

STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
PLANNING REPORT

FOR LANDS AT HOLLYSTOWN-KILMARTIN, DUBLIN 15

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**Brady Shipman
Martin**

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CLIENT
Glenveagh Homes Ltd.

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Brady Shipman Martin

DUBLIN

Mountpleasant Business Centre
Ranelagh
Dublin 6

+353 1 208 1900

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 21 242 5620

LIMERICK

11 The Crescent
Limerick

+353 61 315 127

mail@bradyshipmanmartin.com

www.bradysipmanmartin.com

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1 INTRODUCTION

This Planning Report has been prepared in support of a SHD Planning Application to An Bord Pleanála, on behalf of Glenveagh Homes. The subject application site (hereafter called 'the site') is located in an existing and emerging urban area in the Hollystown / Kilmartin / Tyrrelstown area, in the north-west of the Dublin Metropolitan Area (DMA), Dublin 15. For ease the application is referred to as Lands at Hollystown-Kilmartin. It has a site area of c. 25.3 ha with a gross residential area of 16.89 ha and a net site developable area of c. 13.67 ha (see Fig. 1.4 below for further breakdown of site area).

This application relates to the amalgamation of two separate Strategic Housing Development Pre-Application Consultation Requests (Kilmartin Local Centre Ref: TC06F.309783 and Kilmartin (Hollystown) Sites 2 & 3 Ref: TC06F.309926) to form a single Strategic Housing Development Application.

The subject lands have two distinct parts referred to as Hollystown Sites 2 & 3 to the north, and Kilmartin Local Centre to the south. The Hollystown Sites 2 & 3 lands are largely undeveloped with the eastern-most part of the lands being greenfield in nature and the western-most part of the lands currently in use as a construction compound, with part of the site forming part of the former Hollystown Golf Course lands. The Local Centre lands are undeveloped but accessible via previously constructed roadways. The Local Centre lands subject of this application, lie immediately to the west of the R121, and form the eastern part of the overall Local Centre lands as identified in the Kilmartin LAP, Fingal Development Plan, and in effect comprise the eastern portion of the landbank included in the Kilmartin Local Centre Pre-Application Consultation Request Ref: TC06F.309783.

Two high voltage overhead power lines traverse the site: a 110kv line traverses the northern boundary across Hollystown Sites 2 & 3, and a 220kv line traverses the Local Centre site to the south. Development is restricted within 20m on either side of the 110kv lines, and 30m on either side of the 220kv lines. This means that a large portion of the site is unavailable for development, but can be provided for amenity purposes.

The site is generally bound by the R121 to the east, and Glenveagh Homes lands at 'Site 1' subject of a recent grant of planning by Fingal County Council (Planning Reg. Ref. FW21A/0042), and residential areas of Hollywoodrath to the east beyond the R121; Fingal County Council lands to the south (incl. Tyrrelstown Park) and beyond this to the south and west by the educational facilities of Tyrrelstown, and further to the south (and west) by Tyrrelstown Local Centre and Kilmartin Local Centre lands (not subject of this application); to the west by undeveloped lands within the ownership of Glenveagh Homes; and to the north by the former Hollystown Golf Course lands (please see Fig. 2.1 below), and further north-east by the Ratoath Road.

The new residential area of 'Bellingsmore' (developed by Glenveagh Homes and nearing completion), lies to the south and south-east of Hollystown Sites 2 & 3 and to the north of the Kilmartin Local Centre lands subject of this application.

The lands fall both within and outside the Kilmartin Local Area Plan 2013 (as extended) and wholly within the Fingal County Development Plan 2017-2023 area. The Hollystown Sites 2 & 3 lands are zoned RA 'New Residential', and the Kilmartin Local Centre lands are zoned LC 'Local Centre'. An area to the north of the Hollystown Sites 2 & 3 lands are zoned OS 'Open Space' and proposed for Class 1 open space only.

As such, the delivery of residential development on these lands, as proposed, is in line with the Fingal Development Plan (2017-2023) Core Strategy and the Kilmartin Local Area Plan 2013 (as extended).

The development for which permission is being sought, as set out in the Statutory Notices is as follows:

The proposed development will consist of the development of 548 no. residential units, consisting of 147 apartments/duplexes and 401 houses, ranging in height from 2 to 5 storeys and including retail/café unit, 2 no. crèches, 1 no. Montessori, 1 no. community hub, car and bicycle parking, open space and public realm, over a site area of c. 25.3 ha, as follows:

1. *On lands to the north of the application site (referred to as Sites 2 & 3) the proposed development includes for 428 no. houses and apartments comprising 27 No. 1-bed apartments, 97 No. 2-bed houses, 267 No. 3-bed houses and 37 No. 4-bed houses set out in 401 no. houses (373 no. 2-storey and 28 no. 3-storey) and 9 no. 3-storey apartment buildings (27 no.). A total of 792 no. car parking spaces will be provided for this part of the scheme, of these, 761 no. spaces will be provided for residents with 30 no. spaces provided as visitor parking and 1 no. space for disabled parking. In terms of bicycle parking, a total of 225 no. cycle parking spaces are provided, comprising 180 no. spaces for terraced units (located in 9 no. bike stores with 20 no. bikes in each) plus 45 no. spaces for the apartments.*
2. *On lands to the south of the application site and north of the Tyrrelstown Local Centre (referred to as Local Centre) the proposed development includes 120 no. apartment/duplex units in 4 no. blocks ranging in height from 3 to 5 storeys (32 no. 1 bedroom, 68 no. 2 bedroom and 20 no. 3 bedroom) all of which have balconies or terraces set out as follows:*
 - *Block A, is a 4 storey building, providing 12 no. units with proposed balconies, with a café/retail unit of 154sq.m and community hub of 144.5 sq.m proposed at ground floor.*
 - *Block B, is a 3-5 storey building, providing 34 no. units with proposed balconies and ground floor terraces.*
 - *Block C, is a 3-5 storey building, providing 44 no. units with proposed balconies and ground floor terraces.*

- *Block D, is a 4 storey building, providing 30 no. units with proposed balconies and ground floor terraces, with a crèche of 500 sq.m with an external play space of 200 sq.m and a Montessori of 280.3 sq.m with an external play space of 185 sq.m proposed at ground floor.*
 - *External communal amenity space is provided at ground podium terrace levels throughout the scheme.*
 - *A standalone 2-storey crèche unit is also provided of 529.6 sq.m with an external play space of 243 sq.m, to the south of the site.*
 - *Car Parking is provided in a mix of undercroft in Blocks B & C and at surface level with 108 spaces for residential use and 5 no. creche/Montessori staff spaces, 10 no. creche/Montessori set down spaces, 6 no. visitor spaces and 9 no. public spaces on the Link Street. A total of 300 no. bicycle parking spaces are proposed as part of the development comprising 230 no. long stay spaces for residents and 70 no. short stay spaces for both visitors and the non-residential activity.*
3. *Vehicular access to Sites 2 & 3 to the north of the application site is through the construction of a new vehicular entrance off Hollywoodrath Road (R121), a new footpath and cycle path along the northern and western side of the R121 along the site frontage extending south to the existing Toucan crossing facility over the R121, and provision of 2 no. new Toucan crossings on the R121 (c.0.53 ha) as well as via an extension to Hollystown Avenue link road south of the permitted Bellingsmore development. Vehicular access to the Local Centre to the south of the application site is via the existing access point along Hollystown Avenue and the north-south link route from the existing Tyrrelstown Local Centre which is partially completed and partially under construction. Pedestrian and cycle access is also provided along the R121, through existing roads within the application site and through the creation of a new pedestrian/cycle route to the north at the existing entrance to the clubhouse of the former Hollystown Golf Course.*
 4. *The development of proposed Class 1 public open space of 2.77ha and Class 2 public open space of 1.69ha including pedestrian/cycle routes, seating areas, kick about area, playgrounds, dog park, associated landscaping works including planting, changes in level and boundary treatments. In addition 3.21 ha of linear park under the existing power lines and 2.11ha of ancillary linear open space which includes for SUDS and hedgerow features is provided in the scheme. The proposed Class 1 open space is provided as a north south pedestrian and cycle connection to the north an connecting the site to the Ratoath Road and the future Dublin GAA facilities at this location.*
 5. *The construction of a new foul outfall sewer, approx. 3km in length to connect to the existing 600mm diameter foul sewer to the south of Powerstown Road which will include decommissioning of the existing Pump House south of Hollystown Park.*
 6. *The development will also provide for all associated ancillary site development infrastructure including landscaped areas and sustainable*

urban drainage systems under the existing ESB powerlines, and all associated ancillary site development infrastructure including: demolition of an existing shed, ESB sub-stations, public lighting, and foul and surface water drainage; internal roads & footpaths; landscaping; and all associated engineering and site works necessary to facilitate the development.

The proposed scheme is designed to integrate with the previously permitted development at Bellingsmore (Ref FW13A/0088/E1) which is currently under construction and recently permitted residential development on lands to the north east known as Site 1 (FCC Reg. Ref.: FW21A/0042).

This report examines the site location, context, and planning history. It also has regard to issues of compliance with the Fingal County Development Plan 2017-2023, the Kilmartin Local Area Plan (LAP) 2013 (as extended), and Section 28 Guidelines, which are the relevant statutory documents against which the development will be considered.

An Appropriate Assessment (AA) Screening Report and Environmental Impact Assessment Report (EIAR) prepared by Brady Shipman Martin (BSM) are submitted to An Bord Pleanála with the SHD Planning Application documentation.

1.2 Glenveagh Homes at Hollystown-Kilmartin

Glenveagh Homes have a wider landholding at Hollystown-Kilmartin, beyond the site subject of this application (see Fig. 1.3 below).

The subject site is considered in the context of an overall Framework Plan for the lands, which is illustrated in Fig. 1.5 below, and in the accompanying Framework Plan Report. The framework principles seek to integrate future development of the lands into the existing context, connecting south to Bellingsmore and Tyrrelstown Local Centre, and beyond to residential areas, to existing and future residential areas to the east at Hollywoodrath, and north to Hollystown, and into the planned future context.

Principles of open space networks, and pedestrian and cycle linkages, knit the development lands together, and build on policies and objectives set out by Fingal County Council.

The subject site represents the next stages of proposed development across the lands.

Bellingsmore, immediately south and southeast of the Hollystown Sites 2 & 3 lands, and north of the Kilmartin Local Centre lands, within Glenveagh Homes ownership, is under construction and nearing completion. Site 1 (as per map in Fig. 1.3 below), which adjoins the Hollystown Sites 2 & 3 lands at its eastern-most

corner, also within Glenveagh Homes ownership, was recently granted planning by Fingal County Council (Reg. Ref. FW21A/0042) and seeks to deliver further residential development, and significant parklands, at this location.

Lands at Kilmartin Local Centre form part of this application and seek to deliver a mix of café/retail, childcare, and community facilities in tandem with residential development, within the area designated as the Kilmartin Local Centre, which will serve the existing and future residential development of the wider Hollystown-Kilmartin area.

Glenveagh Homes (GH) are committed to the creation of sustainable community building at Hollystown-Kilmartin, and therefore as part of this application for a distinctive residential community, Glenveagh Homes are also committing to the delivery of significant open space (Class 1 Open Space) to the north of the proposed housing, on lands forming part of the former Hollystown Golf Club, which will link to the future planned GAA facilities and community sports grounds, also planned (under separate application by Dublin GAA) on lands forming part of the former Hollystown Golf Club, and link on to the Ratoath Road.

This open space provision will be delivered in tandem with the delivery of residential development at Hollystown Sites 2 & 3, and residential and mixed use development at the Local Centre, ensuring early delivery of quality open space, over and above that required by this specific development, to contribute to strong placemaking, recreation and leisure provision, and community infrastructure. Additionally, this application for development proposes childcare facilities to cater for this current proposed residential development in addition to planned future phases of development, as per Fingal Development Plan and Kilmartin Local Area Plan, reinforcing the delivery of community facilities to serve this emerging urban location.

The proposed residential scheme will contribute to addressing the shortage in housing supply in the prevailing housing crisis, delivering an appropriate density of development on zoned lands, whilst adhering to the policy guidance set out in the National Planning Framework: Ireland 2040, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), Urban Design Manual Best Practice Guide (2009), Design Manual for Urban Roads and Streets (2019), Sustainable Urban Housing, Design Standards for New Apartments (2020), and Fingal County Development Plan 2017-2023, and Kilmartin Local Area Plan (2013 as extended), inter alia.

The various land parcels and phasing for the overall landownership is set out in Figure 1.3 below.

