Planning Authority’s position regarding the cap on residential units in the ‘MIC’ zone having regard to recent changes to national policy directing that compact growth be provided at infrastructural nodes to maximise investment in public infrastructure and ensure sustainable development of scarce urban land. The Local Authority

advised that SUFP will likely be reviewed as part of the next Development Plan review but until that time the case will need to be made to the Board.

Studio Units

The Applicant advised that it is currently intended for there to be a number of west facing studio units with additional internal floorspace (beyond minimum standards) and a Juliet balcony in lieu of a full balcony. The design team advised that they would furnish an apartment layout of such units for review. The Planning Authority raised no immediate difficulty with this approach (subject to review). However following a review subsequent to the meeting, the Planning Authority confirmed that in their opinion some degree of private open space is required for all units albeit some units may be provided with private open space that does not meet the minimum standards provided in the Guidelines due to its BTR nature.

5.2 Pre-Planning Meeting No. 2 with Dún Laoghaire-Rathdown County Council – 18th June 2019

Dun Laoghaire Rathdown County Council	
Ger Ryan (BE)	Senior Planner
Naoimh Fleming (HC)	Senior Executive Planner
Marguerite Cahill (MC)	Executive Planner
Applicant and Design Team	
Amy Lee (RH)	Richmond Homes
Kenneth Beirne (KB)	Richmond Homes
Derek Byrne (DB)	Henry J Lyons Architects
Roldan Jacoby (RJ)	Henry J Lyons Architects
Sadhbh O'Connor (SOC)	Thornton O'Connor Town Planning

Height

In outlining the changes to the scheme since the first meeting, it was confirmed that Building D has been increased by a partial floor level to allow for the provision of a rooftop multi-functional room resulting in a part 17 No. storey building. Dún Laoghaire -Rathdown acknowledged the benefits of such amenity spaces but confirmed that as the proposed heights surpass the maximum height allowance for the site as outlined in the *Sandyford Urban Framework Plan* that an unfavorable comment in this regard would issue from Dun Laoghaire Rathdown County Council.

The design team explained their rationale for the increased height which included responding to a change in National and Local level policy direction which seeks to achieve compact growth at highly accessible locations such as the subject site in addition to seeking to provide an urban design 'marker' of the location at the transport interchange within Sandyford.

Cycle Parking

A key discussion point at the meeting had been the proposed provision of double stackers for cycle parking, which the Roads and Transportation Department were not favorably disposed to.

The design team had subsequently researched the potential omission of the stackers however the quantum of cycle parking would be significantly reduced and therefore a decision was taken to retain the stackers in order to achieve compliance with the standards of the *Apartment Guidelines 2018*.

Landscaping and Streetscapes

The Local Authority advised that the landscaping of the proposed scheme would need to link into the Rockbrook Phase II development.

The design team confirmed that the landscape plans developed allow the Rockbrook Phase II landscaping design to 'bleed in' to the subject scheme so that it is not discernible at street level where one scheme ends and the other starts.

5.3 Section 5 Tripartite Pre-Planning Meeting – 11th September 2019

The Section 5 Tripartite meeting took place in the offices of An Bord Pleanála on 11th September 2019. Thornton O'Connor Town Planning and Henry J Lyons Architects have prepared response documents (enclosed as separate documents) to comprehensively address the items raised at the Section 5 meeting.

The key design amendments since the Section 5 meeting include:

- The reduction in the quantum of units from 575 No. units to 564 No. units;
- Amendments to the unit mix to provide a greater number of larger units;
- Increase in car parking spaces from 272 No. to 285 No.;
- Increased creche area from 215 sq m to 354 sq m;
- Increased café area from 122 sq m to 141 sq m;
- Revised façade treatment;
- Introduction of a 75 No. Sheffield stands;
- Introduction of a variety of play equipment in the landscaping; and
- All units now benefit from a private balcony.

5.4 Part V

Part V requirements under the Planning Act (as amended) apply to Build-to-Rent developments. As outlined in *DHPCLG Housing Circular 36 2016, Section 96(3)* sets out 6 No. types of Part V agreement that may be made, which include:

1. Transfer of lands (section 96(3), paragraph (a));
2. Build and transfer of up to 10% of the proposed housing units (section 96(3), paragraph (b)(i));
3. Transfer of housing units on any other land in the functional area of the planning authority (section 96(3), paragraph (b)(iv));
4. Lease of housing units either on the site subject to the application or in any other area within the functional area of the planning authority (section 96(3), paragraph (b)(iva));
5. Combination of a transfer of land and one of more of the other options; and



6. Combination of options not involving a transfer of the ownership of land (section 96(3), paragraph (b)(viii)).

The Guidelines state that the particular circumstances of Build-to-Rent apartment projects may mitigate against the putting forward of acquisition or transfer of units and land options outlined above and the leasing option may be more practicable in such developments.

Please find enclosed Part V costing prepared by the Applicant which confirms that 56 No. units will be sold to the Local Authority.

6.0 PROPOSED DEVELOPMENT IN DETAIL

6.1 Description of the Proposed Development

Demolition

The development will principally consist of the demolition of the existing structures on site. The principle of demolishing the remaining structures on site was established under the extant scheme permitted under DLR. Reg. Ref.: D07A/0619 and ABP Ref.PLo6.301428.

Development

The development, which will have a Gross Floor Area of 49,342 sq m will principally consist of: the demolition of the existing structures on site and the provision of a Build-to-Rent residential development comprising 564 No. apartments (46 No. studio apartments, 205 No. one bed apartments, 295 No. two bed apartments and 18 No. three bed apartments) in 6 No. blocks as follows: Block A (144 No. apartments) is part 10 to part 11 No. storeys over basement; Block B (68 No. apartments) is 8 No. storeys over basement; Block C (33 No. apartments) is 5 No. storeys over lower ground; Block D (103 No. apartments) is part 16 to part 17 No. storeys over lower ground; Block E (48 No. apartments) is 10 No. storeys over semi-basement; and Block F (168 No. apartments) is 14 No. storeys over semi basement.

The development provides resident amenity spaces (1,095 sq m) in Blocks A, C and D including concierge, gymnasium, lounges, games room and a panoramic function room at Roof Level of Block D; a creche (354 sq m); café (141 sq m); a pedestrian thoroughfare from Carmanhall Road to Blackthorn Drive also connecting into the boulevard at Rockbrook to the west; principal vehicular access off Carmanhall Road with servicing and bicycle access also provided off Blackthorn Drive; 285 No. car parking spaces (254 No. at basement level and 31 No. at ground level); 21 No. motorcycle spaces; set-down areas; bicycle parking; bin storage; boundary treatments; hard and soft landscaping; lighting; plant; ESB substations and switchrooms; sedum roofs; and all other associated site works above and below ground.



Figure 6.1: Proposed CGI.

Source: Visual Lab, 2019.

6.2 Key Site Statistics

Site Area:	15,426 sq m (1.54 ha)
Extent of Demolition proposed:	1,145 sq m
Gross Floor Area (above ground):	49,342 sq m
Total Floor Area (including carpark Lo & L1):	58,931 sq m
Site Coverage ⁸ :	31.6%
Plot Ratio:	3.19
No. of Units per Ha.	365.6 No.
Communal Internal Amenity Space:	1,095 sq m
Car Parking Spaces:	285 No. [254 No. at Level 0 & 31 No. at Level 1]
Cycle Parking Spaces:	1,178 No.
Motorcycle Parking Spaces:	21 No.

Proposed Heights	
Block	Maximum Height
A	34.63 metres
B	25.62 metres
C	16.63 metres
D	52.38 metres
E	31.63 metres
F	43.63 metres

6.3 Separation Distances

The proposed development presents heights ranging from 5 No. storeys (Block C) to part 16 – part 17 No. storeys (Block D) which vary over semi-basements, basements and lower ground floors, as described at Section 1.2.

Blocks A, B and C are built up to the shared western boundary with Rockbrook Phases I and II. We note that the positioning of Blocks B and C align with the eastern elevations of Rockbrook Phase I, therefore creating a courtyard within the subject site between these Blocks. The internal separation between Blocks B and C is 31.53 m. In addition, a landscaped external area measuring 23.38 m is also provided between Blocks A and B along the boundary, which will facilitate a pedestrian connection between the subject site and Rockbrook.

