



PLANNING REPORT – WHITE PINES CENTRAL SHD

FOR ASSESSMENT OF PROPOSED RESIDENTIAL DEVELOPMENT AT WHITE PINE CENTRAL, STOCKING AVENUE, DUBLIN 16



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1.0 INTRODUCTION

1.1 Application for Development

Tom Phillips + Associates¹ (“TPA”) in association with a multi-disciplinary team are instructed by the Applicant, Ardstone Homes Limited² to prepare this Strategic Housing Development (SHD) planning application in respect of a 2.2ha site at White Pines Central, Stocking Avenue, Dublin 16 (see Figure 1.1).

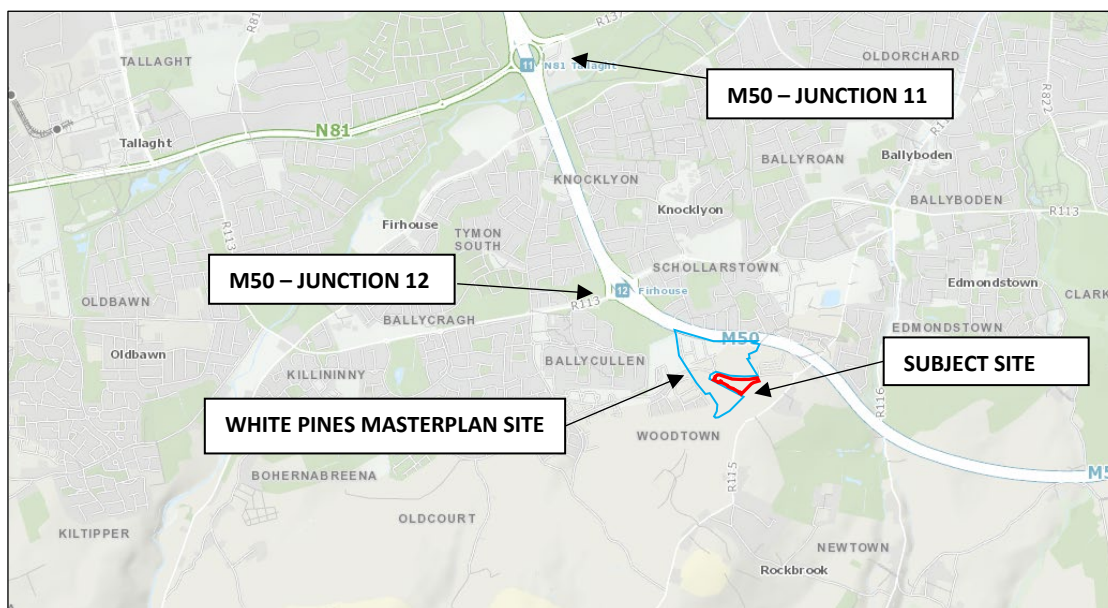


Figure 1.1: Urban Context Map (Source: www.geohive.ie; Annotated and Cropped by TPA, 2021).

The subject site at White Pines Central forms part of a wider Masterplan development, known as White Pines. The White Pines masterplan site comprises; White Pines Central, White Pines East, White Pines North, White Pines South and White Pines Retail.

Ardstone Homes Ltd. control the entire White Pines masterplan site and have already provided for some 281 no. three, four and five bedroomed family homes on lands adjacent to the subject site. The subject application (White Pines Central) represents the fifth and final phase of the wider White Pines masterplan development.

Phase	Provided/Proposed	Status
1. White Pines North	175 no. 3-5 bed family homes	Complete and Occupied
2. White Pines South	106 no. 3-5 bed family homes	Complete and Occupied
3. White Pines Retail	A single storey convenience retail unit (c.1,479 sq.m. GFA) and a three storey creche building (c.577sq.m. GFA).	Construction Commenced August 2020

¹ 80 Harcourt Street, Dublin 2, D02 F449.

²No. 48 Fitzwilliam Square, Dublin 2, D02 EF89.

4. White Pines East SHD	241 units in a mix of 1 and 2 bed apartments (see Table 1.2 below).	SHD Application submitted 30.03.2021
5. White Pines Central SHD	114 no. 1-3 Bed apartments/duplex units.	Subject application.

Table 1.1: White Pines Masterplan Development

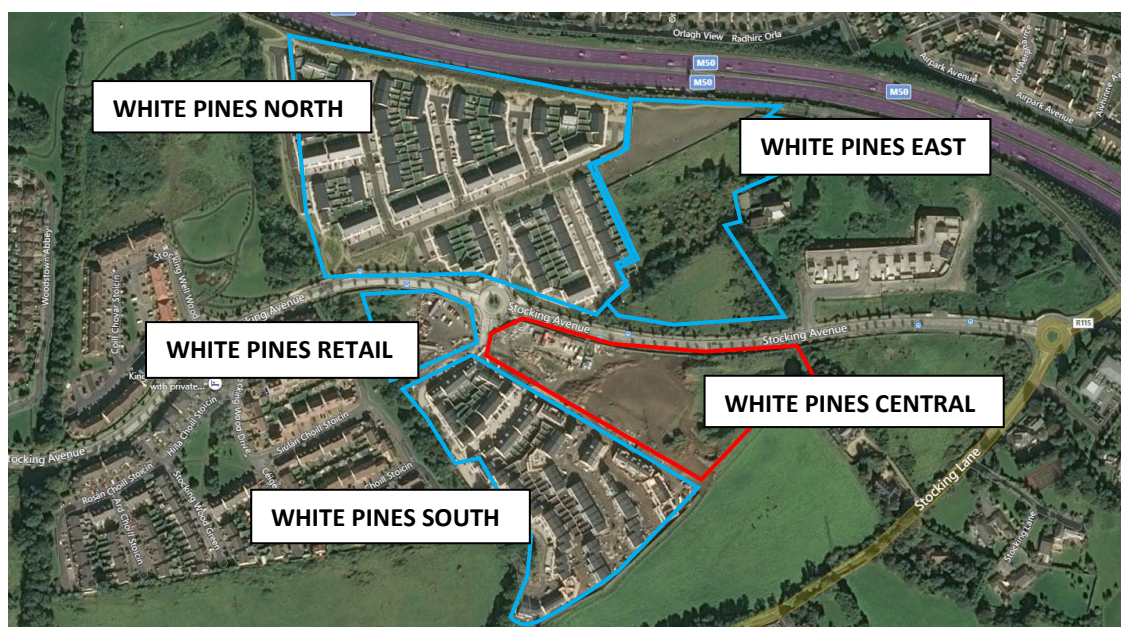


Figure 1.2: Adjoining Ardstone Homes Development Sites (Source: Google Maps, Annotated and Cropped by TPA, 2021).

Reg. Ref.	Address	Decision	Description
Completed/Approved Ardstone Homes Development			
South Dublin Reg. Ref. SD19A/0345, as amended SDCC Ref. SD20A/0322)	White Pines Retail	Granted 22.03.2021	Planning permission was granted permission for the construction of a neighbourhood centre comprising: a single storey convenience retail unit (c.1,688 sq.m. GFA) and a three storey creche building (c.591sq.m. GFA).
South Dublin Reg. Ref. SD19A/0099/ ABP Ref. PL06S.304670	White Pines South	Granted 26.09.2019	Retention permission was sought for works proposed to 65 no. houses. The overall development related to the construction of 99 no. houses permitted under Ref. SD17A/0359 on a site of c.2.29 ha at Stocking South.
South Dublin Reg. Ref. SD17A/0443–	White Pines South	Granted December 2017	Planning permission was granted by SDCC in December 2017 to amend a portion of the site, relating to 7 no. houses of the 122 permitted under application Reg. Ref. SD10A/0041, as amended.



South Dublin Reg. Ref. SD14A/0222, as amended SD14A/0222 SD17A/0359	White Pines North -	Granted 20.03.2015	Planning permission was granted for a 10-year permission for the construction of 175 no. residential units.
Forthcoming Planning Applications			
ABP Ref. PL06S.309836.	White Pines East SHD	N/A	An SHD planning application was submitted to ABP 30 th March 2021 for the construction of 241no. residential units and a community building space on a site north of Stocking Avenue, see Figure 1.2 above.

Table 1.2: Ardstone Development Sites surrounding White Pines Central

Please refer to Section 3.0 below for a comprehensive breakdown of the site’s planning history and other relevant planning applications in the area.

1.2 Proposed Development

In summary, the proposed development comprises the construction of 114 no. Build to Rent (BTR) residential units, in a mix of one, two and three bed apartments/duplex units across 6 no. blocks. Block A comprises a part 6, part 4 storey building providing some 47 no. one and two bed apartments. Blocks B, C1, C2, D1 and D2 each comprise 3 storey buildings providing a total of 67 no. one, two and three-bedroom apartment and duplex apartment units.

It should be noted that while the residential units are being proposed as BTR, as detailed in the Hosing Quality Assessment prepared by Reddy Architecture Urbanism (RAU), all proposed residential units have been provided in excess of the minimum standards set out in Appendix 1 of the Apartment Guidelines (2020).

The proposed development also includes hard and soft landscaping, boundary treatments, public lighting, ESB substations, plant/switch rooms, residential waste facilities, piped site wide services, and all ancillary works and services necessary to facilitate construction and occupation of the scheme. The development will be served by a vehicular access via White Pines South, on the southern side of the site, and by a new emergency access road at the north-eastern end of the development.

1.3 Environmental Impact Assessment Report (EIAR)

The project is accompanied by an *Environmental Impact Assessment Report* pursuant to EIA Directive 2014/52/EU, (which amends the previous EIA Directive 2011/92/EU), the *Planning and Development Act 2000 (as amended)* (“the Act”), and the *Planning and Development Regulations, 2001 (as amended)* (“the Regulations”).



A notification of this application will be made to the Dept. of Housing, Planning and Local Government, pursuant to section 172B of the Act, in advance of formally submitting the SHD application to the Board, for publication to the EIA Portal. The *EIAR* has been prepared due to the potential cumulative effects of the White Pines Masterplan residential projects, as the proposed development as a standalone project would not meet the threshold for a full *EIAR*.

1.4 Purpose of Planning Report

The purpose of this *Planning Report* is to outline the background to and substance of the development proposal. The report is intended to assist with the assessment of the application by providing an accessible summary of the content and context of the overall development and to give an insight into the rationale for the proposal and the process undertaken.

1.5 The Project Team

The project team includes the following consultants:

- Tom Phillips + Associates – Planning Inputs (TPA)
- Reddy Architecture + Urbanism (RAU)
- Mitchell + Associates Landscape Architects (MA)
- DBFL Consultant Engineers (DBFL)
- O'Connor Sutton Cronin Consultant Engineers (OCSC)
- Michael Slattery Associates (MSA)
- AWN Consultant Engineers (AWN)
- IAC Archaeology (IAC)
- Altemar Environmental Consultants
- 3D Design Bureau (3DDB)
- CMK Horticulture & Arbiculture Ltd (CMK)

This experienced planning and design team has worked together to produce what is considered to be the optimal sustainable development for the subject site.

1.6 Pre-Planning Consultation

Pre-Planning Consultation was undertaken with South Dublin County Council (SDCC) and An Bord Pleanála (ABP) during the pre-application consultation stage of the subject SHD application (ABP Ref. ABP-308642-20).



A range of issues were discussed at these meetings including matters relating to layout, design and building heights. These issues are addressed in detail in the ‘*Response to An Bord Pleanála Opinion*’ document, prepared by TPA.

This document specifically addresses issues raised within the ABP Opinion, dated 22nd February 2021. In addition to this, the document also addresses issues raised by South Dublin County Council’s (SDCC) during initial pre-application S.6 (4)(b) consultation.

In accordance with Section 5 of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, Ardstone Homes Limited completed the An Bord Pleanála Pre-Application Consultation in respect of proposed Strategic Housing Development (SHD) at White Pines Central, Stocking Avenue, Dublin 16, and is now seeking planning permission.

1.7 Part V Requirements – Social Housing

The proposed development is subject to the requirements of Part V of the *Planning and Development Act 2000* (as amended). The Applicant has liaised in this regard with SDCC Housing Officer, Rachel Jackson and SDCC Senior Staff Officer, Philomena O’Rourke. A Meeting was held on 6th March 2020 with respect to the proposed development’s Part V obligations.

Following this meeting, a letter was issued by SDCC to the Applicant confirming that Ardstone Homes Ltd. have engaged with SDCC in respect of Part V. This letter further noted that the exact details of Part V obligations can only be agreed following a grant of planning permission.

As detailed in Appendix 2 of the SHD Application Form, submitted with this application, the Part V obligations relating to the proposed development at White Pines Central SHD have been met in full, in accordance with the previous planning application (SD04A/0393/ ABP Ref. PL06S.212191, as amended) for the redevelopment of the subject site, and wider lands (see section 3.1 of the Planning Report for further information).

