

STRATEGIC HOUSING DEVELOPMENT, BLACKWOOD SQUARE, NORTHWOOD, SANTRY, DUBLIN 9

Planning Report & Statement of Consistency



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Development Blackwood
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STATEMENT OF CONSISTENCY

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1 INTRODUCTION

1.1 Proposed Development

Cosgrave Developments (the Applicant) is seeking planning permission for development on lands within the former Santry Demesne, north of Northwood Avenue adjacent to existing retail, residential and commercial lands.

The proposed development will consist of the construction of:

- 4 no. 7-storey plus penthouse apartment (8-storey) blocks containing 331 no. apartment units comprising: 6 no. one bedroom units, 292 no. two bedroom units and 33 no. three bedroom units over a shared basement;
- 334 no. associated car parking spaces at basement level, 4 no. surface car parking spaces and 760 no bicycle parking spaces;
- 5 no. ground floor mixed-use commercial units (intended to accommodate Class 1, 2 and 8, café, restaurant uses) within Blocks B and C with a total area of c. 939sq.m.;
- Shared residential services to include a multi-function area (c. 133sq.m.), a gym (c. 140sq.m.) and concierge (81.5 sq.m) within Block A.
- A childcare facility (c. 224sq.m.) within Block C.
- Associated landscaping, public open space, pedestrian and cycle paths, ESB substation, utilities connections and services.

1.2 Statement of Consistency

RPS Group Ltd. has been commissioned by Cosgrave Developments to prepare this Planning Report and Statement of Consistency in relation to the proposed Strategic Housing Development (SHD) at lands off Northwood Avenue, Santry, Dublin 9, County Dublin.

Section 8 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, (the Act) outlines the requirements relating to SHD planning applications and states that applications must be accompanied by a statement which includes the following:

“(iv) (I) setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan, and

(iv) (II) where the proposed development materially contravenes the said plan other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000”.

In accordance with item (iv)(I) above, this Statement of Consistency illustrates how the proposed development will be consistent with the policies, objectives, land use zoning and development standards set out in the *Fingal Development Plan 2017-2023* and other planning policy documents and guidelines, as appropriate. This Statement of Consistency also provides further details in relation to the site location and context, development description and relevant planning history.

As the proposed development will be consistent with the zoning of the subject lands, a material contravention statement, as referred to in item (iv)(II) above, is not required in this instance.

1.3 Format of Report

This Planning Report and Statement of Consistency is arranged under the following headings:

- **Section 1:** Introduction

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- **Section 2:** Site Location and Urban Context
- **Section 3:** Planning History
- **Section 4:** Description of Proposed Development
- **Section 5:** Rationale
- **Section 6:** Environmental Appraisals
- **Section 7:** National, Regional and Local Planning Policy and Guidelines
- **Section 8:** Compliance with Part V
- **Section 9:** Conclusion.

2 SITE LOCATION AND URBAN CONTEXT

The subject site is located within the former Santry Demesne c. 7km from Dublin city centre. The proposed MetroLink Northwood Stop is to be located c. 350m to the west of the subject site. The site is bounded to the north by residential development which is currently under construction (Reg. Ref. F15A/0440 as modified) and to the west by existing car parking associated with Gulliver's Retail Park. The site is bound to the east by an internal roadway and beyond that car parking associated with Swift Square Office Park office and housing under construction (Reg. Ref. F15A/0440 as modified). The site is bound to the south by a McDonald's fast food restaurant and Gulliver's Local Retail Centre.

Further to the south of the subject site is Northwood Avenue. The M50 is approximately 500m to the north. The southern portion of the site currently consists primarily of a greenfield area. The northern portion of the site comprises of a temporary surface car park for construction workers at the adjacent residential development. There is a row of trees on the eastern boundary of the site associated with former field boundaries. The location and immediate context of the subject site is illustrated in **Figure 2-1**.

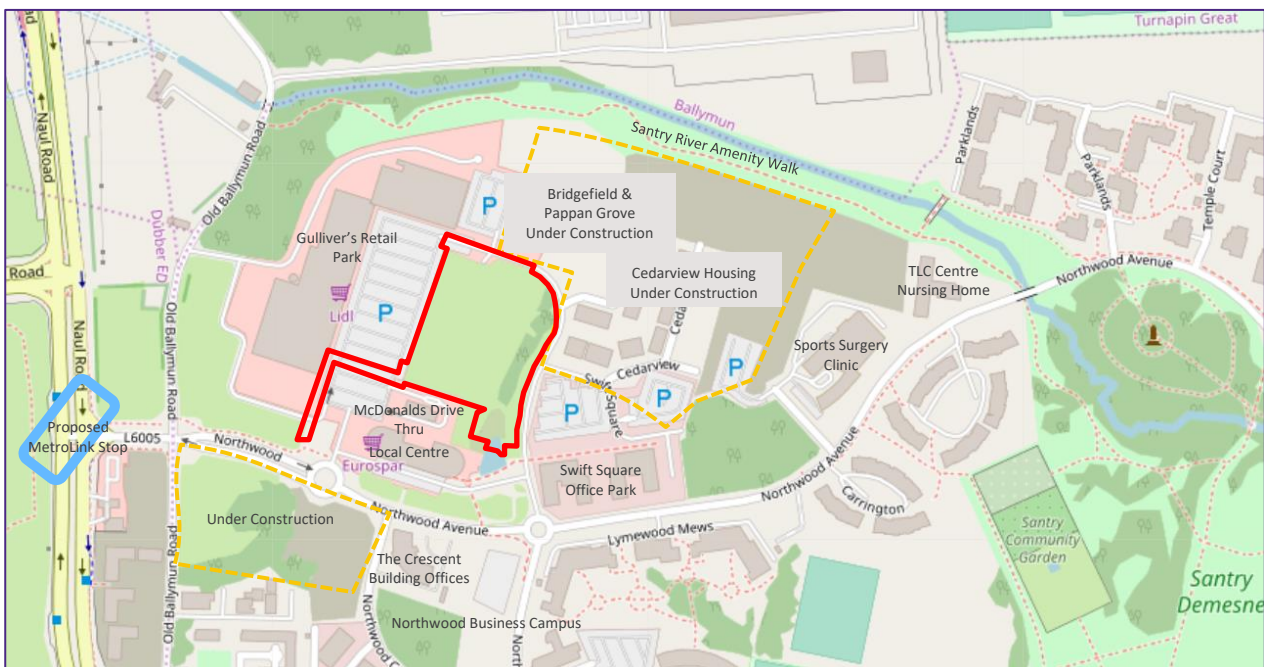


Figure 2-1: Site Location (indicative subject lands outlined in red)

Source: Open Street Map and RPS annotation

The surrounding lands have been subject to significant land use change over the last 15 years. The Applicant has developed Gulliver's Retail Park, Gulliver's Local Centre and part of Swift Square Office Park

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in the immediate vicinity of the subject site and is currently completing adjacent residential development to the north (Bridgefield and Pappan Grove) and to the east (Cedarview) permitted under Reg. Ref. F15A/0440, as amended, some of which will be occupied later this year.

Gulliver's Retail Park accommodates Lidl, Home Base, Home Focus, Petmania, Mr. Price and a number of furniture stores. Gulliver's Local Centre accommodates Spar, Costa Coffee, a chemist, hair and beauty salon and other local shops.

To the east of the site is the Sports Surgery Clinic and TLC Centre Nursing Home. To the south of Northwood Avenue in the immediate vicinity of the subject site are The Crescent Building office complex, Northwood Business Campus, Lymewood Mews Apartments and recreational parkland and grounds in Santry Park. Other sites along Northwood Avenue are under construction

There are good quality pedestrian walkways on all the major links locally including dedicated pedestrian crossing facilities at the signalised junctions in the area. Along the length of Northwood Avenue adjacent to the Sports Surgery Clinic there are footpaths on both sides of the road and an off-road cycle track.

The site benefits from its location near to a number of high frequency bus services. Stops located on the R108, approximately 350m from the site are served by routes 4, 155, 42d, 17a and 13.

The National Transport Authority is progressing the Bus Connects project. This includes Core Bus Corridors which shall provide higher frequency and capacity bus services including measures such as dedicated lanes, higher quality stops, off-board ticketing and full priority at traffic signals. The proposed Ballymun to City Centre Core Bus Corridor Route, which runs along the R102 approximately 700m to the southwest of the site. Bus Connects also provides for the redesign of the bus network and includes plans for bus services at a frequency of 1 every 10 – 15 minutes at midday serving Northwood Avenue.

MetroLink will provide a new rail line to link between Swords and Charlemont in Dublin City Centre. The Preferred Route has been published. The location of the planned Northwood Station is approximately 350m from the subject site at the Northwood Avenue / R108 junction.

The Metro will be similar to the Luas in operation but will enjoy complete priority along its route, allowing for increased frequency of service with a tram expected every 2 minutes during peak periods. Services are scheduled to commence in 2027. The preferred route and station can be seen in **Figure 2-2**.



Figure 2-2: MetroLink Preferred Route

Source: NTA

The site is located within a developing mixed-use community which will benefit from excellent metro and bus public transport linkages.

3 PLANNING HISTORY

A desktop review of the planning history for the subject lands and its immediate surroundings was undertaken using Fingal County Council’s online planning search facility. A summary of the relevant planning history is set out herein. Any concerns or issues identified pertinent to the subject application have been considered in the design process and are addressed in so far as is possible.

3.1 SUBJECT LANDS

The site forms part of a larger Master Plan area of 19.8ha on which planning permission was granted for a mixed-use development in 2005 under Reg. Ref. F04A/1562. The appropriate period for this consent has been extended to 2020 under Reg. Ref. F04A/1562/E2. The permitted Master Plan comprised modern business, enterprise and commercial facilities consisting of c. 77,016 sq. m. Completed elements of the Master Plan include a retail park (Gulliver’s Retail Park), 2 no. of the 4 no. business units (Swift Square Office Park) and the Local Centre. The context of the site within the Master Plan is illustrated in **Figure 3-1** for information purposes.

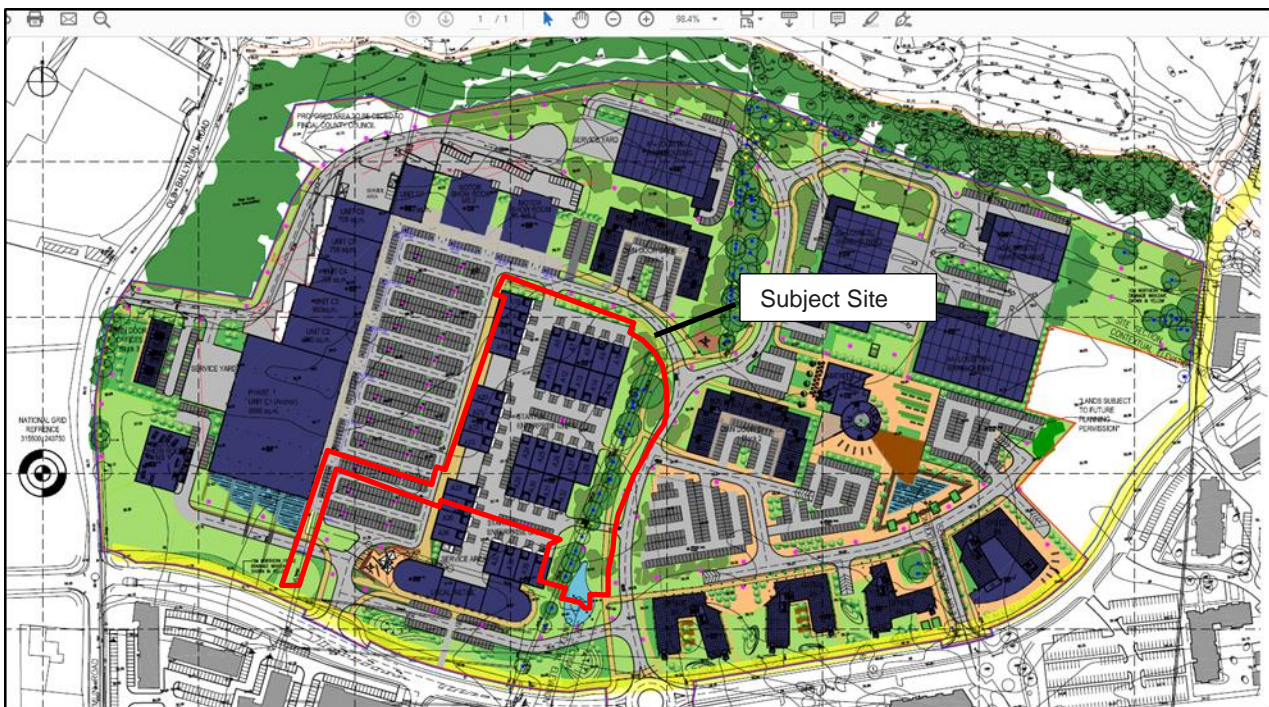


Figure 3-1: Permitted Masterplan with Indicative Site Location in red (Reg. Ref. F04A/1562)

Source: Cosgrave Developments

The overall permitted Master Plan consisted of:

- 5 no. logistic warehouses on single level each with ancillary office space on two levels of c. 11,126 sq. m. in total;
- 35 no. two storey enterprise starter units totalling c. 12,250 sq. m.;
- 4 no. five storey office blocks;
- 28 no. three storey own door office buildings totalling c. 11,172 sq. m.;
- 7 no. single storey retail warehouse units totalling c. 10,500 sq. m.;

- Single storey Local Centre comprising 5 no. units totalling c. 1,670 sq. m.;
- 3 no. two storey motor showrooms totalling c. 3,568 sq. m.;
- 1 no. two storey amenity building totalling c. 1,700 sq. m.;
- 1,926 no. car parking spaces (838 no. car parking spaces to serve office units, 477 no. below surface and 361 no. temporary surface car parking spaces;
- An additional 1,088 no. surface car parking spaces to serve the remainder of the
- development; and
- Ancillary office, administration and staff facilities for all proposed buildings.

The Master Plan also proposed a network of internal roads; a new junction off the old Ballymun Road; 3 no. new junctions off the new Santry Demesne distributor road; reconfiguration of the Santry Demesne distributor road to accommodate deceleration and turning lanes; a new roundabout to aid access into the site and facilitate site junction works; drainage and water supply; utilities; landscaping works; fencing and boundary treatment; security hut; road lighting; and; signage.