Block C is setback 12.53 m from the red line boundary on Blackthorn Drive, with Block E set back an additional 44.4 m, facilitating a proposed pocket park.

⁸ The overall site coverage amounts to c. 41.3% of the site area. Considering the communal use of the Level 2 podium over the carpark, it is worth noting that the site coverage notably reduces, equating to 31.6% of the site area.

Block E and F are situated between 9.7 m and 10.98 m from the from the eastern boundary, noting that the buildings to the east are commercial and educational (temporary permission for a school) in nature.

Ground floor setbacks of more than 8 m are provided from Carmanhall Road with extensive public realm and landscaping proposed as discussed within the enclosed Landscape Report prepared by Bernard Seymour Landscape Architects.

The part 16 – part 17 No. storey tower element is situated 23.7 m from the eastern boundary respectfully. It is considered that Block D will not result in a material negative impact on the residential amenity of existing development at Rockbrook or the low density dwelling houses located further north by virtue of the substantial separation distances provided.

The proposed scheme largely follows the footprint of the extant scheme at the subject site as illustrated below at Figure 6.2.

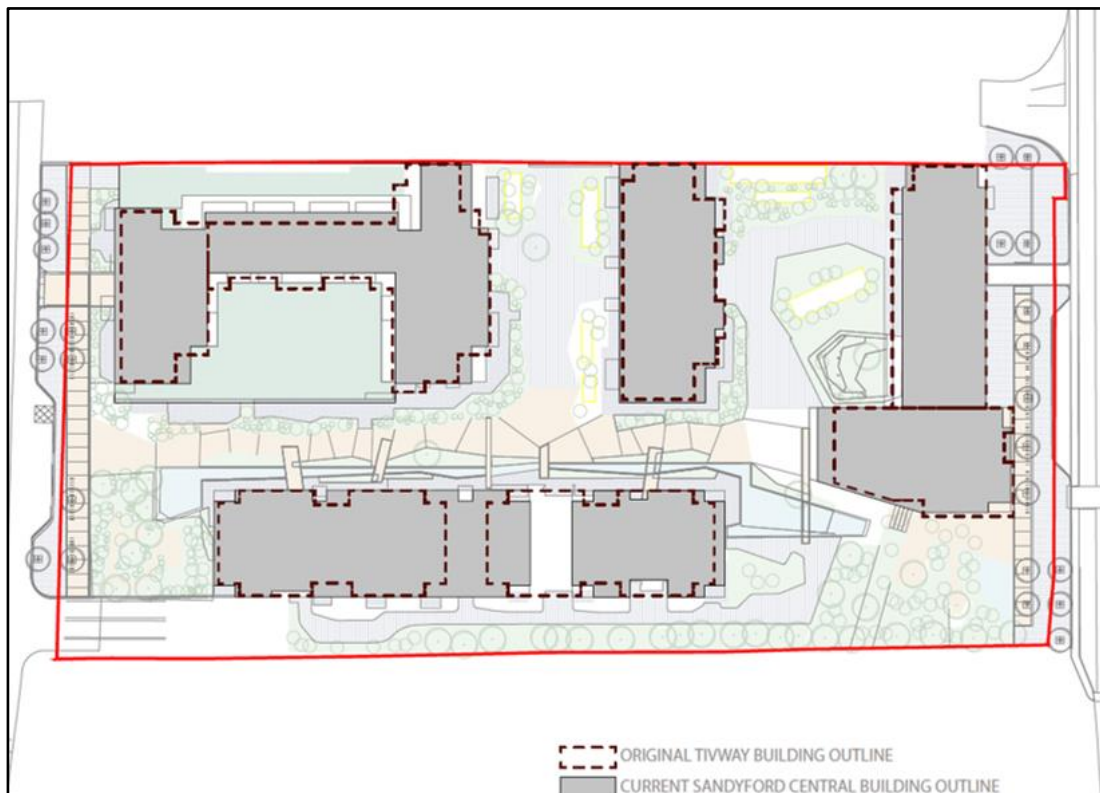


Figure 6.2: Overlay of the Proposed and Extant Schemes at the Subject Site.

Source: Henry J Lyons, 2019.

We refer to the Daylight/Sunlight Study prepared by O’Connor Sutton Cronin Consulting Engineers which demonstrates that across the entire development excellent levels of internal daylight are achieved.

‘The analysis confirms that across the entire development excellent levels of internal daylight are achieved. A 95.6% compliance rate is achieved across the entire development’

In addition, the report notes that no material impacts will occur on neighbouring properties when compared to the currently permitted scheme.

6.4 Height and Massing

In regard to the proposed height and massing of the scheme we refer to the Design Statement prepared by Henry J Lyon Architects which states the following in respect of the highest proposed structure at Block D:

'On Blackthorn Drive, the height to adjoining Rockbrook site is maintained on Block C, with a substantial height increase at the corner on Block D providing an appropriate scale and identity to mark the main access point to Sandyford Central. The taller element of the proposed scheme also appropriately marks the location of the transport hub on Blackthorn Drive envisaged in the SUFP 2016-2022, and the access locations at street level of the communal amenities block.

Block D comprises of 16 levels of residential accommodation and a communal room with roof garden on Level 17. It is located at the furthest point from Lakelands Close, and, by virtue of its location, orientation and distance from this established suburban estate, the proposal avoids impact on the privacy and daylight amenity of the existing residents.

The rooftop multi function room located on Level 17 with panoramic views provides a unique identity to the highest structure in the scheme, reinforcing its urban presence in front of the Luas stop.'

The Landscape and Visual Impact Assessment which forms Chapter 8 of the accompanying Environmental Impact Assessment Report outlines that:

'The insertion of the proposed development into the Sandyford Business District is entirely in keeping with the existing built context and the future planned context for the area.

The proposed development is a well-researched and well-conceived scheme. It is sensitive to the context in which it sits but is not afraid to declare its presence. The case for such higher rise development in this part of the Sandyford Business District has a number of precedents and contributes positively to the planned urban context.

In relation to the issue of height, the building design broadly meets the criteria the Council considers important as set out in the Sandyford Urban Framework Plan (2016-2022). Whilst Block D as proposed currently exceeds the 14 storey height limitation for the lands as included in the Sandyford Urban Framework Plan, the Plan nevertheless envisages high rise, high density residential development for this site and the additional height proposed is appropriate in the circumstances - it sensitively conveys a gateway to the Sandyford Mixed Inner Core Area of the Business District at its main point of arrival. In addition, the proposed scheme is of high quality design; it is appropriately contemporary and stylish; and it makes a positive contribution to the existing skyline.'

Furthermore, the Daylight Sunlight Analysis (enclosed as a standalone document) and Wind Assessment (enclosed as Chapter 13 of the EIAR) demonstrate that no significant and long term negative 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 road frontage and in proximity to high frequency public transport.

6.5 Density

The subject scheme proposes 564 No. Build-to-Rent apartment units. The proposed gross residential density is calculated below:

$$\frac{564 \text{ No. Units}}{1.54 \text{ ha}} = 365.6 \text{ No. Units Per Hectare}$$

Given the precedent set out in the extant permission for 460 No. units (a density of 298.7 units per ha) and the adoption of national policy which seeks greater densities as set out in Section 4.2 and 6.5, it is considered that the subject site is eminently suitable to cater for a high density development. It is important to note that a substantial number of the 'additional units' are being provided within the permitted building forms as 'Build -to-Rent' typologies are typically more compact in design. We note that national policy seeks higher buildings of greater density in close proximity to key nodes of public transport, as such it is considered appropriate that this site is utilised for increased density to provide a greater number of homes in a highly accessible and sustainable location using the Build-to-Rent model, which provides security of tenure.

The proposed density is discussed in further detail at Sections 7.2 and 7.4 in the context of national and local policies respectfully.

The currently proposed scheme provides for 1,726 No. of bedspaces, in comparison the extant permission provides for 1,793 No. of bedspaces. Therefore, it is clear that whilst the subject scheme provides a greater number of units the density of the scheme having regard to population will be lower in the subject scheme having regard to the higher number of smaller unit types responding to market demand in the area and changing household demographics.