As detailed in Appendix 2 of the SHD Application Form, as a result of the 2004 masterplan permission, 100 no. Part V homes were built and transferred to SDCC. These homes were all located within Phase 1 works of the planning permission. However, following the implementation of Phase 1 works the wider masterplan permission was never implemented. As such, c 44.2 no. Part V home were provided in excess of the requirement. This figure is confirmed in the Letter received from SDCC’s Housing Procurement Section, dated March 2016, also included in Appendix 2 of the Application Form.

The c. 44.2 Part V homes (credits) already provided in excess of requirement, have been discounted from the recently approved residential planning applications at White Pines North and White Pines South, as detailed in Table 1 below. This approach has been discussed and agreed with SDCC, though ongoing consultation.



	No. of units	Requirement (10%)	Remaining Credits (44.2 Total)
Constructed			
White Pines North SDCC Reg. Ref. SD14A/0222, as amended	175	17.5	26.7
White Pines South SDCC Reg. Ref. SD19A/0099/ ABP Ref. PL06S.304670 & SDCC Ref. SD17A/044.	106	10.6	16.1
Live Planning Application			
White Pines East SHD ABP Ref.: TA06S.309836	241	24.1	14.1 ³
Subject Application			
White Pines Central SHD	114	11.4	2.7
TOTAL	636	63.6	

Table 1: White Pines Masterplan Site, Part V Provision

As noted in Table 1 above, including the proposed residential development at White Pines East SHD, there remains 14.1 Part V unit credits available to our Client. It is the intention of our client to utilise these credits, in accordance with the proposed development at White Pines Central SHD, thereby fully satisfying the Part V requirements.

For further information please refer to Appendix 2 of the SHD Application Form.

1.8 Land Ownership

The application site is entirely in the ownership of Ardstone Residential Partners Fund, a sub-fund of Ardstone Partners ICAV (the Fund). Ardstone Homes Limited (the Applicant), with its address at 48 Fitzwilliam Square, Dublin 2, acts as investment advisor to the Fund.

1.9 Documents Submitted with the Application

The following documentation is provided in support of this planning application:

1.9.1 Planning Application Form

- A completed SHD Application Form.

1.9.2 Fee Payable

- A cheque made payable to ABP, for the amount €24,820, in respect of ABP's fee for SHD application consultation. The fee has been calculated:
 - 114 (units) x €130 = €14,820
 - EIAR: €10,000
 - Total: €24,820



1.9.3 Planning

- Copy of *Newspaper Notice*;
- Copy of *Site Notice* erected on site;
- *Cover Letter*, prepared by TPA;
- *Statement in Response to An Bord Pleanála Opinion* prepared by TPA
- This *Planning Report*, prepared by TPA;
- *Statement of Consistency*, prepared by TPA;
- *Material Contravention Statement*, prepared by TPA;
- *Community Infrastructure Audit*, prepared by TPA;
- *Childcare Facility Audit*, prepared by TPA;
- *School Needs Assessment*, prepared by TPA;

1.9.4 Architecture

- Sets of Architectural Drawings prepared by RAU;
- *Architectural Design Report* prepared by RAU;
- *Schedules Report* (including HQA), prepared by RAU.

1.9.5 Landscaping

- Sets of Landscape Drawings prepared by Mitchell & Associates Landscape Architects;
- Sets of Tree Survey Drawings, prepared by CMK;
- *Landscape Report*, prepared by Mitchell & Associates Landscape Architects;
- *Planting Schedule*, prepared by Mitchell & Associates Landscape Architects;
- *Outline Maintenance Specification*, prepared by Mitchell & Associates;
- *Outline Softworks Specification*, prepared by Mitchell & Associates;
- *Aboricultural Assessment & Tree Surveys*, prepared by CMK;
- *Verified Views and Photomontages*, prepared by 3DDB³.

1.9.6 Engineering

- Sets of Engineering Drawings prepared by DBFL;
- Lighting Drawing prepared by OCSC;
- *Infrastructure Design Report*, prepared by DBFL;
- *Site Specific Flood Risk Assessment*, prepared by DBFL;

³ Please note, this document was not available to include for the purpose of this legal review. However, a full set of Verified Views and Photomontages, prepared by 3DDB are being prepared and will be submitted with the final SHD application to ABP.



- *Traffic and Transport Assessment*, prepared by DBFL;
- *Preliminary Construction Management Plan*, prepared by DBFL;
- *DMURS Design Statement*, prepared by DBFL;
- *Parking Strategy*, prepared by DBFL;
- *Energy and Sustainability Report*, prepared by OCSC;
- *Residential Lighting Analysis*, prepared by OCSC.

1.9.7 Other Reports

- *Building Lifecycle Report*, prepared by OCSC;
- *Appropriate Assessment Screening Report*, prepared by Altemar;
- *Biodiversity Management Plan*, prepared by Altemar;
- *Daylight Sunlight Report*, prepared by OCSC;
- *Mobility Management Plan*, prepared by DBFL;
- *Accessibility Statement*, prepared by MSA

1.9.8 Environmental Reports

- *Appropriate Assessment (AA) Screening Report* for the proposed Strategic Housing Development at Stocking Avenue, Dublin 16, has also been submitted with the application, prepared by Altemar; and
- *Biodiversity Management Plan*, prepared by Altemar.

1.9.9 Environmental Impact Assessment Report (EIAR)

- Environmental Impact Assessment Report (EIAR) prepared in respect of this application, comprising 18 No. Chapters addressing the following topics:

CHAPTER	ASPECTS OF THE ENVIRONMENT CONSIDERED	CONTRIBUTOR
Chapter 1	Introduction	TPA
Chapter 2	Site Location and Context	TPA
Chapter 3	Description of the Proposed Development	TPA
Chapter 4	Examination of Alternatives	TPA
Chapter 5	Archaeology, Architectural and Cultural Heritage	IAC
Chapter 6	Population and Human Health	AWN
Chapter 7	Biodiversity	Altemar
Chapter 8	Land and Soils (Geology and Hydrogeology)	DBFL
Chapter 9	Landscape and Visual Impact	Mitchell + Associates
Chapter 10	Hydrology including Flood Risk Assessment	DBFL
Chapter 11	Air and Climate	AWN Consulting
Chapter 12	Noise and Vibration	AWN Consulting
Chapter 13	Material Assets – Waste	AWN Consulting
Chapter 14	Traffic and Transportation	DBFL



Chapter 15	Material Assets – Site Services -	DBFL
Chapter 16	Interactions and Cumulative Impacts	TPA
Chapter 17	Mitigation Measures and Monitoring	TPA
Chapter 18	Difficulties Encountered	TPA
Appendices		
A1	Community Infrastructure Audit	TPA
A2	Childcare Facility Audit	TPA
A3	School Needs Assessment	TPA
A4	Sunlight, Daylight and Shadow Analysis	OCSC
A5	Preliminary Construction Management Plan	DBFL

2.0 SITE LOCATION AND URBAN CONTEXT

2.1 Subject Site

The subject site, White Pines Central, is located in south west Dublin, in the administrative district of South Dublin County Council. The site comprises a c.2.2 ha greenfield site, zoned for 'new residential' in the *South Dublin County Council Development Plan 2016-2022*. (Figure 5.1)

White Pines Central is located approximately 1.5km to the south-east of Woodstown village centre. Stocking Avenue, a major distributor route to the new residential areas south of Woodstown Village, bounds the site to the north. Existing and proposed public transport routes have stops along this road. The site is also bound to the west / south west by White Pines Dale, a road recently completed as part of the adjoining White Pines South development.

The site's topography is sloped rising from the site's western boundary, at the Stocking Ave. roundabout, to the highest point of the site at the eastern boundary.

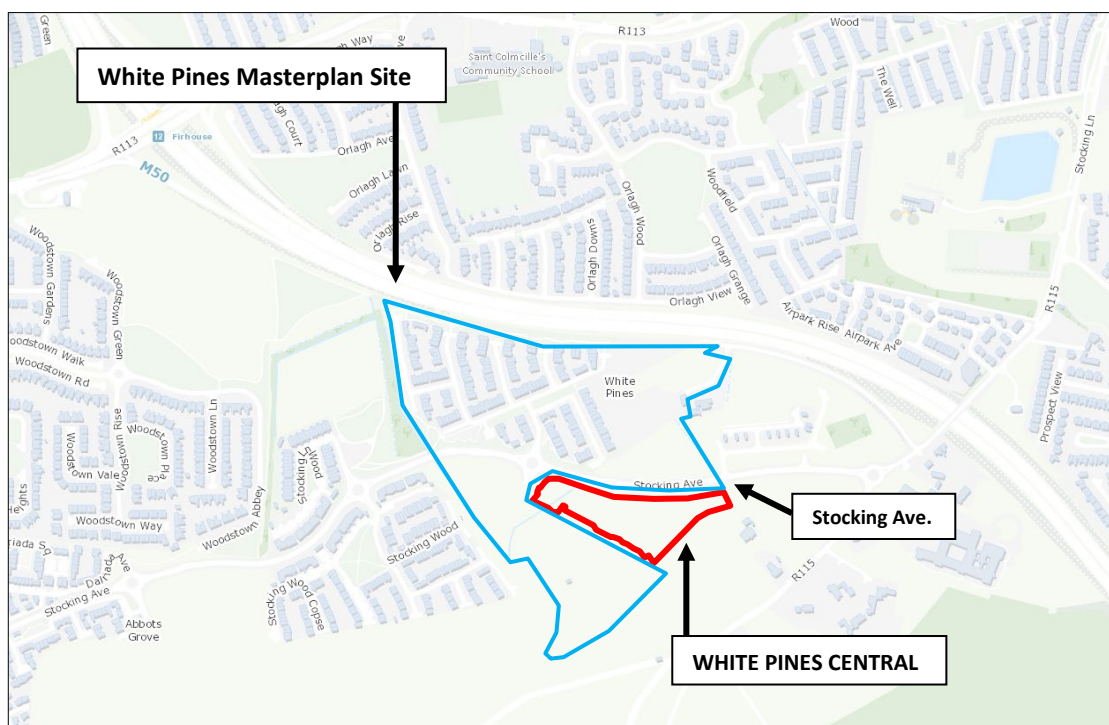


Figure 2.1: Location of Subject Site (Source: Geohive.ie; annotated by TPA, 2020).



Plate 2.1: Northern Boundary of the Subject Site, White Pines South Visible in Background (Source: TPA, 2021)



Plate 2.2: Northern Boundary of the Subject Site, Looking East, White Pines North Visible on Right (Source: TPA, 2021).

2.2 Surrounding Area and Context

The subject site is located within an area characterised primarily by new residential developments.

The wider White Pines masterplan lands, referenced in Section 1.1, largely encircle the site. White Pines South, comprising 106 no. residential units is located to the west and south west. Stocking Retail neighbourhood centre, comprising a retail unit and crèche, is located to the north west. White Pines North, comprising 175 no. residential units and White Pines East, proposed to comprise 241 no. units, are located to the north on the opposite side of Stocking Avenue.

The site is bound to the southeast by 2 no. one off houses, *Áit Linn House* and *Findelen House*. The site is also bound to the south and east by lands zoned for rural and agriculture development. Lands to the east of the site fronting Stocking Lane are also zoned to provide new residential developments.



Figure 2.2: Aerial View of Site and Surrounding Context, Looking North West - Subject Site Indicatively Outlined in Red (Source: Apple Maps - Annotated by TPA, 2021)

As shown in Figure 2.3 below, the surrounding area is characterised by a varied mix of uses including residential dwellings, outdoor amenity spaces, educational facilities, health facilities and retail centres.