Amendments to this parent planning permission, with respect to Gulliver's Retail Park and Swift Square Office Park to facilitate tenant requirements, have been granted and implemented.

A five storey office building with a height of 79m and an area of c.7,221sq.m to the east of the existing Swift Square office buildings 1 and 2 was permitted on 24th May 2017 (Reg. Ref. F16A/0514). This permission has not been implemented.

Residential development within an area of the Masterplan was permitted under Reg. Ref. F15A/0440 replacing 5 no. logistic warehouses (11,126 sq.m), 23 no. 3 storey own door office buildings (9,696 sq.m), 1 no. amenity building (1,700 sq.m) and associated car parking. This development consisted of 374 no. residential units comprising apartments buildings over a shared basement, houses, a childcare facility and associated open spaces on a c.7.0 ha site. This permission was modified by F16A/0572 resulting in the provision of 5 no. additional apartment units and again under F17A/0371 which comprised amendments to 104 no. house units. The most recent permission (Reg. Ref. F18A/0205) provided for the omission of 24 no. houses (Unit Nos. 105 – 128) and revision of boundary treatments permitted under Reg. Ref. F15A/0440 to define the new eastern boundary of the subject site with the Sports Surgery Clinic. Construction of the 355no. units permitted is currently close to completion and is referred to as Bridgefield, Pappangrove and Cedar View.

3.2 ADJACENT LANDS

The surrounding lands have a very extensive planning history and there has been significant development over the last 15 years. The following planning permissions relate to recent application on lands proximate to the subject lands.

Figure 3-2 identifies the location of each planning application listed in this section with their corresponding planning register reference.

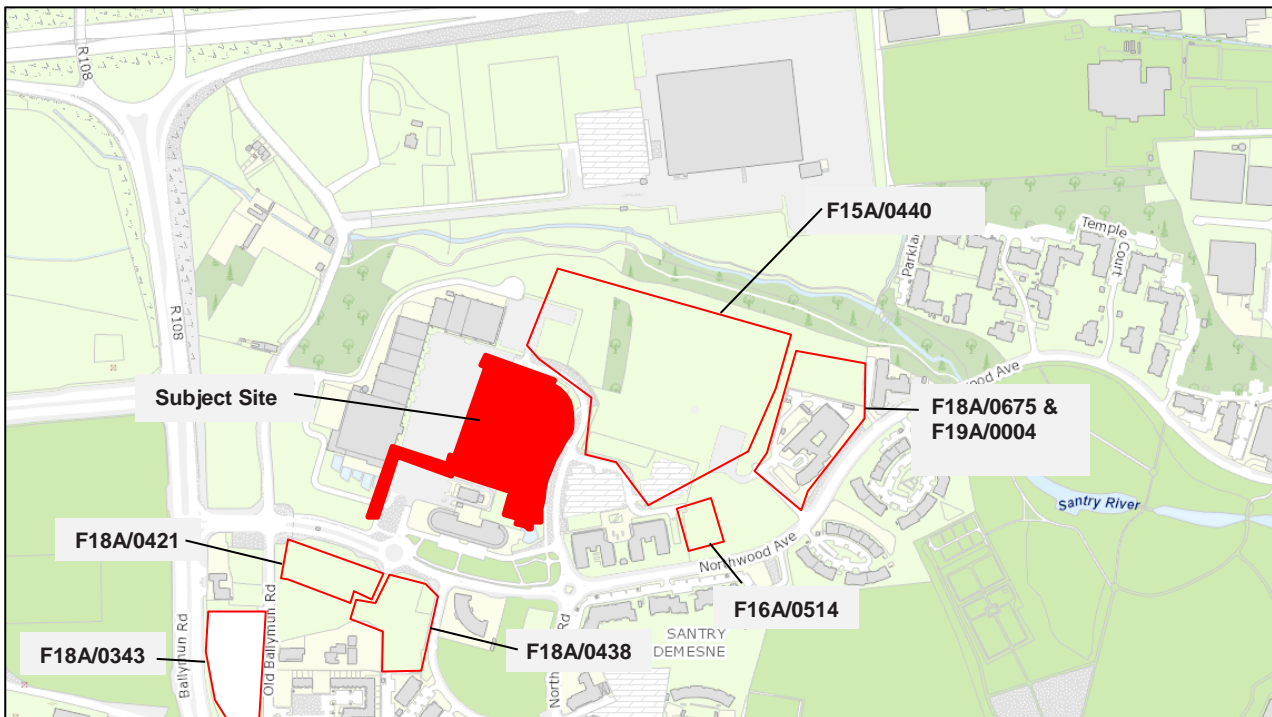


Figure 3-2: Adjacent Planning Applications

Source: Google Maps, RPS Annotation

- **Reg. Ref. F18A/0421:** Planning permission was granted on 7th March 2019 for a mixed use residential scheme comprising 99no. apartments, concierge, creche, residents lounge and meeting rooms on lands approximately 180m to the southwest of the subject site, south of Northwood Avenue.
- **Reg. Ref. F18A/0438:** Planning permission was granted on 16th April 2019 for a mixed use development comprising 2no. 6 storey blocks containing 99no. apartments in total, four storey office building (c.2,536 sq.m) and other associated development. The application forms phase 2 of the development permitted under Reg. Ref. F18A/0421 and is located approximately 180m to the southwest of the subject site, south of Northwood Avenue.
- **Reg. Ref. F19A/0004:** A final grant was issued on 12th July 2019 for an extension to the Sports Surgery Clinic including 2 no. operating theatres and 4 no. intensive care units.
- **Reg. Ref. F18A/0675:** A final grant split decision was issued on 16th July 2019 for retention and permission for additional surface car parking, retention of 3 no. storage sheds and permission for a new store building at the Sports Surgery Clinic.
- **Reg. Ref. F18A/0343:** Planning permission was granted on 17th September 2018 for amendment to previously approved planning permission F17A/0207 and F15A/0054. The proposed amendments consisted of the provision of a 3-bedroom apartment at fourth floor level Core 2, in lieu of permitted arrangement of a 2-bedroom apartment and plantroom. The new proposed mix will consist of 4 No. one bed units, 23 no. two bed units and 3 no. three bed units. The works also include minor elevational changes.

4 DESCRIPTION OF PROPOSED DEVELOPMENT

4.1 Proposed Development

The proposed development comprises of 4 no. apartment blocks arranged around an internal courtyard over a shared basement. A description of each block is set out below:

- **Block A** comprises 88 no. units (2 no. one bedroom units, 63 no. two bedroom units and 23 no. three bedroom units).
- **Block B** comprises 77 no. units (70 no. two bedroom units and 7 no. three bedroom units).
- **Block C** comprises 77 no. units (76 no. two bedroom units and 1 no. three bedroom units).
- **Block D** comprises 89 no. units (4 no. one bedroom units, 83 no. two bedroom units and 2 no. three bedroom units).

Each of the apartment blocks are 7 no. storeys plus penthouse (8-storeys).

The proposed development will also include the provision of a childcare facility and 5 no. mixed use commercial units which may accommodate a range of Class 1, 2 and 8, café, restaurant uses at ground floor within Blocks B and C (c. 939 sq.m). These units will address and animate pedestrian routes and existing retail development in the environs.

Ancillary resident facilities include communal open space, concierge, multi-function room area and gym are also provided at ground floor level.

Secured resident bicycle parking spaces comprising 690 no. are provided at basement level and an additional 70 no. bicycle parking spaces are provided at surface level.

Resident car parking is comprised of 331 no. car parking spaces and 3 no. disabled spaces at basement level. Visitor car parking shall be facilitated through shared use of existing surface level car parking spaces associated with the adjoining retail park and local centre. A letter for Cosgrave Property Group is attached in this regard. In addition to the disabled car parking spaces at basement level, 1 no. disabled car parking space will be allocated at surface level. 3 no. car club spaces shall also be allocated at surface level.

Landscaping and boundary treatments including a new east-west pedestrian/cyclist route linking to existing and planned public transport services is proposed. A north-south pedestrian cycle route is also proposed linking with the pedestrian route through the residential development to the north and providing connectivity with the Santry River Amenity Walk.

For further detail on the physical characteristics of the proposed development please refer to the architectural drawings, design statement and the landscape drawings which accompany this submission.

4.2 Key Site Statistics

The principal details of the proposed development are as follows:

- Red Line Boundary 21,191m²
- Apartments 331 no. apartments
- Childcare Facility 224 sq.m
- Mixed Use Commercial Units 939 sq.m
(Class 1, 2 and 8, café, restaurant uses)
- Resident services: Gym 140 sq.m
 - Multi-Function Area 133 sq.m
 - Concierge 81.5 sq.m
- Car Parking 331 no. spaces + 4 disabled
- Car share spaces 3 no. spaces
- Childcare short term parking 5 no. spaces

- Bicycle Parking 690 no. spaces (basement) + 70 (surface)
- Motorbike Parking 5 no. spaces
- Public Open Space 4,672 sq.m (including 650sq.m play area)
- Private Open Space 3,671 sq.m (including 152sq.m play area)
- Public Realm including route to Metrolink 5,255 sq.m

4.3 Residential

The development will include the construction of 4 no. apartment blocks with a combined total of 331 no. apartment units. A summary of unit sizes within each block is provided in **Table 4-1**.

Table 4-1: Development Schedule

Schedule of Apartment Units and Areas		
Block A	No. of Units	Area
1 Bed	2	50.0 – 70.7sq.m
2 Bed	63	81 - 100.8sq.m
3 Bed	23	99 – 121sq.m
Residential Concierge		81.5sq.m
Multi-function Area		133sq.m
GYM		140sq.m
Block B	No. of Units	Area
2 Bed	70	80 – 91sq.m
3 Bed	7	105 - 119sq.m
Unit A		239sq.m
Unit B		216sq.m
Unit C		102sq.m
Block C	No. of Units	Area
2 Bed	76	80 – 110sq.m
3 Bed	1	105 sq.m
Creche		321sq.m
Unit D		140sq.m
Unit E		242sq.m
Block D	No. of Units	Area
1 Bed	4	50 – 57.5sq.m
2 Bed	83	76 – 99sq.m
3 Bed	2	107 – 110sq.m
Basement Area:		10,150sq.m
Open Space:		Area
Courtyard Private Open Space & Periphery Gardens		3,196sq.m + 475sq.m = 3,671sq.m Including 152sq.m play area
Public Open Space to east and south		4,672sq.m Including 650sq.m play area
Public Realm		5,255sq.m
Parking:		Spaces:
Standard Parking		331 spaces
Disabled Parking		4 space
Car sharing spaces		3 spaces

Schedule of Apartment Units and Areas	
Bicycle parking – basement level	690 spaces
Bicycle parking – surface level	70 spaces

Source: Architect's Schedules

Further details on proposed apartments is set out in the *Housing Quality Assessment* prepared by McCrossan O'Rourke Manning Architects and enclosed as part of the application package.

4.4 Commercial Units

The proposed development also includes provision of a mix of street level units (Class 1, 2 and 8, café, restaurant uses) along the southern and western boundaries adjacent to the existing neighbourhood centre, next to the proposed pedestrian/cycle route to the planned Northwood Metro Station and addressing existing retail development in the area. The provision of these uses along this frontage provide for increased activity at ground level and increases the level of animation along the frontage. The provision of these uses at ground level provide for additional amenity to the future and existing residents in the area.

The 5 no. units comprise:

- Unit 1 - Block B 239 sq.m
- Unit 2 - Block B 216 sq.m
- Unit 3 - Block B 102 sq.m
- Unit 4 - Block C 140 sq.m
- Unit 5- Block C 242 sq.m



Figure 4-1: Active Uses Addressing Existing Development
 Source: Architect's Drawings

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The uses within the ground level units will all be capable of accommodating of a mix of class 1, class 2, class 8, café/deli and restaurant uses. It is proposed that the first use within each of the units will be agreed with the planning authority prior to occupancy with the exempted development planning regulations commencement on all changes of uses thereafter. In this regard the landscaping proposals have been formulated with flexibility in mind to ensure that those areas capable optimising aspect and position will be provided with seating to facilitated passive leisure or spill out areas associated with any prospective café type use.

4.5 Childcare Facility

A childcare facility of 224sq.m is to be provided in the ground floor of Block C in the northwest of the site. This facility can accommodate 48 no. places as derived from the *Childcare Demand Analysis* prepared by RPS which forms part the application documentation. This analysis was informed by policy, existing and proposed childcare provision and the unit mix proposed. This facility includes a dedicated area of private open space for the use of staff and children and is also proximate to the proposed playground within the courtyard. A drop off area directly adjacent to the facility is proposed.

4.6 Access and Connectivity

The proposed development includes a walking and cycling route 'green route'. The green route proposed aims to provide links from the existing development to the north of the proposed development through the existing protected trees and from the east of the site providing a green route across the existing car park and eventually linking to the existing cycle track and footpath on Northwood Avenue and thereby providing access to the planned Northwood Metro Link station. This route will also link the proposed development with the Santry River Amenity Walk.

The main cycling and pedestrian access point will be running east-west and located to the south of the site. This will provide connectivity with wider development within Santry Demesne and a future Northwood metro stop. There will also be a north-south pedestrian / cycle route running from Northwood Avenue to the Santry River Amenity Walk.

Vehicular access to the proposed residential scheme will be via Northwood Avenue. An existing roundabout shall provide access to the basement car park.



Figure 4-2: Open Space and Sustainable Connectivity

Source: Architect's Drawings

4.7 Open Space and Landscaping

As illustrated on **Figure 4-2** the open space and landscape strategy for the proposed development seeks to integrate the new development with development under construction and with the existing landscape character of the area to create attractive, usable and linked open spaces. The public areas are designed as landscape spaces and green links that offer the opportunity for meeting, walking, formal and informal play.

In this regard the proposed landscape scheme seeks to:

- Create an attractive, high quality landscape for future residents and has been designed to integrate the development into the surrounding environment.
- Establish a clear distinction between public and private spaces and ensures that public areas are suitably supervised by adjacent buildings.
- Provide high quality linkages for pedestrians and cyclists to the planned Northwood Metro Link station and the Santry River Amenity Walk.
- Address the adjacent retail areas to the south and west.
- Protect existing treeline, which will enhance biodiversity and visual interest.
- Incorporated, where possible, mature and healthy trees on the eastern boundary into the overall design.