6.6 Design Rationale

The Design Statement prepared by Henry J Lyons Architects and the Landscape Report by Bernard Seymour Landscape Architects are enclosed as separate documents, and both demonstrate the primary concept of the proposed development which is to appropriately integrate the development into the surrounding area and to provide an architecturally sympathetic development to the existing urban morphology which is currently undergoing significant re-development. A fundamental tenet of the design approach is to provide a high quality residential scheme with excellent resident facilities for future occupants of the scheme and bright spacious apartments that include private laundry facilities in each unit, generous floor to ceiling heights (with ground floor level units benefiting from floor to ceiling heights of 3.5 metres) and indoor and outdoor social interaction and relaxation spaces.

6.6.1 Open Plan Apartments

The scheme has been developed to maximise open plan apartment layouts which will result in larger and brighter living room/ kitchen spaces. Each apartment provides and, in some cases, exceeds the required floor area and standards as set out in the *Apartment Guidelines, 2018* relating to apartment and associated room sizes.

Henry J Lyons Architects state in their Design Statement that:

'Apartments have been designed in line with the 2018 Residential Guidelines based on an open plan arrangement.'

'The provision of dual aspect apartments has been maximised in the different building through building form and a careful consideration of the appropriate number of apartments per core in each block.'

The Architectural set of drawings prepared by Henry J Lyons Architects include typical apartment layouts (Drawing Nos. SFC-HJL-XX-ZZ-DR-A-8100 to SFC-HJL-00-XX-ZZ-A-8105 inclusive). Furthermore, a Housing Quality Assessment (HQA) has also been prepared by Henry J Lyons Architects demonstrating that each apartment type meets and in certain circumstances exceed minimum room requirements. The HQA is enclosed as part of the Architectural Design Statement.

6.6.2 Resident Amenities

The proposed scheme provides 1,095 sq m of resident amenities between Blocks A, C and D as described illustrated at Figure 6.3 below.

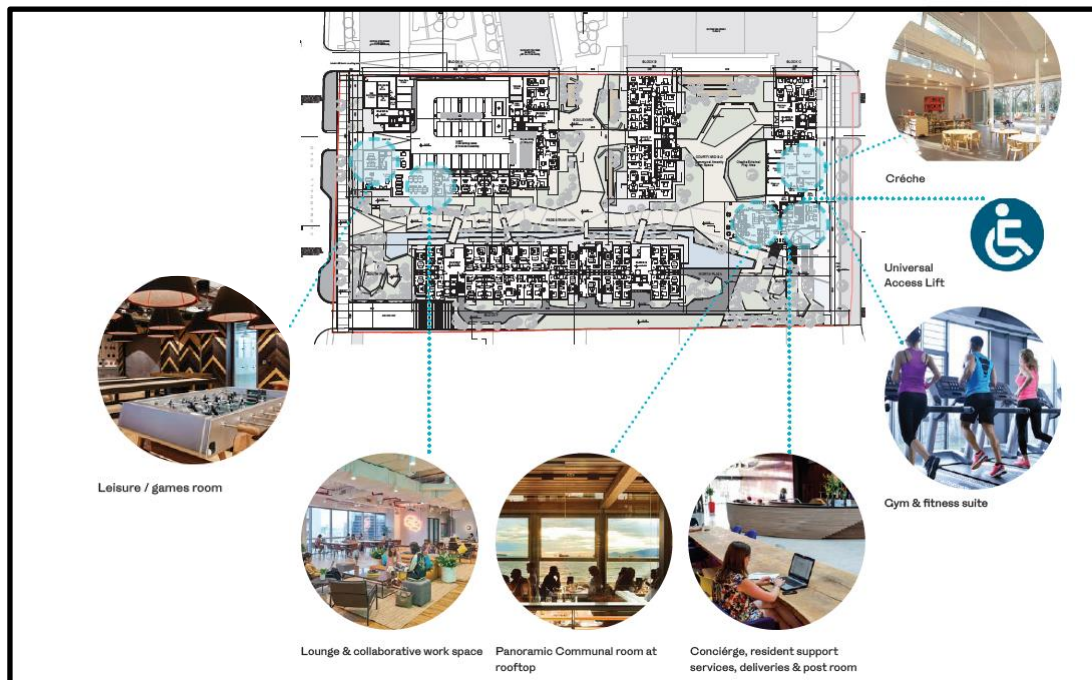


Figure 6.3: Location of Resident Amenity Areas.

Source: Henry J Lyons, 2019.

The resident amenities of Block C and D front Blackthorn Drive providing an active frontage. The concierge is located within the Entrance Lounge of Block D with administration and managers offices to the rear. A gym (253.6 sq m) is also provided at this lower ground level at Block C. At podium level an open plan lounge and study space are proposed. This multi functional space will provide opportunities for communal events and working from home areas outside of the residents private apartment. The open plan space provides direct access to the café which opens up onto the courtyard between Blocks B and C creating an inviting and useable space for all residents.

Resident facilities are also provided in Block A fronting Carmanhall Road including a concierge, lounge and games room.

We note that the provision of resident amenities at both entrances to the site creates an active frontage along Carmanhall Road and Blackthorn Drive whilst also providing choice to the future residents of the scheme. The amenity spaces have been positioned and designed to ensure equal access for all residents. Indicative images of the resident amenity areas are provided below:

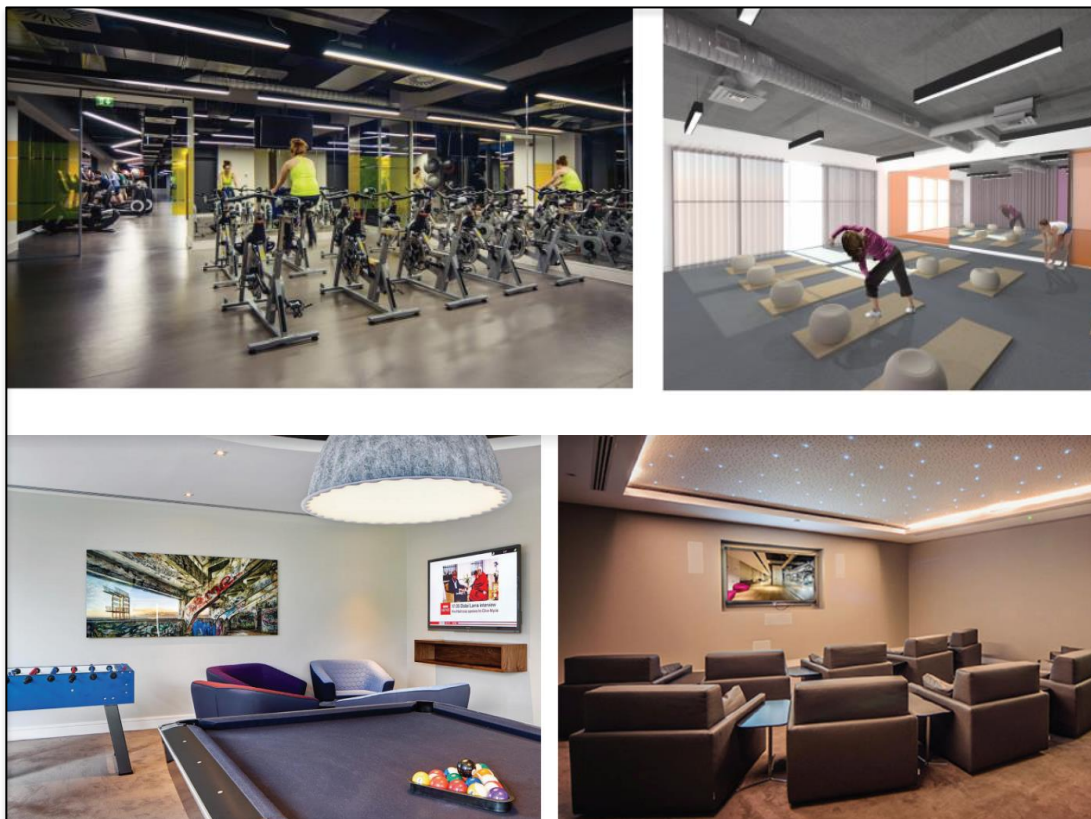


Figure 6.4: Resident Amenity Facilities.

Source: Henry J Lyons, 2019.