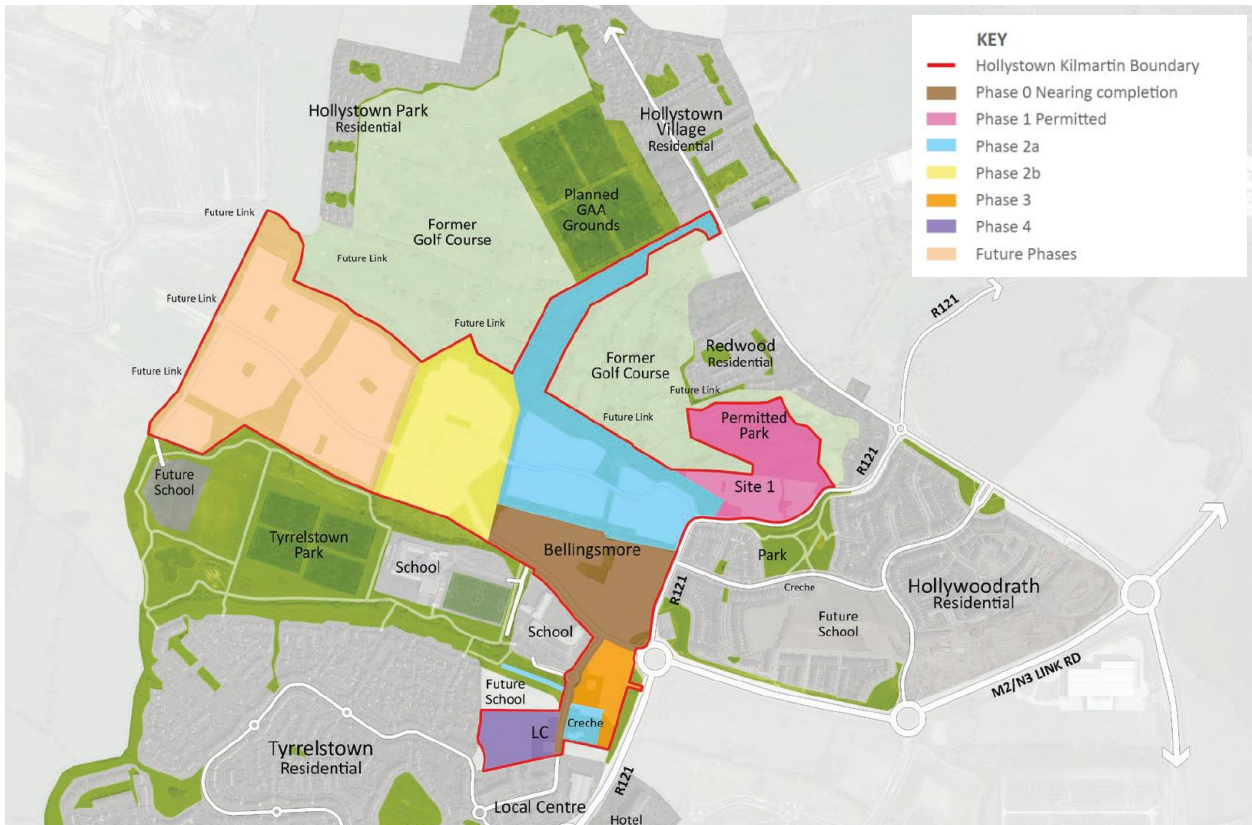
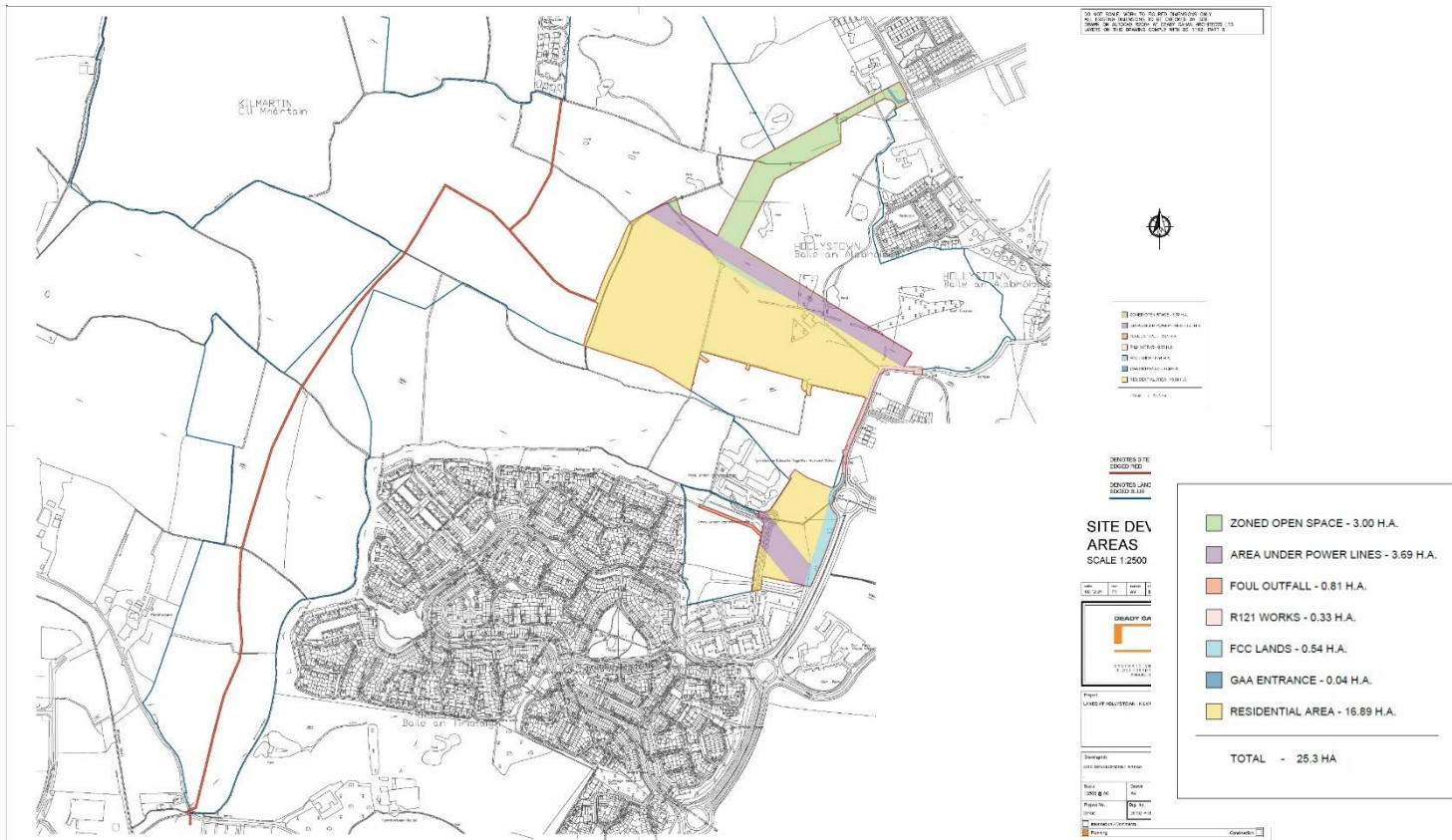


Figure 1.3: Phasing for the Hollystown-Kilmartin Framework Plan Boundary (Source: BSM, 2021).
Fig. 1.4 Site Development Areas (Deady Gahan 2021)



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2 SITE LOCATION AND CONTEXT

2.1 Subject Site

The subject site is located within Fingal County Council, approximately 3.2 km north of Blanchardstown town centre and 2.5 km south west of the M2/N2 motorway, and c. 8kms north-west of Dublin City Centre. As such, the lands are subject to the Fingal County Development Plan 2017-2023. The subject lands are also partly subject to the Kilmartin Local Area Plan 2013 (as extended). We note the provisions of this LAP, the response to which is detailed in Section 5.2 below.



Figure 2.1: Subject site in the wider Dublin and Fingal Context (Source: Google Maps, 2021).

The surrounding area is a relatively new suburban area comprising a mix of uses from residential, to education and commercial. Hollywoodrath is an emerging residential area to the east while directly to the south and southeast, Bellingsmore residential development is nearing completion by Glenveagh Homes. The established Tyrrelstown residential community, and associated Local Centre, are located south of the subject lands.

Educational and community uses are located to the south and west (St. Luke's National School, Tyrrelstown Educate Together National School, Le Chéile Secondary School).

Further to the east and south east is the large scale Northwest and Rosemount Business Parks, and to the southwest Damastown Industrial Park, comprising light industrial and pharmaceutical activities.

The site is accessed via the R121 road which connects Tyrrelstown with the N3, Blanchardstown, and the wider national road network.



Figure 2.2: Subject site in the immediate context (Source: Google Maps, 2021).

3 PLANNING HISTORY

We note numerous applications in the area, in particular 3 no. significant planning applications within the Applicant's landholdings in recent years. The wider area has had a significant amount of planning activity as an emerging residential area, in particular to the east at Hollywoodrath.

3.1 Subject Site & Immediate Adjacent Sites in the Applicant's Landholding

We note the following applications relevant to the subject site:

3.1.1 FCC Reg. Ref. FW21A/0042 (Hollystown Site 1)

Glenveagh Homes applied for planning permission to Fingal County Council for 69 No. dwellings in March 2021. A final grant was issued by Fingal County Council on 24th August 2021. It was prepared in tandem with the subject application and considered as part of a wider development strategy for the landholding, as set out at Section 1.2 above.

3.1.2 ABP Reg. Ref. 303956-19 (SHD)

Glenveagh Homes applied for planning permission for 253 No. dwellings in March 2019, which included the eastern part of the subject lands. The application was refused by An Bord Pleanála (ABP) citing 2 No. reasons for refusal on the 25th June 2019. This application included the lands subject of this current application.

The reasons for refusal included:

1. The "Urban Design Manual – a Best Practice Guide" issued by the Department of the Environment, Heritage and Local Government in 2009, to accompany the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas includes key criteria such as context, connections, inclusivity, variety and distinctiveness. It is considered that the proposed development results in a poor design concept that is substandard in its form, layout and elevational treatment; fails to provide high quality usable open spaces; fails to establish a sense of place; would result in a substandard form of development lacking in variety and distinctiveness, all of which would lead to conditions injurious to the residential amenities of future occupants. Furthermore, the layout of the proposed scheme, being dominated by roads and surface car parking, is contrary to the provisions of the Design Manual for Urban Roads and Streets, issued by the Department of the Environment, Community and Local Government and the Department of Transport, Tourism and Sport in 2013. The proposed development would, therefore, seriously injure the residential amenities of future occupants, would be contrary to these Ministerial Guidelines and would be contrary to the proper planning and sustainable development of the area.

2. Section 4.10 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), together with Criteria

*No. 2 (Connections) in the accompanying Design Manual, seeks in the creation of well-connected communities, to minimise the need for car journeys and encourage walking and cycling. **Having regard to the lack of meaningful pedestrian and cycle facilities proposed along the site boundary with the R121, it is considered that any development of the subject lands would be premature pending the provision of these improvement works. The lack of cyclepaths along the main access road through to the designated GAA lands is also considered unacceptable.** Furthermore, it is considered that if developed prior to the carrying out and completion of these improvement works, the proposed development would endanger public safety by reason of a traffic hazard, including hazard to pedestrians and cyclists. The proposed development, would therefore be contrary to the proper planning and sustainable development of the area.*

(Our emphasis.)

3.1.3 FCC Reg. Ref FW13A/0088 (/E1) (ABP Reg. Ref 243395)

Twinlite Services Ltd applied for planning permission for 177 No. dwellings in August 2013. The application was subsequently granted by An Bord Pleanála on the 20th October 2014. 19 No. conditions were attached to ABP's Order. The application was revised resulting in 172 No. units.

The Applicant was granted an extension of duration of permission 13th August 2019 under FCC Reg. Ref. FW13A/0088/E1.

This site, now known as Bellingsmore, is located within the Applicant's landholding, to the south of Hollystown Sites 2 & 3 and to the north of the Kilmartin LC Lands, and is nearing completion, and is partly occupied (See Figure 1.2).

3.2 Planning History in the Wider Area

We note a series of planning applications on the lands to the east of the subject site part of which is under construction at Hollywoodrath, Hollystown. Originally permitted under FCC Reg. Ref. FW14A/0108, once complete the area will deliver c. 481 units.

Most recently, Gembira Limited applied for alterations to Phase 3 of the permitted scheme under FCC Reg. Ref. FW19A/0058. (Previously permitted under the following FCC Reg. Ref. FW18A/0132; FW17A/0016; FW16A/0148; FW16A/0099, FW14A/0108).

Directly to the south of the above referenced site, FCC granted Kavcre Tyrellstown Limited permission for c.180 units under FCC Reg. Ref. FW15A/0009 (amended by FW16A/0191).

Immediately south of the subject Local Centre site, Lidl Ireland recently secured permission under Planning Reg. Ref. FW18A/0117 for ‘demolition of their existing store, and ancillary retail unit and sub-station. The construction of a licensed Discount Foodstore with ancillary off-licence sales and two retail units and public realm’.

4 PRE-PLANNING CONSULTATION

Both the context and approach to the application site and the emerging design rationale for the proposed development, have been subject to consultation with the Fingal County Council Planning Department under Section 247 of the Planning and Development Act (as Amended).

Pre-application planning meetings for both sites were held with the Council’s Planning Department (in person and on Microsoft Teams) on the following dates:

- 19 December 2019
- 20 February 2020
- 3 June 2020
- 25 January 2021
- 1 February 2021

Additionally, a number of meetings were held with Fingal County Council drainage, roads, and parks departments including site visits throughout this period.

In addition, tri-partite meetings with An Bord Pleanála were held on 1st September 2021 (Sites 2 & 3 Ref: TC06F.309926) and 30th August 2021 (Local Centre Ref: TC06F.309783).

5 PLANNING FRAMEWORK

5.1 Fingal Development Plan 2017-2023

The proposed development is located in the administrative area of Fingal County Council and subject to the Fingal Development Plan 2017-2023, with some of the lands subject to the provisions of the Kilmartin LAP 2013 (as extended) (see map 5.3 below).

This section discusses the specific provisions of the Development Plan in relation to development management standards, Core Strategy and other general policy considerations.

5.1.1 Strategic Vision

The Strategic Vision for the County sets out a series of objectives to shape the future growth of Fingal to plan for and support the sustainable long term development of the County.

We note the following are of direct relevance to the future development of the subject lands, the Strategic Vision aims to:

- *Consolidate urban areas to provide a vibrant, attractive environment for living and working, facilitating efficient movement by sustainable modes of transport throughout the County.*
- *Create a high quality built environment integrating the conservation of Fingal's built heritage with best practice contemporary architecture and urban design...*
- *... Ensure consistency with the Council's Core, Settlement and Housing Strategies to provide high quality housing of a sufficient scale and mix, located in optimum locations and aligned with adequate infrastructure, services and amenities.*
- *...Promote active and healthy lifestyles through increased opportunities for walking, cycling and active sport and recreation.*

Section 1.6 of the Development Plans sets out the Strategic Policy through 25 No. objectives delivering the main aims of the Development Plan.

In particular, we wish to highlight objective Nos. 2 & 3 in this context which aim to:

Objective 2

- *Contribute to the creation of a more socially inclusive, equal and culturally diverse society by providing for appropriate community infrastructure, quality public realm and improving access to information and resources.*

Objective 3

- *Add quality to the places where Fingal's communities live, work and recreate by integrating high quality design into every aspect of the Plan promoting adaptable residential buildings and ensuring developments contribute to a positive sense of place and local distinctiveness of an area.*

The proposed development supports the achievement of these objectives through a development which is of a high quality design, well-connected, provides high quality public and private open space, mix of uses, community infrastructure, resulting in a distinct place, which will contribute to a sustainable community, and which fits within an overall master plan approach for development.

The above consideration feeds directly into one of the cross-cutting themes set out in Section 1.8 is that of 'High Quality Design'. The individual design of units and the overall layout of the proposed development adds to the quality of the scheme resulting in a 'sense of place'.

5.1.2 Core Strategy and Settlement Hierarchy

Chapter 2 of the Development Plan identifies the quantum, location and phasing of development for the plan period that is consistent with regionally defined population targets and settlement hierarchy. It reflects the availability of existing services, planned investment, sequential development and environmental requirements (i.e. an evidence-based approach in determining the suitability of lands for zoning purposes) and therefore also provides the policy framework for all Local Area Plans.

The Core Strategy aligns the Development Plan with the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) as amended by Variation No.2 by FCC (June 2020).

The requirement for a Metropolitan Area Strategic Plan (MASP) to be prepared for Dublin as part of the Regional Spatial and Economic Strategy is set out in Project Ireland 2040 – National Planning Framework. The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area.

While Tyrrelstown and Hollystown are not specifically identified within the Core Strategy, they are located in the Metropolitan consolidated Town associated with Blanchardstown, for which a capacity of 9,306 no. units is identified. These villages are considered distinctive areas that contribute to Blanchardstown's diversity and vitality.

The Settlement Hierarchy identifies a hierarchy of settlement types within the Metropolitan and Core areas of each county and the appropriate policy for growth within them (see Table 2.1).

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Table 2.8 of the Development Plan below sets out the total land and housing capacity for the 2017-2023 Development Plan. The emphasis of the Development Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

We note, Objective SS01 aims to:

“Consolidate the vast majority of the County’s future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the core to towns and villages, as advocated by national and regional planning guidance.”



Figure 5.1: Core Strategy of the Fingal Development Plan. (Source: FCC, 2021).

5.1.3 Urban Fingal

Fingal is divided into a Metropolitan Area and a Core Area. Blanchardstown and Swords are the largest urban centres in Fingal. Blanchardstown is part of the Dublin City and suburbs as described in the RSES and functions as part of the Dublin Metropolitan Area. Strategically located at the intersection of the N3 and M50 national roads, is the largest settlement centre in Fingal. Designated as a Level 2 'Major Town Centre' in the Retail Strategy for the Greater Dublin Area, it is also one of the largest and most important retail centres in the State and a designated location for housing. It will continue to perform the role of the County's primary development centre during the Plan period.

Objective SS12 states:

Promote the Key Town of Swords and the Metropolitan Area of Blanchardstown, respectively, as Fingal's primary growth centres for residential development in line with the County's Settlement Hierarchy

The subject lands are located within the Blanchardstown area of Dublin City and Suburbs, adjacent to Tyrrelstown Village. The policy approach in these areas will be to gain maximum benefit from existing transport, social, and community infrastructure through the continued consolidation of the city and its suburbs.