Figure 2.3: Surrounding Context – Subject Site Indicatively Outlined in Red (Source: Bingmaps - Annotated by TPA, 2021)

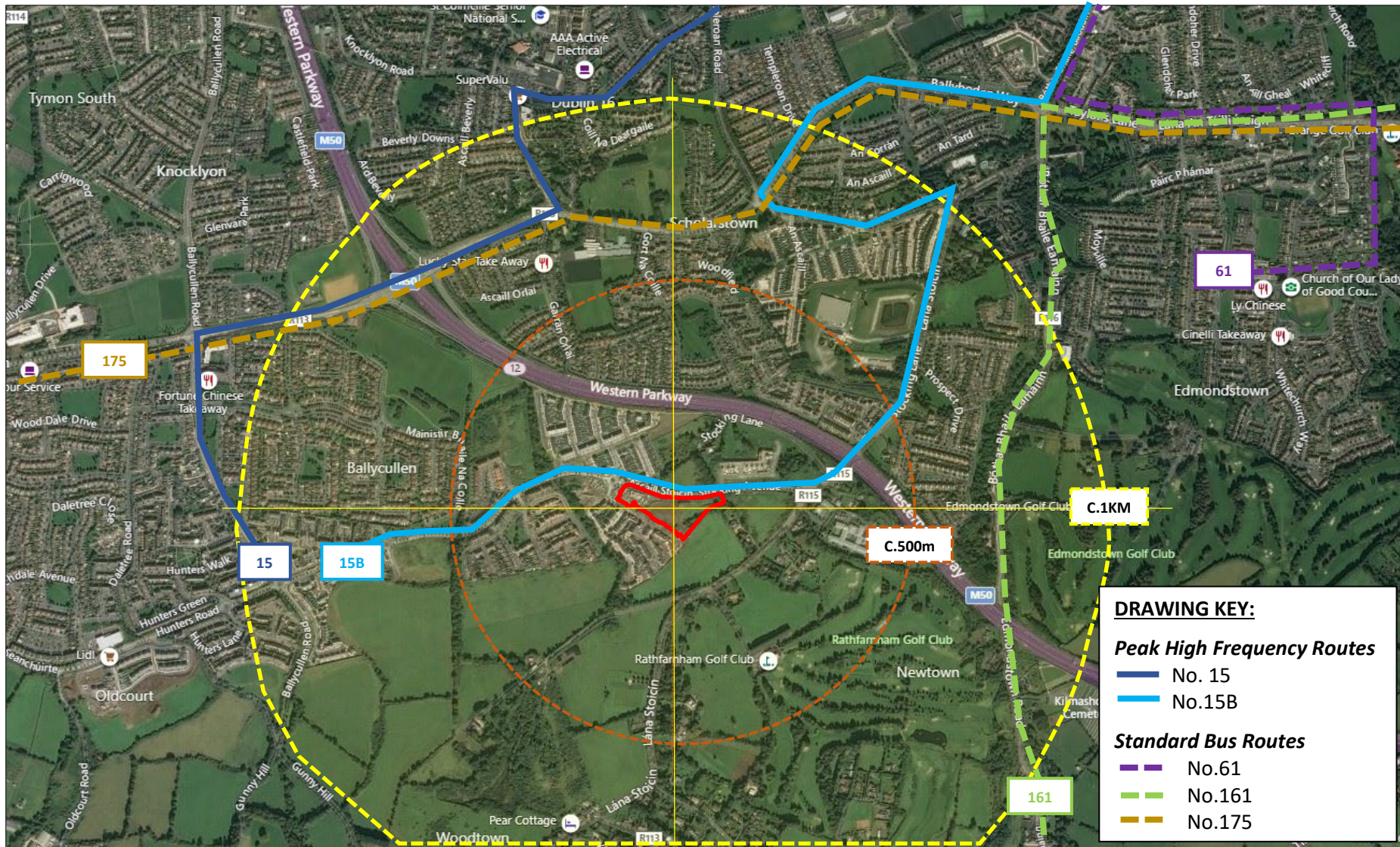


Figure 2.4: Dublin Bus Routes in the Area [Source: geohive.ie, annotated by TPA 2021]



2.3 Public Transport Connections

The site benefits from high quality public transport connections given it is located adjacent to the Route 15B bus stop which provides high frequency peak transport links to Dublin City via, Rathfarnham Village, Rathgar and Rathmines.

In addition to this, Tallaght Town Centre and Tallaght Hospital, significant employment hubs for the surrounding area, are also accessible via connecting bus services, Dublin Bus routes 61/161. These routes also provide a direct connection to the Luas Red Line at Tallaght. During morning peak (7am- 10am), public transport journey times to Dublin City Centre (Aungier St.) are estimated to take c. 35-45mins (source: googlemaps.com).

In addition to the above, it is also noted that the subject site will benefit from substantial public transport upgrade works, as part of the National Transport Authority (NTA) BusConnects proposal, which will transform and overhaul the current bus network to provide a more efficient network, shown in Figure 2.4 below.

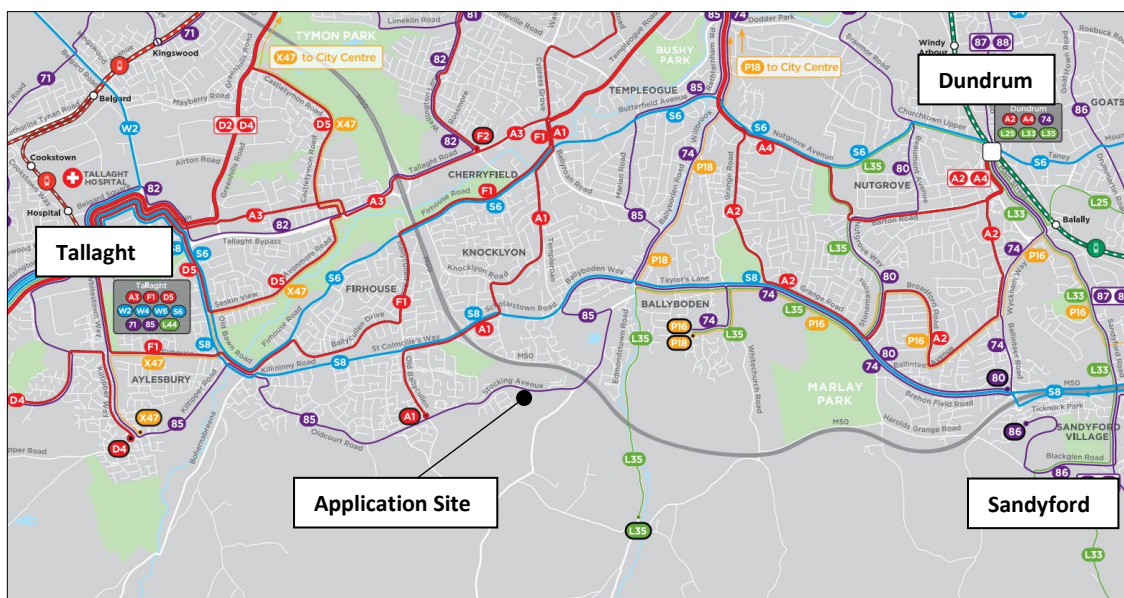


Figure 2.4: Bus Connects Routes (Source: www.busconnects.ie – Tallaght Local Area Map)

Under the BusConnects proposals, the following high frequency routes will serve Ballycullen and the subject site;

- A1 Route–Ballycullen–Beaumont; and
- 85 Route–Tallaght–Parnell Square.

The number 85 bus route, proposed under *Bus Connects*, runs from Tallaght to the City Centre via Ballyboden, Rathfarnham, Harold’s Cross and on to Parnell Square. This route is proposed to operate with a frequency of 10-15 minutes along Stocking Avenue and is directly adjacent to the subject site. This new bus route provides the subject development site with direct



access to Tallaght along with the LUAS Red Line which offers an alternative means of travelling to the city centre.

The A1 bus route is categorised under *Bus Connects* as a '*spine/branch route*' and runs from Ballycullen to Beaumont via the City Centre. This route is proposed to start on Ballycullen Road just north of the roundabout junction with Stocking Lane, approximately 950m west of the subject development. The proposed route will operate with a regular 10-15 minutes frequency.

3.0 RELEVANT PLANNING HISTORY

This section sets out the planning history relating to the subject site and to sites within the wider environs of the scheme.



Figure 3.1: Ardstone Homes Development Sites (Source: Bing Maps: Annotated by TPA 2021).

3.1 Subject Site

The following applications were identified relating to the subject site.

3.1.1 SDCC Ref. SD04A/0393/ ABP Ref. PL06S.212191

Planning Permission was granted by SDCC in September 2005 for a residentially led development, on lands comprising an area of approximately 22.97 ha (including part of the site subject of this application). That permitted development consisted of the following:

“Ten year permission for a development comprising residential, crèche, retail, office and public house uses and include the construction of: (1) 793 no. dwellings consisting of 379 no. houses (231 no. two storey three bedroom houses, 144 no. two storey with attic accommodation four bedroom houses); 4 no. 3 storey 4-bed houses); 414 no. apartment units in 35 no. three storey blocks (70 no. 3 bed duplex units over 70 no. two bedroom ground floor apartments, 274 no. 2 bed apartments). (2) 1,381 no. communal residential car parking spaces; (3) A two storey commercial/community centre of 3,327.5 sq.m, (including circulation areas) containing the following uses: a food store/supermarket of 307 sq.m, including office, toilets and storage facilities on

the ground floor; 3 no. retail units totalling 392.9 sq.m (184.1 sq.m, 104.4 sq.m and 104.4 sq.m) including office, toilet and storage facilities; 2 no. creches of 382.5 and 326sq.m., and a shared communal area of 72sq.m. on the ground and first floor; 5 no. office units totalling 695.3sq.m. (269.3sq.m. 93.5sq.m. 93.5sq.m., 134sq.m. and 105sq.m.) on the first floor; a two storey over basement public house with attic staff/office facilities of total area 810.7 sq.m.; (4) 108 no. car parking spaces for the commercial and public house facilities; (5) A two storey with attic crèche with a total floor area of 534.2 sq.m and 14 no. car spaces. The proposal also includes: 2 no. vehicular access from a district distributor road recently granted permission (An Bord Pleanala Ref. PL06S.202652); the demolition of 1 no. habitable dwelling; all associated site development works including foul, surface water and water supply connections and landscaping works.

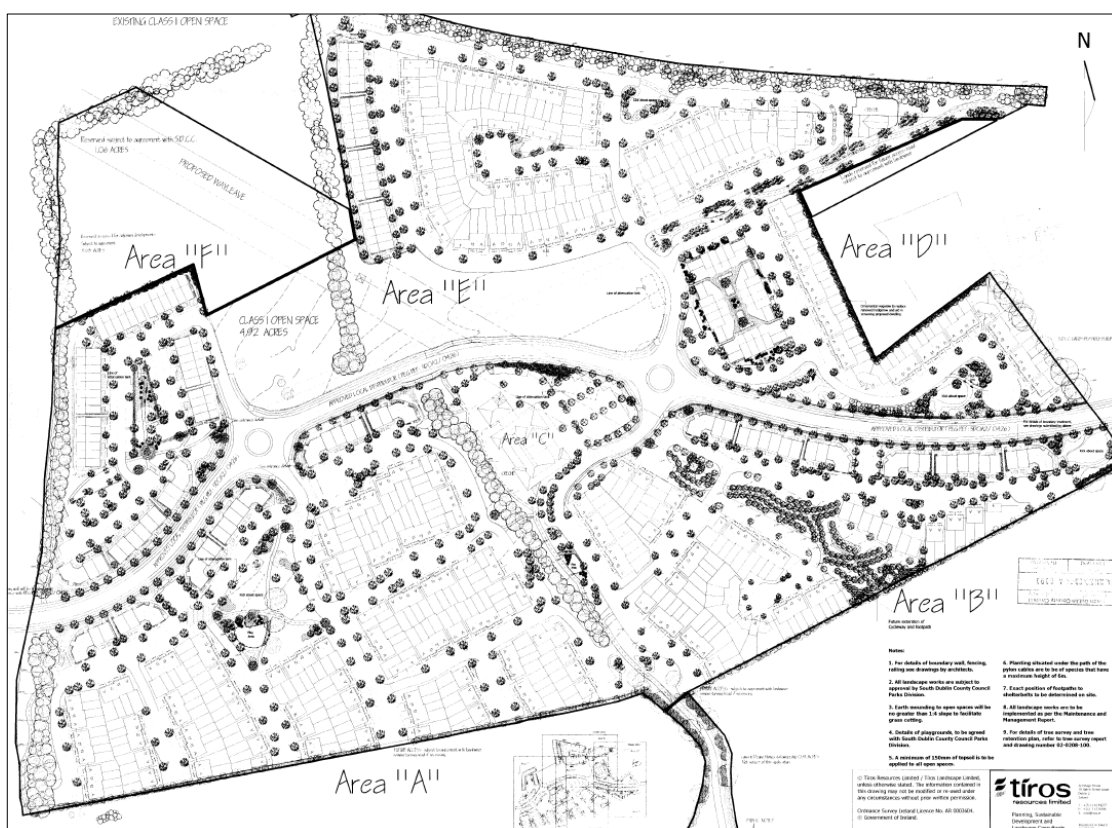


Figure 3.2: Ardstone Homes Planning Application Sites: Landscape Masterplan, SDCC Ref. SD04A/0393/ ABP Ref. PL06S.212191 (Source: SDCC Online Planning Register, annotated by TPA 2021).

The decision was subject to a First Party Appeal , against Conditions: 2 (removal of 2 no. blocks), 4 (construction of a community facility) and 35 (financial contributions) of South Dublin’s Decision notice. Planning permission was granted by ABP in September 2005.

Subsequent to the granting of this planning permission, additional amendment applications were submitted relating to the various development sites, identified in Figure 3.1. There are set out in detail below.

3.2 Planning Applications in the Surrounding Area

The following relevant planning applications in the surrounding area.