In addition to the aforementioned resident amenity areas, a function room/communal meeting room is provided at the 17th level of Block D and opens onto a roof garden. The communal meeting/function room at this level will be a feature statement of the development providing long range landscape views. The layout of the 17th level is provided below.

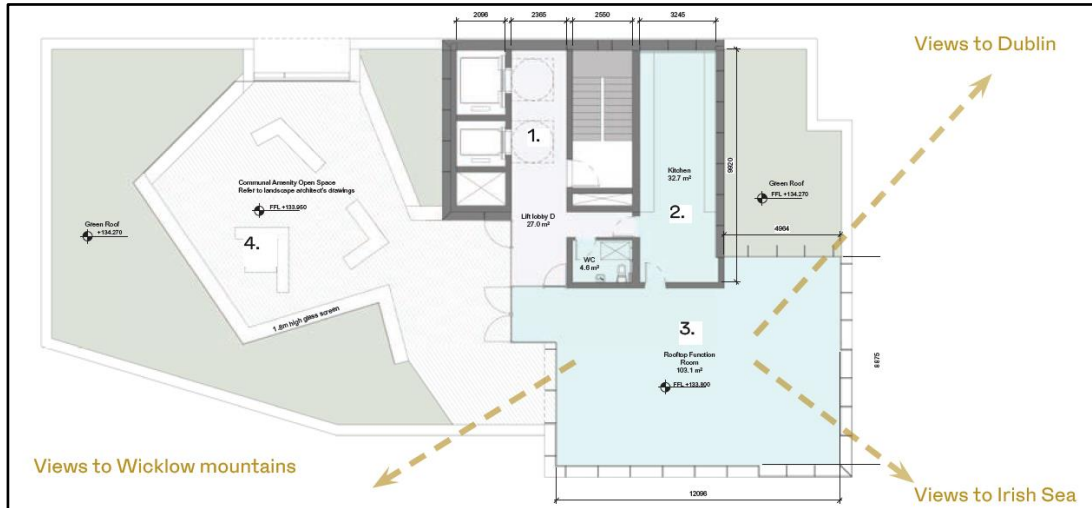


Figure 6.5: Proposed Block D Multi-Function Space.

Source: Henry J Lyons Architects, 2019.

6.6.3 Creche

A creche measuring 354 sq m is provided at podium level of Block C. The creche can be accessed directly from this podium level or via the publicly accessible lift provided at lower ground floor fronting Carmanhall Road.

Although it is anticipated that the creche will primarily serve the needs of the residents who will drop their children off by foot, a designated lay-by area is provided on Carmanhall Road for short term use.

The indicative layout of the crèche provides 5 No. classrooms and an enclosed external play area.

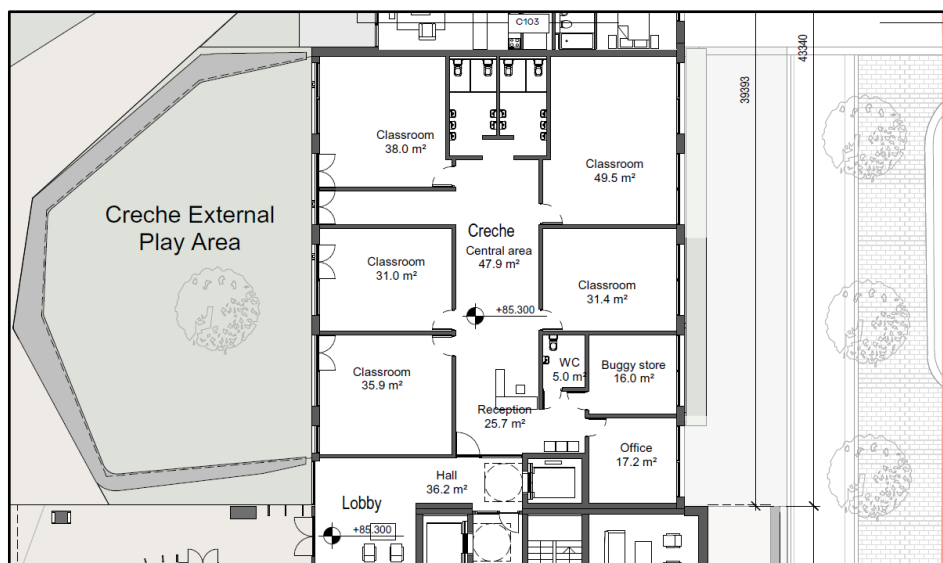


Figure 6.6: Proposed Creche.

Source: Henry J Lyons Architects, 2019.

A Creche and Schools Demand Assessment has been carried out by Future Analytics and is submitted as part of the application. The Assessment outlines that the proposed creche is in accordance with the *Guidelines for Planning Authorities on Childcare Facilities (2001)*

6.6.4 Café

A café (141 sq m) has been provided at podium level of Block D, its strategic corner positioning with full length glazing allows for an active frontage with the proposed landscaped external areas providing additional seating. The café is intended to create a vibrant and active community during the day and will also assist in creating a sense of place engaging the public as they traverse the site from the Luas to the Beacon area. The cafe is positioned adjacent to the creche to provide a complimentary use.

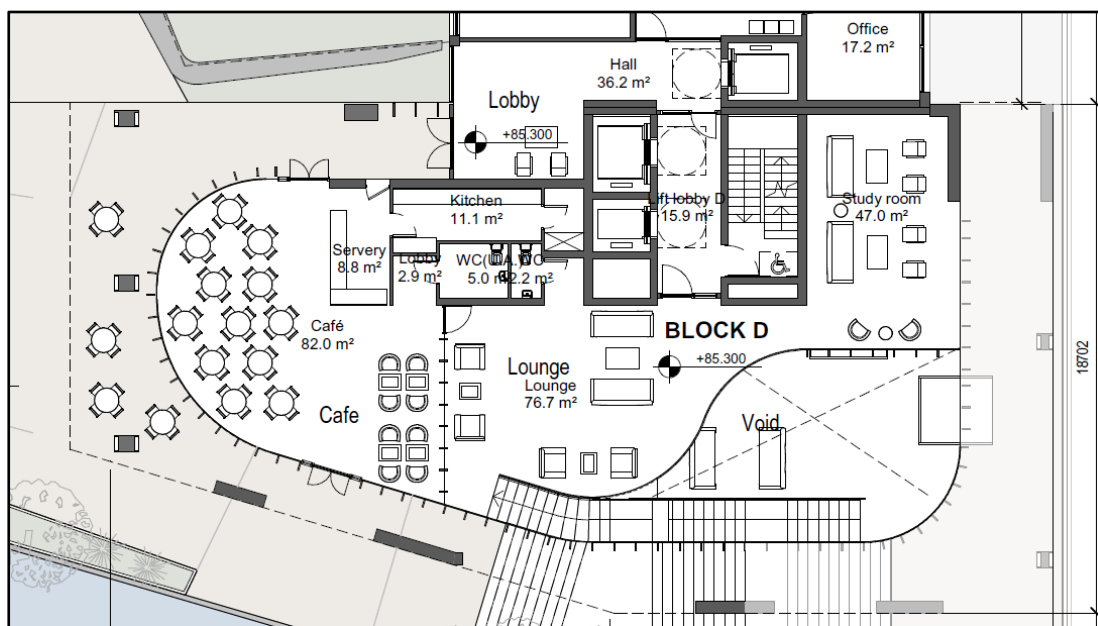


Figure 6.7: Extract from Proposed Landscape Plan Illustrating the Location of the Proposed Café.

Source: Henry J Lyons Architects, 2019.

6.6.5 Landscaping

The overarching design concept behind the podium landscape design is to create a lush, 'green' environment that responds to the architectural structure of the 6 No. blocks. The key tenet of the landscaping proposal is to create a functional and enjoyable area for the residents of the scheme. A design focused on water was deemed the most appropriate response to the podium design schematic. The water will assist in creating a unique and peaceful character in this urban area.

The north-south pedestrian route from Blackthorn Drive to Carmanhall Road naturally creates the main spine with smaller pockets parks and courtyards located at either side. Each space has achieved a distinct character whilst simultaneously integrating into the wider landscaping masterplan. We refer to the Landscape Masterplan and Landscape Report

prepared by Bernard Seymour Landscape Architects which details the various character areas including a Sensory Experience Park, Toddler Play Area, Outdoor Gym Area, Courtyard Lawn and Rooftop Terrace.