Chapter 4 notes the following in relation to Tyrrelstown:

Tyrrelstown is a significant commercial and residential area located 3.5km to the north of the centre of Blanchardstown, but still within its development boundary. It has a purpose built centre which was developed to serve the emerging residential population; as well as the wider area including new development at Kilmartin.

The Development Plan includes a number of objectives in relation to the village and the following objectives are of relevance to the wider area north of the village, including Hollystown:

Development Strategy

Enhance and improve this centre by encouraging suitable retail, commercial and residential uses alongside new school and associated recreational developments. Future development of this area whether of a local centre, open space or residential land use nature needs to respect existing development within the area and be carried out in a sustainable manner to provide a high quality living environment for the existing and future population.

Tyrrelstown Development Plan Objectives

Objective TYRRELSTOWN 1

Provide for appropriate mixed use development which enhances local services and community facilities and which has a residential element.

Objective TYRRELSTOWN 2

Create a network of pedestrian and cycle routes between Tyrrelstown, Kilmartin, Hollystown and Mulhuddart.

Objective TYRRELSTOWN 3

Ensure the physical and visual integration of the centre with the newly developing residential areas to the north.

Objective TYRRELSTOWN 4

Secure a safe and convenient road, pedestrian and cycle system and street network to accommodate the growth of Tyrrelstown.

HOLLYSTOWN

Hollystown is a residential area located approximately 4km to the north of the centre of Blanchardstown, north of Hollystown Golf Course. It has developed from a small rural settlement, originally centred on the St. Thomas's Church of Ireland and Hollystown House, a Protected Structure. An area of LC zoning is identified in the centre of the village to provide additional facilities to serve the emerging residential population, including that of Kilmartin. The proximity of rural lands and groups of mature trees contribute to the attractive setting of this area.

Development Strategy

Ensure the future development of this area respects existing development within the area and is carried out in a sustainable manner to provide a high quality living environment for the existing and future population.

Hollystown Development Plan Objectives

Objective HOLLYSTOWN 1

Provide for an appropriate level of development to complement existing local services and promote the provision of community facilities at a scale commensurate with the level of existing and future residential development.

Objective HOLLYSTOWN 2

Ensure the physical and visual integration of the centre with the newly developing residential areas and landscape setting.

Objective HOLLYSTOWN 3

Create a network of pedestrian and cycle routes between Tyrrelstown and Kilmartin, Mulhuddart and Hollystown.

The proposed development meets many of the above objectives by providing a development which enhances local services and community facilities with a strong and diversified residential component to contribute to the range of dwelling types in this area.

5.1.4 Place Making

Fingal County Council aims to achieve successful and sustainable communities throughout the County. Chapter 3 sets out the role of the Development Plan in this regard.

The Architects Design Statement, and Section 6 of this Report, sets out how the design approach to housing at this location will provide a distinctive design, and housing layout, that fits with its surrounds, but equally distinguishes itself from adjacent new residential development west of the R121.

In relation to ‘Sustainable Housing’ the Development Plan references *Rebuilding Ireland – an Action Plan for Housing and Homelessness*. Chapter 3 states that in order to achieve sustainable neighbourhoods and maximise the contribution of the built environment to addressing climate change Fingal will consolidate *the existing communities, already served by public transport and close to established social and community infrastructure, and the creation of new communities serviced by high quality transport links*.

5.1.5 Zoning

The lands subject of this application are zoned (i) RA ‘New Residential’ (some of which is indicated as subject to LAP), (ii) LC- Local Centre, (iii) OS- ‘Open Space’ and (iv) RU- ‘Rural’. Housing units are located within lands zoned for residential uses, with Class 1 Open Space and pedestrian connections proposed for the lands zoned Open Space, and foul drainage infrastructure proposed to connect through lands zoned RU Rural.

Residential and Local Centre Lands

The objective of the lands containing residential development are as follows:

(i) RA Zoned Lands is to ‘*provide for new residential communities subject to the provision of the necessary social and physical infrastructure*’, with residential included as a permitted in principle use.

(ii) LC Zoned Lands is to ‘*provide for and/or improve local centre facilities*’, with residential included as a permitted in principle use.

The proposed housing is focused solely on the RA and LC zoned lands, and given the primary purpose of this application is to provide for residential uses, the proposed development is clearly consistent with the land-use zoning. Additionally, a mix of uses are proposed for the LC zoned lands, which are permitted in principle.

Open Space & Rural Zoned Lands

The objective Open Space seeks to ‘*Preserve and provide for open space and recreational amenities*.’ It further seeks to ‘*Provide recreational and amenity resources for urban and rural populations subject to strict development controls*.’ Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority.’ The proposed Class 1 Open Space is provided within the Open Space zoned lands.

The provision of the foul outfall pipe to connect to the Powerstown Road, brings the site application area through the Kilmartin Local Area Plan zoned lands, zoned residential development, and through open space and rural lands. The extension northwards of the site application boundary along the R121 encompasses the provision of a cycle and footpath network along this route. In addition, the northern extension of proposed public open space provision runs through open space zoned lands connecting to the former Hollystown Golf Course Clubhouse and to the Ratoath Road.

Specific Local Objectives

Lands at Site 2 are subject to Local Objective 72: *Provide a recreational facility for the Dublin G.A.A. County Board, through the provision by them of a 2.5ha playing pitch and local recreational community facility including a clubhouse, related ancillary facilities and car and cycle parking.* The fulfilment of this Local Objective is further set out in Section 6 below.

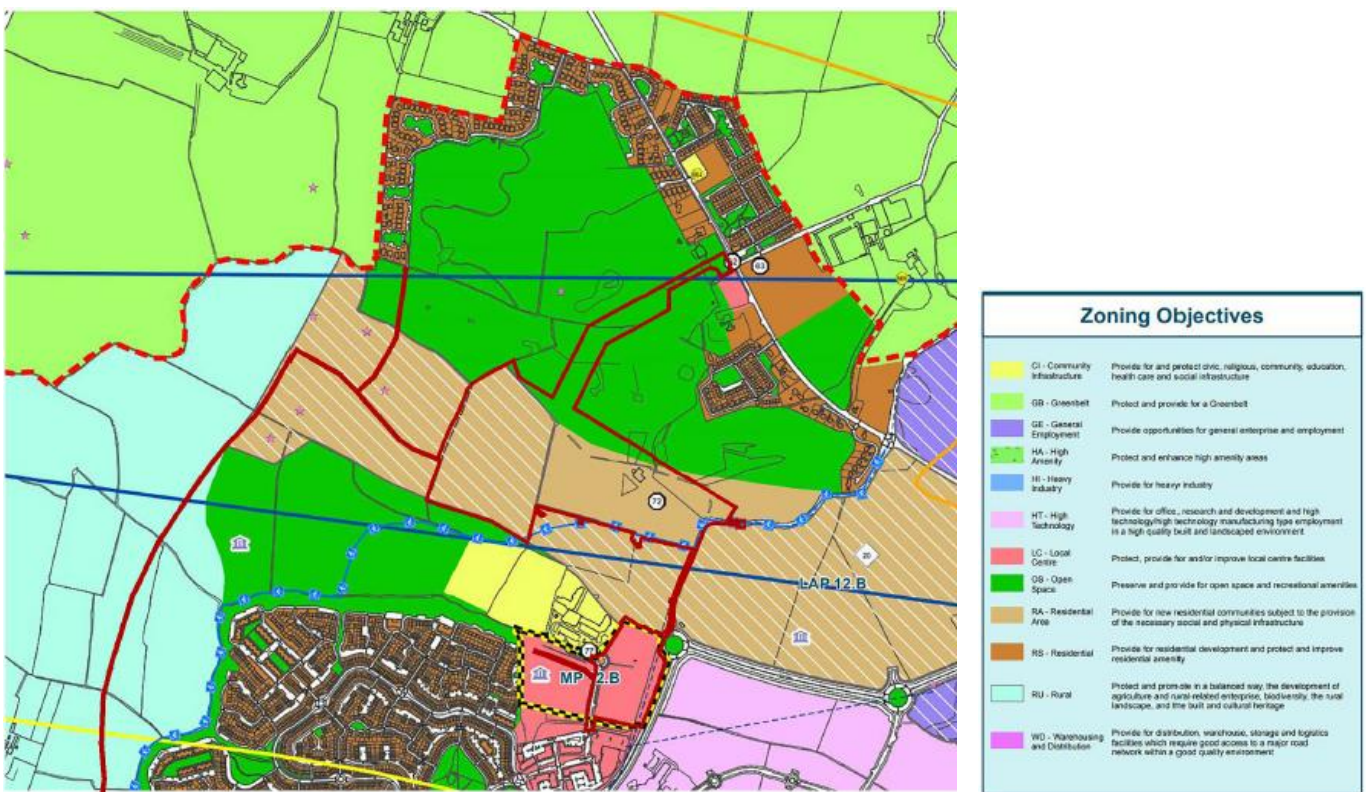


Figure 5.2: Extract from the Fingal Development Plan Zoning Map 12 (Source: FCC)

Local Objective 77 (within Local Centre lands): Facilitate improved parking and drop-off/collection on the approach road to and within Tyrrelstown school campus in conjunction with the Department of Education and Skills

In relation to Local Objective 77, the proposed development will provide 9 no. public on-street parking spaces on the new Link Street, which will form part of the areas to be taken in charge by Fingal County Council.

For the Local Centre lands the zoning map identifies MP 12.B which under Objective Blanchardstown 18 in the Fingal Development Plan states: *Prepare*

and/or implement the following Local Area Plans and Masterplans during the lifetime of this Plan: Tyrrelstown Masterplan (see Maps Sheet 12, MP 12.B.)

This specific objective in relation to a Masterplan as per MP 12.B is met by the provisions set out in the accompanying *Hollystown Kilmartin Framework Plan*, prepared by BSM and submitted as part of this application, the context of which is illustrated in Fig. 1.4 above.

The accompanying Framework Plan (Master Plan document) seeks to consider the entirety of the Glenveagh Homes landholding in the context of Fingal Development Plan objectives, and the Kilmartin Local Area Plan objectives, including the MP 12.B master plan requirement. It incorporates the objectives to deliver a school on part of the MP 12.B lands, subject to Department of Education requirements. As this requirement is not clearly established in terms of school need, the Framework Plan has simply accepted this land bank as a future school and has responded to it in terms of future connectivity requirements, interface and boundary issues, and adjacent land uses, *inter alia*. By considering the MP 12.B master plan requirement within an overall context, it is considered that the accompanying Framework Plan exceeds the requirements of this specific objective and more robustly frames the lands within their context.

5.1.6 Housing Strategy

The preparation of a Housing Strategy is a mandatory requirement under the Planning and Development Act, 2000 (as amended). The Fingal Strategy is included as Appendix 1 of the Development Plan.

The provision of a mix and range of housing types is essential to accommodate the housing needs and expectations of the County's residents. Mixed and inclusive communities, which offer a choice of housing and lifestyles, have been proven to provide a number of community benefits.

The Development Plan refers to a number of documents *Delivering Homes Sustaining Communities* (2007), *Quality Housing for Sustainable Communities* (2007), *Sustainable Residential Development in Urban Areas* (2009), *Urban Design Manual a Best Practice Guide* (2009) and *Government Policy on Architecture* (2009). These guidelines relate to all residential units regardless of their type or location.

The following general objectives relate to the residential development in Fingal:

Objective PM37	<i>Ensure an holistic approach, which incorporates the provision of essential and appropriate facilities, amenities and services, is taken in the design and planning of new residential areas, so as to ensure that viable sustainable communities emerge and grow.</i>
Objective PM38	<i>Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.</i>

Objective PM39	<i>Ensure consolidated development in Fingal by facilitating residential development in existing urban and village locations.</i>
Objective PM40	<i>Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.</i>
Objective PM41	<i>Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.</i>

The proposed residential development proposes a suitable density of c.40.1 units per ha for the overall site with the northern lower density lands at a density of 35.2 units/ha and the Local Centre lands, at a higher density of 80 unit/ha to optimise use of the lands which are zoned and accessible. The lands are also adjacent to emerging and recently developed urban areas.

It is submitted that the proposed development is consistent with the objectives and vision of Fingal County Development Plan Core and Housing Strategies, and other relevant provisions as set out further below, the Kilmartin Local Area Plan, and therefore ensuring consistency with National and Regional policy.

5.1.7 Green Infrastructure and Landscape Considerations

All proposals for development must take account of the Fingal's strategic green infrastructure (GI) resources and ensure that these are protected, managed and enhanced as new development takes place. Development proposals must seek to provide for the protection and provision of green infrastructure which addresses the GI themes identified in the Development Plan in a coherent and integrated manner.

The five GI themes set out in the Development Plan include Biodiversity, Parks, Open Space and Recreation, Sustainable Water Management, Archaeological and Architectural Heritage, and Landscape.

Objective GI20 *Require all new development to contribute to the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure, as appropriate.*

Biodiversity Theme	<p>Objective GI24 <i>Ensure biodiversity conservation and/or enhancement measures, as appropriate, are included in all proposals for large scale development such as road or drainage schemes, wind farms, housing estates, industrial parks or shopping centres.</i></p> <p>Objective GI25 <i>Integrate provision for biodiversity with public open space provision and sustainable water</i></p>
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	management measures (including SuDS) where possible and appropriate.
Parks, Open Space and Recreation Theme	<p>Objective GI26 Maximise the use and potential of existing parks, open space and recreational provision, both passive and active, by integrating existing facilities with proposals for new development and by seeking to upgrade existing facilities where appropriate.</p> <p>Objective GI27 Provide a range of accessible new parks, open spaces and recreational facilities accommodating a wide variety of uses (both passive and active), use intensities and interests.</p> <p>Objective GI28 Provide attractive and safe routes linking key green space sites, parks and open spaces and other foci such as cultural sites and heritage assets as an integral part of new green infrastructure provision, where appropriate and feasible.</p> <p>Objective GI29 Provide opportunities for food production through allotments, community gardens and permaculture food forests in new green infrastructure proposals where appropriate.</p> <p>Objective GI30 Develop a Cycle/Pedestrian Network Strategy for Fingal that encompasses the Fingal Way and other proposed routes which will be screened for Appropriate Assessment and Strategic Environmental Assessment.</p>
Sustainable Water Management Theme	<p>Objective GI31 Ensure the provision of new green infrastructure addresses the requirements of functional flood storage, the sustainable management of coastal erosion, and links with provision for biodiversity, Sustainable Drainage Systems (SuDS) and provision for parks and open space wherever possible and appropriate.</p> <p>Objective GI32 Seek the creation of new wetlands and/or enhancement of existing wetlands through provision for Sustainable Drainage Systems (SuDS).</p> <p>Objective GI33 Seek the provision of green roofs and green walls as an integrated part of Sustainable Drainage Systems (SuDS) and which provide benefits for biodiversity, wherever possible.</p>
Archaeological and Architectural Heritage Theme	<p>Objective GI34 Ensure, wherever possible and appropriate, that elements of the archaeological and architectural heritage are fully integrated into proposals for new developments at the project design stage.</p> <p>Objective GI35 Seek to provide and/or enhance access to archaeological and architectural heritage assets in a sustainable manner, where appropriate, thus facilitating opportunities for education and understanding.</p>

Landscape Theme	Objective GI36 Ensure green infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscapes of Fingal which contribute to a distinctive sense of place.
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Fingal Development Plan provides measures intended to preserve the quality and appearance of sensitive landscapes. Plans and applications will need to have regard to visual impact in certain areas.

Section 9.4 of the Final Development Plan provides details of the County's landscape strategy. The subject lands are located within the 'Low lying Agricultural' character type which is of 'low sensitivity' and 'modest value'.