Green Routes

Pedestrian/cycle routes are proposed to link into those routes already created along Northwood Avenue and those under construction as part of Ref. Ref. F15A/0440 between Cedarview and Swift Square Office Park. The proposed development seeks to continue this route westwards and on towards the proposed location for the Metrolink stop. The final alignment of this route may change as proposals for the Metro are finalised.

The proposed development also includes a sylvan north-south route along its eastern boundary which will provide a connection between the site northwards onto the Santry River Amenity Walk and southward onto Northwood Avenue.

Public Realm

A new public realm is created along the western façade of the building within which it is proposed to locate grass tables with seating areas and tree planting. These spaces have been designed to enable outdoor dining, if desired, but can also provide informal seating not necessarily directly associated with adjoining units but as generally providing civic amenity. A formal hedge is proposed as a buffer between this space and the car parking providing the space with some enclosure and contributing towards creating a comfortable urban street space within which to dwell.

Play

A cluster interconnected play areas extending to an area of c.650 sq.m for older children is provided to the southeast of Block A. Further details are provided in the landscape masterplan for the site prepared by Kevin Fitzpatrick Landscape Architecture.

Communal Courtyard

The communal courtyard will provide a range of open spaces for use by the residents. Secluded seating areas are provided for individuals or small groupings while other spaces to cater for larger groups for communal uses are also integrated into the proposed landscape design. Planting has been designed to create buffers and visual screens between the circulation paths, seating areas and private terraces.

A playground for young children is proposed within the internal courtyard. The proposed play space comprises c.152 sq.m and is passively surveyed by proposed apartments. Further details are provided in the landscape masterplan for the site.

Lighting proposals for the overall site prepared by McElligott Engineers also form part of the submission. Detail in relation to the proposed open space provision and proposed play spaces is contained in the *Landscape Report and Outline Landscape Specification* and associated drawings prepared by Kevin Fitzpatrick Landscape Architecture and are submitted as part of the submission. These landscape plans include hard and soft landscaping for the private and communal amenity spaces, boundary approach and planting programme.

As requested by the Parks Department during pre-application consultations, the suite of landscaping plans also includes a drawing co-ordinated by Kevin Fitzpatrick Landscape Architecture illustrating the proposed landscape measures together with utility and lighting proposals.

4.8 Parking

Cycle Parking

The proposed development will provide 690 no. resident bicycle parking spaces in bicycle store areas within the basement. These stores will provide for the secure storage of bicycles with access restricted to residents only. The storage areas are located in close proximity to the apartment entrances to ensure ease of access and convenience for apartment residents. A further 70 no. bicycle spaces are provided in the form of open air bike rails, outside each apartment block, particularly proximate to retail units. These are spread across the apartment blocks for convenience and will be suitably overlooked for passive surveillance.

Car Parking

The proposed development will include a total of 338 no. car parking spaces (including 4 no. disabled car parking and 3 no. car club sharing spaces). Each apartment will have one dedicated car parking space.

In order to support sustainable use of private vehicular transport provision shall be made for electric vehicle spaces with charging facilities. All car parking spaces shall be ducted to allow for future provision of electric charging. A *Multiple Occupancy Building Car Charging Strategy* prepared by McElligott Engineers is included as part of the planning application documentation and sets out the rationale for the nature, extent, further provision and management of car charging facilities which accord with policy and SEAI grant incentives.

To further support sustainable transport patterns 3 no. spaces for short term car club rental are proposed. These are located at surface level proximate to the proposed commercial units and adjacent to the pedestrian route connecting the subject site to the planned Northwood Metro Link station. 1 no. of the disabled car parking space will also be provided at this location.

The provision of resident car parking spaces within the basement ensures that surface car parking within the subject site is minimised with spaces around the proposed apartment blocks instead forming part of the designed landscape.

Visitor parking and any car park demand generated by the local commercial units shall be facilitated by the use of existing car parking immediately to the west of the subject site associated with the existing retail park and local centre. A letter is attached from Cosgrave Property Group in this regard. This shared usage of car parking spaces represents a prudent and sustainable approach to car parking provision.

4.9 Site Services

Lighting

The application proposes street lighting throughout the residential development as an integral part of the scheme. The lighting plan has been designed in accordance with the *Fingal Development Plan 2017-2023* (see Section 7.1.16), providing a level of brightness that will minimise incidences of light spillage or pollution on the neighbouring residential developments and biodiversity in the surrounding area. Detailed lighting

proposals are set out in the *Public Lighting Report* and associated drawings prepared by McElligott Consulting Engineers and enclosed as part of this submission.

Refuse Bins

Communal bins shall be provided for the proposed apartment units. These will be located within the basement, ensuring proximity for residents and minimisation of visual impact and surface clutter. This level of bin storage has been designed to ensure sufficient space for refuse storage based on the projected levels of waste generation.

A separate provision for commercial/retail tenants is proposed at surface level between blocks B and C. This shall be appropriately screened and is located proximate to the collection point.

Further details are set out in the *Waste Management Plan* prepared by Keywaste and the *Architect's Design Statement* prepared by McCrossan O'Rourke Manning Architects enclosed as part of this submission.

ESB Substation

A double substation is required to support the proposed development and future level of car charging facilities. The requirements of the ESB in this regard are set out in the *Energy Statement* prepared by McElligott Engineers. A design rationale for the location of the utility is set out in the *Architect's Design Statement* prepared by McCrossan O'Rourke Manning Architects.

Flood Risk Assessment

A Flood Risk Assessment prepared by J.B. Barry & Partners Consulting Engineers is included within the submission. The assessment concludes that the PFRA flood extent map and FCC SFRA Flood Map indicates that the existing site lies within Flood Zone C. The CFRAMS fluvial flood extent maps indicates that the site lies within Flood Zone C, and hence is at low risk of flooding.

4.10 Visual Impact

The site is not visible from locations in the wider landscape due to the flat nature of the topography, the scale of the local built development and the significant number of trees in the area. Locally the site is most visually prominent from the local access roads. A Landscape and Visual Impact Assessment together with Verified Views forms part of the EIAR submitted with this planning application. A series of computer generated images (CGI) prepared by Archimedium are also included as part of the planning application documentation.

4.11 Materials and Finishes

Finishes and materials will ensure consistency with existing surrounding developments including the housing scheme to the north and wider development within Santry Demesne (currently under construction).

The proposed buildings employ a controlled palette of materials. It is envisaged that the brickwork will match or be similar in character to that of the adjacent Bridgefield apartments, a soft muted buff. Window, balcony and cladding material and detail will also carry through from Bridgefield.

Continuous vertical planes of bay windows will contrast with and visually break the general brickwork – taut technical planes set against the warm buff masonry.

The top floor of each building is clad with glazed curtain walling which allows the buildings to read as 7 storeys of masonry with a visually and materially lighter sky reflecting attic storey over. Balconies at this level will be punched into the curtain walled volume, retaining a clean un-broken parapet line

Further details in relation to the proposed materials and finishes are provided in the *Architect's Design Statement* prepared by McCrossan O'Rourke Manning Architects and enclosed as part of this submission.

4.12 Integration with Existing Area

The proposed development has been designed in response to the existing site context and development in the area. High quality pedestrian / cycle linkages with the surrounding environment in Northwood and adjacent including the Santry River Amenity Walk and the planned Northwood Metro Link station.

The scheme seeks to promote active uses along the southern and western frontages. These will address existing retail development in the immediate vicinity and will benefit from the creation of a new public realm along the western boundary thereby enabling uses to extend their function onto the street edge.

A priority in the design of the subject development has been the protection and retention of the treeline on the east of the site. As detailed in the enclosed *Aboricultural Report* undertaken by The Tree File Ltd all trees within the site are to be retained and are fully incorporated into the landscape design.

5 RATIONALE

Dublin is experiencing a housing crisis with house prices and rents that continue to increase, making it more difficult and more expensive for people to live reasonably close to employment and social / community facilities. Dublin is one of the least affordable cities to live in with mortgages accounting for over 25% of the average household income, and the average rent now at €1,875 per month. The housing crisis presents significant social and economic challenges and it is feared that the undersupply and subsequent cost of housing may hinder Dublin and Ireland's economic growth and social cohesiveness.

The *National Planning Framework* (see **Section 7.1** of this Statement of Consistency) is planning for 490,000 – 540,000 additional people in the Eastern and Midland Region. This equates to a total population of around 2.85 million people. In accordance with national and regional policies and objectives, this anticipated growth must be accommodated through sustainable development, with high quality residential development provided within the city's development boundary to ensure a compact urban form, reduce commuting times and maximise the viability of public transport options. Residential developments should also be located in close proximity to existing services and facilities including retail and employment areas and schools. (The proposed development's consistency with national and regional planning policies and objectives are detailed in **Section 7** of this Statement of Consistency).

The subject site is easily accessed via the R108, R104 and the M50 and is close to a good range of supporting services within Santry and Ballymun including schools, community facilities, local services and retail uses. The site is located near a number of existing and expanding employment areas including Swift Square Office Park, Northwood Business Campus and Sport Surgery Clinic within Northwood, Dublin Airport, GE zoned lands just north of the M50 while also remaining convenient to the city centre.

There is a range of existing and planned public transport and pedestrian/cycleways in the area which will ensure the proposed development is well connected and accessible. The delivery of Bus Connects including the Ballymun to City Centre Core Bus Corridor and the Swords to City Centre Core Bus Corridor and the MetroLink will further enhance public transport provision in the vicinity of the subject site in the medium term.

Having regard to the above, it is submitted that the subject site represents an ideal opportunity to provide a new strategically located residential development on an appropriately zoned site within Dublin's M50 ring.

6 ENVIRONMENTAL APPRAISALS

6.1 Environmental Impact Assessment Report

The obligations under Directive 2014/52/EU have been transposed into Irish law pursuant to the *European Union (Planning and Development) (Environmental Impact Assessment) Regulations (S.I No. 296 of 2018)*. The regulations specify the developments for which EIA will be required and the information that must be provided in an EIAR prepared in connection with the subject project.

Screening is the term used to describe the process for determining whether a proposed development requires an EIA by reference to mandatory legislative threshold requirements or by reference to the type and scale of the proposed development and the significance or the environmental sensitivity of the receiving baseline environment.

The proposal has been screened by reference to the *Planning and Development Act 2000*, as amended, and the *Planning and Development Regulations 2001*, as amended.

The proposed development is a category 10 “*infrastructure projects*” of Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended but does not exceed the category 10(b)(i) threshold “*Construction of more than 500 dwelling units*” but does align with category 13 “*changes, extensions, development and testing*” which includes:

“(a) Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-

(i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, and

(ii) result in an increase in size greater than –

- 25 per cent, or

- an amount equal to 50 per cent of the appropriate threshold, whichever is the greater.”

For clarity, the subject development in isolation does not fall within development classes set out in Part 1 or Class 10(b)(i) of Part 2 of Schedule 5. However, the subject development is located adjacent to a residential development which is currently under construction by the applicant. Permission for 374 no. residential units on a 7.0 hectare site under Reg. Ref. F15A/0440 was modified by F16A/0572, F17A/0371 and F18A/0205 resulting in the overall provision of 355no. residential units which are now almost complete.

It has therefore been determined that the quantum of development now proposed in addition to the adjacent permitted residential development would exceed the relevant threshold and that an EIA should therefore be undertaken to cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the proposed development.

An Environmental Impact Assessment Report (EIAR) has being prepared and is set out in 3 no. volumes as follows:

- Vol. 1 - Non-Technical Summary
- Vol. 2 - Main Document
- Vol. 3 – Appendices Part A and Part B

This EIAR accompanies the planning application.

6.2 Appropriate Assessment Screening Report

An *Appropriate Assessment Screening Report* has been prepared by Scott Cawley and is enclosed as part SHD application. The *Appropriate Assessment Screening Report* documents evaluation and analysis

seeking to establish whether or not a decision to grant planning permission for the proposed demolition works is likely to have a significant effect on any designated European Site under European Council Directives 92/43/EEC and 2009/147/EC.

The exercise considers the proposed works individually and in combination with other relevant plans or projects, and has been undertaken in view of best scientific knowledge and in view of the conservation objectives of the subject site.

The *Appropriate Assessment Screening Report* concludes that the proposed development is not directly connected with or necessary to the management of any designated European Site. The proposed development will not give rise to potential significant effects on the Qualifying Interests or Special Conservation Interests of any European Site and will not give rise to potential in-combination or cumulative effects with the other projects considered.

7 PLANNING POLICY – STATEMENT OF CONSISTENCY

7.1 Introduction

The Irish Planning System is outlined schematically in **Figure 7.1**. The relevant planning policies are set out for each level within the hierarchy in the sections that follow.