The proposed Landscape Plan has been designed with consideration of the existing landscape character of the site and surrounding area. The proposed scheme will bring movement to the communal spaces with the presence of water and create a more naturalistic landscape design that wraps around the buildings. The proposed materials and planting are detailed in the Landscape Report prepared by Bernard Seymour Landscape Architects.



Figure 6.8: Proposed Circulation and Spaces.

Source: Bernard Seymour Landscape Architects, 2019.

The distinction between public, communal and private spaces at ground level has been achieved through level changes and landscaping, the hierarchy of footpaths and proposed materials.

External amenity

We note a number of key features proposed within the Landscape Masterplan including the water feature that runs through the scheme. This feature adds to both the visual amenity and wayfinding of the scheme.

The Landscape Report states that:

'The asymmetry of the water rill shape and its sense of engaging on the pedestrian route gives a feeling of the space being configured mainly for the pedestrian, notwithstanding this a swept path analysis establishes that the fire tender requirements are fully

developed here too. Moreover, it creates a clear division between the public and the private terraces along blocks E & F'.

Play Equipment

The Landscape proposal has been designed with consideration of a wide range of ages and abilities, for instance the Sensory Park incorporates equipment involving movement and sounds that are typically seen in rehab clinics and retirement homes. The Landscape Report outlines that the Sensory Park will *'enhance the sense of explore'*.

Suitable child friendly play equipment is provided within the landscaped pocket park at Blackthorn Drive, in addition to outdoor gym equipment. The variety of equipment caters for residents and visitors of different ages and ability.

Trees

An Arboricultural Report prepared by the Tree File and enclosed as part of this planning application sets out that:

'the proposed development and its constituent parts that comply with current development expectations and planning densities, require the unavoidable consumption of space to provide for the proposed apartment blocks and basement parking, access roads and paths, as well as various other services and facilities'.

Furthermore, noting that the:

'contextual and sustainability issues have arisen, substantially undermining any potential to retain existing site trees.'

The Report outlines that the proposed Landscaping designed by Bernard Seymour Landscape Architects will mitigate against the removal of the existing trees on site.

6.6.6 Materials

The comprehensive Design Statement prepared by Henry J Lyons Landscape Architects details the proposed materials for each Block.

The material palette is designed to create a unified 'neighbourhood' feel, with brick in complementary tones being the primary material. Visual interest and a sense of individual building identity is created through subtle changes in brick colour from block to block.

The Design Statement outlines that:

'Brick is a traditional residential material and is highly durable. Window frames, balustrades, copings and gates are tonal greys to tie these elements into the wider material strategy. By using the brick in different formats and coursing, another layer of texture is introduced to subtly articulate the levels of the elevations within a coherent and harmonic composition.'



Figure 6.9:
Proposed Material Palette.
Source:
Henry J Lyons Architects,
2019.

7.0 PLANNING POLICY CONTEXT

7.1 Relevant Development Management Standards

The purpose of this section is to detail the relevant current development policies and guidelines applicable to the proposed Build-to-Rent development at the former Aldi site as described at Section 1.2 of this report. The Statement of Consistency submitted with this planning application sets out a full assessment of the consistency of the proposed development with national, regional and local policies.

The key national documents in assessing the subject scheme are the *National Planning Framework – Project Ireland 2040*, the *Urban Development and Building Heights Guidelines for Planning Authorities, December 2018* and the *Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018*. At a local level, the *Dun Laoghaire – Rathdown County Development Plan 2016 – 2022* is the statutory plan for the area and guides development relating to the subject site. The *Sandyford Urban Framework* forms Appendix 15 of the Development Plan and will be discussed throughout Section 7.3.

7.2 National Policy

7.2.1 National Planning Framework – Project Ireland 2040

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

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

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

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

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

*‘**Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and***

upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities. [Our Emphasis].

Therefore, it is our opinion that the NPF supports the provision of the proposed 564 No. Build-to-Rent apartment development through increased density and height at the subject site having regard to the brownfield, underutilised status of the site in close proximity to the Stillorgan Luas stop as well as a range of services and facilities to serve the future tenants. The NPF is discussed in further detail at Section 4.2 of the Statement of Consistency prepared by Thornton O'Connor Town Planning.



Figure 7.1: Proposed CGI.

Source: Visual Lab, 2019.

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

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

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

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

Specific Planning Policy Requirement 3 of the Height Guidelines notes that developments incorporating increased building heights must satisfy specific criteria. We refer to Section 4.5 of the Statement of Consistency and Section 4.2 of the Material Contravention Statement submitted with this planning application which provides a robust assessment of how the proposed development satisfies this specific criterion. The Material Contravention Statement prepared by Thornton O'Connor Town Planning provides a comprehensive rationale and in depth analysis of the proposed height at the subject site.

Notwithstanding the above, we note that the Height Guidelines state the following:

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

The subject site is well served by public transport with Stillorgan Luas stop located less than 100 m from the subject site and multiple bus stops located along Blackthorn Drive and within walking distance to the subject site.

It is considered that the proposed development providing heights of 5 No. (Block C) to part 16 - part 17 No. storeys (Block D) and comprising 564 No. Build-to-Rent apartment units, in addition to a café and creche at the subject site represents the proper planning and sustainable development of the area as heights have been increased in an appropriate urban location that has excellent public transport access.

We submit that the subject lands are ideally located to accommodate increased height and density without having adverse impacts on the receiving environment. The development as proposed is in accordance with the clear direction in recent national legislation to increase height and density in appropriate locations and the proposed development can be successfully assimilated into its context. The height of the development in respect of local policy is discussed at Section 7.5.

We note that an LVIA and Wind Assessment have been carried out as part of the accompanying EIAR (Chapter 8 and 13), in addition a Daylight Sunlight Analysis has been prepared and is submitted as part of this application. When comparing the results to the extant scheme these reports demonstrate that the development will have no negative impacts on the receiving environment.

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

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

Authorities, 2018 in March 2018. We note that the Apartment Guidelines were briefly addressed at Section 2.3 of this report, with a comprehensive analysis provided at Section 4.6 of the Statement of Consistency.

As noted at Section 2.2 of this report, the guidelines outline that 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'.

Build-to-Rent as a housing typology offers the opportunity to accelerate the delivery of new housing and provide enhanced security of tenure to future residents. The proposed development of a 564 No. unit Build-to-Rent scheme will contribute towards allowing Build-to-Rent to emerge as its own residential segment within the functional area of Dún Laoghaire-Rathdown County Council.

We re-iterate that it is considered that the subject site is located within an accessible urban location as set out the Apartment Guidelines, which states:

'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- ***Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions; and***
- ***Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or LUAS).'***

As discussed in detail in Section 2.2 and 2.3 of this Report, it is noted that the Stillorgan Luas stop is located less than 100 m from the subject site, which is located along the green route. In addition, the subject site is located within walking and cycling distance of a multitude of employment locations. We highlight that Sandyford is identified with the Development Plan as being the most significant employment node within the County boundary as shown at Figure 2.1.

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

The Apartment Guidelines recognises the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect household formation and housing demand. The proposed application comprising 564 No. Build-to-Rent units will therefore provide an alternative housing accommodation type for people seeking residential accommodation in Dublin.

We note that 56 No. Build-to-Rent studio units are proposed to address the demand for suitable and affordable tenure not readily seen in the Sandyford area. The provision of studio units responds to changing demographics and household formation which allow for choice of tenure. According to the 2016 CSO, 8.6% (676 No.) of all households in the Dundrum – Balally ED are single occupancy. Furthermore, noting that 5,456 No. persons in the Dundrum – Balally ED are within the typical working age (19-64 No. years old) which represents 67.9% of the total population⁹.

Notwithstanding the detailed analysis of the SPPR requirements in the Statement of Consistency, SPPR3, SPPR7 and SPPR8 are discussed below:

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:	
Studio Apartment (1 person)	37 sq m
1 No. bedroom apartment (2 persons)	45 sq m
2 No. bedroom apartment (4 persons)	73 sq m
3 No. bedroom apartment (5 person)	90 sq m

The floor area parameters set out in SPPR 3 above have been achieved in the design of all units in the subject development.