3.2.1 SDCC Ref. SD19A/0345, as Amended by DB20A/03322 (White Pines Retail)

Planning permission was granted in February 2020 for the construction of a neighbourhood centre comprising: a single storey convenience retail unit (c. 1,479 sq.m GFA); a three-storey building (c. 577 sq.m GFA) comprising a creche at ground, first and second floor levels. The grant of permission omitted a community facility and extended the creche to the second-floor level. For this reason, a community building has been provided as part of the current proposals on the *White Pines East Site*.

This application was provided, in part, to satisfy the requirements of the *Ballycullen Oldcourt LAP (2014) Phasing Strategy* for the surrounding area. For further information please refer to Section 5.3.15 of the *Statement of Consistency*, prepared by TPA, submitted with this application.



Figure 5.3: White Pines Retail Site Plan: SD19A/0345 (Source: Reddy Architecture).

An amendment application, Reg. Ref. SD20A/03322, was granted planning permission on 22nd March 2021 for the provision of a mezzanine storage level (c. 138 sq.m), additional plant, and associated works relating to the Retail site.

A further amendment planning application was submitted to SDCC on 25th March 2021, Reg. Ref. SD21A/0071) for modification and relocation of permitted ESB sub-station. A decision on this application is due on 19th May 2021.

As shown above, a c. 577 sq.m creche was provided within the Stocking Retail development. The inclusion of this creche space was provided, to enable the relocation of the creche space (364.8 sq.m), originally granted planning permission in accordance with the White Pines North development, SD14A/0222, as amended by SD17A/0132; SD18A/0196, detailed above. For further information please refer to the *Childcare Demand Assessment*, prepared by TPA, submitted with this application, which indicates that the approved creche facility will cater for all Ardstone residential development lands within the vicinity, including that of the subject application.

3.2.2 White Pines East SHD, ABP Ref. PL06S.309836.

As noted above, Ardstone Homes Limited have recently submitted a separate standalone SHD planning application on 30st March 2021 for lands at White Pines East. The application comprised the construction of 241 no. residential units, in 5 no. apartment blocks, ranging in height from 4-6 storeys, and 3no. three storey duplex block. The development is proposed to provide 94 no. 1 Bed and 148 no. 2 bed units. The application is due to be decided by 19th July 2021 (ABP Ref. 3097992).

Whilst the SHD Planning Application at White Pines East is considered to be within Phase 4 of the wider White Pines Masterplan development (see Table 1.1), the subject Application at White Pines Central SHD is in no way reliant on the application at White Pines East SHD.

3.3 Residential Planning Applications in the wider Area

The following Table sets out relevant residential planning applications in the wider area.

Location	Reference	Decision	Description
White Pines South	SD17A/0359	Granted February 2018	Planning permission was granted by SDCC on 28th February 2018 for amendments to SDCC Reg. Ref. SD10A/0041/ABP Ref. PL06.237857, detailed above. The amendments comprised minor façade and access arrangements.
	SD17A/0443-	Granted December 2017	Planning permission was granted by SDCC in December 2017 to amend a portion of the site, relating to 7 no. houses of the 122 permitted under application Reg. Ref. SD10A/0041, as amended.



Location	Reference	Decision	Description
	SD10A/0041/ ABP PL06S.304670	Granted September 2009	Planning permission was granted by ABP in September 2009 for the omission of 21 no. approved houses and the construction of 85 no. houses (52 no. 3 bed 2 storey houses and 32 no. 4 bed 2 storey houses). The application was subsequently amended by SDCC Ref. SD19A/0099/ ABP PL06S.304670, granted in March 2011. This resulted in a total of 106 residential units being provide within the White Pines South Development. For further information please refer to table 5.2 below.
White Pines North	SD05A/1013	Granted February 2006	Planning permission was granted in February 2006 for the construction of 92 no. 2 bed apartments in total, consisting of 18 no. 2 bed apartments in 4/5 storey block on sites 1-18 (formerly sites 1-12) Road 25 (Precinct 6), 34 no. 2 bed apartments in 2 no. 3/4 storey blocks on sites 2-68 (formerly sites 2-60) Road 2 (Precinct 1) and 40 no. 2 bed apartments in 2 no. 3/4 storey blocks and 1 no. 3 storey block on sites 1-40 (previously sites 1-36) Road 13 (Precinct 3). As compliance with Condition No. 4 of Grant of Permission Register Reference SD04A/0393.
	SD14A/0222	Granted March 2015	Planning permission was granted by SDCC in March 2015 for a 10-year permission for the construction of 164 houses, 8 apartments and 1 creche (364.8sq.m). In total 172 no. dwellings were provided. The application was subsequently amended by a number of amendment applications; SDCC Ref. SD17A/0465, Granted February 2018; SDCC Ref. SD18A/0196, Granted, July; SDCC Ref. SD17A/0132, Granted August 2017; and SDCC Ref. SD18A/0300, Granted March 2019.
	SD17A/0359	Granted February 2008	Application Granted to amend a permitted residential scheme (SDCC Reg. Ref. SD10A/0041; (ABP Ref. PL06.237857) at a site of 3.35 ha (lands initially identified as part of the permitted Precinct 3 'Stocking Heath'). The proposed development consisted of modifications to the permitted elevation (AOD) of houses to respond to existing topography and the construction of associated changes to the permitted access roads and ancillary works. This application resulted in the total provision of 175 no. Houses on the White Pines North Site. For a full breakdown of the approved mix, please refer to Table 5.2 below.



Location	Reference	Decision	Description
Stocking Wood	S95A/0436	Granted February 1996	Comprising the demolition of 2 houses, the erection of 600 2-storey houses with public open space and associated site works, access via a new entrance off Ballycullen Road. Provision of 11.2 acres of Class 1 public open space, access via a relocated existing entrance off the proposed new Link Road. Provision of 8.75 acres of Class 1 public open space on the north side of the proposed new Link Road adjacent to Castlefield, Knocklyon, Dublin 16.

Table 3.1: Relevant Planning Applications Surrounding the White Pines Central Site

3.3.1 Stocking Lane SHD, ABP Ref. PL06S.308763

An SHD application for the provision of 131 no. residential units (21 no. houses and 110 no. apartments), a creche and associated site works was submitted to ABP by MacCabe Durney Barnes Limited on a site opposite the Ballyboden Water Treatment Plant, c.800m north east of the subject site, at Stocking Lane.

The application was refused planning permission on 25th March 2021 by ABP for the following reason;

“Having regard to the provisions of the South Dublin County Development Plan 2016-2022, specifically housing policy 9 - objective 3 requiring proposals to comply with Section 11.2.7 of the South Dublin County Development Plan 2016-2022, which states that new residential development that would adjoin existing one and/or two storey housing, shall be no more than two storeys in height, unless a separation distance of 35m or greater is achieved, and to the form, height and layout of the proposed development, it is considered that the proposed development materially contravenes the housing policy 9 – objective 3 of the South Dublin County Development Plan 2016-2022.

Furthermore, the statutory requirements relating to public notices and the submission of a material contravention statement have not been complied with by the applicant. Accordingly, the Board is precluded from granting permission in circumstances where the application is in material contravention of the development plan and where the statutory requirements referred to above have not been complied with.”

While the decision above has been taken into consideration as part of the subject application, it is noted that the proposed residential blocks at White Pines Central do not directly adjoin any existing residential areas. The site does adjoin White Pines South, to the south, however,



this area is separated by a large area of open space, provided beneath the wayleave for the power lines, as shown in Figure 4.1 below.

4.0 PROPOSED DEVELOPMENT

4.1 Detailed Description of Development

Ardstone Homes Ltd. intend to apply to An Bord Pleanála for permission for a strategic housing development at a site a site of c.2.2 ha, at Stocking Avenue, Dublin 16.

The development (c.10,673 sqm GFA) will consist of the construction of 114 no. Build to Rent residential units (a long-term rental housing scheme): in 6 no. apartment/duplex blocks, ranging in height from 3 - 6 storeys;

The development will provide 32 no. 1 bed, 53 no. 2 bed units and 29 no. 3 bed Build to Rent units as follows:

- Block A is a part 6 part 4 storey apartment block comprising 47 No. units (26 no 1 bed units and 21 no. 2 bed units). Block A includes balconies on southern, northern and western elevations. Residential Tenant Amenities comprising c.110 sqm is provided at lower ground floor level of Block A to serve all residential units, comprising; a reception area, residents lounge and multipurpose room.
- Block B is a 3 storey duplex block comprising 11 No. units (2 no. 1 bed apartments, 5 no. 2 bed apartments and 4 no. 3 bed duplex units). Block B includes balconies/terraces on western and northern elevations.
- Block C1 is 3 storey duplex block comprising 15 No. units (2 no. one bed units, 7 no. 2 two bed units and 6 no. three bed units). Block C1 comprises balconies/ terraces on the eastern and northern elevations
- Block C2 is 3 storey duplex block providing 19 no. units (2 no. one bed units, 9 no. 2 two bed units and 8 no. three bed units). Block C2 includes balconies/terraces on western and northern elevations.
- Block D is a 3 storey duplex block providing 18 no. units (9 no. 2 bed apartments and 9 no. 3 bed duplex units). Block D comprises terraces on western elevation.
- Block E is a 3 storey duplex block comprising 4 No. units (2 no. two bed units and 2 no. 3 bed units). Block E comprises terraces on southern elevation.

The development will also provide 98 no. car parking spaces and 198 no. cycle parking spaces. The main vehicular access to the scheme will be from Stocking Avenue, via White Pines Dale. An additional emergency vehicular access point will also be provide from Stocking Ave, to the north east of the site, facilitating access for emergency vehicles only. This access will also facilitate access for pedestrians and cyclists.

All other ancillary site development works to facilitate construction, site services, piped infrastructure, 1 no. ESB sub-station, plant, public lighting, bin stores, bike stores, boundary treatments and provision of public and private open space including hard and soft landscaping, plant, provision of public and private open space areas comprising hard and soft

landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground.



Figure 4.1: Proposed Site Plan - Level 1, Drawing No. 3.2_011 (Source: RAU)

The proposed development comprises 6 no. residential blocks. Block A is a part 6 part, 4 storey building providing 47 no. apartments. Blocks B, C1, C2, D and E comprise 3 storey duplex buildings providing 67 no. apartment and duplex units.

The proposed building heights have been carefully selected in response to the site's topography, sloping up from the site's north west boundary at Stocking Lane, where the development's tallest building, Block A at 6 storeys, is located.

Overall building heights within the scheme vary from 3 to 6 storeys.

4.2 Description of Apartment Blocks (A- D)

4.2.1 Block A

Block A is a part 6, part 4 storey building, providing 47 no. apartments in a mix of 1 and 2 bed units. Block A will provide; 26 no 1 bed units and 21 no. 2 bed units.

Block A includes balconies on northern, eastern, western and southern elevations.



Figure 4.2: Block A Southern Elevations (Source: Drawing no. 3.1-201, prepared by RAU)

Block A also provides c. 110sq.m of residential tenant amenity space, at lower ground floor level, to serve White Pines Central, shown in Figure 4.3 below. In addition to this, additional informal external residential amenity space will also be provided, in front of Block A, at the newly created plaza space. It is intended that this space could also be booked for informal gatherings and dedicated events for residents of the scheme.

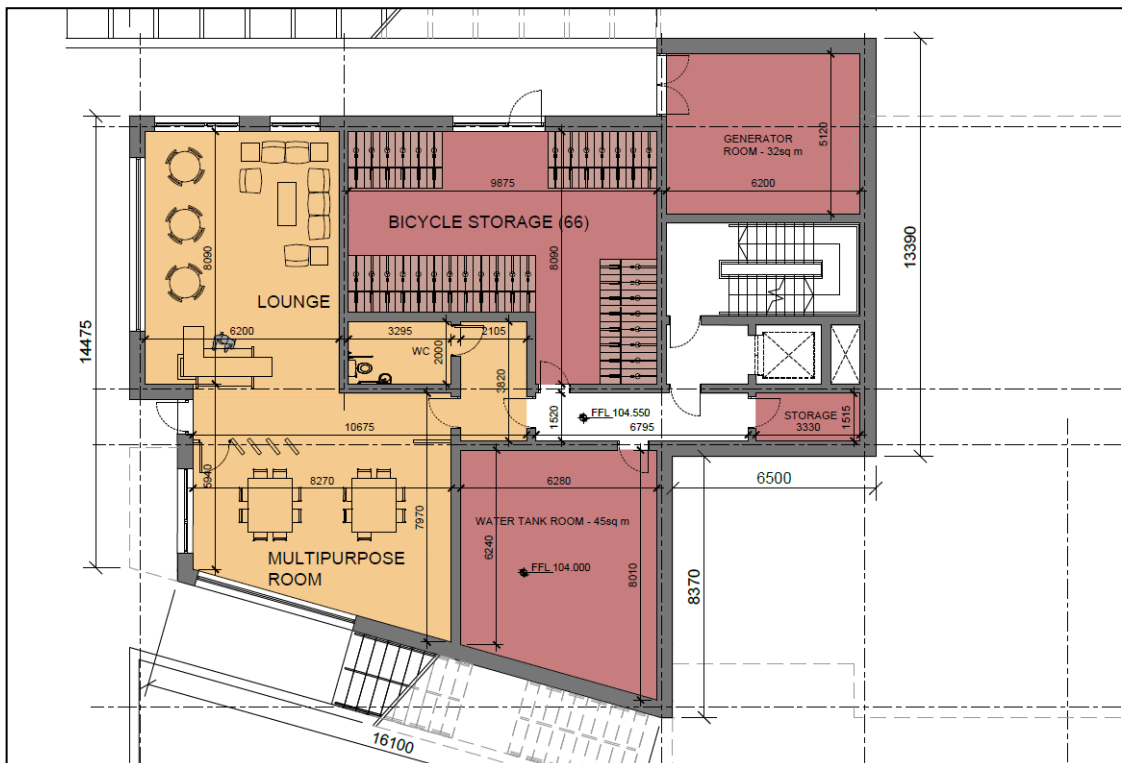


Figure 4.3: Internal Residential Amenity Space (Source: RAU Design Statement).