Key principles of the landscape strategy involve:

- Protecting the skyline
- Preserving existing tree belts
- Establishing riparian corridors along watercourse
- Preserving natural boundaries

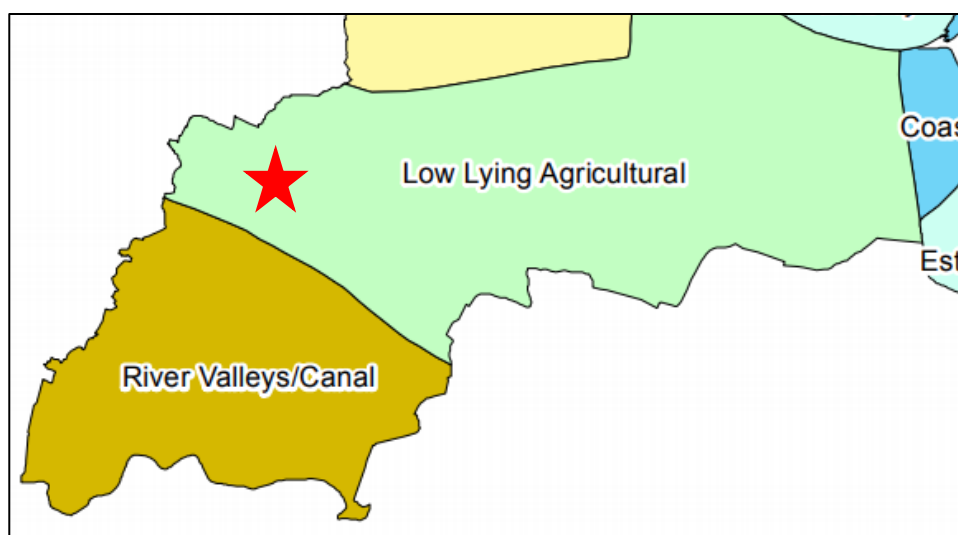


Figure 5.3: Extract from Fingal Green Infrastructure Map 1. (Source: Fingal Development Plan 2017-2023.) (Red star indicates subject lands)

FCC provides a number of 'Green Infrastructure Maps' (Map Sheet 14, 15 and 16) within their Development Plan. We note the following objectives which are reflected on these maps:

Map 14	The road to the south of the lands is considered a 'Rural Route' within the GDA Cycle Network
Map 15	The objective GIM 31 located to the West of the lands (Map Sheet 15) aims: "Seek the establishment of a wetland corridor between the Tolka and Ward Rivers via the Pinkeen stream The site is located within a 'Nature Development Area' (Map Sheet 15).

Map 16

5 No. recorded monuments are indicated on the lands to the west.

There is a stream located to the south and north of the site which partially traverses the wider landholding. This stream is a tributary of the Pinkeen River which is considered to be of 'moderate' river quality status which has a reduced diversity of species.

5.1.8 Noise Zones

The subject site is within Noise Zone B and C. The Council will restrict inappropriate development in order to minimise the adverse impact of noise without placing unreasonable restrictions on development and to avoid future conflicts between the community and the operation of the airport. The layout of the proposed development has therefore been informed by the provisions of the Development Plan as amended by Variation No. 1 (adopted 9th December 2019).

Objective DA07 in this regard states:

“Strictly control inappropriate development and require noise insulation where appropriate in accordance with table 7.2 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. To accept that time based operational restrictions on usage of a second runway are not unreasonable to minimize the adverse impact of noise on existing housing within the inner and outer noise zone.

Non-residential buildings and uses which are viewed as being noise sensitive within the functional area of FCC include hospitals, residential care facilities and schools.

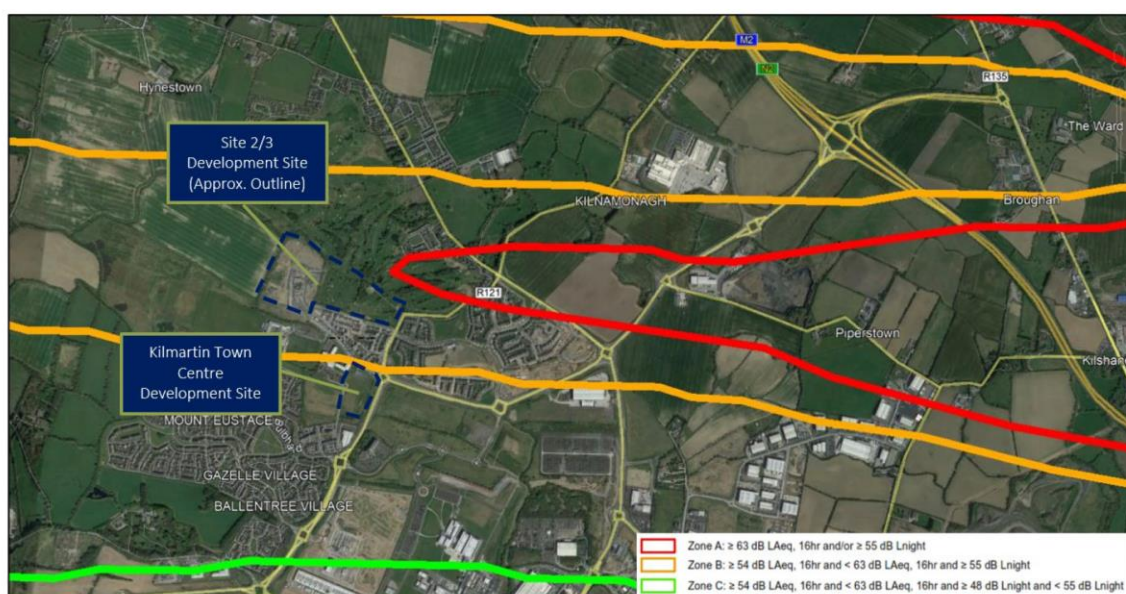


Figure 7
Note

Future Daytime Aircraft Noise Zones (source: Fingal County Council)

The blue shaded area approximately indicates the location of the proposed residential buildings which all fall within Zone B. The Kilmartin Town Centre lands are located within Zone C.

Figure 5.4 Extract from AWN Airport & Road Noise Impact Assessment Report, submitted as part of this application.

For Zone B the objective of FCC is:

To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure noise insulation is incorporated within the development.

The Development Plan further states:

Noise sensitive development in this zone is less suitable from a noise perspective than in Zone C. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed.

Appropriate well-designed noise insulation measures must be incorporated into the development in order to meet relevant internal noise guidelines.

An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the developments design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels.

Applicants must seek expert advice.

For Noise Zone C the objective of FCC is:

To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure, where appropriate, noise insulation is incorporated within the development

The Development Plan further states:

Noise sensitive development in this zone is less suitable from a noise perspective than in Zone D. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed.

The noise assessment must demonstrate that relevant internal noise guidelines will be met. This may require noise insulation measures.

An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the development's design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels.

Applicants are strongly advised to seek expert advice.

In this regard, identified 'noise sensitive uses' are located within Noise Zone C, and therefore childcare facilities are proposed at the Local Centre, to complement existing education facilities adjacent, and proposed new community amenities and facilities, and to cater to childcare facility needs for the wider Hollystown-Kilmartin future development residential areas.

A Noise Chapter is included in the EIAR, and an Airport & Road Noise Impact Assessment Report prepared by AWN is submitted as part of this application.

5.1.9 Public Safety Zone

As indicated on Sheet 12 of the Fingal Development Plan 2017-2023, the site is located within the Outer Public Safety Zone (Outer PSZ) associated with Dublin Airport (blue lines on Figure 5.2). In the Outer Public Safety Zone (PSZ) there is an upper limit to the population or employment density allowable, as set out by the ERM Public Safety Zones Report, 2005, and reflected in the Fingal Development Plan. Development in these zones face certain restrictions such as high density housing, schools or facilities which attract large numbers of people.

With respect to the Outer PSZ, the Report states that the future development of Category 1, Houses, within this zone should ensure a density of less than or equal to 60 persons per any single half hectare.

The Report also states that no further development of Category 5, Institutional Accommodation uses, which include hospitals, schools, nurseries, care homes and prisons should take place within the Outer PSZ.

(See Table 6.1 of the ERM Report at Fig. 5.5 below)

FCC follow the advice of the Dublin Airport Authority / Irish Aviation Authority regarding the effects of proposed development on the safety of aircraft and its safe and efficient navigation with objective DA13 stating:

Promote appropriate land use patterns in the vicinity of the flight paths serving the Airport, having regard to the precautionary principle, based on existing and anticipated environmental and safety impacts of aircraft movements.

The Fingal Development Plan is consistent with Table 6.1 of the ERM Public Safety Zones Report, 2005.

Table 6.1 Permitted Developments (applicable to new applications for development)

Permitted Developments	Public Safety Zone (PSZ)	
	Inner PSZ	Outer PSZ
All developments	No further development (existing developments remain)	see below (existing developments remain)
Outer PSZ		
1. Housing		≤ 60 persons/half hectare
2. Holiday Accommodation		≤ 100 beds per development
3. Retail/Leisure Facilities		≤ 85 persons/half hectare
4. Working Premises		≤ 110 persons/half hectare
5. Institutional Accommodation		No further development
6. Sports Stadia		No further development
7. Limited Use		≤ 220 persons/half hectare
No restrictions on development beyond Outer PSZ		
Notes		
1.	Housing – i.e. residential accommodation, persons at home.	
2.	Holiday Accommodation – i.e. hotels, caravan parks.	
3.	Retail/Leisure Facilities – i.e. shopping centres, sports halls, sports grounds, swimming pools, bowling alleys, golf clubs.	
4.	Working Premises – i.e. factories, offices and facilities where persons are expected to congregate, such as railway stations.	
5.	Institutional Accommodation – i.e. hospitals, schools, nurseries, care homes, prisons.	
6.	Sports Stadia – i.e. football/rugby stadia.	
7.	Limited Use – use not exceeding (approximately) a maximum of 12 hours in one week. i.e. Sunday markets, car boot sales, day fairs.	

Figure 5.5: Extract from ERM Public Safety Zones Report, 2005 (Source: Department of Transport)

The proposed density of the lands subject of this application at c.35.2 dwellings per hectare is set within this context. Please see Deady Gahan Architects Design Statement for details of PSZ compliance.

As a result of the above stated restrictions on development, the childcare and community facilities are proposed within the Local Centre zoned lands to the south of the application site which sit outside the Outer PSZ, and which also aligns with Noise Zone C, being a preferable location for such uses.

5.1.10 Development Management Standards

Chapter 12 of the Fingal Development Plan sets out Development Management Standards for development proposals.

Design Criteria for Urban Development

The Development Plan sets out the following requirements for large scale residential developments:

High Quality Urban Design

Objective DMS03 states: *Submit a detailed design statement for developments in excess of 5 residential units or 300 sq m of retail / commercial / office development in urban areas. The design statement is required to:*

- Explain the design principles and design concept.
- Demonstrate how the twelve urban design criteria (as per the 'Urban Design Manual - A Best Practice Guide') have been taken into account when designing schemes in urban areas.

- *Each of the twelve criteria is of equal importance and has to be considered in an integrated manner.*
- *Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Urban Centre Strategy, Framework Plan or other similar Plan affecting the site.*
- *Include photographs of the site and its surroundings.*
- *Include other illustrations such as photomontages, perspectives, sketches.*
- *Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.*
- *Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.*
- *Outline how Green Infrastructure integrates into the scheme.*

Please see Deady Gahan and O'Mahony Pike Architectural Design Statements, drawings and Housing Quality Audit for detail in relation to compliance with the above.

Green Roofs and Walls

- **Objective DMS16:** *Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision.*
- **Objective DMS17:** *Promote and encourage the use of green walls and roofs as part of an integrated approach to green infrastructure provision.*

Design Criteria for Residential Development

Section 12.4 sets out design criteria for Residential Development. The following areas have been carefully considered by the design team, in particular the Development Plan draws attention to the following areas:

- **Residential Zoning:** the subject lands are appropriately zoned for the proposed development and will in turn create a new high quality residential environment.
- **Mix of Dwelling Types:** the development will provide a sustainable mix of unit types and sizes enabling a choice of housing for a broad section of the population.
- **Residential Density:** the proposed density has been carefully considered in the context of the emerging urban area, the presence of key public transport facilities and in reference to guidelines including: *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009)*, *the Sustainable Urban Housing Design Standards for New Apartments (2018)* and *the Urban Development and Building Heights Guidelines for Planning Authorities (2020)*.

Apartment Development

Apartment design standards set out in individual Development Plans have now been superseded by the *Sustainable Urban Housing Design Standards for New Apartments* (2020).

Quantitative Standards

The Development Plan sets out a range of quantitative standards for residential units in order to achieve a high standard of accommodation for future residents. The following general standards apply:

- **Objective DMS24:** *Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.*
- **Objective DMS25:** *Require that the majority of all apartments in a proposed scheme of 100 or more apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.*
- **Objective DMS26:** *For apartment schemes between 10 and 99 units, require that the majority of all apartments in a proposed scheme must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%. This may be redistributed throughout the scheme, i.e. to all proposed units.*
- **Objective DMS27:** *Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.*

The proposed development meets or exceeds the above standards. Please see Deady Gahan and O'Mahony Pike Architectural Design Statements, drawings and Housing Quality Audit for detail in relation to compliance with the above.

Other Residential Development Standards

The Development Plan sets out a range of standards in relation to residential developments including: separation distance, daylight and sunlight, acoustic design, communal facilities and refuse facilities. In order to achieve a high standard of accommodation for future residents:

Separation Distances

The proposed development meets the relevant standards in relation to other design standards including separation distances and acoustic standards. There is one instance where closer separation distance is provided in the Local Centre for urban design reasons, but designs ensure that there is no overlooking and units achieve appropriate daylight penetration.

Please see documentation prepared by Deady Gahan Architects and OMP Architects including Design Rationale and Schedule of Accommodation for further details of these standards. See also AWN *Airport & Road Noise Impact Assessment Report* for information in relation to acoustics and DMS31.

Objective DMS28	<i>A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.</i>
Objective DMS29	<i>Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.</i>
Objective DMS31	<i>Require that sound transmission levels in semi-detached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards and evidence will need to be provided by a qualified sound engineer that these levels have been met.</i>

Daylight, Sunlight and Overshadowing

The proposed development meets the British standard referred to in DMS30 of the Fingal Development Plan (extracted below) in relation to Daylight and Sunlight.

Objective DMS30	<i>Ensure all new residential units comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and B.S. 8206 Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting or other updated relevant documents.</i>
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Please see Daylight Sunlight Report prepared by IN2 for further details of same. This report directly addresses An Bord Pleanála Opinion issued at Pre-Application Consultation stage. Further details in this regard are found in the Response to An Bord Pleanála Opinion included in this application documentation.

Management Companies and Facilities for Apartment Developments

The proposed development meets the relevant standards in relation to management facilities. GVH will implement a Management Company for Hollystown Sites 2 & 3 to manage those areas indicated on the Taking in Charge drawing set out in the Architects Design Statements, including communal open space, areas of intensive planting, and communal parking areas that will fall within the charge of an appropriately constituted Owner's Management Company. A separate Owner's Management Company will be set up for the Local Centre site to similarly manage communal areas.

Objective DMS33	<i>Require properly constituted management companies in apartment type schemes are set up and necessary</i>
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	<i>management structures are put in place for the benefit of the residents.</i>
Objective DMS34	<i>Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council.</i>

Refuse Storage and Bins

The proposed development meets the relevant standards in relation to Refuse Storage and Bins. Please see Outline Operational Waste Management Plan prepared by Byrne Environmental Consulting in the EIAR Appendices; and Architects Design Statements and Schedule of Accommodation for further details of refuse facilities.