Specific Planning Policy Requirement 7

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

BTR development must be:
<p>(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;</p>
<p>(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:</p> <p>(i) <u>Resident Support Facilities</u> - comprising of facilities related to the operation of the development for residents such as laundry facilities,</p>

⁹ http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=CTY31&Geog_Code=2AE19629149F13A3E0550000000001#SAPMAP_6_630

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 relation to part (b) of SPPR7, the proposed scheme will provide high quality communal and recreational amenity areas including concierge, gymnasium, study area, lounge areas, games rooms and function room. The individual units will benefit from private laundry facilities.

It also proposed to provide outdoor recreational amenity spaces comprising public open space (4,117 sq m) and communal open spaces (4,761 sq m) which represents 58 % of the site area. This will ensure that a high-quality standard of living will be provided for the future tenants.

Specific Planning Policy Requirement 8

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

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

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

1. The scheme provides 46 No. Studios (8.2%), 205 No. one bed apartments (36.3%), 295 No. two bed apartments (52.3%) and 18 No. three bed apartment (3.2%), albeit there are no restrictions on dwelling mix in Build-to-Rent schemes;

2. The proposed Build-to-Rent apartments meet and, in some cases, exceed the standards set out in relation to apartment sizes, storage and private amenity space; and
3. The site is located in an accessible urban location as discussed earlier in this section therefore reduced car parking is proposed (285 No. car parking spaces to serve the development)

The subject Build-to-Rent scheme is fully in accordance and consistent with the criteria set out in the *Apartment Guidelines, 2018*.

Dwelling Mix

It is our understanding that the proposed Build-to-Rent development subject to this application is the first such development of this residential typology in the Sandyford area. We note that the Rockbrook Phase II (Build-to-Sell) application recently permitted by An Bord Pleanála will provide the following unit mix:

Rockbrook Phase II		
Type	No.	%
Studio	32	7
1 Bed	122	29
2 Bed	251	59
3 Bed	23	5

By comparison the proposed development comprises:

Subject Scheme		
Type	No.	%
Studio	46	8.2
1 Bed	205	36.3
2 Bed	295	52.3
3 Bed	18	3.2

Therefore, the Rockbrook scheme provides 64% larger units (2 and 3 bed units) and 36% smaller units (studio and 1 bed units) whilst the subject scheme provides a complementary mix of 55% larger units and 45% smaller units.

Given the changing population demographics and the very high rental prices in Dublin, the provision of studio apartments will address the demand for suitable accommodation that is not typically catered for in traditional Build-to-Sell models. The provision of a greater number of studio apartments will contribute to alleviating the acute housing shortage prevailing and the significant demand that exists in the Sandyford area. The proposed 'Build-to-Rent' model will meet the housing needs of a greater number of persons, in particular young workers in Sandyford.

Communal Open Space

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

Minimum Floor Areas for Communal Amenity	
One bedroom	5 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

The development proposes to provide 4,761 sq m outdoor communal amenity space (in addition to high quality public open space of 4,117 sq m), which represents 31% of the site area. The development proposes to provide 46 No. studio apartments, 205 No. one bedroom units, 295 No. two bed units and 18 No. 3 bed unit which results in a total requirement for 3,482 sq m to accord with the minimum areas for communal amenity space set out in the Guidelines, thus exceeding the minimum standards by 1,279 sq m.

In addition to the outdoor communal amenity space and outdoor public open space, the development will also provide dedicated internal communal space of 1,095 sq m including gymnasium, study area, games room, lounges and function room ensuring that high quality internal and external communal amenity space is provided for future tenants.



Figure 7.2 and 7.3: CGI of Proposed Scheme.

Source: Visual Lab, 2019.

Dual Aspect

We highlight that a minimum of 33% dual aspect units are required in more central and accessible urban locations such as the subject site, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure attractive street frontage where appropriate. The subject scheme proposes 57% of the units as dual aspect. The proposed scheme fully accords with the Apartment Guidelines, 2018, thus demonstrating the high quality of the scheme.

Car Parking

The *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities*, March 2018 states the following:

'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' [Our Emphasis]

As the subject lands are located proximate to public transport services (c. 100 m) the proposed development has been provided with 285 No. car parking spaces which represents a ratio of 0.5 spaces per residential unit.

Please refer to the enclosed Transport Impact Assessment prepared by O'Connor Sutton Cronin Engineering Consultants for further details.

Having regard to the proposed Build-to-Rent model, which will generate less parking demand than a standard residential development and the excellent public transport in the vicinity, it is considered that this level of parking is appropriate.

Bicycle Parking

The Apartment Guidelines state that:

'a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.'

In accordance with the *Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities*, March 2018, some 1,178 No. cycle parking spaces are proposed as set out below.

Provided Spaces	Stacked Parking	Sheffield	Subtotal
Level 0	786 No.	102 No.	888 No.
Level 1	110 No.	30 No.	140 No.
Public Realm		150 No.	150 No.
Total Provision	896 No.		1,178 No.

7.3 ***Dún Laoghaire-Rathdown County Development Plan 2016-2022***

The *Sandyford Urban Framework Plan* (SUFPP) forms Appendix 15 of the current Dun Laoghaire Rathdown County Development Plan and thus will be intertwined in the discussion below.

7.3.1 Zoning

The subject site is zoned 'MIC' in the *Dún Laoghaire Rathdown County Development Plan 2016-2022*, where the stated objective is 'to consolidate and complete the development of the mixed-use inner core to enhance and reinforce sustainable development'. We note that lands zoned MIC form Zone 2 within the SUPF.

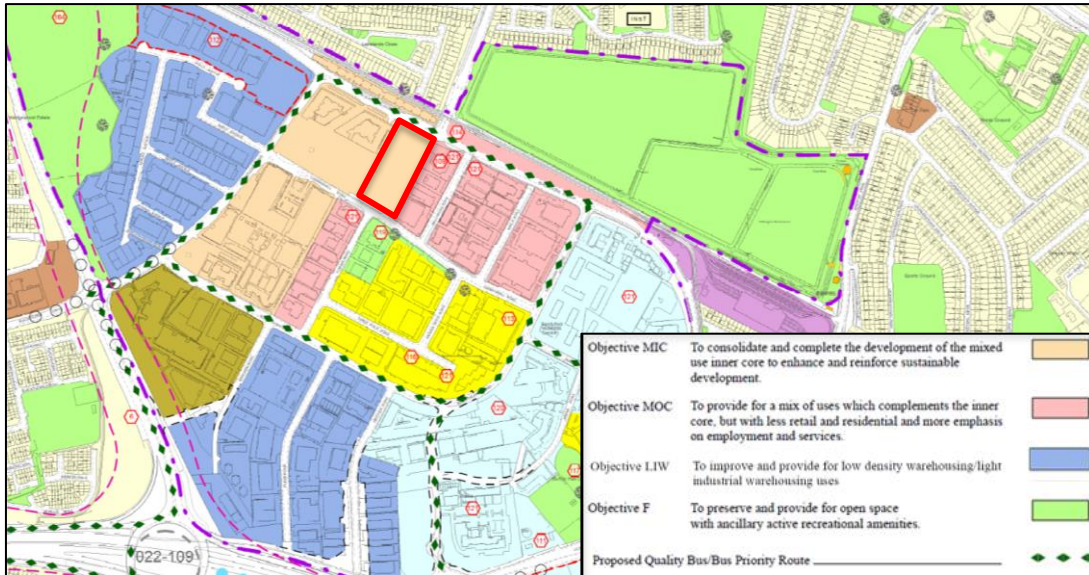


Figure 7.4: Zoning Map with Subject Site Outlined Indicatively in Red

Source: Zoning Map Extract (Map No. 6) from *Dún Laoghaire - Rathdown County Development Plan 2016-2022*.