4.2.2 Block B

Block B is a 3 storey duplex block providing 11 no. residential units. The building will provide 2 no. 1 bed apartments, 5 no. 2 bed apartments and 4 no. 3 bed duplex units. Block B includes balconies/terraces on western elevation.

Blocks B, C1, C2, D and E are similar in appearance and layout. They are all three storey duplex blocks, with ground floor apartments and 3 bed duplex units above. Please refer to Figures 4.4 and 4.8 for further information.



Figure 4.4: Block B East Elevation (Source: Drawing no. 3.1-202, prepared by RAU).

4.2.3 Block C1

Block C1 is a 3-storey duplex block providing 15 no. units in a mix of 1, 2 and 3 bed units. Block C1 will provide 2 no. one bed units, 7 no. 2 two bed units and 6 no. three bed units.

Block C1 includes balconies on the eastern and western elevations.

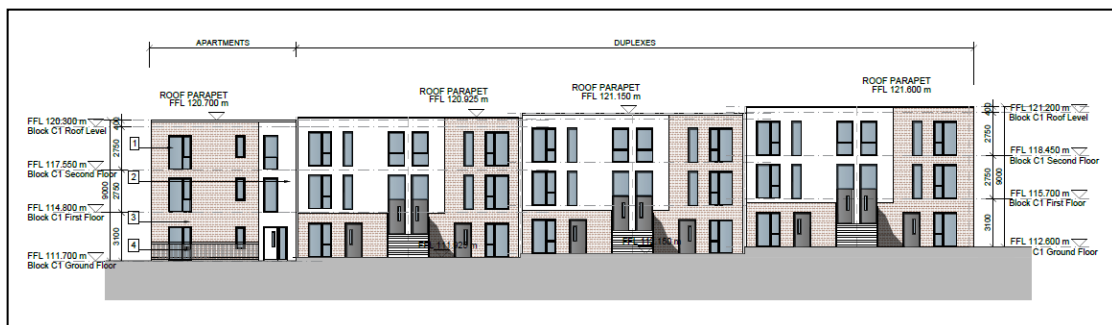


Figure 4.5: Block C1 East Elevation (Source: Drawing no. 3.1-203, prepared by RAU).

4.2.4 Block C2

Block C2 is 3 storey duplex block providing 19 no. units in a mix of 1, 2 and 3 bed units. Block C2 will provide 2 no. one bed units, 9 no. 2 two bed units and 8 no. three bed units.

Block C2 includes balconies on the eastern and western elevations.



Figure 4.6: Block C2 West Elevation (Source: Drawing no. 3.1-204, prepared by RAU).

4.2.5 Block D

Block D is a 3-storey block, providing 18 no. units. Block D will provide 9 no. 2 bed apartments and 9 no. 3 bed duplex units.

Block D includes balconies/terraces on western elevation.



Figure 4.7: Block D East Elevation (Source: Drawing no. 3.1-205, prepared by RAU).

4.2.6 Block E

Block E is a 3-storey building providing 4 no. units. Block E will provide 2 no. 2 bed apartments and 2 no. 3 bed duplex units.

Block E includes balconies/terraces on western elevation.



Figure 4.8: Block E Northern Elevation (Source: Drawing no. 3.1-205, prepared by RAU).

4.3 Design and Building Materials

There is a broad range of materials proposed within this development, varying depending on use and location within the development. In general, the elevations comprise the use of brick and render within the elevations of Blocks A, B, C1-2, D and E. As noted in the Architectural Drawings, prepared by RAU, the following materials will be utilised in the building's construction;

- Render Finish;
- Brick Finish.
- Glazing – Selected Aluminium Window System.
- Powdercoated mild steel louvred grilles for ventilation/smoke extract.
- Powdercoated mild steel balconies.
- Powdercoated mild steel gates.
- Brise soleil fins;
- Cassette aluminium cladding;
- Brushed stainless steel signage.

For further information please refer to the Architectural Drawings, prepared by RAU, submitted with this application.

4.4 Access Arrangements

As shown in Figure 4.9 below, the main vehicular access to/from the subject development will be provided via White Pines Crescent on the southern boundary of the site, which connects onto a roundabout on Stocking Avenue. There will also be an emergency vehicular access onto Stocking Avenue via a new priority junction on the north-eastern boundary of the site.



Figure 4.9: Proposed Site Access Locations (Source: EIAR Chapter 14, Figure 14.15).

For further information please refer to Chapter 14 of the *EIAR*, Traffic and Transportation, which provides a full description and assessment of the traffic and transportation impacts arising from the proposed development.

4.5 Landscaped Spaces

The landscaped spaces have been designed to create a sense of place, supporting the urban design layout in the creation of streetscapes and residential spaces. The design strategy aims to promote sociability, providing places for social interaction and the creation of a sense of community.

The landscape strategy has been prepared by Mitchell and Associates in the context of the provisions of the *Ballycullen and Oldcourt LAP 2014* and informed by detailed assessments undertaken as part of the development process, as outlined further in the *EIAR* and supporting planning application documents. Mitchell and Associates were also the Landscape Architects responsible for the adjoining White Pines South and North schemes thus ensuring that a cohesive approach has been developed for the entire Masterplan lands.

The approach to the site layout and landscape masterplan prioritises non-vehicular traffic on internal roads with pedestrian desire lines catered to. Inherent to the design is a people-friendly layout.

The provision of a landscaped amenity space with various character areas (e.g. landscaped buffer zone (wild grasses); kickabout / key public realm nodes; and children's play area) will cater for a wide range of future users.

4.6 Secondary Projects

The subject proposal is not reliant on the completion of secondary projects and is thus a fully functioning independent project.

As shown in Figure 3.1 above, Ardstone Homes have already developed a number of sites surrounding White Pines Central for residential and commercial use. In addition to this, Ardstone Homes recently submitted an SHD planning application for the provision of 241 no. residential units at White Pines East, directly north of the site.

Although White Pines Central comprises the 5th and Final Phase of development, the project is entirely independent and not reliant on the completion of any previous phases, as outlined in Table 1.1 above.



5.0 PLANNING POLICY CONTEXT & COMPLIANCE

5.1 National and Regional Planning Policy and Guidance

A separate *Statement of Consistency* report, prepared by TPA, is submitted with this application. The report details how the proposed development complies with National, Regional and Local Planning Policies and objectives and guidance.

The following National and Regional Planning Policy Documents and Guidance are addressed in detail in Section 4 of the Statement of Consistency;

- *Project Ireland 2040 - National Planning Framework (2018).*
- *National Development Plan (2018-27).*
- *Eastern and Midlands Regional Spatial Economic Strategy (2019).*
- *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing: Design Standards for New Apartments (2020).*
- *Design Manual for Urban Roads and Streets (DMURS) (2013).*
- *The Planning System and Flood Risk Management (2009).*
- *Sustainable Residential Development in Urban Areas (2009).*
- *Urban Design Manual: A Best Practice Guide (2009).*
- *Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)*
- *Part V of the Planning and Development Act 2000: Guidelines (2017).*

5.2 Local Planning Policy - South Dublin County Council Development Plan 2016-2022 and Ballycullen-Oldcourt Local Area Plan (BOLAP) 2014

The *Statement of Consistency* submitted with this SHD application, containing a detailed assessment of how the proposed development complies with local planning policies and objectives. The following section will provide a summary of this assessment.

5.3 Local Planning Compliance

5.3.1 SDCC Land Use Zoning

As shown in Figure 5.1 below, the entire site is zoned for ‘new residential communities’, in the *South Dublin County Council Development Plan 2016-22*. The zoning objective for this is;

“To protect and/or improve residential amenity”

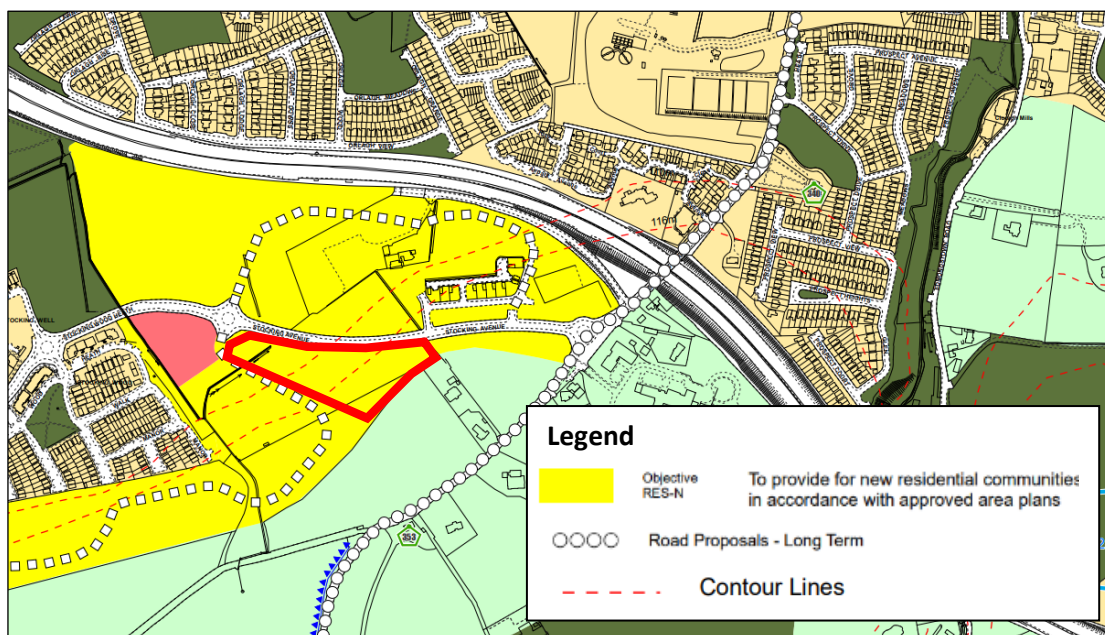


Figure 5.1: Zoning Map SDDP 2016-22, Application Site Outlined Red (Cropped and annotated by TPA, 2021).

Use Class	Uses
Permitted in Principle	Housing for Older People, Nursing Home, Open Space, Public Services, Residential , Residential Institution, Retirement Home, Shop-Local, Traveller Accommodation.
Open to Consideration*	Advertisements and Advertising Structures, Allotments, Agriculture, Bed & Breakfast, Betting Office, Camp Site, Car Park, Caravan Park-Residential, Cemetery, Childcare Facilities, Community Centre, Crematorium, Cultural Use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Hotel/Hostel, Home Based Economic Activities, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Off-Licence, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Recreational Facility, Recycling Facility, Restaurant/Café, Service Garage, ShopNeighbourhood, Sports Club/Facility, Stadium, Veterinary Surgery.

Table 5.1 – ‘RES’ Land Use Zoning Matrix (Source: SDDP 2016-2022, Table 11.2)



The *SDCCDP 2016-22* sets out policies and objectives for new housing within Chapter 2. The proposed development is consistent with the requirements of the Development Plan as outlined below.

5.3.2 Ballycullen-Oldcourt Local Area Plan 2014

The subject site is located within the *Ballycullen-Oldcourt Local Area Plan (BOLAP)* area. The *BOLAP* was published in June 2014 and was later amended in June 2017. In 2019 the LAP was extended and will now expire on 2nd June 2024. `

As such, it is the statutory plan for the area and guides all future development relating to the subject lands, with consideration also given to the *South Dublin County Council Development Plan 2016-2022*.

For a breakdown of how the proposed development complies with the policies and objectives of the *BOLAP 2014*, please refer to Section 5.3 of the accompanying Statement of Consistency. A summary of this compliance is provided in the sections below.