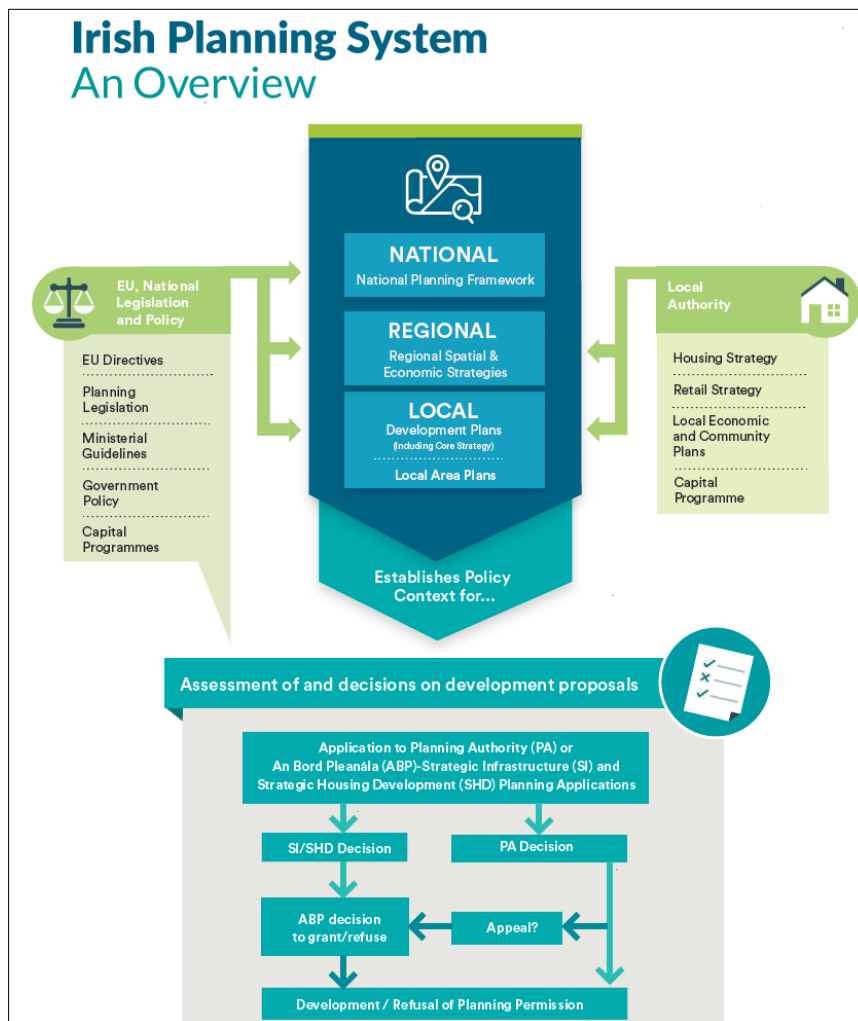


Figure 7-1: Irish Planning Hierarchy

Source: NPF

STATEMENT OF CONSISTENCY

The key provisions of national and regional planning policy as they relate to the proposed development are set out in the following sections. The key policy documents of relevance to the proposed development are as follows:

- National
 - Project Ireland 2040 – National Planning Framework;
 - Rebuilding Ireland – Action Plan for Housing and Homelessness;
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
 - Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018;
 - Design Manual for Urban Roads and Streets 2013;
 - Urban Design Manual – A Best Practice Guide, 2009;
 - Urban Development and Building Heights – Guidelines for Planning Authorities, 2018;
 - Guidelines for Planning Authorities on Childcare Facilities, 2001; and
 - The Planning System and Flood Risk Management (2009).
- Regional
 - Regional Spatial and Economic Strategy – Eastern and Midland Regional Assembly; and
 - Greater Dublin Area Transport Strategy (2016-2035).
- Local
 - Fingal Development Plan (2017 – 2023).

7.2 Project Ireland 2040 National Planning Framework

Project Ireland 2040 National Planning Framework (NPF), published in May 2018, is the primary articulation of spatial, planning and land use policy within Ireland up to 2040. The NPF aims to avoid urban sprawl by promoting increased residential densities in urban areas, consequently reducing pressure on infrastructure demands and adverse impacts on the environment.

National Policy Objective 33 of the NPF states that it is a national policy to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*”. The NPF expands on this objective, explaining that the future homes of Ireland will be built in locations that support sustainable development such as cities and larger towns with provision of infrastructure, access to services and can be delivered in an efficient and appropriate way.

National Policy Objective 3b states that it is an objective of the NPF to “*deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints*”. In delivering these new homes the NPF aims to achieve inclusive and sustainable communities that are finished to a high standard.

National Policy Objective 4 of the NPF aims to “*ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*”.

A number of “key enablers” for the growth of Dublin are identified in the NPF which are supportive of the subject development including:

- Delivering Metro Link;
- Development of an improved bus-based system; and

- Progressing housing development on public transport corridors.

The consistency of the proposed development with the NPF is outlined in **Table 7-1**.

Table 7-1: NPF Consistency Appraisal

National Planning Framework		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Objective 33	Prioritise the provision of new homes at locations that can support sustainable development	Proposed development located adjacent to existing retail, commercial and residential facilities and served by existing and planned high capacity public transport.
Objective 3b	Deliver at least half of all new homes in the five Cities	Proposed development located within Dublin Metropolitan area.
Objective 4	Quality of design and integration	<p>High quality of design is detailed in the <i>Architect's Design Statement</i> prepared by McCrossan O'Rourke Manning Architects. The 4 no. proposed buildings form a framed composition around a large central courtyard. The alignment of the western faces of the proposed buildings is formal, set to run parallel with the opposing Gulliver's Retail Park buildings and the "Bridgefield" apartments to the north. This continuity of alignment delivers an immediate visual integration and a sense of place – the street line and the square enclosure. It is envisaged that the brickwork will match or be similar in character to that of the adjacent "Bridgefield" apartments, a soft muted buff. Window, balcony and cladding material and detail will also carry through from "Bridgefield".</p> <p>The proposed residential development will fit within a mixed community adjacent to an existing local retail centre and proximate to commercial employment development. The proposed development includes high quality pedestrian / cycle linkages to the Santry River Amenity Walk, Santry Demesne Park and the planned Northwood Metro Link station.</p>

7.3 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland – Action Plan for Housing and Homelessness (Rebuilding Ireland) was launched in 2016 with the overarching goal to accelerate the delivery of housing from its current under-supply across all tenures. Rebuilding Ireland aims to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation. The plan seeks to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing over its period (2017-2021), while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.

Rebuilding Ireland is set around five pillars of proposed actions; Pillar 1 to address homelessness; Pillar 2 to accelerate social housing; Pillar 3 to build more homes; Pillar 4 to improve the rental sector; and Pillar 5 to utilise existing housing.

The delivery of housing in the right place is also recognised as being of crucial importance within Rebuilding Ireland. Locating housing in the right place provides for access to employment opportunities and to services

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such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.

The consistency of the proposed development with Rebuilding Ireland is outlined in **Table 7.2**.

Table 7-2: Rebuilding Ireland Consistency Appraisal

Rebuilding Ireland		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Pillar 1	Address homelessness	Proposed development will increase housing supply and directly addresses homelessness.
Pillar 2	Accelerate social housing	Proposed development will provide for the transferral of housing units to persons nominated by Fingal County Council as detailed in letter 7 th November 2019 from FCC to Cosgrave Developments included with the application documentation.
Pillar 3	Build more homes	Proposed development comprises 331 no. apartments.
Pillar 4	Improve rental sector	Proposed development will increase housing supply and directly addresses rental supply.
Pillar 5	Utilise existing housing	Proposed development will not hinder utilisation of existing housing.

7.4 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The role of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (the Residential Development Guidelines) is to ensure the sustainable delivery of new development throughout the country. It focuses on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
- Provide a mix of land uses to minimise transport demand.

The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. They recommend that planning authorities should promote high quality design in their policy documents and in their development management process.

Table 7-3: Sustainable Residential Development in Urban Areas Consistency

Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Residential Density	Land use planning should underpin the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors. Minimum net densities	The proposed development is located within 350m of existing bus services and the proposed Northwood MetroLink Station to which it shall be linked by a direct and dedicated pedestrian and cycle route. At such a location the proposed density of c. 158 no. units per hectare is considered appropriate.

Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas

	of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors.	
Provision of community facilities	Sustainable neighbourhoods require a range of community facilities including childcare, schools and retail provision.	The proposed development is adjacent to an existing neighbourhood centre. The development proposals include a childcare facility, mixed use commercial units and shared residential services to include a gym and multi-function room.
Daylight, Sunlight and Energy Efficiency	<p>The efficiency gains derived from passive solar estate layouts should be enhanced by designing individual dwellings so that solar collection is maximised.</p> <p>Where overshadowing may be an issue daylight and shadow projection diagrams be submitted.</p>	<p>Aspect and orientation of the apartment units have been designed to maximise the favourable south and west aspects. More than 50% of apartments will be dual aspect.</p> <p>The <i>Daylight and Sunlight Assessment</i> accompanying the SHD application notes the level of units which are in accordance with the target averaged daylight factor.</p> <p>As set out in the <i>Energy Statement</i> prepared by McElligott Consulting Engineers accompanying the SHD application, methods will be employed to further improve the energy ratings of the buildings and reduce their carbon emissions. A <i>Building Life Cycle Report</i> prepared by McCrossan O'Rourke Manning Architects also accompanies the application which sets out the range of material used to ensure efficiency, longevity and limited maintenance requirements</p>
Open Space	<p>The provision of adequate and well-designed private open space for apartments is crucial in meeting the amenity needs of residents; in particular, usable outdoor space is a high priority for families.</p> <p>Private open space can be provided in the form of rear gardens or patios for ground floor units, and balconies at upper levels. It is important that in the latter case adequate semi-private or communal open space, in the form of landscaped areas, should also be provided.</p> <p>Apartment developments in be unable to achieve public open space standards similar to suburban developments where bed space rates are considerably lower. The design of public open spaces in higher density areas is more critical, requires integration with the design concept and may need to be more intensively maintained.</p>	<p>Private balcony/terrace areas are in accordance with or exceed the Design Standards area requirements of 9sqm, 7sqm and 5sqm respectively. All balconies/terraces are 1.5m deep or greater.</p> <p>Communal/Semi-private Open Space is provided within the courtyard formed by the four perimeter blocks (3,196sq.m). The overall communal area provided, c. 3,671 sqm, comfortably exceeds that required by applying the Design Standards requirements of 9 sq.m, 7 sq.m and 5 sq.m respectively to the proposed 331 apartments (c. 2,371 sq.m).</p> <p>The high quality, landscaped public open space enhances the visual and amenity value of the development, maintains existing trees along the eastern boundary and is detailed fully in the landscape plans and report included prepared by Kevin Fitzpatrick Landscape Architecture.</p> <p>It is proposed to provide an area of open space extending to c 0.46.ha. This is in excess of standards set out in <i>Sustainable Urban Housing: Design Standards for New Apartments</i> and is c.22% of the site area.</p> <p>In addition, the site devotes c.52 ha to the creation of a public realm and link to the proposed Metrolink station.</p>
Access for All	Circulation within housing layouts, including access to individual buildings, should have regard to the varying needs of occupants over their lifetimes, including	The proposed development has employed best practice design, ensuring that residential units are fully accessible and are flexible in their layout. The units will be able to adapt and evolve with the changing needs of prospective occupants over the life of the unit. The internal dimensions

Guideline for Planning Authorities on Sustainable Residential Development in Urban Areas

	needs associated with mobility difficulties and the normal frailty associated with old age.	of the proposed units are generally in excess of the design standards as set out in the <i>Fingal Development Plan 2017 – 2023</i> and the <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018</i> , offering generously sized rooms that are accessible for all.
Waste Services	Adequate provision is to be made for the storage and collection of waste materials.	There are no. 8 refuse facilities at basement level to cater for operation residential waste which are located proximate to lift cores from each block and are of sufficient size as detailed in <i>Waste Management Plan</i> enclosed. There is also no. 1 refuse facility at surface level to cater for operational commercial waste.

7.5 Sustainable Urban Housing– Design Standards for New Apartments 2018

In March 2018, the Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018* (the New Apartment Standards). The updated document builds on previous guidelines published in 2015 taking account of; experience in their implementation since 2015; the need to enhance apartment output to secure both additional housing supply and more compact urban development patterns; and departmental and stakeholder research and analysis into the deliverability of increased supply of apartments.

Accordingly, the 2018 update of the Apartment Standards aims to:

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

A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. These locations within reasonable walking distance (i.e. up to 15 minutes or 1,000-1,500m) to/from high capacity urban public transport stops (such as DART or Luas); and sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services are considered suitable for residential development such as that proposed.

The New Apartment Standards also set out design standards that supersede Development Plan standards in relation to:

- Apartment mix;
- Internal space standards;
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartment to stair / lift ratio;
- Storage spaces;
- Amenity spaces including balconies and patios;
- Car parking; and
- Room dimensions.

The consistency of the proposed development with the New Apartment Standards is outlined in **Table 7.4**.

Table 7-4: Design Standards for New Apartment Consistency Appraisal

Sustainable Urban Design		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Location	Within urban areas, the scale and extent of apartment development should increase in relation to proximity to core urban centres and public transport nodes	The scale and density of proposed development is appropriate to the location adjacent to the planned Metro and Core Bus Corridor.
Housing Mix	<ul style="list-style-type: none"> Up to 50% one-bed / studio No min for three-bed 	<p>2% one bed proposed. 88% two bed proposed. 10% three bed proposed.</p> <p>A <i>Unit Mix Report</i> prepared by RPS is included as part of the application documentation.</p>
Floor Area	<p>Minimum Apartment Floor Areas:</p> <ul style="list-style-type: none"> Studio apartment 37 sq.m 1-bedroom apartment 45 sq.m 2-bedroom apartment 63 sq.m (3 person) 2-bedroom apartment 73 sq.m (4 person) 3-bedroom apartment 90 sq.m 	<p>There are no studio apartments proposed. All 1 bed apts are greater than 50sqm. All 2 bed apts are greater than 73sqm. n/a All 3 bed apts are greater than 104sqm.</p>
Floor Area	Majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.	In excess of 50% of the units exceed by 10% or more the minimum floor areas
Dual Aspect Ratio	<p>In suburban or intermediate locations, it is an objective that a minimum of 50% of apartments will be dual aspect.</p> <p>At least 33% of units should be dual aspect in more central, accessible and some intermediate locations (i.e. near city or town centres). Ideally any 3 bedroom apartments should be dual aspect.</p>	Aspect and orientation of the apartment units have been designed to maximise the favourable south and west aspects. More than 50% of apartments will be dual aspect
Floor to Ceiling Height	Ground floors, floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. Standard floor to ceiling height is 2.4m.	<p>Proposed Floor to Ceiling heights are as follows:</p> <p>Ground floor apartments 2.7m Apartments first floor and over 2.4m min Ground floor mixed use commercial 3.5m</p>
Lift Core	A maximum of 12 apartments per floor on a lift core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, subject to overall design quality and compliance with building regulations.	No more than 12 no. apartments per floor on a lift core are proposed.
Internal Storage	<p>Minimum Storage requirements:</p> <ul style="list-style-type: none"> Studio 3 sqm 1-bed 3 sqm 2-bed (3 person) 5 sqm 2-bed (4 person) 6 sqm 3+ bed (5+ person) 9 sqm <p>Secure storage can be provided outside individual units, and this may be used to satisfy up to half of the minimum storage requirement for individual apartment units.</p>	The storage provision within each the units equals or exceeds the Design Standards requirements of 9sqm, 6sqm and 3sqm respectively and is provided within the apartment.
Private Amenity Space	Private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.	Private balcony/terrace areas are in accordance with or exceed the Design