Objective DMS35	<i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i>
Objective DMS36	<i>Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.</i>
Objective DMS37	<i>Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.</i>

Public Open Space

The provision of open space in the proposed development has been carefully considered. Section 12.7 of the Development Plan sets out Fingal's approach to open space in developments. The proposed development provides an open space strategy in excess of requirements of the Fingal Development Plan, and has been developed in close consultation with FCC.

FCC has five basic principles of open space provision: *Hierarchy, Accessibility, Quantity, Quality and Private Open Space*. In this regard the Kilmartin LAP sets out an open space hierarchy for the subject lands.

Please see BSLA's Landscape Design Statements for Sites 2 & 3 and the Local Centre in regard to landscape proposals, and the Architects Design Statements on private and public open space. The BSM Framework Plan provides details of the location, extent and interconnectivity of these public spaces.

Objective DMS56	<i>Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to</i>
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	<i>Screening for Appropriate Assessment and consultation, including the public, as necessary.</i>
Objective DMS57	<i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</i>
Objective DMS57A	<i>Require a minimum 10% of a proposed development site area be designated for use as public open space.</i>

5.2 Kilmartin Local Area Plan

As outlined previously in this report the application site partly sits within the Kilmartin Local Area Plan 2013-2019 boundary, with the rest of the site abutting this LAP boundary. The LAP was adopted by FCC on May 13th 2013 and was further extended at a Council meeting (Ref. F/119/18) until 11th May 2023.

The overall purpose of the LAP is as follows:

- *Creation of a single community in the northern part of Blanchardstown, integrating with the existing community at Tyrrelstown.*
- *Provision of residential development in a phased and integrated manner, with a supporting level of mixed uses to serve the needs of the community in an extended local centre.*
- *Creation of a permeable and legible movement network for all modes of transport linking the lands internally and externally with the Greater Blanchardstown Area.*
- *Provision of high quality recreational open space and amenity facilities to meet active and passive recreational needs of the expanding population.*
- *Provision of community and health care facilities, in particular, schools.*
- *Protection, integration and enhancement of existing environmental features within the lands and in the park located directly south.*
- *Delivery of a high quality urban design to ensure that the area has its own unique character and identity and is a desirable place to live, work and recreate.*

While the proposed development sits partially within the LAP, and the remainder of the site immediately abuts this boundary, we note the importance of the LAP and its provisions. The development supports the achievement of the LAP and its vision as it provides a high quality residential development connected to the wider area.

The development Strategy for the LAP address several key areas:

- Local Centre
- Green Infrastructure
- Movement Strategy and Transportation Infrastructure

LANDS AT HOLLYSTOWN- KILMARTIN

Planning Report

- Land Use Mix
- Urban Design
- Water and Infrastructure Services.

These areas are fully addressed by the enclosed documentation within this application documentation, in particular the BSM Framework Plan, the Architecture Design Statements prepared by Deady Gahan Architects / Proctor & Matthews and by O'Mahony Pike Architects; Engineering Services Report prepared by DBFL Consulting Engineers; and Landscape Design Statements prepared by BSLA.

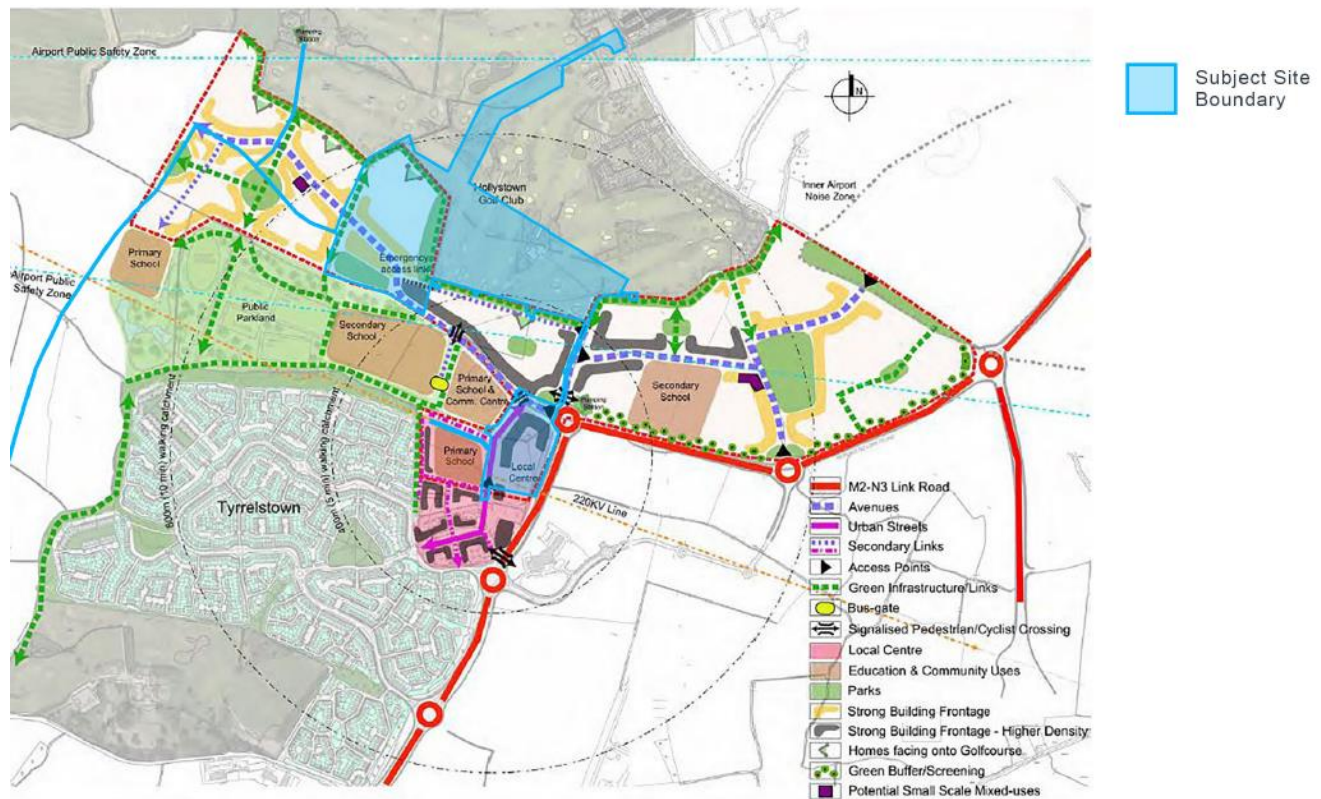


Figure 5.6: Extract from Kilmartin LAP Urban Structure Plan (Source: FCC, 2021).

5.2.1 Local Centre Provision

Section 4.4.8 provides further detail in relation to Local Centre facilities:

Local centres support a range of services including shops, supermarket and non-retail services for the local community at a convenient and accessible location. The Tyrrelstown Local Centre provides a mix of daytime and evening uses. The LAP provides for an expansion of the existing centre.

The Local Centre is highly accessible to residential, schools and community facilities. The Local Centre zoning is c. 6 hectares. This figure does not include existing retail facilities at Tyrrelstown, which has a net retail convenience floor space in the region of 5,000sq m.

The Local Centre zoning has the potential to accommodate a significant level of development. To ensure the Local Centre develops at a scale to serve its catchment population, retail applications shall, where deemed necessary by the Planning Authority, be accompanied by a Retail Impact Assessment (RIA). The RIA shall demonstrate compliance with the Development Plan and demonstrate that there will be no material or unacceptable adverse impact on the vitality and viability of any existing centre or Blanchardstown Town Centre.

The Local Centre will be designed within an urban village street pattern connecting in a fully permeable manner with the surrounding street network. Residential/office over retail/commercial units will be supported. Stand-alone, single-storey supermarket buildings are not considered appropriate. Small scale comparison shops which cater for local requirement will be accommodated, such as a shoe shop, clothing boutique, bookshop or similar. Trip intensive commercial developments with requirements for significant car-parking should be concentrated to the east of the main urban street.

The LAP sets out the following objectives:

Objective LC01 *Promote the clustering of retail, service, office, educational, healthcare, recreational and community facilities within the Local Centre zoning to meet the demands of the future residents of the area.*

Objective LC02 *Facilitate the development of the Local Centre having regard to the retail and service needs of its catchment population.*

Objective LC03 *Ensure retail applications, where deemed necessary by the Planning Authority, are accompanied by a Retail Impact Assessment*

The LAP also sets out design guidance for the Local Centre:

- *The Local Centre shall be developed in an urban village format and shall address / connect into the surrounding street network in a seamless manner. Residential/ office over ground floor units will be encouraged to facilitate an appropriate mix of uses. A range of daytime and evening uses shall be encouraged.*
- *The Local Centre shall incorporate a high quality public space which shall be attractively landscaped, incorporate bicycle parking and seating arrangements, and have a high quality paving finish. The space shall be designed to ensure that vehicular parking does not encroach upon this area.*
- *Buildings shall generally be arranged in a perimeter block pattern adjoining and providing a strong edge and supervision to the main street they front onto, with access to development at designated junctions only.*
- *Only limited direct vehicular access from buildings shall be permitted onto the main streets. Principal pedestrian entrances to the residential development shall be from the public street.*

- *Buildings shall be mainly 3/5 storeys in height, with punctuation buildings facilitated at key sites. The higher punctuation buildings shall be the exception and not the rule.*
- *Bus lay-bys and a taxi area shall be accommodated at designated points in the Local Centre.*
- *Parking for the commercial uses within the Local Centre shall be located to the rear of buildings, where possible.*
- *The Local Centre shall be designed and accessible for all modes of transport, including delivery vehicle, car, bus, pedestrian and cyclist movement.*

The proposed development responds to the above objectives, through the provision of cafe, childcare (both crèches and montessori) and community hub facilities, integrated with housing and public open space provision, linking to the existing local centre and to the wider educational and residential areas beyond. Residential is accommodated both over and adjacent other uses, within an urban street pattern. Parking is accommodated such that it does not dominate the public realm and street scape, and public areas are designed to ensure passive surveillance.

Reinforcing the existing Local Centre, with the inclusion of predominantly community / childcare (and residential) uses to the north-east of the LC zoned lands, will reinforce the viability and vitality of the existing cluster of activities. The remaining Local Centre lands to the west will come forward as part of a separate application to further enhance and consolidate the Local Centre. The reserved school site is subject to Department of Education requirements. No retail is proposed in this application and as such there is no impact on higher order retail areas at Blanchardstown Town Centre, and no Retail Impact Assessment is required.

Please see Section 6.1 which includes a full response to the above design considerations and OMP's Architectural Design Rationale.

5.2.2 Green Infrastructure & Public Open Space

We note the following key objectives:

- **Objective L01** *Protect existing trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their management.*
- **Objective L02** *Ensure that any development in proximity to a townland boundary, roadside hedgerow or a hedgerow which forms a link with other habitats retains such features or replaces such features with equal or greater area of native trees, hedgerows and shrubs.*
- **Objective L03** *Ensure that adequate measures are taken to protect residential amenities adjacent to roads Transportation Infrastructure*

In accordance with the above objectives and the Development Plan, the landscape design strategy has been carried out in order to preserve hedgerows and existing biodiversity features where possible.

- **Objective POSR01:** Provide a wide variety of public open spaces on a hierarchical basis throughout the LAP lands in order to achieve a choice of open space facilities.
- **Objective POSR02:** Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms
Note: In calculating open space provision for RA lands west of R121, an allowance of 6 hectares of land should be given for the public park being provided immediately south.
- **Objective POSR03:** Require a minimum 10% of the LAP 'RA' area be designated for use as public open space. (Fingal Development Plan 2011-2017 Objectives OSO2A and OSO2B apply). The above requirement applies independently to both parcels of RA lands east and west of the R121.
- **Objective POSR04:** Ensure every home within a new residential scheme is located within 100 metres walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park.
- **Objective POSR05:** Provide for the development of quality open space areas and facilities to meet the recreational needs of residents.
- **Objective POSR06:** Maximise the accessibility of the recreational amenities by developing a network of key cycle and pedestrian routes

The proposed Landscape Strategies for both sites as set out by BSLA in the accompanying documentation, responds to Kilmartin LAP objectives, in addition to Fingal County Development Plan objectives.

5.2.3 Movement Strategy and Transport Infrastructure

The LAP sets out the a tiered and phased approach to movement, focused on a hierarchy of street functions in the area (Map 7 of the LAP) in order to create a legible and highly connected community.

The LAP incorporates a network of pedestrian and cycle routes connecting to the Local Centre, schools, community services and public open space (Map 8). The proposed development responds to the requirements of the LAP providing a series of high quality pedestrian and cyclist linkages and connection. The BSM Framework Plan sets out a proposed delivery framework for these connections ensuring permeability and connectivity with existing and permitted development and future planned developments.

Pedestrians and cyclists' access to the site will be via two primary accesses located on the R121 (Hollywoodrath Road), one at the existing Hollywood Road junction with the R121, and the other at the site's easternmost point on the R121.

Crossing the R121 will be facilitated by 2 no. new proposed Toucan Crossings for safe access across the R121, to the neighbouring Hollywoodrath development. Access for pedestrians and cyclists is also proposed via the almost completed Bellingsmore site to the south.

The following objectives are pertinent to the proposed development:

- **Objective C01:** *Provide for an urban environment within Kilmartin where priority is given to legibility and permeability for cyclists and pedestrians, with safe, direct and easy access provided to public transport points, schools, park, local centre, existing community of Tyrrelstown and to the Greater Blanchardstown Area.*
- **Objective C02:** *Ensure that all pedestrian and cycle routes within Kilmartin are overlooked by residential development*
- **Objective C03:** *Encourage direct walking and cycle routes through pocket parks and open space areas to provide direct linkages between the character neighbourhoods, local centre, schools, parks and public transport.*
- **Objective MS1:** *Prioritise sustainable modes of transport including walking, cycling and public transport and reduce reliance on the use of private cars within Kilmartin.*
- **Objective MS2:** *Ensure existing junctions and roads external to the lands are designed to maximise transportation efficiency and movement. A Traffic Management Plan shall be prepared for the area containing the LC lands/Phase 1 (east and west) taking cognisance of schools to be completed prior to the lodgement of any planning application.*
- **Objective MS3:** *Develop a hierarchical street network comprising a number of new street links, supporting internal permeability, with links to the surrounding environment.*

5.2.4 Cycle and Pedestrian Access

The LAP incorporates a network of pedestrian and cycle routes connecting to the Local Centre, schools, community services and public open space (Map 8). The proposed development responds to the requirements of the LAP by providing a series of high quality pedestrian and cyclist linkages and connections.

The following objectives are pertinent in this regard:

- **Objective C01:** *Provide for an urban environment within Kilmartin where priority is given to legibility and permeability for cyclists and pedestrians, with safe, direct and easy access provided to public transport points, schools, park, local centre, existing community of Tyrrelstown and to the Greater Blanchardstown Area.*
- **Objective C02:** *Ensure that all pedestrian and cycle routes within Kilmartin are overlooked by residential development.*

- *Objective C03: Encourage direct walking and cycle routes through pocket parks and open space areas to provide direct linkages between the character neighbourhoods, local centre, schools, parks and public transport.*

5.2.5 Density and Housing Mix

Section 4.4.1 of the LAP discusses Density and Housing Mix.

stating *'The RA lands west of the R121 will support net densities of 35 units per hectare representing c. 866 units.'*

The following objectives are relevant in this regard:

- *Objective DHM01 Promote a sustainable mix of housing types, sizes and tenures to reflect the diversity of needs in an expanding community set in a high quality well designed environment.*
- *Objective DHM02 Promote the provision of family sized residential units.*

The LAP outlines sustainable locations for higher densities at the Local Centre and at appropriate adjacent locations. Medium densities are identified across the majority of the lands. Lower densities are identified at the eastern and western parts of the site.