As shown in Figure 5.2, the subject site is zoned 'A1'. The zoning objective for this designation states;

“To provide for new Residential Communities in accordance with approved Area Plans”

In providing some 114 no. residential units on the subject lands, the proposal is fully compliant with this zoning objective.

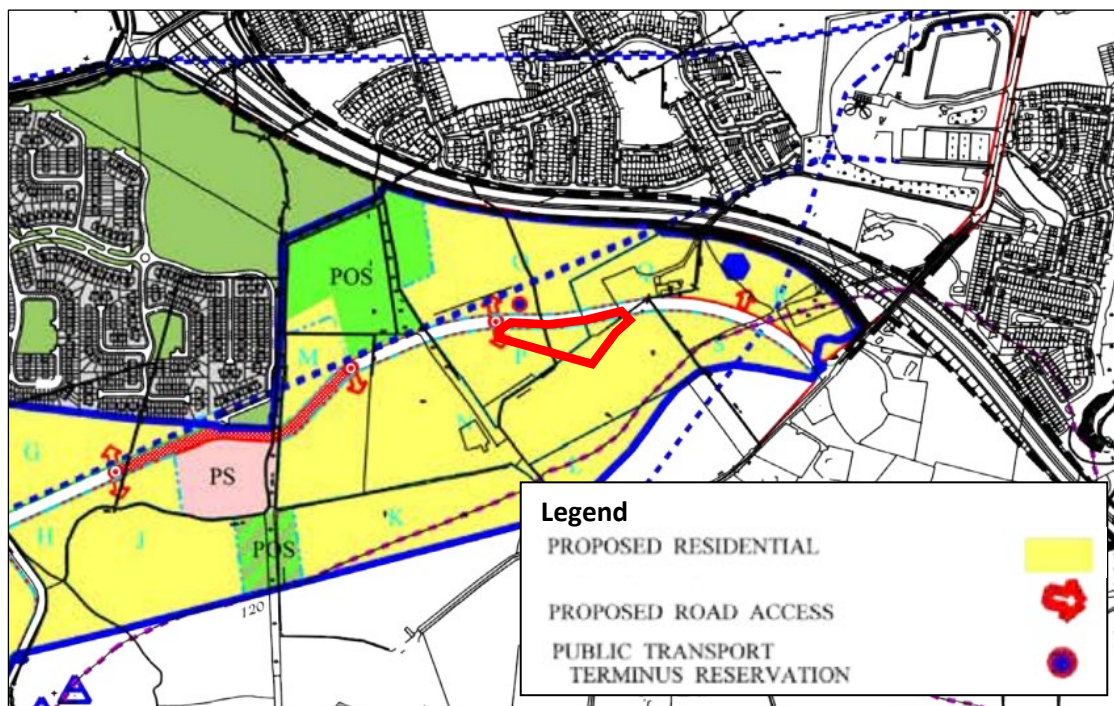


Figure 5.2: Land Use Zoning Map Ballycullen-Oldcourt LAP 2014, Application Site Outlined Red (Cropped and annotated by TPA, 2021).

5.3.2.1 Residential Design and Layout

Local Policy H11, Objective 1 states;

“To promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation.”

The proposed site layout and scheme design has been developed in compliance with the standards provided for in Chapter 11 of the Development Plan and Part L of the Building Regulations.

5.3.2.2 Building Heights

The proposed development provides 6 no. residential apartment and duplex buildings up to 6 no. storeys in height. This is considered to materially contravene policy LUD8 of the *BOLAP (2014)*.

BOLAP 2014 Objective LUD8

Development shall be no more than one storey at street level on the Upper Slope Lands, no more than two storeys at street level on the Mid Slope Lands and no

more than three storeys on the Lower Slope Lands. New dwellings backing onto or adjacent to existing single storey dwellings should be no more than two storeys.

The proposed development, at its highest point (Block A at 6 no. storeys) is in excess of the blanket restriction of 3 no. storeys, applied by *BOLAP 2014*. In addition to this, it is also noted that the proposed development materially contravenes *BOLAP* policy *Objective LUD8* relating to the mid and upper sloped lands.

As detailed in the *Statement of Consistency*, and *Material Contravention Statement*, accompanying this submission, the National Planning Framework, *Apartment Guidelines (2020)* and *Building Height Guidelines (2018)*, recommend a flexible application of planning standards for proposals which are well designed and justified. This is particularly notable in respect of this development. For further information please refer to the Design Statement Prepared by RAU.

With regard to the impact of the proposed development on the surrounding area, we refer the Board to the enclosed *Daylight and Sunlight Assessment*, carried out by OCSC, and the Visual Impact Assessment, prepared by Modelworks. These documents confirm that no significant impacts occur as a result of the proposed development.

It is further noted that the site has a sloping topography, rising from the site's lowest point on western boundary (+104.8 OD) to the site's highest point along the eastern boundary (c. 120.325m OD). Block A comprises the tallest element of the proposed development, located at the lowest point of the site along the western boundary. This allows for increased heights without compromising views within and surrounding the proposed development and the wider White Pines Masterplan site.

The proposed building heights and orientation have been carefully selected to respond to the site's sloping topography. As shown in Figure 5.3, given the site's sloping topography, when viewed from a distance, the proposed height of Block A will be broadly in line with Block C and Blocks D&E.

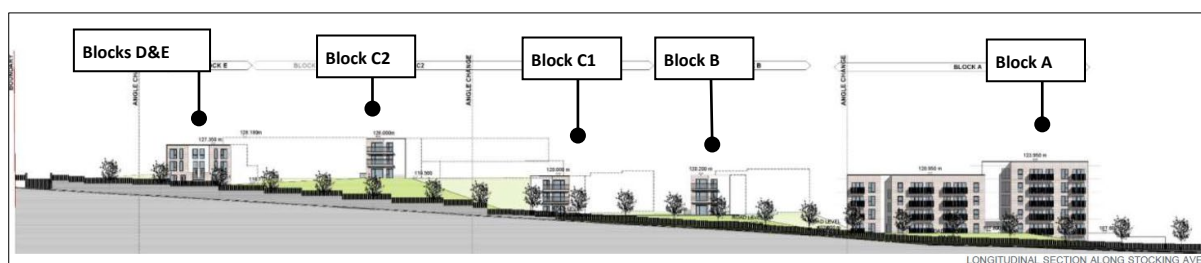


Figure 5.3: Contiguous Site Section, Stocking Avenue, (Source: RAU Drawing No. P1-153D).

It is considered that the subject site is capable of readily accommodating a development of up to 6 no. storeys, without giving rise to any significant adverse impacts in terms of daylight, sunlight, overlooking or visual impact, as assessed in the accompanying EIAR.

Furthermore, it is noted that the site is located on a prominent roundabout location on Stocking Avenue. The inclusion of a 6-storey building at this location is considered entirely appropriate in the interest of providing a distinct location with a sense of place. In addition, the proposed development reflects the prevailing form of development in the area.

Please refer to Section 5.1 of the accompanying Material Contravention Statement for further justification of the proposed heights.

5.3.4 Residential Densities

As detailed in Figure 5.4, the site is located across three defined areas of the *BOLAP 2014*, namely, the Lower Slope, the Middle Slope and the Upper Slope lands.



Figure 5.4: Ballycullen - Oldcourt LAP 2014, [annotated by TPA 2021]

The *BOLAP (2014)* requires the following residential density provision;

- The Lower Slope Lands shall consist of medium to low density, (32 – 38 dwellings per ha);
- The Mid Slope Lands shall consist of low density (22 – 28 dwellings per ha); and
- The Upper Slope Lands shall consist of very low density (12 – 18 dwellings per ha).

As noted in Figure 5.4, the proposed development site at White Pines Central SHD is located within all 3 Character Areas, The Upper, Middle and Lower Sloped Lands.

These designations are reflected in the proposed scheme layout, whereby the tallest element of the development, Block A, is located on lower sloped lands and the remaining 3 storey blocks, are located in the Upper Sloped lands.

As noted above, the current planning application at White Pines Central represents the 5th and final phase of development for the wider White Pines Masterplan Site. It is therefore considered, in the interest of providing a balanced and sustainable community with a mix of tenure types and unit sizes, the proposed development at White Pines Central should be assessed as the final component of the wider White Pines Masterplan development.

	No. of units	Site Area	Dwellings per Ha
White Pines North	175	6.17	28.3
White Pines South	106	2.83	37.45
White Pines East	241	2.98	80.87
White Pines Central	114	2.2	51.82
TOTAL	636	14.18	44.85 Units Per Ha

Table 5.2: White Pines Masterplan Site Densities

As noted in Table 5.2 above, the proposed development at White Pines Central, when considered in isolation, has a residential density of c. 52 dwellings per hectare. The overall residential density of the Wider White Pines Masterplan site, as a result of the proposed application would be c. 44.85 units per Ha.

However, as shown in Table 5.3 below, if we take the prescriptive density requirements set out in the *BOLAP 2014* and apply them across the White Pines Central site, this would result in the 2.2 Ha site only providing between 42 and 56 dwellings. This would give a residential density of between 19 – 25 dwellings per Ha for the subject site. This density range would be entirely inappropriate for a site which falls under the National definition of central/accessible or intermediate urban, as detailed in the Statement of Consistency, prepared by TPA.

Area	Policy Requirement	Site Area	Policy Provision
Lower	32 – 38 UPH	.4Ha	13-15
Mid	22 – 28 UPH	.9Ha	19- 25
Upper	12 – 18 UPH	.9Ha	10- 16
TOTAL		2.2Ha	42-56 Dwellings

Table 5.3: BOLAP 2014 Density Requirements

Furthermore, it is also noted that the density requirements set out in the *BOLAP 2014* is not in accordance with *SDCCDP 2016-22* Policy H8 Objective 6, requiring a residential density of between 35-50 units per hectare.

It is therefore submitted that a material contravention of the Development Plan and Local Area Plan occurs as a result of the subject proposals, which seek a density of c. 52 units per hectare.

A *Material Contravention Statement*, prepared by TPA, accompanies this planning application. The statement demonstrates that permission for the scheme can be granted having regard to Section 37(2)(b) of the Planning and Development Act 2000 (as amended).

5.3.5 Mix / Dwelling Types

Local Policy H10, Objective 1, states;

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

The proposed development provides a mix of one, two and three-bedroom apartments totalling 114 no. units. This includes 32 no. one-bedroom, 53 no. two-bedroom and 29 no. three-bed residential units. This provision is considered to be a positive addition to the area as these unit types are currently limited within the local area as identified in Table 5.4 below.

Unit Type	White Pines North	White Pines South	White Pines East	White Pines Central (Subject Application)	Combined	% of Total
1-bed apartments	-	-	93	32	125	19.5%
2-bed apartments	-	-	148	53	201	31.5%
3-bed house/duplex	81	41		29	151	24%
4-bed house	84	48			132	21%
5-bed house	10	17			27	4%
Total Units	175	106	241	114	636	100%

Table 5.4: Proposed, Provided and Planned Unit Types - Ardstone Homes Residential Developments on Stocking Avenue

As noted in Table 5.4, the residential units in the wider area are dominated principally by three-bedroom and four-bedroom detached and semi-detached housing. The proposed mix of 1, 2 and 3 bed units will help create a strong and sustainable mixed community in tandem with wider proposed and provided residential sites at Stocking Avenue.

As such, in the interest of providing a comprehensive housing mix for the Stocking Avenue area, responding to local demand, the proposed residential mix is considered entirely in line with the proper planning and sustainable development of the area.

Local Policy LUD3 of the *BOLAP 2016-22*, states;

The permissible dwelling mix shall yield a minimum of 90% or more houses. Apartment and duplex units are not permissible on the Upper Slopes of the Plan Lands. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this objective.

It is submitted that a Material Contravention of the Local Area Plan occurs as a result of the subject proposals, which seek to provide 114 no. units. Please refer to Section 5.3 of the Material Contravention Statement submitted with this request for further information.

5.3.6 Public Open Space

The layout, as progressed, provides 6 no. residential blocks surrounded by a large quantum of publicly accessible open space 9,845 sq.m, representing c. 45% of the total site area. This includes the area of open space proposed beneath the wayleave for the power lines. If the area of open space beneath the powerline is discounted from the above calculation, the remainder of the site still provides is 5,890sq.m, representing c. 37% of the remaining site area.

Table 5.2 of the *BOLAP (2014)*, sets out Open Space Requirements as follows;

- Lower Slope Lands 20%
- Mid-Slope Lands: 20%
- Upper Slope Lands: 30%

5.3.7 Car Parking Standards

Tables 11.23 and 11.24 of the *SDCCDP 2016-22* set out standards for car parking. This sets out 1 no. car parking space per one-bedroom apartment, 1.25 No. car parking spaces per two-bedroom apartments and 1.5 spaces for a three-bedroom apartment. It is noted that the *Development Plan* standards are maximum standards.