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Sustainable Urban Design

	<ul style="list-style-type: none"> • Studio 4 sqm • 1-bed 5 sqm • 2-bed (3 person) 6 sqm • 2-bed (4 person) 7 sqm • 3+ bed (5+ person) 9 sqm <p>Minimum depth of 1.5m is required for balconies, primarily accessed from living room.</p> <p>Standards may be relaxed for refurbishment schemes, or on urban infill sites of up to 0.25ha, subject to overall design quality.</p>	<p>Standards area requirements of 9sqm, 7sqm and 5sqm respectively.</p> <p>All balconies/terraces are 1.5m deep or greater.</p>
Security Considerations	<p>Apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.</p>	<p>Open spaces and play areas internal and external to the building and adjacent pedestrian / cycle and vehicular routes benefit from passive surveillance.</p> <p>Entrance points shall be clearly indicated, well lit, and overlooked by adjoining dwellings. Provision has been made to accommodate concierge services at the main arrival point to the development.</p>
Access and Services	<p>Apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations.</p>	<p>Apartments are compliant with Part M of the building regulations.</p>
Communal Facilities	<p>Communal rooms including, laundry facilities, community or meeting rooms and gym may be provided in apartment schemes, particularly in larger developments.</p>	<p>A concierge, multi-function room and gym are proposed.</p>
Childcare	<p>Threshold for provision of childcare facilities in apartment schemes should be established having regard to the scale and unit mix; existing childcare facilities and demographic profile of the area. One-bedroom or studio units should not generally be considered to contribute to requirement for any childcare provision and subject to location, this may also apply in part, or whole to units with two or more bedrooms.</p>	<p>A childcare facility with 48 no. spaces is proposed. A <i>Childcare Demand Analysis</i> is submitted as part of the planning application documentation.</p>
Refuse Storage	<p>Provision shall be made for the storage and collection of waste materials in apartment schemes. Refuse facilities shall be accessible to each apartment stair/ lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage. The following general design considerations should be taken into account in the provision of refuse storage facilities:</p> <p>Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;</p> <p>In larger apartment schemes, consideration should also be given to the provision of separate collection facilities for other recyclables such as glass and plastics;</p> <ul style="list-style-type: none"> • Waste storage areas must be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies and taking account the avoidance of nuisance for habitable rooms nearby; • Provision in the layout for sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people; 	<p>Refuse facilities are located in the basement at 8 no. locations proximate to lift cores from each block, and 1 no. refuse facility at surface level all of which are sufficient in size as detailed in the <i>Waste Management Plan</i> enclosed.</p> <p>Sufficient provision for the temporary storage of segregated materials prior to deposition in communal waste storage.</p> <p>Provision for separate collection of food waste, glass, recycling / cardboard and general waste.</p> <p>Waste storage areas, as detailed in <i>Waste Management Plan</i> shall:</p> <p>Drainage of a basic nature is recommended for the bin area. This is to allow for up keep/power washing of the area. (Actual specification would be referred to the contractor).</p>

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- Waste storage areas should not present any safety risks to users and should be well-lit;
- Waste storage areas should not be on the public street, and should not be visible to or accessible by the general public. Appropriate visual screening should be provided, particularly in the vicinity of apartment buildings;
- Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles;
- The capacity for washing down waste storage areas, with wastewater discharging to the sewer.

Ventilation would also be required but the contractor would advise on relevant regulations.

Mag door openers that comply with fire safety regulations are recommended to allow for removing bins without damaging doors, a metal strip can also be put on areas where bins can damage doors or areas of concern (picture below as example).

Adequate lighting is recommended to allow for a brighter, safer environment. Lux of 350-450 advised minimum, this is above the standard requirement.

A waste brush and pan set shall be kept in all bins rooms. This allows the tenants to be a part of keeping the rooms clean if a bag spills etc.

A waterproof epoxy paint shall be used on the floors and also to fully paint the walls. Epoxy paint to go up to 4.5 feet on wall an additional option. This allow for spillages to be easily cleaned, but also for greatly improved aesthetics.

KeyWaste will provide recycling guidelines and policy for the residents.

- Communal Amenity Space
- Studio: 4 sq.m
 - One bedrooms: 5 sq.m
 - Two bedrooms: (3 person) 6 sq.m
 - Two bedrooms: (4 person) 7 sq m
 - Three bedrooms: 9 sq.m

Communal/Semi-private Open Space is provided within the courtyard formed by the four perimeter blocks (3,196sq.m). The overall area provided, c. 3,671 sqm, comfortably exceeds that required by applying the Design Standards requirements of 9 sq.m, 7 sq.m and 5 sq.m respectively to the proposed 331 apartments (c. 2,371 sq.m).

- Children's Play
- Recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs should be catered for:
- Within the private open space associated with individual apartments;
 - Within small play spaces (c.85-100 sqm) for children up to age of 6 in a scheme that includes 25 or more units with 2 or more bedrooms.
 - Within play areas (200- 400 sqm) older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms

Private open space within apartments accords with *Sustainable Urban Housing: Design Standards for New Apartments* and provides for children's play needs. A play area of 152 sq.m is provided within the semi-private open space courtyard formed by the four perimeter blocks for children up to 6 years of age.

3 no. play areas are provided (650 sq.m) in a series of interconnected areas to the south east of the Block A for older children and young teenagers.

- Bicycle Parking and Storage
- General minimum standard of 1 no. cycle storage space per bedroom.
- Visitor cycle parking shall also be provided at a standard of 1 no. space per 2 no. residential units.
- Parking should be sheltered, secure and safe. It is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided.

690 no. bicycle parking spaces are proposed within the basement. These spaces are secure and sheltered within secured enclosed spaces in the basement. The high quality spaces do not include stacking and can be used by all cyclists. An additional 70 no. bicycle parking spaces are proposed at surface, giving a total provision of 760 no. spaces. This provision is considered to be appropriate given the level public transport which services the proposed development.

Sustainable Urban Design

There is the opportunity in the future to provide additional bicycle parking spaces if it is found there is additional bicycle parking demand through the reallocation of existing surface car parking spaces adjacent to the proposed development.

A Car and Bicycle Parking Strategy is set out in the Traffic and Transport section of the EIA and *Traffic and Transport Assessment*.

Car Parking	<p>Section 4.18 states that the quantum of car parking provision for residential developments generally is a matter for individual planning authorities having regard to local circumstances (notably location and access to public transport).</p> <ul style="list-style-type: none"> • Central and/or Accessible Urban Locations: Car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances • Intermediate Urban Locations: a reduced overall car parking standard. • Peripheral and/or Less Accessible Urban Locations: one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required. 	<p>1 no. car parking space per apartment is proposed. No additional car parking spaces are proposed for visitors. Visitor car parking demand is to be met through more shared usage of existing retail car parking spaces associated with the adjacent retail park and local centre.</p> <p>Proposed car parking provision is considered to be in accordance with the that proposed for an intermediate urban location.</p> <p>A Car and Bicycle Parking Strategy is set out in the Traffic and Transport section of the EIA and <i>Traffic and Transport Assessment</i>.</p>
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7.6 Design Manual for Urban Roads and Streets 2013

JB Barry & Partners Consulting Engineers have undertaken a separate appraisal of the proposed development and its conformity with the *Design Manual for Urban Roads and Streets 2013*. This appraisal of consistency is enclosed in **Appendix A** confirms the following:

“The roads and streets contained within the existing Northwood Park development and the proposed Blackwood Square development have been designed in accordance with the principles set out in the Design Manual for Urban Roads and Streets (DMURS).”

7.7 Urban Design Manual – A Best Practice Guide

The Urban Design Manual seeks to create residential developments where people want to live and visit. In order to achieve this, the Urban Design Manual is based around 12 no. criteria:

- Context;
- Connections;
- Inclusivity;
- Variety;
- Parking;
- Efficiency;
- Distinctiveness;
- Layout;
- Public Realm;
- Adaptability;
- Privacy and Amenity; and
- Detailed Design

The 12 no. criteria are considered as a means of testing a proposal against the principles of good urban design. The proposed development has been designed with consideration for this criteria and good urban design practice has been incorporated throughout the proposal in its layout, public realm and open space.

STATEMENT OF CONSISTENCY

The consistency of the proposed development with the Urban Design Manual is outlined in **Table 7-5**.

Table 7-5: Urban Design Manual Consistency Appraisal

Urban Design Manual		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
<p>Context: How does the development respond to its surroundings?</p>	<ul style="list-style-type: none"> The development seems to have evolved naturally as part of its surroundings. Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users. Form, architecture and landscaping have been informed by the development's place and time. The development positively contributes to the character and identity of the neighbourhood. Appropriate responses are made to the nature of specific boundary conditions. 	<p>Proposed development in form and materials is clearly linked to existing residential and commercial development. The density of the scheme is higher than the adjacent residential development to reflect evolution of area adjacent to planned metro and national planning guidelines.</p> <p>The high quality, landscaped public open space enhances the visual and amenity value of the development, maintains existing trees along the eastern boundary and is detailed fully in the landscape plans and report included.</p> <p>Further detail is provided in the <i>Architect's Design Statement</i> prepared by Kevin Fitzpatrick Landscape Architecture.</p>
<p>Connections: How well connected is the new neighbourhood?</p>	<ul style="list-style-type: none"> There are attractive routes in and out for pedestrians and cyclists The development is located in or close to a mixed-use centre The development's layout makes it easy for a bus to serve the scheme The layout links to existing movement routes and the places people will want to get to Appropriate density, dependent on location, helps support efficient public transport 	<p>The proposed development:</p> <ul style="list-style-type: none"> Links directly to existing footpaths. Is adjacent to a neighbourhood centre, commercial development and residential development. Is located approximately 350m from existing bus services and the proposed MetroLink Northwood Station. <p>The density of the proposed development is appropriated given proximity to high capacity public transport network.</p>
<p>Inclusivity: How easily can people use and access the development?</p>	<ul style="list-style-type: none"> New homes meet the aspirations of a range of people and households Design and layout enable easy access by all There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all. New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers 	<p>The proposed development includes a variety of apartment type including 1, 2 and 3 bedroom units of differing designs.</p> <p>Design is in accordance with Part M Building Regulations.</p> <p>As detailed in the <i>Architect's Design Statement</i> the proposed development includes public and private amenity spaces and play areas for younger and older children. All apartments are provided with private balconies, terraces or patios.</p> <p>The public open space is external to the building blocks and is therefore clearly defined and accessible to all.</p> <p>As detailed in the <i>Architect's Design Statement</i> the proposed buildings will deliver a distinctive placemaking feature in the overall development, a gathering of built structures of scale and massing appropriate to address the spaces they face and, in the case of the west elevations, to frame the adjacent large space to the west.</p>
<p>Variety: How does the development promote a good mix of activities?</p>	<ul style="list-style-type: none"> Activities generated by the development contribute to the quality of life in its locality Uses that attract the most people are in the most accessible places 	<p>The proposed development will provide homes for people adjacent to existing retail and commercial development and high capacity public transport.</p> <p>The development will include a range of mixed use commercial units capable of accommodating class 1, 2,</p>

Urban Design Manual		
	<ul style="list-style-type: none"> • Neighbouring uses and activities are compatible with each other Housing types and tenure add to the choice available in the area • Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood 	8, café/deli and restaurant uses adding to the variety and vibrancy of the area.
<p>Efficiency: How does the development make appropriate use of resources, including land?</p>	<ul style="list-style-type: none"> • The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design • Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems • Buildings, gardens and public spaces are laid out to exploit the best solar orientation • Appropriate recycling facilities are provided 	<p>The proposed development is within 350m of existing bus services and the planned Metro link high capacity public transport. The proposed scheme delivers a density of c. 158 units per hectare.</p> <p>The landscape strategy aims to integrate the new built development with the existing landscape and create attractive and usable open spaces while contributing to the local biodiversity. The public areas are designed as landscape spaces that offer the opportunity for meeting, walking and formal and informal play. The long-term development and maintenance of the landscape is an integral part of the design strategy. This is fully detailed in the enclosed <i>Landscape Report & Outline Landscape Specification</i> prepared by Kevin Fitzpatrick Landscape Architecture.</p> <p>The SuDS strategy for the proposed development provides a comprehensive approach to the management of surface water on the site. This is contained in the <i>Water Services Report</i> prepared by JB Barry & Partners Consulting Engineers.</p> <p>The 4-block configuration allows gaps between buildings for light penetration. Aspect and orientation of the apartment units have been designed to maximise the favourable south and west aspects.</p> <p>The existing trees that are retained within the scheme are to be complemented by additional planting of native and naturalised broadleaf tree planting. The plant species are chosen to respect the local environment while providing suitable vegetation that is harmonious with a residential area and will be successful through all stages of its maturity.</p> <p>As detailed in the <i>Waste Management Plan</i> the proposed development shall provide for the separation and collection recycling / cardboard, glass and the collection of food waste.</p>
<p>Distinctiveness: How does the proposal create a sense of place?</p>	<ul style="list-style-type: none"> • The place has recognisable features so that people can describe where they live and form an emotional attachment to the place • The scheme is a positive addition to the identity of the locality 	<p>The proposed development through use of materials and design is linked with existing adjacent development. The development is linked with and provides improved connectivity to the Santry River Amenity Walk.</p> <p>The apartments are located adjacent to the existing neighbourhood centre, this in addition to proximity to</p>

Urban Design Manual

- The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout
- The proposal successfully exploits views into and out of the site
- There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre

Northwood MetroLink Station emphasises the centrality of this location. By tilting the axis of the south west building, two triangular plaza spaces are created. The southern space doubles as plaza/arrival area for the scheme and as part of the east to west permeability route through the wider masterplan area. The schemes concierge space opens to this area. The second plaza are, immediately west of the south-west building, is envisaged as an open area which could in future incorporate external seating for a coffee shop or restaurant. These plaza areas will have quality landscaping and paving, the latter area presenting the more taut urban aesthetic.

Layout:
How does the proposal create people-friendly streets and spaces?

- Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.
- The layout focuses activity on the streets by creating active frontages with front doors directly serving the street
- The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers
- Traffic speeds are controlled by design and layout rather than by speed humps
- Block layout places some public spaces in front of building lines as squares or greens, and some semi private space to the back as communal courts

In addition to linking with the wider pedestrian network within Northwood the proposed development has direct pedestrian routes to:

- Northwood MetroLink Station
- Gulliver’s Local Centre
- Santry River Amenity Walk
- Santry Demesne Park

Active frontages address the existing Gulliver’s Local Retail Centre and Gulliver’s Retail Warehouse. The proposed development proposes very limited modifications to the existing road network and ensures vehicle speed in the vicinity of the creche is reduced and there are no turning movements. A public space green area is provided in front of building lines to the east and semi-private space is provided within the courtyard formed by the four blocks.

Public Realm:
How safe, secure and enjoyable are the public areas?

- All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use
- The public realm is considered as a usable integrated element in the design of the development
- Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood
- There is a clear definition between public, semi private, and private space
- Roads and parking areas are considered as an integral landscaped element in the design of the public realm.

The public open space is overlooked by the apartments and incorporates play areas for older children. Public, semi private and private space are clearly defined. The children’s play area is located within the internal courtyard and is overlooked by apartments. Private space is within balconies, terraces and patios. Semi-private space is within the courtyard formed by the four blocks. Public open space is located at the perimeter of the building blocks. No car parking is proposed at surface and new road / junction upgrades proposals are minimal.

Adaptability:
How will the buildings cope with change?

- Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation
- The homes are energy-efficient and equipped for challenges anticipated from a changing climate

The apartments shall be energy-efficient and will include the use of space heating, heat pumps or CHP. Low energy luminaires and automatic controls such as motion sensors are to be provided for electric lighting to maximize efficiency in use within common areas and external lighting.

Urban Design Manual		
	<ul style="list-style-type: none"> The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annexe or small office 	<p>Ducting facilitating the provision of additional E car charging points will be provided.</p> <p>The layout of the apartments including bedrooms and storage areas provides flexibility for future modification of apartments.</p>
<p>Privacy and Amenity: How does the scheme provide a decent standard of amenity?</p>	<ul style="list-style-type: none"> Each home has access to an area of useable private outdoor space The design maximises the number of homes enjoying dual aspect Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout. Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables. 	<p>Each home has access to an area of useable private outdoor space provided within balconies, terraces or patios in excess of standards set out in <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018</i>. Over 50% of apartments are dual aspect. The design of all buildings is required to meet with all relevant parts of the Building Regulations. The specific detail of which will be completed at detailed design stage All apartments include a storage area in excess of standards set out in <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018</i> and have provision for the sorting and storage of recyclables prior to depositing in appropriate bin at basement level.</p>
<p>Parking: How will parking be secure and attractive?</p>	<ul style="list-style-type: none"> Appropriate car parking is on-street or within easy reach of the home's front door. Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation. Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces. Materials used for parking areas are of similar quality to the rest of the development. Adequate secure facilities are provided for bicycle storage. 	<p>Secure car parking is provided in the basement. One car parking space per unit is provided. Access to the basement is provided by lifts and stairs from each of the four blocks.</p> <p>Visitor car parking is provided at surface and facilitates efficient multi-use of existing car parking spaces. 690 no. sheltered bicycle parking spaces are provided in secure enclosed areas within the basement and 70 no. bicycle parking spaces are to be provided at surface.</p>
<p>Detailed Design: How well thought through is the building and landscape design?</p>	<ul style="list-style-type: none"> The materials and external design make a positive contribution to the locality The landscape design facilitates the use of the public spaces from the outset Design of the buildings and public space will facilitate easy and regular maintenance Care has been taken over the siting of flues, vents and bin stores 	<p>Proposed development in form and materials is clearly linked to existing residential and commercial development.</p> <p>The landscape design prioritises the retention of the existing trees on the eastern boundary to provide a mature and useable public space from the outset. Landscaping and recreation areas have been so designed, including the choice of materials to minimise the need for maintenance.</p> <p>Residential bins shall be stored within the basement and the limited commercial bins shall be located and screened from view between Blocks B and C.</p>

7.8 Urban Development and Building Heights

The *Urban Development and Building Heights – Guidelines for Planning Authorities* (Building Heights Guidelines) were published in December 2018 to set out national planning policy guidelines on building heights in urban areas. The Building Heights Guidelines state that *“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”*.

Section 3.2 of the Guidelines set out a number of criteria against which a proposed development shall be assessed. Specific Planning Policy Requirement (SPPR) 3 states that:

“It is a specific planning policy requirement that where:

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

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

The consistency of the proposed development with the criteria relating to SPPR 3 is set out in **Table 7-6**.

Table 7-6: Building Heights Guidelines Consistency Appraisal

Building Heights Guidelines		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Section 3.2: Development Management Criteria - At the scale of the relevant city/town	<ul style="list-style-type: none"> The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. Development proposals incorporating increased building height, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to 	<p>The proposed development is located within 350m of existing bus services and the proposed Northwood MetroLink Station to which it shall be linked by a direct and dedicated pedestrian and cycle route.</p> <p>The development is also linked with and provides improved connectivity to the Santry Amenity Walk and has direct pedestrian routes to Gulliver’s Local Centre and Santry Demesne Park.</p> <p>Through use of materials, design and layout, the proposed development will fit well within existing adjacent development. It will provide active frontages to address the existing Gulliver’s Local Retail Centre and Gulliver’s Retail Park.</p> <p>By tilting the axis of the south west building, two triangular plaza spaces are created. The southern space doubles as plaza/arrival area for the scheme and as part of the east to west permeability route through the wider masterplan area.</p> <p>A public space green area is provided in front of building lines to the east and semi-private space is provided within the courtyard formed by the four blocks.</p> <p>As detailed in the <i>Architect’s Design Statement</i> prepared by McCrossan O’Rourke Manning Architects the proposed buildings will deliver a distinctive placemaking feature in the overall development, a gathering of built structures of scale and massing appropriate to address the spaces they face and, in the case of the west elevations, to frame the adjacent large space to the west.</p> <p>A Landscape and Visual Impact Assessment is contained in the EIAR which is enclosed as part of the planning application pack.</p>

Building Heights Guidelines

	<p>respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	
<p>Section 3.2: Development Management Criteria - At the scale of district/ neighbourhood/ street</p>	<ul style="list-style-type: none"> • The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape • The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered. • The proposal enhances the urban design context for public spaces and key thoroughfares, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure. • The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner. • The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood. 	<p>The proposed development has been designed with consideration for the context and setting of the subject site and will enhance the neighbourhood and streetscape. The development is linked with and provides improved connectivity to the Santry River Amenity Walk and has direct pedestrian routes to:</p> <ul style="list-style-type: none"> • Planned Northwood MetroLink Station • Gulliver’s Local Centre • Santry Demesne Park <p>Active frontages address the existing Gulliver’s Local Retail Centre and Gulliver’s Retail Park.</p> <p>The landscape strategy aims to integrate the new built development with the existing landscape and create attractive and usable open spaces while contributing to the local biodiversity. Further detail is provided in the enclosed <i>Landscape Report & Outline Landscape Specification</i> prepared by Kevin Fitzpatrick Landscape Architecture.</p> <p>As detailed in the <i>Architect’s Design Statement</i> prepared by McCrossan O’Rourke Manning Architects the proposed buildings will deliver a distinctive placemaking feature in the overall development, a gathering of built structures of scale and massing appropriate to address the spaces they face and, in the case of the west elevations, to frame the adjacent large space to the west. The facades are articulated to ensure variety and avoid long, uninterrupted walls. Materials and design are linked with existing adjacent development to ensure the proposed development comfortably sits into its surroundings.</p> <p>The proposed development will improve legibility by addressing existing spaces through active frontages and façade details that are distinctive and easy to recognise.</p> <p>The proposed development will provide homes for people adjacent to existing retail and commercial development and high capacity public transport. The development will include a range of mixed use commercial units capable of accommodating class 1, 2, 8, café/deli and restaurant uses adding to the variety and vibrancy of the area.</p>
<p>Section 3.2: Development Management Criteria - At the scale of the site/ building</p>	<ul style="list-style-type: none"> • The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. • Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for 	<p>Aspect and orientation of the apartment units have been designed to maximise the favourable south and west aspects. More than 50% of apartments will be dual aspect. The 4-block configuration allows gaps between buildings for light penetration. The <i>Daylight and Sunlight Assessment</i> accompanying the SHD application notes the level of units which are in accordance with the target averaged daylight factor.</p>

Building Heights Guidelines

Buildings – Part 2: Code of Practice for Daylighting’.

Section 3.2: Specific Assessments	To support proposals at some or all of these scales, specific assessments may be required and these may include: <ul style="list-style-type: none"> • Potential micro-climatic effects such as down-draft. • Potential impacts in sensitive bird and/or bat areas. • Potential impact on important telecommunication channels such as microwave links. • Potential impact on air navigation. • Potential impact on historic built environment. • Relevant environmental assessment requirements including SEA, EIA, AA and Ecological Impact Assessment, as appropriate. 	An EIAR and Appropriate Assessment Screening Report are enclosed as part of the SHD application package. These assessment reports consider all potential environmental impacts associated with the proposed development.
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Section 3 of the Building Heights Guidelines also includes SPPR4 which states that:

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

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

In accordance with the above, it is highlighted that:

- The proposed development will provide a density of c. 158 units per hectare within 350m of existing bus services and the proposed Northwood MetroLink Station to which it shall be linked by a direct and dedicated pedestrian and cycle route.
- The proposed development forms part of the wider redevelopment of lands within the former Santry Demesne / Northwood area that provides for a mix of building heights and typologies. Further information is provided in the *Architect’s Design Statement* prepared by McCrossan O’Rourke Manning Architects and enclosed as part of the SHD application.

7.9 Guidelines for Planning Authorities on Childcare Facilities

The *Childcare Facilities – Guidelines for Planning Authorities* (Childcare Guidelines) provide a framework to planning authorities for the preparation of forward planning documents and set a standard for assessing planning applications with consideration for childcare facilities.

STATEMENT OF CONSISTENCY

The Childcare Guidelines state that planning authorities should require the provision of “one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings”. However, the Guidelines note that: “this is a guideline standard and will depend on the particular circumstances of each individual site”.

The consistency of the proposed development with the Childcare Guidelines is outlined in **Table 7-7**.

Table 7-7: Childcare Guidelines Consistency Appraisal

Childcare Guidelines		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Chapter 3 Development Control & Related Standards	In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.	A childcare facility of 224sq.m is to be provided in the ground floor of Block C in the northwest of the site. This facility can accommodate 48 no. places as derived from the <i>Childcare Demand Analysis</i> prepared by RPS which forms part the application documentation. This analysis was informed by policy, existing and proposed childcare provision and the unit mix proposed. This facility includes a dedicated area of private open space for the use of staff and children and is also proximate to the proposed playground within the courtyard. A drop off area directly adjacent to the facility is proposed

7.10 The Planning System and Flood Risk Management

The *Planning System and Flood Risk Management Guidelines* (FRM Guidelines) introduced a “comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process”. The FRM Guidelines were prepared by the Office of Public Works (OPW) in partnership with the then Department of Environment, Heritage and Local Government (DEHLG). The OPW are the lead agency for flood risk management in Ireland. They develop indicative flood maps and catchment-based Flood Risk Management Plans (FRMPs) in partnership with planning authorities, the Environmental Protection Agency (EPA) and other relevant departments and bodies.

Implementation of the FRM guidelines will be achieved through actions at the national, regional, local and site-specific levels. The FRM Guidelines assist in the preparation of relevant national and regional departmental publications and regulations which in turn guide local planning authority policies and objectives. At local level, the FRM Guidelines highlight that “flood risk is a key consideration in preparing development plans and local area plans and in the assessment of planning applications”.

The FRM Guidelines also states that they “should be utilised by developers and the wider public in addressing flood risk in preparing development proposals”. When applying for planning permission, applicants and their agents are required to:

76 “Carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding, on specific sites and declaring any known flood history in the planning application form as required under the *Planning and Development Regulations 2006*.”

77 Engage with planning authorities at an early stage, utilising the arrangements for pre-planning application consultation with regard to any flood risk assessment issues that may arise.

78 Carry out a site-specific flood risk assessment, as appropriate, and comply with the terms and conditions of any grant of planning permission with regard to the minimisation of flood risk”.

The consistency of the proposed development with the FRM Guidelines is outlined in **Table 7-8**.

Table 7-8: Appraisal Planning System and Flood Risk Management Guidelines

Flood Risk		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Chapter 5 Flooding & Development Management	Sequential approach should be applied to avoid development in areas at risk of flooding.	The CFRAMS fluvial flood extent maps indicates that the site lies within Flood Zone C, and hence is at low risk of flooding. The PFRA flood extent map and FCC SFRA Flood Map indicates that the existing site lies within Flood Zone C.
	Where appropriate a detailed flood risk assessment is to accompany planning applications.	A <i>Flood Risk Assessment</i> is included in planning application documentation.
	Development in flood risk areas should be subject to the Justification test.	The <i>Flood Risk Assessment</i> concludes a justification test is not required for the proposed development.

7.11 Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategies (RSES) including the Metropolitan Area Strategic Plans (MASP) shall support the implementation of the *National Planning Framework* and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region.

The RSES for the Eastern and Midland Region came into effect on 28th June 2019. The RSES will:

- *“Take account of national policy – the NPF – Ireland 2040 and future national planning frameworks,*
- *Support and reflect the economic policies and objectives of Government and link with spatial planning objectives,*
- *Consider the qualities, population size, service offering and location of our towns and cities, and*
- *Support balanced economic development, building on the individual strengths of the 3 Irish regions and our shared interests (including our links with Northern Ireland)”*

The high level vision set out in the RSES is:

“To create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.”

This vision is underpinned by three key principles:

- *“Healthy Placemaking To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in.*
- *Climate Action The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.*
- *Economic Opportunity To create the right conditions and opportunities for the Region to realise sustained economic growth and employment that ensures good living standards for all.”*

The RSES supports the construction of MetroLink from Swords to Sandyford.

The RSES includes a Metropolitan Area Strategic Plan (MASP) which is aimed at providing the metropolitan area with planning and investment frameworks to address high-level and long-term strategic development matters including: strategic growth and development; transport and water infrastructure; regeneration, housing and employment; and regional parks and pedestrian and cycling networks. The subject site is located within the MASP and is proximate to the Dublin – Belfast Corridor.