Density is a key aspect of ensuring the sustainable use of residentially zoned and accessible lands. The proposed development proposes a density of c.35.2 units / hectare on Sites 2&3 and 80 units / hectare at the Local Centre, giving an overall proposed density of c. 40 units/ha. This aligns with both FCC policy and with development restrictions set out above in relation to Airport Public Safety Zones.

This is further set out in Section 6 below and in the Architects Design Statement.

5.2.6 Height

The LAP sets out a height strategy which is predominately 2-3 storeys in height.

Objective BH01 states: *Building height will primarily range between 3-5 storeys within the Local Centre and between 2-3 storeys elsewhere on the LAP Lands. Local landmark and feature building elements over the stated building heights are acceptable at important locations, where they contribute to the visual amenity, civic importance and legibility of the area. These locations are to be agreed with the Planning Authority at application stage.*

The height of dwellings across Sites 2 & 3 will be 2-3 storeys while the Local Centre Lands are at 2-5 storeys in compliance with the LAP. This strategy is fully detailed in the Architects Design Reports.

5.2.7 Education and Community Infrastructure

Section 4.4.5 of the LAP sets out the requirement for education and community uses. The LAP identifies a site for a new primary school located on the Local Centre lands south of the existing school sites (immediately south and west of the proposed development) and to the east of the LAP for a secondary school (see Map 9). There are numerous existing and proposed school sites within the area. The LAP states that the need for both the primary school and post-primary school site reservations will be assessed on an ongoing basis.

Objective ECI01 states:

Where reservations for schools are no longer required, the sites will revert to a residential land use designation.

Please see Community and Social Infrastructure Audit for overview of education facilities provision prepared by BSM in relation to the above consideration.

Given the quantity of existing schools in the area and expected population of the development, the existing and planned supply of school places is considered sufficient to meet future demand.

5.2.8 Character Areas

The urban design concept for the LAP is structured around 18 Character Areas (Map 10).

It is the intention that each character area will feel and read as an individual entity. The LAP provides the detail in the following character areas (A-J) within the subject lands.

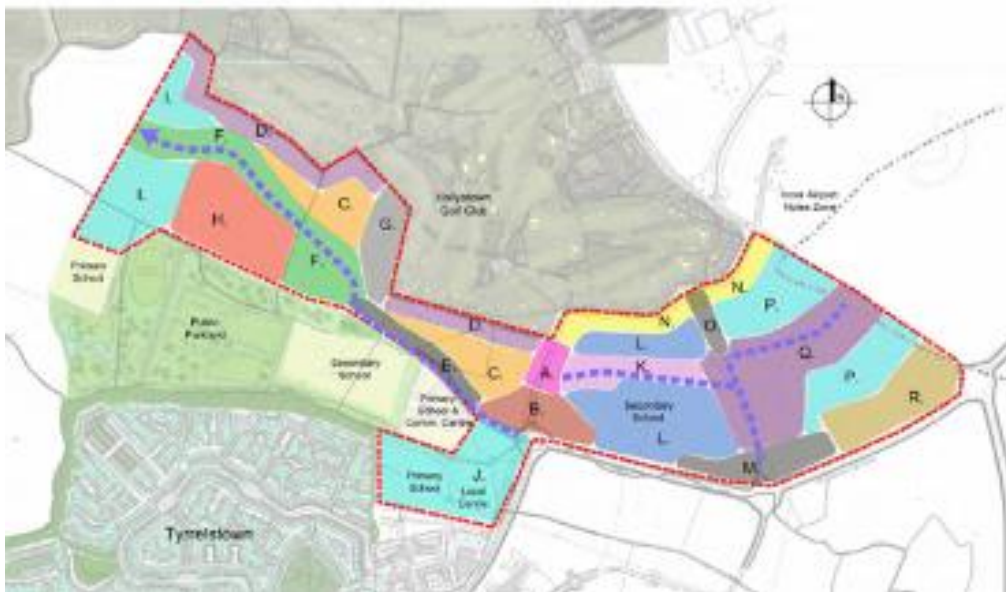


Figure 5.7: Extract from Kilmartin LAP County Council character areas (Source: FCC, 2021)

The following Character Area are of particular relevance:

C. Courtyard Housing/Homezones

Suitable for medium density housing with various orientations for dwellings. Parking to be provided in the vicinity/curtilage of dwellings. Homezones will be designed to provide playspaces. A north-south connection will be maintained.

D. Hollystown Golf Club Boundary

A significant landscape buffer is to be provided which will include provision of a trimtrack/ parcourse. Access to the LAP lands west of the R121 is gained to the south of this buffer area. Dwellings will be north facing with south facing rear gardens. This character area will support a medium density and a north-south connection will be facilitated.

F. Kilmartin Avenue West Character 2

Similar in character with Area E. Houses fronting a wide tree lined avenue with a strong street edge with provision for private parking/public parking, and with space to accommodate buses. The design of the Avenue should have regard to the future accessibility of lands located further west. Trees and building lines will provide consistency over the entire length of the avenue. Additional car parking will be carefully incorporated into the design of houses. The area will accommodate medium density with dwellings north/south facing. (See section 4.3 for more detail on avenue design).

G. Golf Club Boundary/ Public Open Space

A medium density character area type defined by its location fronting onto Hollystown Golf Club. Dwellings will be east facing with west facing rear gardens. A wider area of open space will be provided which will include provision of a trimtrack / par course. A north-south connection will be maintained. An emergency vehicular access link will be provided to the south.

N. Overlooking R121 & Hollystown Golf Club

The R121 (Church Road) is a planned green pedestrian and cycle link to Hollystown Village with provision for a low level of car accessibility. The objective here is to preserve the rural character of the R121. A balance will be struck between maintaining the strong and attractive rural character and providing a minimum level of passive supervision so that the amenity value is maximised. Cognisance will be taken of the flora and fauna in the design of housing to take advantage of natural breaks in vegetation to facilitate supervision. Housing will be generally north facing. Housing will be designed to reflect the rural character and the character of Hollystown village.

J: Local Centre

Defined by the permitted land uses within the 'LC' zoning, its relationship to the existing neighbourhood centre and its key role in linking the Kilmartin residential lands to the existing Tyrrelstown Centre. The building heights in this higher density area will range in general from 3/5 storeys, with a mixture of residential/commercial/ cultural/community land uses dominating. Single storey stand alone commercial units will not be permitted. A high level of design is expected with strong north-south permeability to exist. Orientation of buildings will be addressed to reduce prominence of overhead power lines.

Provision of a civic amenity open space with strong urban frontages is to be provided.

While it is acknowledged that the Local Area Plan character areas were defined prior to the rezoning of part of the subject lands to residential use, the character areas are nonetheless pertinent in their intent, and as such the particulars of the relevant character areas have been taken into

In this regard, the proposed housing responds to the character areas as set out. Please see Architects Design Statements for full details, in addition to the BSLA Landscape Design Reports.

5.2.9 Water and Infrastructure Services

Infrastructure and utilities are an essential component of the sustainable development of Hollystown-Kilmartin. Infrastructural services include water supply, wastewater and surface water removal and treatment as well as utilities including electricity supply, broadband, gas and telecommunications. All such infrastructure and utilities must be planned for so that they are available to support the quantum of development envisaged, in a manner that is environmentally appropriate, cost effective, efficient and protects public health. Please see enclosed Engineering Reports and Drawings prepared by DBFL Consultant Engineers for further detail.

5.2.10 Phasing

The LAP sets out the sequence of phasing for the lands which is ordered so that development moves from the centre out. Phase 2 West cannot commence until 75% of Phase 1 West has been completed to the satisfaction of the Planning Authority. Part of the application lands fall into the Phase 2 West phasing area, with the remainder in Phase 1 West, and adjacent to it (but outside the LAP area).

The following requirements are relevant:

Phase 1 West

- *340-360 residential units.*
- *Vehicular link from the existing Local Centre to the M2/N3 link road roundabout to be constructed.*
- *Pedestrian/cycle connection west of the 2 no. existing primary schools linking the LAP lands to the Local Centre to be constructed.*
- *Traffic Management Plan to be prepared for the area containing the LC lands/ Phase 1 (east and west) taking cognisance of schools to be completed prior to the lodgement of any planning applications.*
- *The Traffic Management Plan must address the following issues:*
 - *Bus access to the Local Centre, and potentially to the residential areas of the LAP.*
 - *Bus terminal facilities (turnabout and layover) in and near the Local Centre.*

- *Pedestrian and cyclist routes, in particular from the residential areas to the Local Centre and the schools.*
- *Pedestrian and cyclist routes crossing the Avenue.*
- *The capacity of the roundabouts on the M2-N3 Link Road for motorised traffic.*
- *Provide a fully equipped and operational playground.*
- *Agreement with the Planning Authority on the payment of the costs of developing the 6 ha of open space already transferred in respect of development of Phases 1-3 West.*
- *Prepare and agree with Fingal County Council a detailed design plan for the entire east/west main avenue to the west of R121 prior to the submission of any planning application.*

Phase 2 West

- *250-270 residential units.*
- *Primary School Site in Local Centre zoning transferred to Department of Education and Skills unless otherwise agreed with the Planning Authority.*
- *Main Avenue Street to be fully completed.*

The proposed development respects the phasing strategy of the LAP. Phasing is further set out in the BSM Framework Plan, accompanying this application.

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

The aim of these guidelines is to set out the key planning principles which should guide the delivery of residential development in urban areas. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed in the section below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines reinforce that planning authorities ‘*should promote increased residential densities in appropriate locations, including city and larger town centres*’ and that ‘*firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved*’.

These qualitative standards have been brought through in the Design Manual as referenced above and the Fingal County Development Plan which have guided

the design approach of the scheme. This is set out in detail in the accompanying Architect's Design Statement.

The subject lands can reasonably be considered 'Outer Suburban / 'Greenfield' sites' as classified by the Guidelines. These are described as *'open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities'*. In this case, much of the required facilities are located nearby such as retail, education and employment areas. As set out by the respective Reports on Schools, Community and Social Infrastructure and Childcare, the area already has good provision of the key infrastructure to support the future population.

The Guidelines set out that densities in the general range of 35-50 dwellings per hectare will provide the greatest efficiency in land usage in this context. The proposed development, at c.35.2 units /ha for the Sites 2 & 3 and c.80 units / hectare for the Local Centre, giving an overall density of c.40 units/ha is entirely in accordance with this density range, and further influenced by the Outer Public Safety Zone limitations as set out at Section 5.1.9 of this Report. The Guidelines set out the 12 No. Best Practice Design Manual criteria which are discussed in the following section.

Having regard to the above the Core Strategy of the Development Plan promotes the continued consolidation of the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

5.4 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)

The *Sustainable Urban Housing Design Standards for New Apartments* were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020. The Guidelines update previous guidance from 2015, (and 2018), and note that this is done *'in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines'*.

The Guidelines note that the National Planning Framework projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities, and of particular relevance to this site, it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are

located. This requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each city, i.e. on sites within the existing urban 'envelope'.

The Guidelines have been updated, from the previous 2015 and 2018 Guidelines, to amend and address new areas including:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small-scale urban infill schemes;
- Address the emerging 'build to rent' sector;
- To limit the 'shared accommodation' sector, and presume against granting permission for this type of development; and
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.

The Guidelines identify Intermediate Urban Locations as areas which are suitable for smaller scale higher density developments. The location of the Hollystown Sites residential development can be classified as an 'Intermediate Urban Location'.

These locations are defined as:

- *Sites within or close to i.e., within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) of principal town or suburban centres.*
- *Sites within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services.*
- *Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.*

The Guidelines state:

"In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard."

The subject site is located adjacent to the existing Tyrrelstown Local Centre, which it is proposed to expand on, and there are many employment locations in the immediate vicinity, including for example North-west Business Park to the south east, Damastown Industrial Park to the south-west, which includes many large scale employers. In addition, the lands are within a 5km radius of Blanchardstown Connolly Hospital, Technical University Dublin Blanchardstown Campus, and Blanchardstown Major Town Centre.

These Guidelines apply to apartment developments and therefore to the apartments proposed as part of this residential development, the majority of which is made up of houses but are considered in respect of the proposed apartment units.

This SHD Application is accompanied by a Housing Quality Assessment (HQA), prepared by Deady Gahan / Proctor & Matthews Architects / O'Mahony Pike Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the revised apartment Guidelines 2020.

The HQA illustrates in tabular format how each apartment unit within the proposed scheme meets or exceeds the relevant standards as set out in the Guidelines including SPPR3: Minimum Apartment Floor Areas and SPPR 4: Dual Aspect Apartments.

6 PROPOSED DEVELOPMENT

6.1 Overall Design Rationale

As previously set out, Glenveagh Homes are the owner of a larger landbank at Hollystown-Kilmartin which extends beyond this subject application area. A master plan / framework plan for the lands has been developed which sets the context for the development of this site. This master plan approach ensures that the subject residential and mixed use development is considered within a broader context, and will be integrated into a future development framework.

See the Framework Plan for Hollystown Kilmartin prepared by Brady Shipman Martin included as part of this SHD Application documentation.

Vision & Strategy Approach

The Vision for this proposed new residential development at Hollystown is to continue the sense of community and place making, to provide a quality housing environment, and to create a distinctive housing development which sits within its wider context, contributing positively to it. It further proposes the delivery of a significant landbank of Class 1 public open space (c.2.77 ha) as part of this development which represents a meaningful contribution to community infrastructure for the wider area.

Local Objective 72 Dublin GAA Facilities

In further seeking to deliver meaningful and significant community infrastructure in the area, and as part of the delivery of the zoning objectives for the subject lands, Glenveagh Homes have engaged with Dublin GAA in relation to Local Objective 72 to “Provide a recreational facility for the Dublin G.A.A. County Board, through the provision by them of a 2.5ha playing pitch and local recreational community facility including a clubhouse, related ancillary facilities and car and cycle parking”

Following engagement with Dublin GAA it is now proposed to deliver a larger c 24 acres/9.7 ha GAA / community playing fields and facility to the north of the residential scheme proposed in this development at the site of the former Hollystown Golf Club, which will be subject to a separate application for development. This larger landbank will seek to make use of existing car access, parking, and clubhouse facilities at the former Hollystown Golf Club, and connect back to residential areas through the links proposed as part of this current application and delivered as Class 1 Public Open Space. This proposal is set out indicatively in the Framework Plan for Hollystown Kilmartin, prepared by BSM, in addition to the BSLA Landscape Design Statements and other documentation submitted with this SHD Application. It should be noted, that any illustration of this proposed GAA facility is indicative only, and is subject to a final application inclusive of detailed drawings by the Dublin GAA to Fingal County Council.

This GAA proposal, facilitated by the transfer of lands from Glenveagh Homes to Dublin GAA, delivers significantly beyond the Local Objective requirements in land area and in terms of the breadth of facility that will be delivered to the Dublin GAA but importantly also back to Tyrrelstown GAA and the wider community.

This proposed new facility will be a GAA Games Cluster Facility, subject to a future planning application by the Dublin GAA. This facility will be designed to deliver a range of accessible playing facilities available to the growing numbers of juveniles and adults playing Gaelic Games in schools and clubs, on a shared basis, throughout the area. It will be open to local schools and clubs. A range of facilities are to be proposed including grass pitches and all-weather pitches, and a community jogging / walking trail, connecting to the open space network proposed.

Connectivity to this planned new facility is provided for within this application and connecting through to the Ratoath Road. (See BSLA Landscape Design Statements for Sites 2&3).