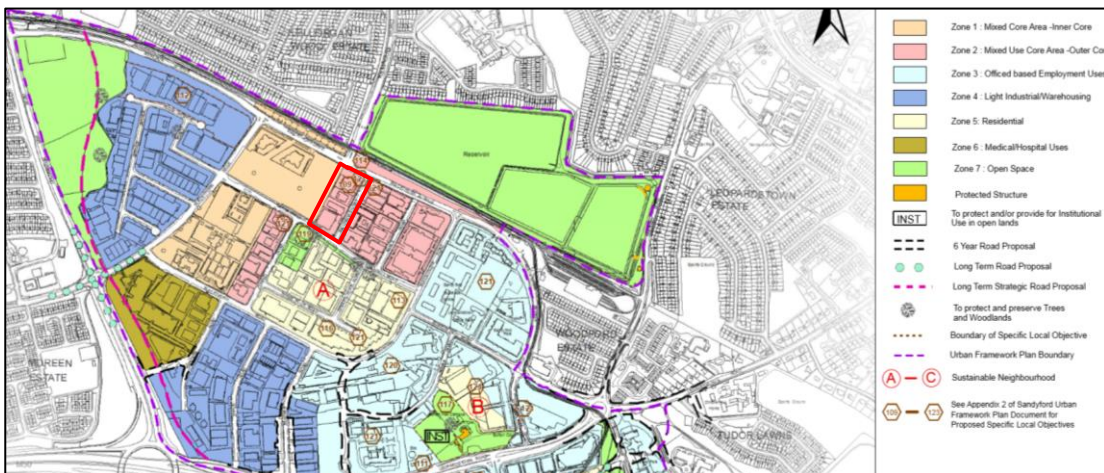


Figure 7.5: SUPF Zoning Map with Subject Site Outlined Indicatively in Red

Source: Zoning Map Extract from Appendix 15 of the *Dún Laoghaire - Rathdown County Development Plan 2016-2022 - Sandyford Urban Framework*.

The site does not contain any Protected Structures or any conservation designations. Blackthorn Avenue located to the north of the subject site is designated as a proposed quality bus/bus priority route. The proposed development which comprises 564 No.

residential units with ancillary resident amenities, creche and café are permitted in principle on the subject lands.

7.3.2 SUFP Unit Number Limitation

Objective MC₄ of the SUFP states that:

'it is an objective of the Council to limit the number of additional residential units within Zone 1 (MIC) and Zone 2 (MOC) to circa 1,300 residential units. Of these 1,300 residential units, 835 have planning permission as of October 2014. This scale of residential development accords with the SUFP 2011.' **[Our Emphasis]**.

The proposed scheme if granted will result in a total of 1,356 No. residential units within Zone 1 and Zone 2 of the current SUFP (calculation provided below). We highlight that the policy objective clearly states 'circa' 1,300 residential units and therefore is non exact in its quantitative guidance.

In our opinion the provision of a total of 1,356 No. residential units within Zones 1 and 2 of the SUFP complies with the policy set out above by reference to the inclusion of word '**circa**' in the policy which clearly demonstrates that it was not intended to be an exact limitation. In this regard we note that '**circa**' is defined in the Cambridge dictionary as '*approximately*'. As such the 56 No. units above this figure represents a negligible 6% excess. It is our professional planning opinion that 1,356 No. units is circa 1,300 No. units.

The calculation for the 1,356 No. units is provided below and has been prepared and agreed in conjunction with Dún Laoghaire Rathdown County Council. Furthermore, An Bord Pleanála have verified our calculations of unit numbers in the Inspector's Report for the Rockbrook Phase II development (Ref.: ABP-304405-19). The Inspector in their report states:

'The PA opinion concludes that there is capacity for c.413 units remaining within the 'Mixed Use Core Area' and that while the proposed development would exceed the cap by 15 units, this is an approximate cap and the proposed development represents a minor increase on the cap.'

The Inspector recognised the miscalculation of 413 No. units and continues on in their report to rectify the anomalies between the Board's calculations and the Local Planning Authority. The revised calculations have been taken into account by Thornton O'Connor Town Planning below:

Under the revised SUFP (adopted in March 2016), as part of the County Development Plan, it was stated that as of October 2014, 835 No. units have planning permission leaving a shortfall of 465 No. units. We have liaised with Dun Laoghaire Rathdown County Council and are advised that in July 2016 a further permission (D05A/1159E) withered thus releasing an additional 480 No. units into future capacity. Account is also taken to the extant permission pertaining to the subject site for 459 No. units. Also, permission has recently been granted permission for 84 No. apartment units in the Beacon South Quarter area (B₄) within the MIC zoning (Reg. Ref. D18A/0785). The Planning Authority have acknowledged that there was previously proposed 64 units on this B₄ site (D04A/0618) which was included in the original calculations and therefore the actual 'new' units over and above is 20 No. only (assuming it is constructed). An SHD has granted by An Bord Pleanála (Reg. Ref.: ABP-

304405-19) at Rockbrook Phase II for 428 No. units which brings the number up to 1,251 No. units. Therefore, there is remaining capacity for 49 No. units.

October 2014	835 No. units permitted leaving shortfall of 465 No. units (+465)	465
July 2016	Reg. Ref. D05A/1159E withered releasing an additional 480 No. units (+491)	956
July 2018	SHD ABP Ref. PLo6D.301428 granted permission for 459 No. units at subject site (extant permission) (-459)	497
June 2019	Reg. Ref. D18A/0785, ABP Ref. PLo6D.303738 granted permission for 84 No. units which is 20 No. new units as 64 No. previously permitted at site were included in calculations) (-20)	477
	SHD ABP Ref. PLo6D.304405 granted permission for 428 No. units at Rockbrook Phase II (-428)	49
Therefore, 49 No. units in addition to the 459 No. units (total of 508 No. units) already permitted at subject lands can be accommodated without exceeding 1,300 No. units within Zones 1 and 2 of the SUFP.		

As demonstrated in the table above, a quantitative analysis demonstrates that a total of 508 No. units may be accommodated at the subject site (previously permitted 459 No. in addition to 49 No. surplus units available) without exceeding 1,300 No. units. Thus, the proposed development of 564 No. units will result in an excess of 56 No. units beyond the indicative 1,300 No. unit target. Therefore, we calculate that the proposed development subject to this application will result in the development of 1,356 No. units within Zone 1 and Zone 2.

Since the Section 5 tripartite meeting the design has been subject to a number of design amendments resulting in the reduction of units from 575 No. to 564 No. which is reflected in the unit figure calculations agreed with Dún Laoghaire Rathdown County Council. Please refer to the correspondence with Dún Laoghaire – Rathdown County Council contained with

Appendix A of the Response to the Opinion document confirming their agreement our calculations.

It is our professional planning opinion that the excess of 56 No. units is marginal, and the policy is non exact by reference to 'circa', as such a material contravention statement is not required in this instance. We further note that the SUFP would have been drafted in circa 2015, significantly in advance of the publication of current national planning policy which seeks densification and increased height on the appropriate sites, such as the subject site. Finally, we also note that the Local Authority advised during pre-planning discussions that a review of the Development Plan is due to be undertaken in the coming months. Thus, in our professional planning opinion it is likely that this indicative cap will be amended to reflect current national policy direction to increase heights particularly at sites that benefit from high quality public infrastructure.

7.3.3 Infill Development

Section 8.2.3.4 (vii) of the Development Plan sets out the policy of Dún Laoghaire-Rathdown County Council concerning infill residential developments as follows:

'new infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.'

The current site is enclosed by temporary hoarding which will be removed following construction. The application is supported by a comprehensive Landscape Masterplan prepared by Bernard Seymour Landscape Architects which details boundary treatments.

The layout and form of the proposed scheme has been informed by the characteristics of the subject site and surrounding sites, in particular Rockbrook Phases I and II. The design of the proposed development provides an appropriate relationship with the Rockbrook developments with elements such as landscaping, and positioning of built forms comprehensively considered to seamlessly integrate with the Rockbrook schemes. In addition, the technical assessments including LVIA, Wind and Daylight Sunlight Analysis conclude that no material impacts on residential amenity will occur as a result of the proposed development, which has an additional height from the extant scheme.

The Daylight Sunlight Report prepared by O'Connor Sutton Cronin refers to the sunlight reflection noting that:

'the selection of materials play an important role in ambient daylight levels. The façade of the proposed buildings have been carefully selected to promote a sense of brightness and light'.

The proposed development will positively contribute to the surrounding area and will assimilate into its environment through the specific attention paid to the detailed design of the public realm.

7.4 Density

The proposed development provides 365.6 No. Units Per Hectare. We highlight that due to the Build-to-Rent nature of the development, 44.5% of the proposed units are either studios or one bed apartments which skews the density parameters and therefore we submit that the proposed density is not comparable to a general apartment development which would normally include a greater provision of three bedroom units and a lesser number of studios one bedroom units.