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With regard to housing the RSES identifies an acute need to increase the supply of housing, particularly within cities and defined settlements.

The consistency of the proposed development with the RSES is outlined in **Table 7-9**.

Table 7-9: RSES Consistency Appraisal

Regional Spatial and Economic Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
3 Key Principles	Heathy Placemaking - Creation of healthy and attractive places to live.	Proposed development includes play areas for children, resident gym and is located proximate to significant green areas including Santry River Amenity Walk and Santry Park. The location of the development supports pedestrian, cycling and public transport travel.
	Climate Action - Enhance climate resilience and to accelerate a transition to a low carbon economy.	Construction materials, public transport access, pedestrian connectivity all promote climate resilience. The building fabric elements that will be used in the construction of the apartments will achieve the following performance: <ul style="list-style-type: none"> ▪ Walls 0.15 W/m2K ▪ Roof 0.16 W/m2K ▪ Windows 1.4 W/m2K ▪ Floors 0.14 W/m2K Improvements in heating performance are to be delivered by integrating air to water heat pumps as the lead contributor to the district heating network. Further detail is provided on the building fabric elements and the efficient, longevity and maintenance are provided in the <i>Building Lifecycle Report</i> prepared by McCrossan O'Rourke Manning Architects and the <i>Energy Statement</i> prepared by McElligott Consulting Engineers and included in the planning application documentation.
	Economic Opportunity - Create the right conditions and opportunities for the Region to realise sustained economic growth and employment.	The proposed development will increase housing supply thereby addressing a key potential constraint on economic growth within the city.
Regional Strategic Outcomes	Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens.	The proposed development is located within the metropolitan area adjacent to existing development including a neighbourhood centre and employment lands. The site is also serviced by existing and planned public transport services which link the proposed development with the wider region.
	Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.	The proposed development is located approximately 350m from the proposed MetroLink Northwood Station and existing public bus services. The proposed development includes a high quality pedestrian / cyclist link to these public transport services and will support future ridership of bus and rail services. 3 no. car share spaces are proposed. The proposed development will further the growth of a sustainable mixed use community with commercial, residential and retail facilities within Northwood.
	Pursue climate mitigation in line with global and national targets	Construction materials, public transport access, pedestrian connectivity all promote climate resilience.

Regional Spatial and Economic Strategy

	and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050.	An efficient centralised heating system shall minimise energy requirements. Ducting shall be provided to facilitate provision of E-car charging for all car parking spaces within the basement.
Housing Policy Objectives	Support Local Authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low cost rental and affordable homeownership.	In accordance with Section 96, Part V of the Planning and Development Act 2000 (as amended) units will be transferred to the Planning Authority for social and affordable housing. Please find enclosed in the submission a letter from Fingal County Council dated 7th November 2019 outlining their agreement subject to further negotiation.
	Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.	The proposed development includes a variety of apartment type including 1, 2 and 3 bedroom units and c.40 no. different designs. The variations in size, layout, storage space and private open space ensure the proposed development provides a range of housing types which will be attractive to a wide demographic. As detailed in the <i>Architect's Design Statement</i> the proposed development includes public and private amenity spaces and play areas for younger and older children. The high quality existing and planned public transport provisions serving the proposed development ensure the development will be attractive to those without access to a private motor vehicle.

7.12 Transport Strategy for the Greater Dublin Area 2016 - 2035

The *Transport Strategy for the Greater Dublin Area, 2016 to 2035* (Transport Strategy), prepared by the National Transport Authority sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare up to 2035. The strategy purpose of the Transport Strategy is *“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods”*.

The Transport Strategy promotes significant improvements to the pedestrian and cycling network in order to maximise inclusive accessibility for all. The Transport Strategy supports the provision of New Metro North (Now titled MetroLink,) and the Ballymun to City Centre core bus corridor.

With regard to development, including residential development, the Transport Strategy supports the integration of land use and transport through:

- Reducing the need to travel;
- Reducing the distance travelled;
- Reducing the time take of travel;
- Promoting walking and cycling; and
- Promoting public transport use.

Strategic Planning Principles of the Transport Strategy state that:

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- “Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised”.

The consistency of the proposed development with the Transport Strategy is outlined in **Table 7-10**.

Table 7-10: Transport Strategy Consistency Appraisal

Transport Strategy		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Land Use Integration and Behavioural Change (Chapter 7) Local Planning Principles	Planning at the local level should promote walking, cycling and public transport by maximizing the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools	The proposed development: <ul style="list-style-type: none"> • Links directly to existing footpaths and cyclepaths. • Is adjacent to a neighbourhood centre, commercial development and residential development. • Is located approximately 350m from existing bus services and the proposed Northwood MetroLink Station and is linked by a direct and dedicated pedestrian and cycle route.
	New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes;	Pedestrian / cycling routes are proposed within the subject site, connecting with the wider network within Northwood, particularly routes to the Metro Link, the adjacent neighbourhood centre, the Santry River Amenity Walk and Santry Park.
	Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips;	The proposed development prioritises pedestrian and cycle linkages. The proposed network will ensure that car movement within the site will be minimised with a very low level of through trips.

7.13 Fingal Development Plan 2017-2023

The local planning policy framework is set out in the *Fingal Development Plan 2017 – 2023* (FDP). Future development of the subject lands are governed by the Development Plan which sets out planning policies and objectives, as well as design standards for the administrative area.

The entire area of the subject lands is zoned “ME – Metro Economic Corridor” with an objective that seeks to “Facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor.” (see **Figure 7-2**).

The vision for lands with this zoning objective is to:

“Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the Metro within a setting of exemplary urban design, public realm streets and places, which are permeable, secure and within a high quality green landscape”

Uses that are considered to be ‘Permitted in Principle’ under the ‘ME’ zoning objective include inter alia:

- Residential;
- Restaurant / Café;

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- Retail -Local up to 150sq.m nfa;
- Health Practitioner;
- Utility Installations; and
- Open Space.

The proposed largely residential development within a wider mixed use community including employment and retail facilities accords with the land use zoning.



Figure 7-2: Land Use Zoning and Site Context

There is a local objective to prepare a Masterplan for lands at Northwood including the subject site.

“Objective SANTRY 5

Prepare and implement a Masterplan for lands identified at Northwood (see Map Sheet 11, MP 11.E) during the lifetime of this Plan. The main elements to be included are provided below. The list is not intended to be exhaustive.

- *Facilitate provision of an underpass to include provision for a car, bus, cycle, and pedestrian link to link lands east and west of the R108 to enhance connectivity.*
- *Ensure where feasible, development overlooks the Santry River Walk.*
- *Allow the re-location of existing units to facilitate connectivity to the proposed Northwood Metro Stop.*
- *Enhance pedestrian links within and to Santry Demesne.*
- *Ensure the continued protection of trees within the subject lands.*
- *Facilitate provision of a direct access route from Old Ballymun Road through Northwood. Development shall enhance connectivity to the proposed Northwood Metro Stop.”*

The subject site is located within the Outer Airport Noise Zone.

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The Development Plan is underpinned by a number of cross cutting themes including the principles of sustainable development, climate change adaptation, social inclusion and high quality design. Chapter 1 provides a strategic overview which sets the context for the more detailed policies and objectives contained therein. The Development Plan's overall aims and strategic direction of consolidated development, efficient use of land and integrated transport and land-use planning was formulated from a consideration of various national, regional and local documents including the NSS and the RPGs for the GDA.

Section 1.1 of the Development Plan provides an environmental overview of the County. It acknowledges Fingal's diverse range of environmental and heritage resources which include the coast, countryside, rivers, amenity lands, and rich archaeological and architectural heritage. The Development Plan identifies a number of key environmental challenges for the County which include inter alia:

- *“Protecting the ecological integrity of Natura 2000 sites while allowing for ongoing growth and development.*
- *Providing for growth and development which reduces energy consumption, promotes sustainable modes of transport and reduces car-dependency.*
- *Ongoing provision of high-quality accessible parks and open spaces for our growing population.”*

Policy objectives with regard to the Metro Economic Corridor included within the Development Plan state:

“Objective ED98

Prepare Local Area Plans and Masterplans within the lifetime of the Development Plan for strategically important Metro Economic zoned lands in collaboration with key stakeholders, relevant agencies and sectoral representatives.

Objective ED99

Protect the integrity of the Metro Economic corridor from inappropriate forms of development and optimise development potential in a sustainable and phased manner.

Objective ED100

Ensure high quality urban design proposals within the Metro Economic zoning, incorporating exemplary public spaces, contemporary architecture and sustainable places within a green landscape setting.”

The Development Plan provides specific guidance on a number of issues pertaining to the development of apartments including:

- Residential Mix;
- Private Amenity Space;
- Communal Amenity Space;
- Public Open Space;
- Overlooking and Overshadowing;
- Retail / Café Units;
- Ancillary Development Uses;
- Car Parking;
- Cycle Parking; and
- Public Art.

The consistency of the proposed development with the FDP is outlined in **Table 7-11**.

Table 7-11: Development Plan Consistency Appraisal

FDP		
Reference	Relevant Policy / Objective / Guidance	Statement of Consistency
Residential Mix Objective PM40	<i>“Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.”</i>	The proposed development includes 1, 2 and 3 bedroom apartment units of varying size and design and is located adjacent to an emerging residential community made up of apartments and houses as permitted under Reg. Ref. F15A/0440 as amended. A <i>Unit Mix Report</i> prepared by RPS is enclosed as part of the planning application.
Residential Density Objective PM41	<i>“Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.”</i>	The subject site is within 350m of existing bus services and the proposed Northwood Metro Stop. The development is directly adjacent to a local retail centre. The proposed scheme delivers an appropriate density of c. 158 units per hectare.
Open Space – Objective PM65	<i>“Ensure all areas of private open space have an adequate level of privacy for residents through the minimisation of overlooking and the provision of screening arrangements.”</i>	All apartments are provided with private balconies, terraces or patios. The distance between the proposed blocks help ensure an appropriate level of privacy.
Open Space - Objective DMS89	<i>“Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 12.6.”</i>	Each home has access to an area of useable private outdoor space provided within balconies, terraces or patios in excess of standards set out in Table 12.6 of the FDP.
Open Space - Objective DMS90	<i>“Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents”</i>	The scale of the central common courtyard and the set-back distance between buildings provides good privacy for residents of the units fronting the semi-private open space at the centre of the scheme. Apartments along the eastern flank of the scheme will enjoy the vista of the bank of large retained trees. The trees will deliver visual pleasure and a sense of privacy and enclosure. New tree planting is proposed along the western flank of the site. The aim is to soften the vista from the apartments and to suggest a semi-private setback while retaining the urban tautness necessary on this side of the scheme
Open Space - Objective DMS91	<i>“Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 12.6.”</i>	A semiprivate area within the courtyard formed by the proposed blocks including sitting out areas shall be provided in excess of standards set out in Table 12.6 of the FDP.
Open Space - Objective DMS92	<i>“Permit in appropriate layouts (e.g. courtyard layouts) the provision of a combination of private and semi-private open spaces.”</i>	Semi-private open space and private balconies and patios /terraces are provided within the courtyard area.
Open Space -	<i>“In order to provide existing and future communities with adequate recreational and leisure opportunities, the Council will employ a flexible approach to the delivery of public open space and more intensive</i>	It is proposed to provide an area of open space extending to c 0.46.ha. This is in excess of standards set out in <i>Sustainable Urban Housing: Design</i>

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Objective PM52	<p><i>recreational/amenity facilities. It is the intention of the Council, however, to ensure, except under exceptional circumstances, public open space provision exceeds 10% of a development site area.</i></p> <p><i>“Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms”.</i></p>	<p><i>Standards for New Apartments and is c.22% of the site area.</i></p> <p>The rigid application of the standards set out in Objective PM52 provides a population estimate of 562 people and a requirement for open space provision of c. 1.4ha. Given this site area is 2.1ha such a provision is not practicable. The proposed provision of 0.46ha equates to 22% of site and is considered to be more appropriate. In addition, the subject site is proximate to Santry Park which is classified as a regional park. The subject site is proximate to Santry River Amenity Walk. The location of the site and its connectedness to surrounding open spaces is illustrated on Figure 4.2.</p> <p>It is also noted that this development also devotes 0.52ha to the creation of public realm and link to the proposed MetroLink, which is additional to the public open space provision.</p>
Open Space - Objective PM53	<p><i>“Ensure public open space is accessible and designed so that passive surveillance is provided”.</i></p>	<p>Public open space is accessible and benefits from passive surveillance from the adjoining blocks.</p>
Open Space - Objective PM53	<p><i>“Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation to include residents”.</i></p>	<p>The open spaces provided are all high accessible and immediately adjacent to the perimeter of the blocks. It is envisaged that the large public park area to the east shall link with a similar space currently being delivered in the “Bridgfield” scheme to the north and thereafter connected northwards to the Santry River Amenity Walk. The location of the site and its connectedness to surrounding open spaces is illustrated on Figure 4.2.</p>
Open Space - Objective PM53	<p><i>“Provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses”.</i></p>	<p>The internal courtyard will provide areas for passive recreation, seating and play. Play areas (650sq.m) shall be provide to the south east of Block A and combined with seating areas and the proposed walkway.</p>
Play Facilities Objective DMS75 -.	<p><i>“Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4sqm per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units”</i></p>	<p>The rigid application of the standards set out in Objective DMS75 generates a requirement for play provision of c. 1,324 sq.m.</p> <p>Two separate play areas are provided. A play area of 152sqm for younger children is provided within the courtyard. A play area of 650sqm for older children is provided to the east and south of Blocks A and D. This is in excess of standards set out in <i>Sustainable Urban Housing: Design Standards for New</i></p>