It is therefore put forward that the Local Objective 72 is met at an alternative location but proximate to the residential area in which it is proposed in the Fingal Development Plan. It is nonetheless linked back to the adjacent residential communities through the provision of significant pedestrian and cycle linkages and public open space provision, right back to the educational facilities and Local Centre to the south, and to the Tyrrelstown Park open space network.

It is submitted that the development proposed in this SHD Application is consistent with the objectives of the Fingal County Development Plan by responding to, and fulfilling, zoning and local objectives however it is captured in the Material Contravention Statement to allow consideration by An Bord Pleanála.

Residential Strategy Approach

A considered design approach to the architecture, the site layout and the public realm has been developed for this site. An approach that sits well within both the existing and emerging Hollystown and Kilmartin environments, and which is complemented by the public open space proposed.

The design approach is based on a need to seek a suitable density, establish a sense of place and community, while making a contribution to the surrounding green infrastructure and community and social assets. The proposed development contains two distinct lands, Sites 2 & 3 to the north, which is lower density residential housing (driven by constraints of the Airport Public Safety Zone as set out previously) and the Local Centre which is higher density apartment development.

In respect of Sites 2 & 3 to the north, and as more fully set out in the Architecture Design Statement prepared by Deady Gahan, the proposed urban layout is defined by three character areas, each having a distinct identity, with a hierarchy of spaces clearly defined, and a landscape focus. Townscape markers in the form of variations in heights provide public realm legibility. At the heart of each neighbourhood sits a communal landscape for residents to enjoy, this together with elements of pocket play encourage an interactive and neighbourly environment for both residents and visitors, and is linked through a network of green links for safe pedestrian and cycle movement through the development and beyond to public open space, amenities, community facilities, education, local centre, employment, and adjacent residential areas.

The proposed housing varies between two and three storeys, to particularly address their setting and location. The 3 storey units are located at key gateways to the proposed development, corners and nodes, creating strong definition within the overall layout and acting as visual markers within the neighbourhood.

The courtyard house typologies are unique to the Hollystown lands (also previously permitted by FCC at Site 1), benefitting from both their own private high level terraces and also a ground floor, rear, low walled patio, which connects into the wider landscape - both visually and physically. Their continuation into and through the proposed development links the neighbourhoods with a common design approach, while a differentiated approach is taken to the urban layout, allowing it to respond to its immediate contextual constraints and opportunities.

In order to manage parking and avoid the visual dominance of the car and prioritise the pedestrian / cyclist within the neighbourhood, the proposed courtyard house typologies incorporate parking provision within the footprint of each home, while meeting Fingal County Council parking standards. Visitor parking is carefully placed within each cluster. This approach removes parked cars from the public realm and home zones, enabling a safer and greener environment, whilst allowing priority to pedestrians, children's play, and cyclists. Similarly, parking is proposed in a variety of configurations throughout the scheme, ensuring the public realm is inviting, safe and open to passive surveillance from adjacent residential units.

Please see Deady Gahan Architects Design Statement where the design approach is more fully set out.

In respect of the Local Centre lands, in considering the design proposal it is worthwhile addressing the established site constraints and boundary conditions. The local centre portion of the site constitutes approximately 3.54 ha. The site is bounded to the west by a link road between the existing Tyrrelstown Centre and the Tyrrelstown National School which lies to the Northwest of the site. There are also 220kv pylons which transect the site in a north west / south east

direction. Taken in conjunction with the established link road these factors define the developable potential of the site. Other influencing factors include the established Tyrrelstown Centre and Tyrrelstown National School to the south and north west of the site respectively.

The nature of the proposed development responds to these site constraints and boundary conditions by establishing a strong road presence along the R121 and link road. The area within the buffer zone around the Pylons is utilised to effect a parkland setting and local amenity recreational areas. In addition a child care facility acts as a focal point to the south of the scheme linking into future development on the west side of the link road with Tyrrelstown Centre and Tyrrelstown National School.

The architectural intent is defined by its parkland residential surroundings and strong architectural edge to both the Link Road and the Regional Road R121. The scale and massing of the residential units and the selective use of materials maintains a secure and attractive environment while defining the urban edge to the established roadways.

The ground floor layout includes extensive active frontages relating to the mixed use nature of the development. With a cafe and different childcare facilities on ground floor and own door residential access from apartments on blocks B&C, this creates a vibrant public realm through the design proposals for active frontages.

The location of both the Community Hub & the Cafe at a natural desire route through the development from adjacent lands connecting to the R121 and public transport, creates a focal point for the scheme with emphasis on public amenity, play and recreation. An attractively landscaped external seating and recreation zone further reinforces the amenity value of this area.

By siting of the Crèche on lands to the south the design creates an opportunity to develop an attractive pavilion within a park lands setting. The design is of a scale sympathetic to the child care facilities proposed and offers secure landscaping opportunities for break out spaces and external play

The building height strategy pays close attention to the established built environment while addressing the need for greater densities coupled with high residential amenity standards for sun light & day light. The development ranges in height from a 5 storey point block at the junction between the Kilmartin Link road and Hollystown Road. This acts as a landscape marker for entry into the scheme.

The development then steps down in scale to better relate to the existing national school while maintaining a strong public edge. This design strategy further emphasises the marker building without the need for additional height.

The scheme also maintains a 4 storey aspect onto the R121 defining a strong architectural edge to this side of the development. The pavilion crèche is of a scale which is sympathetic to the child care facilities proposed and acts as a focal point within the parkland context

6.2 Residential Accommodation

The proposed scheme comprises 548 no. residential units, with a mix of 1, 2 and 3 bed apartment/duplex units (147 in total) and own door 2, 3 and 4 bed houses (401 in total).

The proposed scheme provides the following unit mix:

	Apartments		Houses		Total	
	Number	%	Number	%		%
1 bed	59	40.1%	0	0.0%	59	10.8%
2 bed	68	46.3%	97	24.2%	165	30.1%
3 bed	20	13.6%	267	66.6%	287	52.4%
4 bed	0	0.0%	37	9.2%	37	6.8%
Total	147	100.0%	401	100.0%	548	100.0%

This is provided for in 28 no. 3-storey houses, and 373 no. 2-storey houses, and 9 no. 3-storey apartment buildings on Sites 2 & 3 and in 4 no. 3-5 storey apartment blocks on the Local Centre Site.

All of the houses and apartment units have been designed to ensure a high quality of residential amenity, including minimising overlooking, ensuring good separation distances, variation in house types to ensure a varied streetscape, etc. This is comprehensively set out in the 2 no. Architects Design Statements, accompanying this application.

Also please see Section 6.5 below for further details.

6.3 Other Uses and Ground Floor Units/Active Uses

The scheme also provides for a quantum of non-residential uses which will provide for the needs of future residents but also some local services for existing residents, complementary to the existing Local Centre facilities:

Use	Area (sq.m)
Creche	500
Creche	529.6
Montessori	280.3
Community Hub	144.5
Retail/Café	154
Total	1608.4

6.4 Open Space & Public Realm

Open space is an integral part of the provision of high-quality green infrastructure for communities and forms a core element in the Green Infrastructure Strategy for the County. Section 12.7 of the Development Plan relates to Open Space. Table 12.5 further details the open space hierarchy. FCC has five basic principles of open space provision: *Hierarchy, Accessibility, Quantity, Quality and Private Open Space*, each of which has been considered and implemented in the open space strategy designed for this proposed residential development.

In relation to Public Open space the Development Plan sets out the following objectives:

Objective DMS57 *Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.*

Objective DMS57A *Require a minimum 10% of a proposed development site area be designated for use as public open space*

The proposed development provides for a Class 2 Open Space area of 1.69ha (12.4% of the site developable area), in addition to 2.77 ha of Class 1 public open space, which together far exceed the Development Plan overall requirements of 3.67 ha, as per Table 1 below. Class 1 Open Space provision and Class 2 Open Space provision also meet specific requirements as per FCC Development Plan as per Table 1 below.

Sites 2 & 3 & Local Centre					
	1-bed	2-bed	3-bed	4-bed	Total
No. of Units	59	165	287	37	548
Population	88.5	247.5	1004.5	129.5	1470
		Required (ha)		Proposed (ha)	
@2.5 ha per 1000		3.675		4.46	
@75% Class 1		2.75625		2.77	
@25% Class 2		0.91875		1.69	

Table 1 Open Space Provision

A significant area of public open space is provided for within this proposed development, integrated into the landscape, making connections for pedestrians and cyclists through the urban area using existing landscape corridors and connecting them to new linkages within and beyond the development.

This significant area of Class 1 Open Space provision is part of the Glenveagh Homes commitment to the wider area of residential development and community building. Class 1 Open Space of 3.5ha has already been granted permission in respect of a Glenveagh Homes 69-unit permitted development on Site 1 (Planning Reg. Ref. FW21/0042), far exceeding the requirements for this part of the site and which will further add to the extensive public open space provided by the entire Hollystown-Kilmartin lands. This open space is designed as a network of spaces to be interlinked and easily accessible from the existing, permitted and planned residential areas, contributing to overall permeability and quality amenity provision in the area.

A key aspect of the landscape proposal is the connection of Class 2 open spaces within the residential element of the scheme to the additional open space beneath the power-lines and then northwards to the future GAA facilities and pitches, through the designated Class 1 Open Space area.

The linear park provides substantial buffer and is significant enough in size to provide not only for connectivity for cyclists and pedestrians. In addition the area provides for a number of different recreational opportunities solidifying it as a valuable entity within the scheme proposals.

Open spaces must be designed to a high specification. Careful consideration has been given to the quality and long-term sustainability of open space. The proposed public open spaces are overlooked and designed in such a way that anti-social behaviour will be minimised through passive surveillance.

Incorporated into the overall design of the Class 2 open spaces, areas have been set aside for more formal recreational uses. These areas are strategically

distributed around Sites 2 & 3 with a variety of different functions which serves to benefit the local residents and community by bringing different users and age groups together to meet and enjoy their surrounding environment. The important need for play in the development has been considered in a number of ways, from the conventional playground approach, to more informal play. Pocket parks, larger parks incorporating various activity opportunity zones, shared surface spaces, and kick about areas are all proposed within the open space. For the Local Centre lands, these public spaces are located adjacent proposed development and along the Link Road, located in close proximity to the educational facilities established here, and proximate to the existing Local Centre facilities at Tyrrelstown.

In addition significant Linear Park space of 5.32 ha, which is located along hedgerows and in overhead ESB buffer zones, which cannot be considered for Class 1 or 2 Public Open Space but is none the less available and useable by existing and future residents is proposed and constitutes an important amenity provision for the area.

For further information on the Landscape Design please see BSLA Reports and Drawings. In addition, please see the enclosed Framework Plan for Hollystown Kilmartin prepared by BSM, which sets out the Open Space provision across Glenveagh Homes holdings, and which illustrates the early and expansive provision of public open space to meet existing, proposed and future residential community needs.

Playground Facilities

Playground facilities should cater for defined age groups and provide for a variety of facilities and play opportunities. All residential schemes in excess of 50 units should incorporate playground facilities which should be provided at a rate of 4 sqm per residential unit.

Objective DMS75

Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.

The BSLA Landscape Design Statements set out the provision of play areas throughout the proposed development, within easy access of the residential units, and well overlooked through passive surveillance, and set back from busy roads. A total provision of c. 4,746 sq.m is provided for in Site 2 & 3 and c. 509 sq.m in the Local Centre, which includes for both play and exercise, significantly in excess of the requirements.

Tree Policy

Trees provide both valuable amenity and wildlife habitat. Visually they add to an area, softening the impact of physical development on the landscape while also fulfilling an important role in the improvement of air quality in urban areas and providing wildlife habitats. 'The Forest of Fingal – A Tree Strategy for Fingal' sets out the Council's policy for street tree planting, management and maintenance.

Objective DMS77

Protect, preserve and ensure the effective management of trees and groups of trees.

The Arborist report is included with this Strategic Housing Development Application, and the landscape proposal seeks to retain and incorporate existing woodland plantations into the scheme whilst additional planting is proposed to increase age profile diversity. This is further set out in the BSLA Landscape Design Statement and the Tree Report prepared by Independent Tree Surveys.

6.4.1 Private Open Space

In terms of private open space the Development Plan sets out the importance of private open space in relation to houses. One of the characteristics of the traditional type housing is the provision of private open space, usually to the rear of the front building line of the house.

FCC require all residential units to be provided with private open space. Open space standards set out qualitative and quantitative standards so as to ensure that the maximum benefit is derived from the open space.

The Architects' Housing Quality Assessment provides details in relation to the provision of private open space which meets and exceeds this standard.

Objective DMS87	<p><i>Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:</i></p> <ul style="list-style-type: none"> <i>3 bedroom houses or less to have a minimum of 60 sq m of private open space located behind the front building line of the house.</i> <i>Houses with 4 or more bedrooms to have a minimum of 75 sq m of private open space located behind the front building line of the house.</i> <p><i>Narrow strips of open space to the side of houses shall not be included in the private open space calculations.</i></p>
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Requirements for apartments are as set out in the *Sustainable Urban Housing, Design Standards for New Apartments (2020)*. The minimum private amenity space provided greatly exceeds that of the standards, and this is clearly set out in the Housing Quality Assessment.

6.5 Access, Car & Cycle Parking

Vehicular, Pedestrian and Cyclist Access

The proposed residential development is ideally located to maximise access to / from the site by sustainable forms of travel including walking and cycling to local amenities. There are also high-quality public transport links to Blanchardstown, Broombridge and Dublin City Centre.

In this regard, the proposed development seeks to optimise pedestrian, cycle, and public transport accessibility, and minimise private vehicle usage.

Car Parking

Car parking provision is provided in line with Fingal County Council Development Plan standards, with the exception of parking for the apartment units on the Local Centre site, as set out below.

Overall, a total of 930 no. car parking spaces will be provided at the proposed development. For the residential development, a total of 870 no. spaces will be provided for the residential units, equating to an overall car parking ratio of 1.6 spaces per unit.

With regards to Sites 2 & 3, a total of 792 no. car park spaces will be provided with 762 no. resident car park spaces whilst the remaining 30 no. spaces will be provided as visitor car parking spaces. Therefore, this is in accordance with the FCC Development Plan which requires between 737 – 834 no. car park spaces to be provided (comprising 732 – 829 resident spaces plus 5 visitor spaces).

Whilst within the Local Centre development, a total of 138 no. spaces will be provided. The breakdown at this location is as follows;

- 108 no. residential spaces,
- 5 no. staff parking at the creche/Montessori,
- 10 no. set-down spaces at the creche/Montessori,
- 6 no. visitor spaces and
- 9 no. public spaces on the Link Street

In terms of the Kilmartin Local Centre, a total of 138 no. spaces are proposed. A total of 114 no. spaces are proposed for the residential (apartment) activity, comprising 108 no. resident and 6 visitor spaces. The residential car parking is provided at a ratio of 0.9 spaces per apartment unit, a reduced quantum from the FCC requirements. This reduced provision is in accordance with the DHPLG requirement, considering the proposed developments accessibility characteristics and the guidance which states that for sites classified as an

intermediate urban location “a reduced overall car parking standard” must be considered. This is considered further in the Material Contravention Statement.

Bicycle Parking

An overall provision of 525 cycle parking spaces will be provided across the development, comprising 441 resident/long stay spaces and 84 visitor spaces. A breakdown of the cycle parking provision within Hollystown Sites 2 & 3 and in the Kilmartin Local Centre is provided in the following sections.