We note that Res₃ (Residential Density) and Res₄ (Existing Housing Stock and Densification) of the Development Plan seek higher residential densities. The aforementioned policies are discussed in detail at Section 6.3 of the accompanying Statement of Consistency.

It is re-iterated that the currently proposed scheme provides for 1,726 No. of bedspaces which compares to 1,793 No. bedspaces permitted in the extant scheme. Therefore, it is clear that whilst the subject scheme provides a greater number of units the density of the scheme having regard to population will be lower in the subject scheme having regard to the higher number of smaller unit types responding to market demand in the area and changing household demographics.

7.5 Building Height

Appendix 9 of the *Dun Laoghaire-Rathdown Development Plan 2016-2022* sets out a broad strategy for building heights in the County, with Section 4 of the Strategy detailing the policy approach against which building heights will be assessed.

Notwithstanding the above, the *Sandyford Urban Framework Plan, 2016* Objective 3 outlines that the '*building heights within Sandyford Business District ranges from 1 to 2 storey developments within the established areas of the Sandyford Business Estate and Stillorgan Industrial Estate to between 4/5 and 14 storey in recently permitted schemes within Sandyford Business Estate.*' The *Sandyford Urban Framework Plan, 2016* provides an indicative masterplan of suitable heights within Sandyford with the subject site shown with a '*Permitted/Developed Building Height*' of 5-14 No. storeys as shown below.

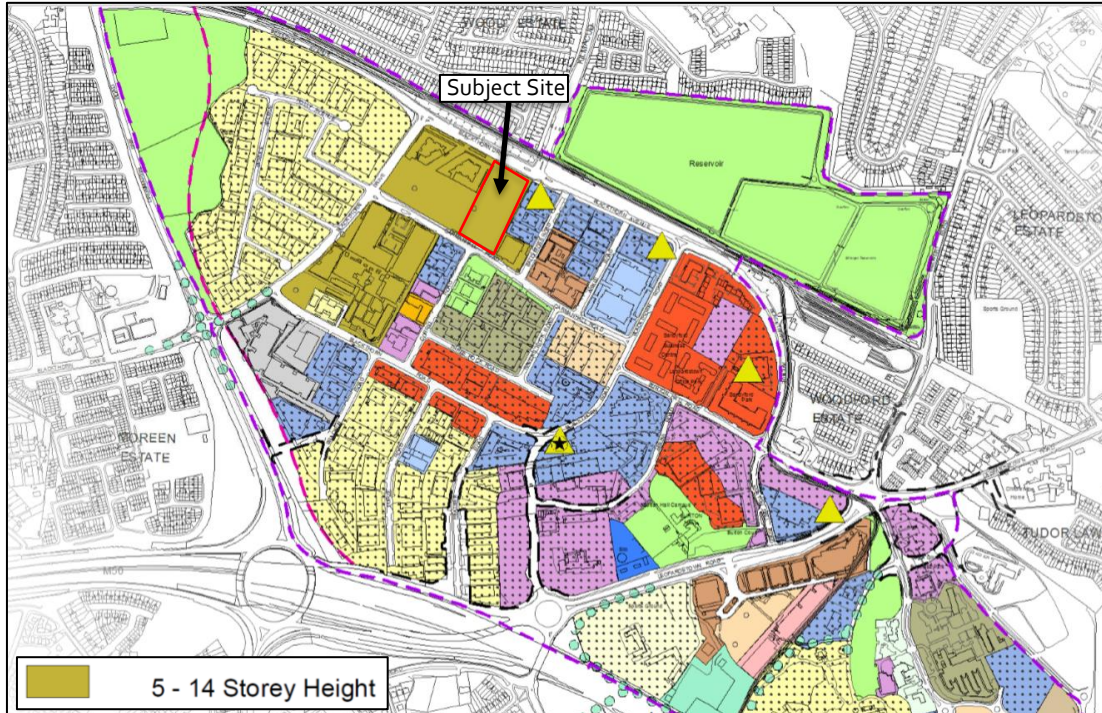
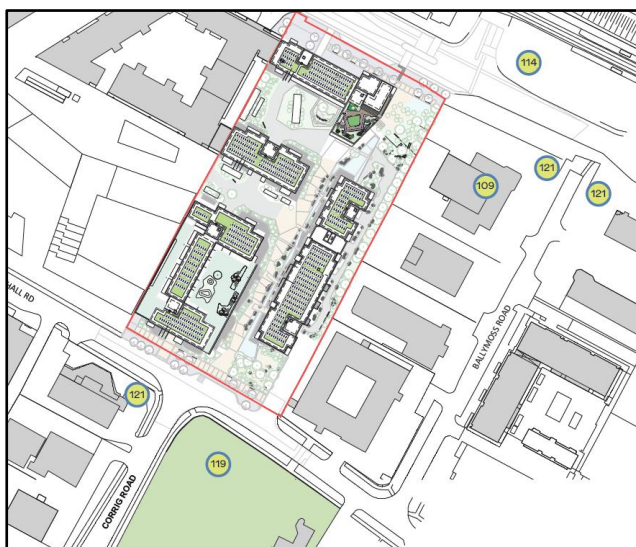


Figure 7.6: Map Showing the Building Heights Envisioned in Sandyford.
Source: Map No. 3 Sandyford Urban Framework Plan Annotated by Thornton O'Connor Town Planning).

The proposed development comprises a part 16 – part 17 No. storey element, as such the Material Contravention Statement prepared by Thornton O'Connor Town Planning has comprehensively addressed policy objective SUIP 3 and demonstrates that the proposed scheme responds to more recently published National and Regional level policy direction to achieve compact growth in order to compact urban sprawl.

Local Objectives

There are a number of Local Objectives in close proximity to the subject site as illustrated below.



- 119 To develop a Sandyford Business District Civic Park at the corner of Corrig Road and Carmanhall Road.
- 109 To seek the provision of a use that animates the street corners e.g. Hotel/Apart Hotel at north western end of Ballymoss Road at the junction with Blackthorn Avenue (Map 1). Building to be of notable design (Map 3).
- 114 To provide a Public Transport Interchange adjacent to the Stillorgan Luas Stop.
- 121 To ensure the provision of pocket parks and civic spaces in accordance with locations specified on Map 1 and Drawing no.10.

Figure 7.7: Local Objectives.

Source: Henry J Lyons Architects, 2019.

Although there are no local objectives identified on the subject site, those located in proximity to site have been considered throughout the design process. The subject site will provide direct north – south access from the pocket parks and civic spaces envisaged in Objective No. 121 located to the south of the site to the public transport interchange located to north of the subject site adjacent to the Stillorgan Luas stop.



Figure 7.8:
CGI of Proposed Scheme

Source:
Visual Lab, 2019.

7.6 Conclusion

The proposed development which provides a Build-to-Rent residential development of 564 No. apartments, fully accords with the zoning objective pertaining to the site, which has an extant permission for a residential scheme on the lands. A Material Contravention Statement has been submitted in respect to the proposed height of one slender block within the development. With the exception of height which contravenes local policy only, the proposed development is considered to fully comply with National, Regional and Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development and having regard to the location of the lands in close proximity to high-frequency public transport and a wide range of services. The design has sought to respond to the locational characteristics of the site proximate to low density houses to the north and high density apartments to the west yet provide a development that also responds to the



site characteristics and opportunities presented by a underutilised plot that is positioned on a key location in Sandyford. As such, it is considered the proposed development fully accords with the principles of proper planning and sustainable development.



8.o CONCLUSION

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

We submit that the subject site is ideally suited to the provision of a Built-to-Rent residential development due to its position proximate to the Stillorgan Luas stop which facilitates easy access to many employment locations, in addition to the multitude of employment opportunities within walking and cycling distance of the subject site.

The principal goal of the subject development, which seeks to provide 564 No. Build-to-Rent apartments with ancillary facilities and amenities on this key underutilised site in Sandyford is to increase housing supply on a strategically located large plot of underutilised land and contribute towards ameliorating the current housing crisis.

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

Yours sincerely

A handwritten signature in black ink that reads "Sadhbh O'Connor". The signature is written in a cursive, flowing style.

Sadhbh O'Connor
Director
Thornton O'Connor Town Planning