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		<p><i>Apartments</i> and in consideration of the housing mix proposed and the proximity of the site to Santry River Amenity Walk and Santry Park this is considered an appropriate provision of play facilities.</p> <p>It is also noted that a playground is also under construction immediately to the north of the site as part of the residential development being completed at Bridgefield.</p>
Play Facilities Objective DMS76 .	<p><i>“Ensure that in the instance of an equipped playground being included as part of a specific facility, it shall occupy an area of no less than 0.02 hectares. A minimum of one piece of play equipment shall be provided for every 50sqm of playground”</i></p>	<p>The play areas for younger children is c. 152sqm. More than one piece of play equipment shall be provided for every 50sqm of playground.</p> <p>The total area of the three interconnected play areas for older children is c. 650sqm. More than one piece of play equipment shall be provided for every 50sqm of playground.</p>
Noise Objective DA07	<p><i>“Strictly control inappropriate development and require noise insulation where appropriate within the Outer Noise Zone...”</i></p>	<p>The Noise and Vibration Chapter of the EIAR considers external noise sources and include recommendation to be included the proposed development.</p>
Car Parking	<p>The Development Plan states with regard to car parking standards: <i>“Car parking standards provide a guide as to the number of required off-street parking spaces acceptable for new developments. The principal objective of the application of car parking standards is to ensure that, in assessing development proposals, consideration is given to the accommodation of vehicles attracted to the site within the context of existing Government policy aimed at promoting modal shift to more sustainable forms of transport.”</i></p> <p>Table 12.8 of the Development Plan requires 1 no. car parking space for one bedroom apts, 1.5 no. car parking spaces for two bedroom apartments and 2 no. car parking spaces for 3 or more bedroom apts; and an additional 1 no. visitor car parking space is to be provided for every 5 no. units.</p> <p>One space or more per 100 spaces should be reserved for disabled parking bays.</p>	<p>It is proposed to provide 331 no. car parking spaces and an additional 4 no. disabled car parking spaces. Each apartment has 1 no. dedicated car parking spaces. In addition, 3 no. car club sharing spaces are allocated for use at surface level. Visitor car parking is to be provided for by the shared usage of existing adjacent retail car parking spaces. This quantum of car parking is considered to be appropriate given the overarching policy objective to promote sustainable transport modes and the planned provision of Northwood Metro Link train station within 350m of the subject site.</p> <p>This quantum of car parking is less than that which would be calculated by the rigid application of the Development Plan standards. However Development Plan standards <i>“provide a guide”</i> only and in the context of Government Policy, specifically as articulated in the <i>Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018</i> the proposed car parking provision is considered to accord with the Development Plan.</p> <p>A Car and Bicycle Parking Strategy is set out in the Traffic and Transport</p>

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		section of the EIAR and <i>Traffic and Transport Assessment</i> .
Bicycle Parking	The Development Plan states that the 'Norm' standard for bicycle parking for apartment units is 1 no. space per unit, with an addition 1 no. visitor space per 5 no. apartment units.	It is proposed to provide 760 no. bicycle parking spaces. This quantum of bicycle parking is significantly greater than that set out in the <i>Fingal Development Plan</i> . A Car and Bicycle Parking Strategy is set out in the Traffic and Transport section of the EIAR and <i>Traffic and Transport Assessment</i> .
Substations Objective DMS18:	Locate, where possible, new utility structures such as electricity substations and telecommunication equipment cabinets, not adjacent to or forward of the front building line of buildings or on areas of open space. Require new utility structures such as electricity substations and telecommunication equipment cabinets to be of a high quality design and to be maintained to a high standard by the relevant service provider.	A double substation is required to support the proposed development and future level of car charging facilities. The requirements of the ESB in this regard are set out in the <i>Energy Statement</i> prepared by McElligott Engineers. A design rationale for the location of the utility is set out in the <i>Architect's Design Statement</i> prepared by McCrossan O'Rourke Manning Architects.
Objective DMS19:		
Dual Aspect Objective DMS20	<i>"Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect."</i>	Over 50% of the apartment units are dual aspect.
Dual Aspect Objective DMS21	<i>"Allow a reduced percentage of dual aspect apartments only in circumstances where it is necessary to ensure good street frontage and subject to high quality design. In no instance will the provision be less than 33% of the number of apartments in the scheme."</i>	NA
Floor to Ceiling Height DMS22	<i>"Require a minimum floor to ceiling height of 2.7 metres in apartment units, at ground floor level."</i>	Proposed Floor to Ceiling heights are as follows: Ground floor apartments 2.7m Ground commercial units 3.5m.
Apt Lifts DMS23	<i>"Permit up to 8 apartments per floor per individual stair/lift core within apartment schemes."</i>	No more than 8 apartments per floor per individual stair/lift core are proposed.
Separation Distance Objective DMS28	<i>"A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs"</i> .	The minimum separation distance between directly opposing primary windows is greater than 22m.
Floor Area Objective DMS25	<i>"Require that the majority of all apartments in a proposed scheme of 100 or more apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%."</i>	In excess of 50% of the units exceed, by 10% or more, the minimum floor areas
Refuse Storage Areas Objective DMS36	<i>"Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided"</i> .	Proposed refuse storage areas are shown in basement and ground floor plans and detailed in the <i>Waste Management Plan</i> and within the <i>Architect's Design Statement</i> prepared by McCrossan O'Rourke Manning Architects.

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Refuse Storage Areas Objective DMS37	<i>"Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres".</i>	8 no. bin storage areas are provided within the basement and 1 at surface level. These bins are located proximate to the stair/lift core for each of the blocks to enable ease of access.
Lighting Objective LP01	<i>"Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas".</i>	The lighting scheme minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas. A <i>Public Lighting Report</i> and associated drawings prepared by McElligott Engineers forms part of the application documentation.
Public Art Objective DMS05	<i>"Require new residential developments in excess of 100 units and large commercial/retail developments in excess of 2000 sqm to provide for a piece of public art to be agreed with the Council."</i>	Our client is supportive of public art. A prominent location proximate to the main entrance to the apartment development is indicated on the landscape drawings prepared by Kevin Fitzpatrick Landscape Architecture.
Objective SANTRY 5	<i>"Enhance pedestrian links within and to Santry Demesne.</i>	The proposed development shall include pedestrian links which will enhance connectivity with Northwood Metro Station and Santry River Amenity Walk and Santry Park.
	<i>Ensure the continued protection of trees within the subject lands.</i>	As detailed in the <i>Landscape Report & Outline Landscape Specification</i> prepared by Kevin Fitzpatrick Landscape Architecture all the trees within the site (not recommended for immediate removal by the Arborist) are to be retained within the proposed scheme and incorporated into the landscape design. Recommendations contained in the <i>Arboricultural Report</i> will be incorporated into the Construction Management Plan for the approved development.
	<i>Facilitate provision of a direct access route from Old Ballymun Road through Northwood. Development shall enhance connectivity to the proposed Northwood Metro Stop.</i>	The proposed development shall not prejudice provision of a direct access route from Old Ballymun Road through Northwood. A new pedestrian / cycle link from the subject site to the Northwood Metro Station is proposed. This alignment may change as the metro plans are finalised.

8 COMPLIANCE WITH PART V

The proposed development is subject to the requirement of Part V of the Planning and Development Act 2000 (as amended). The Applicant has engaged with Fingal County Council's Housing and Community Department and they have agreed in principle to provide social housing units on site, in accordance with the statutory provisions. In this regard please find enclosed in the submission a letter from Fingal County Council dated 7th November 2019 outlining their agreement regarding the transfer of properties subject to further negotiation taking place and detail of the development cost (**Appendix B**).

9 CONCLUSION

This Statement of Consistency has been prepared in relation to the proposed SHD at lands at Northwood Avenue, Santry, Dublin 9. The proposed development will consist of the construction of: 331 no. apartment units in total, including 6 no. one bedroom units, 292 no. two bedroom units and 33 no. three bedroom units; associated car parking, bicycle storage and substation; landscaped public open space; network of pedestrian and bicycle paths with access points along the north south, east and west boundaries of the subject site and high quality connections to the planned MetroLink station at Northwood and Santry River Amenity Walk; and associated drainage arrangements, landscaping, boundary treatments and site development works.

This Statement of Consistency with planning policy has been prepared specifically to address the requirements of the SHD guidance document issued by An Bord Pleanála. It demonstrates that the proposed development is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy.

It is submitted that the provision of a medium – high density residential development and open space at this highly accessible location will assist in the development of Santry Demesne and provide for a more compact and sustainable urban form adjacent to high capacity public transport services. The proposed development will promote a strong sense of character and place and will facilitate a safe and socially inclusive community at a highly accessible location near to existing community and retail facilities and Northwood local centre. The development has been designed with respect for the existing adjacent form, layout and urban grain while encouraging individual character and a sense of belonging to a distinct place.

The proposal is 'Permitted in Principle' under the ME – Metro Economic zoning objective;

- The density is in accordance with that set out in the *Fingal Development Plan 2017-2023* and *Sustainable Residential Development in Urban Areas*;
- All dwelling types are generously sized and are in excess of the stated standards; offering flexibility and ensuring that the proposed units can be adapted to the needs of their residents during their lifetime;
- The private and communal amenity space to be provided will also exceed the standards and has been designed to have a high level of passive surveillance;
- The proposed layout and landscaping establish a clear distinction between public and private spaces and ensures that public areas and car parking spaces are suitably supervised; and
- Car and cycle parking is in line with requirements.

Having regard to this Statement of Consistency and the accompanying documentation provided as part of the planning application, it is respectfully requested that permission be granted for the proposed development in the interest of proper planning and sustainable development in Dublin and more specifically Fingal.

Appendix A

**Statement of Consistency with Ministerial Guidance Design Manual for
Urban Roads and Streets**

Cosgrave Developments



Blackwood Square, Northwood, Santry Demense, Dublin 9

Planning Application to An Bord Pleanala

Statement of Consistency with Ministerial Guidance

Design Manual for Urban Roads and Streets (2013)

November 2019



Document Control Sheet

Client:	Cosgrave Developments
Project Title:	Blackwood Square, Northwood, Santry Demense, Dublin 9
Document Title:	Statement of Consistency with Ministerial Guidance Design Manual for Urban Roads and Streets (2013)
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Table of Contents <i>(incl. Y/N)</i>	List of Tables <i>(incl. Y/N)</i>	List of Figures <i>(incl. Y/N)</i>	Pages of Text <i>(No.)</i>	Appendices <i>(No.)</i>
Y	N	N	3 no.	n/a

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Add hyperlink to Verification Email on PIM Register for each issue							
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SECTION 1: STATEMENT

This statement of consistency confirms the following:

- The roads and streets within the Northwood, Santry, D.9 and within the proposed Blackwood Square development, have been designed in accordance with the principles set out in the Design Manual for Urban Roads and Streets (DMURS).
- The roads and streets have also been designed in accordance with the key principles of the Fingal Development Plan (2017 – 2023) to promote sustainable modes of transport and a reduction in car dependency.

SECTION 2: SPECIFIC CONSIDERATIONS

DMURS encourages safer and more sustainable forms of travel and prioritises pedestrians, cyclists and public transport (in that order) over private motor vehicles.

The design has followed the 4 core principles contained in DMURS namely;

Design Principle 1:

To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.

The street network has been designed to maximise connections to amenities and services. High levels of permeability and legibility has been included in the design to enable residents to move in a sustainable manner without the use of the private car as the predominant choice of travel. Pedestrian and cycle networks have been provided throughout the main corridor of Northwood Avenue. The pedestrian and cycle networks connect with the Dublin Bus stops on Ballymun Rd (R108) and Swords Rd (R132), the existing retail areas, parks, office areas and other amenities. The development will also include a new pedestrian walkway through Gulliver's Retail Park, providing direct access to the future MetroLink stop.

Design Principle 2:

The promotion of multifunctional streets that balance the needs of all users within a self-regulating environment.

The aim is to enhance the value of place while at the same time calming traffic and improving pedestrian and cyclist comfort. This has been achieved by the design of safe streets that encourage low speeds by the use of raised tables, zebra crossings, curved roads and horizontal deflections while at the same time providing segregated off-road cycle and pedestrian routes which enable free movement of vulnerable users.

Design Principle 3:

The quality of the street is measured by the quality of the pedestrian environment.

Street design in Northwood has focused on the provision of a high-quality public space with priority for the pedestrian/cyclist. The public space immediately adjacent the retail area of the Blackwood Square development has been designed with the pedestrian in mind. The materials, finishes, and street furniture will be rationally and strategically applied. This Blackwood Square design will create a greater sense of place, where the streets, pedestrian areas and greenery contribute to the creation of attractive and lively mixed-use place.

Design Principle 4:

Greater communication and cooperation between design professionals through the promotion of a plan led, multidisciplinary approach to design.

The design of Blackwood Square, Northwood is being carried out by a full team of consultants comprising Town Planning, Architecture, Landscape Architecture, Engineering, Environmental, Conservation and Heritage Specialists.

The design team has a clear understanding of the process required to produce a collaborative and coordinated design taking into account plans and policies, spatial requirements and movement patterns.

SECTION 3: Summary

This design of the proposed Blackwood Square development recognises the importance of assigning higher priority to pedestrians and cyclists, without unduly compromising vehicle movement, in order to create secure, connected places that work for all members of the community. Walking and cycling will improve health and well-being and will provide greater opportunities for interaction which promote neighbourliness and community growth.

The Northwood development as a whole focuses on streets as attractive places. Utilising DMURS, it has encouraged the project team to design appropriate to context, character and location that can be used safely and enjoyably by the public.

Appendix B

Part V Agreement



Cosgrave Developments
15 Hogan Place
Dublin 2
D02 DK23

7th November 2019

Our Ref: B147.1

Re: Development at Pappan Grove Phase II, Northwood, Santry, Dublin 9

Dear Sirs,

I note your correspondence with regard to your proposed planning application for development of 331 units at Pappan Grove Phase II, Northwood, Santry, Dublin 9.

I note an agreement, in principle, with your client, subject to further negotiation, has been reached under Article 22(2)(e) of the Planning & Development Regulations 2001 (as amended) as follows for the purpose of validating your proposed planning application;

1. Transfer to the Planning Authority of persons nominated by the authority, a number of housing units on the subject site.
2. I confirm that details outlining the unit type have been submitted to the Housing Department and will be subject to further agreement.
3. I confirm that construction cost information has been submitted to the Housing Department and will be subject to further negotiation.

Should a planning permission issue in this instance, please contact the Housing Department with a view to finalising further details and agreeing costs and unit type for this development.

This validation letter is being issued for the above development proposal only and is valid only for a period of 3 months from the date of its issue.

Yours sincerely,

Marina Rennicks
Senior Staff Officer
Housing Department