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1	ZONE 2
Apartment	1 Bed	1 space	0.75 space
	Duplex		
	2 bed	1.25 space	1 space
	3 bed+	1.5 spaces	1.25 space
House	1 Bed	1 space	1 space
	2 Bed	1.5 space	1.25
	3+ bed	2 space	1.5

Figure 5.5: SDCC Parking Standards [source: *DSCC 2016-22*, Table 11.24 Parking Standards]

As noted above, a total of 98 no. car parking spaces are provided to serve the residential units. This provides for c.0.86 car parking spaces per unit. The proposed provision is considered entirely appropriate in the context of the site's location and public transport connections.

5.3.8 Bicycle Parking Standards

Bicycle Parking Standards are set out in Section 11.4.1 of the *SDCCDP 2016-22*. In total 238 no. cycle parking space will be provided throughout the development site.

Bicycle storage for the apartment units is provided within secure covered bicycle stores located throughout the site. In total, 114 no. long stay secure cycle parking spaces will be provided. 124 no. additional short stay spaces are also provided at throughout the development site, adjacent to apartment entrances, and significant areas of open space.

In total 238 no. cycle parking spaces will be provided. This equates to c. 2.1 no. long stay bicycle parking space per residential unit, which is substantially higher than the 1 No. bike space per 5 apartments as required by the Development Plan (*SDCCDP 2016-22* Table 11.22).

Bicycle parking standards are set out in Section 4.17 of the *Apartment Guidelines (2020)* requiring a minimum standard of 1 cycle storage space per bedroom to be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

The proposed development comprises the provision of 32 no. one bed units, 53 no. two bed units and 29 no. three bed units. This would require a provision of 225 no. long stay cycle parking and 57 no. visitor cycle parking spaces.

As detailed in the attached Parking Strategy submitted for the proposed development, the provision of 238 no. cycle parking spaces, including 124 no. short stay spaces is considered entirely appropriate for the proposed development

For further information, please refer to Section 4.1 of the Parking Strategy, prepared by DBFL, submitted with this application.

5.3.9 Community Infrastructure

Local Policy C1, Objective 4 states;

To ensure that community facilities are provided in new communities on a phased basis in tandem with the provision of housing in accordance with approved Local Area Plans or Planning Schemes.



Internal tenant amenity space of c. 110 sq.m will be provided at lower ground level of Block A, to serve the residents of the proposed scheme, providing a range of services and support facilities. These services / facilities will be available for the use of all residents in the development.

A concierge / reception desk will be provided on the Lower Ground Floor of Block A, at the site's primary entrance, in a hotel style reception. This space will provide constant access to all services, management and maintenance facilities through the implementation of a dedicated communication website / app / intranet site, to be implemented as part of the development.

A public square is proposed in front of Block A, providing pedestrian connections between the proposed development and White Pines Retail. The development will also provide a range of public open spaces, including landscaped play elements such as gentle mounds and wildflower plantings.



6.0 SUMMARY OF EIAR

The proposed development has been screened for EIA in accordance with the *European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018*), in accordance with the EIA Directive.

Section 172(1) of the Acts sets out the requirement for EIA. Mandatory EIA is required for Projects listed in Part 1 of Schedule 5 of the *Planning and Development Regulations 2001 (as amended)* (“*the Regulations*”), referred to as Annex I Projects, in accordance with the EIA Directive.

The Project is not listed within Part 1 of Schedule 5 of the Regulations and therefore mandatory EIA is not required in this instance.

With respect to Part 2 of Schedule 5 (Annex II Projects), the Project has been assessed against the following relevant criteria:

Class 10 – Infrastructure Projects

Subsection 10(b)(i):

“Construction of more than 500 dwelling units”

This Project comprises a mixed-use development comprising 114 no. BTR residential dwellings in a mix of apartments and duplex units. This is below the threshold for an EIAR.

However, as noted above, Ardstone Homes have recently submitted an SHD planning application to ABP for 241 no. residential units on a site immediately north of White Pines Central, described as White Pines East (see Figure 1.2). Furthermore, Ardstone Homes have also recently developed 175 no homes at White Pines North and 106 no. homes at White Pines South. As noted in Table 5.3 above, when considered cumulatively, the total number of units being proposed and provided across the White Pines Masterplan Site (636 no. Dwellings) is in excess of the threshold set out in Class 10 of Schedule 5, as noted above.

Although it is not strictly necessary to include homes that have already been completed within the above threshold, in the interest of comprehensively addressing any environmental concerns, and given the no. of homes recently delivered in the area by our client, it is considered appropriate to provide an EIAR to consider any potential impacts, in line with the provisions of the EIA Directive.

As noted above, Ardstone Homes have also lodged a separate SHD application on a site adjacent to the subject site, White Pines East. Given both SHD Applications (White Pines East and White Pines Central) are being submitted independently, a separate standalone EIAR is

provided with each planning application. Each EIAR will consider the impacts of their subject development and also the cumulative impacts of both developments in tandem.

6.1 EIAR Content

The following section will provide a comprehensive review of all EIAR chapters.

6.1.1 Examination of Alternatives

Chapter 4 of the *EIAR* is prepared by TPA to examine the alternative development options which have been considered for the subject site during the design development process. The chapter contains a detailed overview of the evolution of the scheme design.

6.1.2 Archaeology, Architectural & Cultural Heritage

IAC Archaeology Ltd. has prepared Chapter 5 of the EIAR to assess the impact, if any, on the archaeological, architectural, and cultural heritage resource of a proposed residential development at Stocking Avenue, Dublin 16 (Figures 5.1).

As noted in this Chapter, the site is not identified as being in an area with any relevant Archaeological, Architectural or Cultural Heritage. However, given that the site has not previously been developed and given the extent of works proposed an assessment is still considered appropriate.

6.1.3 Population & Human Health

The proposed development may impact on population and human health, employment, local community and amenity uses, during the construction and operational phases. As such, Chapter 6 evaluates the impacts of the proposed development on population and human health.

The Chapter has been prepared in accordance with the relevant EIA Report Guidelines and considers the “*existence, activities and health of people*” with respect to “topics which are manifested in the environment such as employment and housing areas, amenities, extended infrastructure or resource utilisation and associated emissions”.

Chapter 6 concludes that the proposed development will not result in any significant adverse effects on human health during either the construction or operational phase.

The proposed development will have numerous direct and indirect benefits on a regional and national scale and will have an overall positive effect on the local, regional and national population in terms of providing key residential development to ameliorate the effects of the current housing crises.

6.1.4 Biodiversity

Chapter 7 of EIAR was carried out by Altemar Ltd. It assesses the biodiversity value of the proposed development area and the potential impacts of the development on the ecology of the surrounding area within the potential zone of influence (ZOI). It also outlines the standard construction, operational and monitoring measures that are proposed to minimise potential impacts and to improve the biodiversity potential of the proposed development site.

Desk studies were also carried out within the chapter, to obtain relevant existing biodiversity information within the Zone of Influence. The assessment extends beyond the immediate development area to include those species and habitats that are likely to be impacted upon by the project.

The chapter concludes that none of the Natura 2000 sites (SAC & SPA) are within the potential Zone of Influence of this development. The nearest conservation site with a hydrological connection (Dodder Valley pNHA via public surface water network) to the site is 2.4 km downstream from the proposed development. No intact terrestrial biodiversity corridors connect the development area to a designated conservation site. The development footprint is dominated by agricultural grassland and scrub habitat.

The successful implementation of the Construction and Environmental Management Plan and additional measures outlined in this chapter of the EIAR would be seen as important elements to the successful mitigation/off-setting of the loss of biodiversity on site.

The overall impact on the ecology of the proposed development will result in a long term slight neutral residual impact on the existing ecology of the site and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional terrestrial biodiversity features, mitigation measures and a sensitive native landscaping strategy.

6.1.5 Land & Soils

Chapter 8 of the EIAR comprises an assessment of the likely impact of the proposed development on the soils and the geological environment as well as identifying proposed mitigation measures to minimise any impacts.

Impacts on geology and hydrogeology are assessed in terms of the construction and operational phase of the proposed development. This includes the geo-technical and environmental site investigation. Potential cumulative impacts with other projects, including White Pines East SHD, are also assessed.

6.1.6 Landscape & Visual Impact Assessment

A *Landscape and Visual Impact Assessment (LVIA)*, prepared by Macroworks, is submitted as part of the EIAR. Chapter 9 of the EIAR assesses the impact of the proposed development on the landscape character and visual amenity of the current site and on the site environs.

The assessment describes the landscape character of the subject site and its hinterland, together with the visibility of the site from significant viewpoints in the locality. This assessment should be read with reference to the Architectural Design Statement prepared by RAU and with the photomontages, which are contained in a separate A3 report prepared by 3D Design Bureau.

6.1.7 Hydrology (Including Flood Risk Assessment)

Chapter 10 of the EIAR is an assessment of the likely impact of the proposed development on the surrounding surface water and hydrogeological environments (including flood risk, surface water drainage, foul drainage and water supply) as well as identifying proposed mitigation measures to minimise any impacts.

The site falls from its eastern boundary (+123.00) towards its western boundary (+103.50), following the grade along Stocking Avenue. As such, gravity drainage solutions are provided for both surface water drainage and foul drainage.

Foul Drainage

Foul drainage from the site will discharge by gravity into the existing foul drainage network constructed to serve White Pines South under planning application SD10A/0041. The existing foul drainage network has been designed to accommodate additional flow from the subject application site. A spur has been left from White Pines South foul drainage network adjacent to the site's western boundary. As the site falls from its eastern boundary towards its western boundary, a gravity drainage solution can be facilitated.

Surface Water Drainage

Surface water runoff from the site's street network will be directed to tree pits via conventional road gullies (with high level overflow to the piped surface water network) while surface water runoff from on street parking areas will be captured by permeable paving.

Surface water runoff from duplex roofs will be routed to the proposed surface water pipe network via the porous aggregates beneath permeable paved parking areas (providing an additional element of attenuation).

Surface water runoff from apartment roofs will be captured by green roofs (sedum blanket) prior to being routed to the piped surface water drainage network.



The site has been assessed in relation to surface water attenuation. Surface water discharge rates from the proposed surface water drainage network will be controlled by a Hydrobrake type flow control device and associated underground attenuation tanks.

Surface water discharge will also pass via a full retention fuel / oil separator which was installed as part of “White Pines South” under SD10A/0041 before leaving the site.

Please refer to DBFL’s Infrastructure Design Report for full details of the proposed SUDS methodologies.

Water

The proposed development will utilise a 500mm Watermain watermain running along the southern side of Stocking Avenue, adjacent to the site’s northern boundary. An existing 150mm water main network is also located to the south of the site within White Pines South.

The proposed development’s water supply is to be taken from the existing 500mm diameter water main located on Stocking Avenue and connected back into the 150mm diameter network located within White Pines South. A 200mm diameter looped water main will be provided within the development.

6.1.8 Air Quality & Climatic Factors

Chapter 11 of the EIAR assesses the likely air quality and climate impacts, if any, associated with the proposed development. The local air quality impact assessment, regional air quality impact assessment and climate impact assessment, included with this chapter, have all been based on cumulative traffic data incorporating projected traffic from existing and committed developments in the vicinity of the project site.

The Chapter concludes that impacts will be long-term and imperceptible with respect to air quality and climate.

6.1.9 Noise & Vibration

AWN Consulting Ltd. carried out a noise and vibration impact assessment of the proposed White Pines Central development site. Chapter 12 provides a summary of the baseline environment, the relevant criteria adopted for the project, the key items to be assessed relating to noise and vibration and the methodologies to be employed.



6.1.10 Material Assets – Waste

Chapter 13 of the EIAR comprises an assessment of the likely impact of the proposed development on the waste generated from the development as well as identifying proposed mitigation measures to minimise any impacts.

A site-specific *Construction and Demolition Waste Management Plan (C&DWMP)* has been prepared by AWN Consulting Ltd to deal with waste generation during the construction phase of the project and has been included as Appendix 13.1 of the accompanying EIAR.

Construction & Demolition Waste Management Plan and Operational Waste Management Plan

A *Construction & Demolition Waste Management Plan* and *Operational Waste Management Plan* have been included within the EIAR to document the anticipated levels of and types of waste generated by the proposed development and outline proposed mitigation measures to ameliorate any anticipated negative impacts.

The *Operational Waste Management Plan* provides details on the anticipated levels of waste the operational phase of the development may give rise to, also detailing measures for the collection, recycling and disposal of this waste.

In summary, all waste generated during the construction and operational periods is proposed to be appropriately disposed of in accordance with the *Waste Management Plans*.

Details of the demolition and construction programme are outlined in greater detail within a *Preliminary Construction Management Plan*, prepared by DBFL Consulting Engineers.