At Hollystown Sites 2 and 3, a total of 45 no. bicycle parking spaces are proposed to serve the apartments comprising 5 no. cycle spaces for each triplex unit. This exceeds the DHPLG requirements (of 41 no. spaces) and equates to a rate of 1.6 spaces per unit (apartments only). The bicycle parking for the triplex apartments will be provided for within secure covered bike parking areas within the communal space of the rear gardens.

The Courtyard houses which incorporate carports, contain dedicated areas within the carport capable of storing two bicycles. The remaining house types will all have secure gardens areas to the rear of the properties capable of storing bicycles.

A further 9 no. covered bicycle racks have been provided across the site which will be available for the use by the local community. This in recognition of the difficulty often encountered by occupants or visitors of terraced units with regards to accessing the rear garden areas to store bicycles, which requires bringing the bicycle through the house. The racks have been located so as they are in overlooked areas enabling passive surveillance, thereby enhancing security. These bicycle racks will accommodate 20 bicycles each, thereby providing an additional 180 bicycle parking spaces across the site.

With respect to the Kilmartin Local Centre element of the application, a total of 300 no. bicycle parking spaces are proposed as part of the development comprising 230 no. long stay spaces for residents and 70 no. short stay spaces for both visitors and the non-residential activity.

Furthermore, the proposed provision of 230 long stay spaces for the residential activity at the Kilmartin Local Centre is in accordance with the DHPLG Apartment Guidelines which require 230 no. long stay spaces. The overall residential cycle parking provision for the Kilmartin Local Centre therefore equates 1 secure space provided per bedspace or a rate of 1.9 spaces per unit.

These will be provided in secure, covered cycle stores located both internally and externally. Further detail on the cycle parking provision is provided in Section 7 of this report.

In terms of the visitor/short stay cycle parking, a total of 70 no. short stay spaces are proposed. These will be provided in the form of Sheffield Stands and will be distributed across the site.

The design approach in regard to the specification of bicycle parking on-site, in the context of the sites' accessibility characteristics, is deemed to be more than adequate, particularly in relation to the apartment units, which is in accordance with the DHPLG Apartment Guideline requirements. Further detail on the proposed cycle parking facilities and management regime is provided in the Parking Management Strategy in the Traffic & Transport Assessment prepared by DBFL Consulting Engineers.

The proposed residential development is located such that it will not have any traffic impact on the existing residential development in the area. The access and internal layout is designed in accordance with DMURS and includes for good permeability and will promote and facilitate sustainable travel patterns as part of the overall development. The accompanying DMURS Statement of Consistency prepared by DBFL further sets this out.

6.6 Residential Development Standards

The vision for residentially zoned lands are to ensure the provision of high quality new residential developments with good layout and design, within close proximity to community facilities, and with an appropriate mix of house sizes, types and tenures.

The proposed development is fully in compliance with the Fingal County Council Development Plan Standards, as set out in Chapter 12, and with the *Sustainable Urban Housing, Design Standards for New Apartments* Guidelines for Planning Authorities (2020) where applicable.

This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment (HQA) prepared by Deady Gahan / Proctor and Matthews Architects (Sites 2 & 3) and O'Mahony Pike (Local Centre) which is included with this SHD Planning Application.

Section 12.4 of the Development Plan sets out the relevant quantitative standards for houses. Table 12.3 of the Development Plan sets out minimum room sizes and widths for houses. Further, Objective DMS24 states: *Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.*

How this development complies with all FCC Development Plan standards and with the *Sustainable Urban Housing* Guidelines is set out more fully in the Architectural Design Statements and Housing Quality Assessments which form part of the enclosed documentation.

6.6.1 Residential Quality Standards – Houses

The vision for residentially zoned lands are to ensure the provision of high quality new residential developments with good layout and design, within close proximity to community facilities, and with an appropriate mix of house sizes, types and tenures.

Section 12.4 of the Development Plan sets out the relevant quantitative standards for houses.

Table 12.3 of the Development Plan sets out minimum room sizes and widths for houses and apartments.

Further, Objective DMS24 states: *Require that new residential units comply with or exceed the minimum standards as set out in Tables 12.1, 12.2 and 12.3.*

In addition, to allow for life-long living and flexibility, the 3 and 4 bed house units have adaptable roof spaces to allow for individuals and families to extend their homes if required, and subject to proper planning.

The proposed development meets this requirement the details of which are set out in the HQA prepared by HJL for compliance with Table 12.1 of the Development Plan.

Private Open Space

In terms of private open space the Development Plan sets out the importance of private open space in relation to houses. One of the characteristics of traditional type housing is the provision of private open space, usually to the rear of the front building line of the house.

Objective DMS87 aims to ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:

- 3 bedroom houses or less to have a minimum of 60 sq m of private open space located behind the front building line of the house.
- Houses with 4 or more bedrooms to have a minimum of 75 sq m of private open space located behind the front building line of the house.
- Narrow strips of open space to the side of houses shall not be included in the private open space calculations.

As evident in the HQA provided by Deady Gahan, in respect of the housing units, the proposed development meets and exceeds this standard.

Separation Distances

The Development Plan sets out the following requirements for the separation of housing units:

- **Objective DMS28:** *A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs. A separation distance of at least 2.3 metres should be provided between the side walls of each house, pair of semi-detached houses or each terrace of houses in order to allow for adequate maintenance and access.*
- **Objective DMS29:** *Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.*

As is evident in the enclosed drawing and documents prepared by Deady Gahan / Proctor and Matthews the proposed housing units, on Sites 2 & 3, meet the above objective.

6.6.2 Residential Quality Standards – Apartments

Unit Mix

The proposed mix is in compliance with the unit mix requirements of SPPR 1 of the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities which states:

SPPR 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.

The proposal includes the following mix:

	Apartments		Houses		Total	
	Number	%	Number	%		%
1 bed	59	40.1%	0	0.0%	59	10.8%
2 bed	68	46.3%	97	24.2%	165	30.1%
3 bed	20	13.6%	267	66.6%	287	52.4%
4 bed	0	0.0%	37	9.2%	37	6.8%
Total	147	100.0%	401	100.0%	548	100.0%

Floor Areas

The proposed floor areas are in compliance with the amended mix requirements of SPPR 3 of the Guidelines which states:

SPPR 3

Minimum Apartment Floor Areas:

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

The proposed development includes units above the minimum floor areas. Further it is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

The proposed residential units meet or exceed the minimum standards for apartment sizes. All units are above minimum floor standards and many exceed these standards significantly.

Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the HQA as prepared by Deadhy Gahan and OMP Architects, and submitted with this application.

Private and Communal Amenity Space

The Guidelines state that private amenity space shall be provided in the form of gardens or patios / terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security.

Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and be of a minimum depth of 1.5m.

The Guidelines require the following minimum private amenity sizes:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

The proposed balconies or terraces meet or exceed the minimum standards for private open space.

The Guidelines also require that communal amenity space must be provided within a scheme which can be in the form of courtyards, roof gardens etc. In

addition in larger schemes communal internal spaces are to be provided for residents use only i.e. multi-purpose rooms, cinema rooms, gym etc.

The Guidelines require the following minimum communal open space areas:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

	Required Sq.m	Provided Sq.m
Blocks A	78	1638
Block B	246	
Block C	304	
Blocks D	198	224
Total	826	1,862

The total communal open space requirement for the development is therefore 826 sq.m. This requirement has been exceeded through the provision of podium courtyard between Blocks B and C, to serve residents of Blocks A, B and C and a communal open space at ground level on the east of Block D totalling 1,862 sq.m. All the blocks are designed around high quality public open space/public realm which is accessible to all residents.

Storage

The Guidelines states that minimum storage requirements must be met as follows:

- Studio 3 sq.m
- 1-bed 3 sq.m.
- 2-bed 6 sq.m.
- 3-bed 9 sq.m.

The proposed residential units meet or exceed the minimum standards for storage areas.

Aspect

With regards to dual aspect units the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) in Section 3.17 require that a minimum of 50% of the overall number of units in a scheme should be dual aspect '*Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments. Ideally, any 3 bedroom apartments should be dual aspect*'.

While SPRR4 states *'In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: (ii) in suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.'*

The Development Plan standards state that apartment units shall be provided with a good level of daylight and sunlight which contribute to a high quality living space.

Additionally the 2020 Guidelines state at Section 3.18 that *"Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered where overlooking a significant amenity such as a public park, garden or formal space or a water body or some other amenity feature."*

The proposed scheme is in compliance with the requirements of Section 3.17 and SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) by providing for 100% of dual aspect units on Sites 2 & 3 and 53% dual aspect units on the Local Centre lands with no single aspect north facing units.

Floor to Ceiling Heights

The proposed mix is in compliance with the amended mix requirements of SPPR 5 of the Guidelines which states:

SPPR 5

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

The Guidelines identify that 2.4m is standard good practice however 2.7m would be a minimum standard for ground floor apartments but a higher ground floor should be considered where apartments are not proposed at ground level.

The proposed scheme has floor to ceiling heights of a minimum of 2.7m.

Detailed daylight assessment has been carried out on the proposed development by IN2, and is outlined in greater detail in their accompanying report and EIAR.

Lift and Stair Cores

The proposed mix is in compliance with the amended mix requirements of SPPR 6 of the Guidelines which states:

SPPR 6

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

The proposed development has sought to minimise the number of cores and maximise the number of apartments off each and typically, the blocks have 1-10 apartments per core, with most apartments being accessed off cores with 4-6 units per core, in compliance with the standards.

Internal Space Configuration

Minimum internal space requirement for living/dining/kitchen rooms and bedrooms are set out in the Development Plan. Compliance with the internal rooms sizes are demonstrated in the HQA provided by both Deady Gahan in respect of Sites 2 & 3 and by OMP Architects in respect of the Local Centre. It is set out that all of the proposed units meet or exceed the Guidelines requirements.

6.7 Refuse Storage and Bins

The proposed development meets the relevant standards in relation to Refuse Storage and Bins. Please see Architects Design Statements for further details of refuse facilities.

The following objectives are set out in the Fingal Development:

Objective DMS36	<i>Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.</i>
Objective DMS37	<i>Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.</i>

6.8 Sunlight and Daylight

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development. The proposed orientation of the streets and blocks represents the best response to the site context in terms of day light and sunlight availability as a result of the density and height proposed.

A Daylight assessment was carried out for the proposed development utilising BRE 209 by IN2 Engineering, as per Development Plan requirements. The Average Daylight Factor was calculated for internal spaces and relevant design development was carried out to ensure good daylight could be achieved for all areas of the scheme.

The IN2 Report includes results of the comprehensive analysis undertaken, analysing KLD's and Bedrooms to meet ADF = 2.0%+/ 1.0%+ respectively, demonstrating how compliance was determined for 97% of the total apartment rooms (349 rooms of 120 apartments) assessed. In addition to 97% of spaces achieving minimum compliance, the daylighting provision throughout the development was determined to be very good, with the median ADF determined for KLD's being 2.6% - i.e. 50% of apartments were calculated to have daylighting performance at least 30% above minimum compliance levels. In the small quantity of rooms (3% or 11 no.) where minimum ADF compliance could not be demonstrated, compensatory measures (larger apartment unit size/ dual-lit apartment etc.) to offset reduction in daylighting have been provided for relevant apartments and are identified in the Report in accordance with 2020 Apartment Guidelines. In addition, where KLD's were found to be non-compliant (i.e. ADF below 2.0%) daylighting improvement measures were ensured in each case to at least attain a minimum level of ADF = 1.5%+. For Sites 2 & 3 area of the development, the triplex unit typology has been assessed and full ADF compliance determined.

In terms of sunlight access, excellent levels of sunlight are experienced across the development. The amenity spaces, both communal and public realm/open space provided comfortably exceeds the BRE guidelines for sunlight on the test day of 21st of March.

6.9 Childcare Facilities

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing developments where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

However the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* state that:

'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms'.

The proposed scheme contains 10.8% one bed units apartments which as per the above, are discounted in the calculation of the requirement for childcare spaces. The proposed development comprises 489 no. 2, 3 and 4 bed residential units.

The proposed development provides for the following childcare facilities to be delivered:

Facility	Unit Size	Approx. No. Childcare Spaces
Creche – (standalone)	c.530sqm	c.106 spaces
Creche – (Block D)	c. 500sqm	c. 100 spaces
Montessori – (Block D)	c. 280sqm	c. 60 spaces
Total Childcare Provision	c. 1,310sqm	c. 266 spaces

Based upon 489 units, and as set out in the Schools Demand and Childcare Facilities Assessment Report enclosed with this SHD application, childcare facilities in the range of c.74-130 spaces is required. As outlined above what is being provided is far in excess of the requirements but futureproofs childcare provision for future phases of development where childcare facilities cannot be provided because of the restrictions on the lands location with Airport Safety Zones. It is intended that the standalone crèche is phased for delivery in line with the first phase of residential development being delivered under this permission (as per phasing Fig. 1.3 above).

Given the scale of development existing, under construction and permitted for the area, an assessment of the childcare provisions was carried out as part of this development assessment. The Childcare Facilities Assessment (contained with the Schools Demand and Childcare Facilities Assessment Report) found that there are a number of crèches operating in the area and a number of new crèches permitted the area.

As such it is considered that the proposed crèche will meet proposed and future residential demand for childcare facilities.

7 PART V REQUIREMENTS

Preliminary consultation has taken place with Fingal County Council Housing Department in this regard. At this stage Glenveagh Homes would be happy to discuss any of the options, as set out under Section 96 of Part V of the Planning and Development Act (as amended), with Fingal County Council. We enclose a Part V Pack as part of the documentation submitted to An Bord Pleanála.

8 ENVIRONMENTAL CONSIDERATIONS

8.1 APPROPRIATE ASSESSMENT

An Appropriate Assessment (AA) Screening Report is submitted to An Bord Pleanála with the SHD Planning Application prepared by Brady Shipman Martin, which concludes that no significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.

8.2 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The revised 2014 EIA Directive (Directive 2014/52/EU amending Directive 2011/92/EU) uses the term environmental impact assessment report (EIAR) rather than the previous environmental impact statement (EIS). Where current national guidelines and regulations refer to an Environmental Impact Statement or EIS, this can be taken to mean an Environmental Impact Assessment Report (EIAR).

Projects requiring environmental impact assessment are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended).

Schedule 5 (Part 1) of the Planning & Development Regulations 2001 (as amended) lists major project classes for the purposes of mandatory EIA, which typically include industrial, chemical, energy, waste, infrastructure and intensive agricultural developments. The proposed development at Hollystown-Kilmartin does not correspond to a development set out under Part 1 of Schedule 5 and therefore, EIA is not a requirement under this provision.

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class above which EIA is required. Sub-sections 10(b) (i) and 10(b) (iv) addresses 'infrastructure projects' referring to housing and urban developments, and require that the following classes of project, relevant to this project, be subject to EIA:

*"Class 10(b) (i). Construction of **more than 500 dwelling units**."*

*"Class 10(b) (iv). Urban development which would involve an area greater than 2 hectares in the case of a business district, **10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere**." [Our emphasis]*

The proposed development involves the construction of a residential development of 548 no. residential units (which sit as part of existing permitted and under construction units in the same development) on a site of 25.3 ha hectares on the north western fringe of Dublin city.

As such an Environmental Impact Assessment Report (EIAR) is submitted to An Bord Pleanála with this SHD Planning Application.

9 CONCLUSION

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential development with associated community and commercial uses for these lands identified for residential development.

This Planning Report demonstrated that the proposed development is in accordance with recent Government guidance in relation to the delivery of residential developments, Fingal County Development Plan 2017-2023, the Kilmartin Local Area Plan (2013 as extended), and in the interest of the proper planning and sustainable development of the area.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal as presented constitutes a high quality development proposal.