Topsoil and subsoil will be excavated to facilitate site preparation, construction of foundations, and the installation of underground services. The volume of material to be excavated has been estimated by the project engineers and detailed in the EIAR chapter. Topsoil and subsoil will be reused onsite in landscaping and non-structural fill where possible.

For further information please refer the *Construction and Demolition Management Plan*, appended to Chapter 13 of the EIAR, submitted with this application.

6.1.11 Traffic & Transportation

Chapter 14 of the EIAR assesses and evaluates the likely impact of the proposed development on the existing Traffic and Transportation environment in the vicinity of the site, as well as identifying proposed mitigation measures to minimise any identified impacts arising from the residential development at Stocking Avenue.

The scope of this assessment covers transport and sustainability issues including access, pedestrian, cyclist and public transport connections. Recommendations contained within this



chapter are based on existing and proposed road layout plans, on site traffic observations and junction vehicle turning count data. Traffic surveys were commissioned specifically for this assessment with the objective of providing background information relating to the existing traffic movement patterns across the local road network.

As confirmed in this Chapter, the assessments undertaken as part of this assessment, and also in accordance with the transport related documents detailed in Section 7, confirms that the proposed development is not considered to have any substantial impact on the local road network, during construction and operational phases of the development.

6.1.12 Material Assets – Site Services

Chapter 15 of the EIAR comprises of an assessment of the likely impact of the proposed development on existing utility services in the vicinity of the site as well as identifying proposed mitigation measures to minimise any impacts.

The Chapter notes a number of measures to be put in place for the construction phase of the proposed development. No mitigation measures are deemed necessary, or proposed, for the operational phase of this development.



7.0 OTHER REPORTS

7.1 Material Contravention Statement

A *Material Contravention Statement*, prepared by TPA, is submitted with this application. The *Material Contravention Statement* provides a justification for the *Material Contravention* of the provisions of the *SDCCDP 2016-22 and BOLAP (2014)*.

As set out in Section 37(2)(b) of the *Planning and Development Act 2000* (as amended), An Bord Pleanála may materially contravene a Development Plan or Local Area Plan where national planning policy objectives take precedence. In our professional planning opinion, the Applicant acknowledges that there is a reasonable basis for concluding that the proposed development could potentially materially contravene the Development Plan and Local Area Plan as indicated in the report in relation to Building Height, Density and Dwelling Mix

The *Material Contravention Statement* is therefore included to allow An Bord Pleanála (the competent authority for strategic housing development applications) to make a determination on this matter during their assessment of the application for permission.

It is submitted that the justification set out within the attached statement clearly demonstrates that the proposed development should be considered appropriate for the subject site, due to the sites location adjacent to a public transportation route and the policies and objectives set out within the Section 28 Guidelines.

7.2 Statement of Consistency

A *Statement of Consistency* is submitted with this application. The *Statement of Consistency* demonstrates the compliance of the proposed development with the relevant National, Regional and Local Planning Policy context.

The *Statement of Consistency* concludes that the proposed development is consistent with National Planning Policy and is largely consistent with the policies and objectives contained within the *SDCCDP 2016-22* and the *BOLAP (2014)*.

7.3 Architectural Design Statement & Housing Quality Assessment

An *Architectural Design Statement*, prepared by RAU, is submitted with this application. The *Architectural Design Statement* provides an assessment of the site and surrounding context which forms part of the concept strategy and ultimate design of the proposed development.



A separate *Housing Quality Assessment* is also included with the application, detailing how each proposed residential unit meets the requirements of the *2020 Apartment Guidelines*.

7.4 Landscape Report

A *Landscape Design Report*, prepared by Mitchell Associates, is submitted with this application. The *Landscape Design Report* demonstrates how the proposed landscape scheme has been developed having regard to the; *SDDP 2016 – 2022*; *BOLAP (2014)*; *Design Manual for Urban Roads and Streets*; *National Children’s Play Policy ‘Ready Steady Play’*; and the *All-Ireland Pollinator Plan 2015-2020*.

7.5 Traffic and Transport Assessment

A *Traffic and Transport Assessment*, prepared by DBFL, is submitted with this application. The purpose of this *Traffic and Transport Assessment* is to quantify the existing transport environment. Furthermore, the report also provides detailed assessments, to identify the potential level of any transport impact generated as a result of the proposed development.

The scope of the report covers transport related issues including; means of vehicular access; pedestrian; cyclist and local public transport connections. The principal objective of the report is to quantify any level of impact across the local road network and subsequently ascertain both the existing and future operational performance of the local road network.

The report concludes that the impact on the surrounding road network, as a result of the proposed development, will be minimal. It is therefore concluded that the proposals represent a sustainable and practical approach to development on the subject lands and there are no traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development.

7.6 Mobility Management Plan

A *Mobility Management Plan*, prepared by DBFL, is submitted with this application. The *Mobility Management Plan* is prepared to guide the delivery and management of several coordinated transport related initiatives, which ultimately seek to encourage sustainable travel practices for all journeys to and from the proposed residential accommodation development.



7.7 Parking Strategy

A *Parking Strategy*, prepared by DBFL, is submitted with this application. The *Parking Strategy* presents a detailed rationale behind the proposed quantum of vehicle parking (including mobility impaired parking and service vehicle parking) and cycle parking that is being proposed as part of the development proposals.

The report sets out the management measures that will be deployed to allocate the use and control of parking provided at the proposed development site. The report also sets out the principles of the parking management strategy proposed and should be read in conjunction with the *Traffic and Transport Assessment* and the *Mobility Management Plan* prepared by DBFL.

7.8 Energy and Sustainability Report

An *Energy and Sustainability Report*, prepared by OCSC, is submitted with this application. The *Energy and Sustainability Report* provides an overview of how the project intends to integrate sustainability as a key strategy into the building's design. The report focuses on the performance targets required by the Building Regulations. The report sets out the energy design approach that requires the design to initially focus on an energy demand reduction. the document.

This report confirms that if the energy and sustainability strategy is successfully implemented, the proposed White Pines Central development will achieve all energy and sustainability targets.

7.9 Building Life Cycle Report

A *Building Life Cycle Report*, prepared by OCSC, is submitted with this application. The *Building Life Cycle Report* is prepared in accordance with the requirements of the *2020 Apartments Guidelines*, which outline the requirement for a building lifecycle report to be included with the application. The purpose of this report is to clearly outline the future operation and management of apartment developments and the long-term management and maintenance structures.

The report concludes that the proposed development will be constructed to the highest standards and in compliance with all relevant guidelines and policies which seek to provide for energy efficient and liveable multi-unit developments that will reduce maintenance costs for residents over time.



7.10 Appropriate Assessment (AA) Screening

Altemar, Marine and Environmental Consultancy, has prepared a *Screening Assessment Report in Support of the Appropriate Assessment Process*, which is enclosed with this application.

The assessment concludes;

No Natura 2000 sites are within the zone of influence of this development. Having taking into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development that would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites. In addition, no in-combination effects are foreseen.

7.11 Daylight Sunlight Report

A *Daylight Sunlight Report*, prepared by OCSC, is included as an appendix to the EIAR. The Daylight Sunlight Report provides a detailed analysis of;

- The daylight levels within the living and bedroom areas of selected apartments, to give an indication of the expected daylight levels throughout the proposed development;
- The expected sunlight levels within the living areas and bedrooms within the proposed development;
- The quality of amenity space, being provided as part of the development, in relation to sunlight; and
- Any potential daylight or sunlight impact the proposed development may have on properties adjacent to the site.

The analysis confirms that across the entire development excellent levels of internal daylight are achieved, with a 100% compliance rate achieved across the proposed development. The report further notes how the majority of apartments not only meet, but greatly exceed, the recommendations outlined within the BRE guidelines on 'Site Layout Planning for Daylight and Sunlight' and British Standard BS 8206.

7.12 Community Infrastructure Audit

A *Community Infrastructure Audit*, prepared by TPA, is included with this application. The *Community Infrastructure Audit* demonstrates that there is an adequate supply of education, childcare, community and religious facilities within c. 10-minutes' drive of the application site.



Furthermore, the surrounding area provides a variety of public parks and amenity areas, playgrounds and sporting facilities.

The report also identifies potential gaps in the existing service provision of the area, which are limited to higher order healthcare facilities, such as hospitals, and more significant arts and cultural facilities. The report considers the combined development scheme (i.e. White Pines North, South, East and Central), which includes a range of residential support and public amenities.

7.13 Schools Demand Assessment

A *Schools Demand Assessment*, prepared by TPA, is included with this application. The *Schools Demand Assessment* provides an analysis of the existing level of school services provision and a detailed assessment to determine potential requirement for additional facilities at this location, as a result of the proposed development.

The report concludes;

“There are 11 No. existing primary schools and 8 No. post-primary schools currently operating in the Rathfarnham School Planning Area to which the subject site belongs. These facilities cater to a student population of c. 4,200 primary school students and c. 4,100 post-primary students and have demonstrated low levels of growth in the recent 5-year period (c. increase of 4% and 2% respectively from 2015/16 to 2019/20). With respect to future enrolments, we note that a c. 5% decrease in enrolments at the primary school level and a c. 13% increase in post-primary school enrolments is anticipated for the Dublin region from 2019/20 to 2024/25, with respect to the most recent regional population projections published by the Department of Education and Skills.

The need for additional educational facilities within the county is established in the South Dublin Development Plan 2016-2022, which specifically references the requirement for a secondary school at Firhouse/Ballycullen in C9 Objective 10. This school opened in interim accommodation in August 2018 and was in the site acquisition phase for a permanent location as of August 2020, as per DES records.

While there is no explicit requirement for a new school identified within the subject development lands, there are 2 No. other primary and/or post-primary school sites designated within the current Ballycullen-Oldcourt Local Area Plan 2014 (Extended) at Stocking Avenue and Oldcourt-Gunnyhill of relevance to residential development within the area. We note that these lands are in separate ownership to the subject lands and are unrelated to the proposed development. It does not appear that any development works have been progressed to date at either location.



At a national level, no new schools were proposed to be delivered within the Rathfarnham School Planning Area in the short term under the school building programme (i.e. 2019-2022), despite the aforementioned designation of school sites within the relevant development plans. However, one new primary school and two new post-primary schools are scheduled to open within the neighbouring feeder areas of Firhouse and Dublin 6/6W by 2020.

As these facilities will increase the availability of places for future students in the short-to medium-term by providing 16 No. new primary classrooms and 2,000 No. new post-primary school places within the region, it is considered that the future demand generated by the proposed development (i.e. 527 No. places - including 322 No. primary and 205 No. post-primary school children) is likely be absorbed by the existing schools network and other planned schools currently under development within the area."

7.14 Childcare Capacity Audit

A *Childcare Capacity Audit*, prepared by TPA, is included with this application. The *Childcare Capacity Audit* provides a detailed analysis to determine the existing level of childcare services provision and potential requirement for additional facilities to service the proposed developments. A comprehensive audit of the surrounding area was undertaken as part of this report.

The report is prepared in accordance with the *Childcare Facilities: Guidelines for Planning Authorities, 2001* and the *SDDP2016-22*, specifically Community Infrastructure Policy 8 and Policy 9, Objective 7.

There is sufficient capacity in the recently approved creche facility on the Ardstone Retail Site to accommodate all of the residential Ardstone development lands in the vicinity;

"the c. 385 sq. m childcare facility permitted under Reg. Ref. SD19A/0345 has sufficient capacity (i.e. 50 spaces or more) to absorb the demand of the entire scheme comprising 'White Pines North, South and East' and 'Stocking Central'. As this development forms part of the overall residential scheme and is currently under construction, an additional childcare facility is not proposed to be provided as part of the current application."

8.0 CONCLUSION

It is considered that the proposed development of 114 no. residential units is well-designed and will complement the existing and emerging residential developments surrounding the site. The scheme provides for an appropriate and efficient residential density, a safe vehicular access arrangement, high quality open spaces, and a well-designed scheme which respects the existing area and is an appropriate scale along Stocking Avenue.

It is considered that the proposed development inherently accords with National and Regional sustainable planning principles particularly in relation to the promotion of more compact and efficient forms of urban development and significantly increased residential densities in appropriate locations. This is in line with the *National Planning Framework* and the recently adopted *Apartment Guidelines (2020)* and *Building Height Guidelines (2018)*. The realisation of the objectives of this National Guidance necessitates facilitating residential development to a height in appropriate locations, otherwise the requisite sustainable densities cannot be achieved.

Given the importance of housing delivery in meeting the ongoing, serious under-provision of residential accommodation, particularly in the Dublin area, increased heights and densities are not only appropriate but also essential in meeting the ambitious housing targets set by National Guidance.

Should you have any questions on any aspect of the proposed development, please do not hesitate to contact us.

Yours faithfully



Gavin Lawlor
Director
Tom Phillips + Associates