

STRATEGIC HOUSING DEVELOPMENT  
PLANNING APPLICATION  
**STATEMENT OF CONSISTENCY**

FOR LANDS AT HOLLYSTOWN-KILMARTIN, DUBLIN 15

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**Brady Shipman  
Martin**

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**Glenveagh Homes Limited**

DATE

**December 2021**

## LANDS AT HOLLYSTOWN- KILMARTIN

### Statement of Consistency

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### Brady Shipman Martin

#### DUBLIN

Canal House  
Canal Road  
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](http://www.bradysipmanmartin.com)

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## 1 INTRODUCTION

On behalf of Glenveagh Homes Limited, this Statement of Consistency with Planning Policy has been prepared to accompany a Planning Application to An Bord Pleanála in relation to a proposed Strategic Housing Development at Lands at Hollystown-Kilmartin, Dublin 15.

The proposed development will consist of the development of 548 residential units. A full description is set out in the Statutory Notices.

This Statement of Consistency with planning policy has been prepared to specifically address the requirements of the Strategic Housing Development guidance document issued by An Bord Pleanála. This Planning Application is also accompanied by a Planning Report which includes further details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.

This standalone planning policy consistency statement demonstrates that the proposal is consistent with the relevant national planning policy and guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by Deady Gahan / Proctor & Matthews Architects, O'Mahony Pike Architects, Bernard Seymour Landscape Architects (BSLA), Brady Shipman Martin, DBFL, and other design team members.

For further details of consistency with the quantitative standards for residential units as set down in the *Sustainable Urban Housing: Design Standards for New Apartments* (2020), the *Fingal County Development Plan 2017-2023*, and the *Kilmartin Local Area Plan 2013*, please refer to the Housing Quality Assessment and other schedules and documents prepared by Deady Gahan / Proctor & Matthews Architects and O'Mahony Pike Architects and the Planning Report included in this Planning Application.

## 2 CONSISTENCY WITH PLANNING POLICY

### 2.1 National and Regional Planning Policy

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Rebuilding Ireland – Action Plan for Housing and Homelessness
- Project Ireland 2040 - National Planning Framework,
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES)

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities;
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Design Manual for Urban Roads and Streets (2019);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018);
- The Planning System and Flood Risk Management (2009);
- Birds and Habitats Directive – Appropriate Assessment; and
- EIA Directive.

#### 2.1.1 Housing for All – A New Housing Plan for Ireland (2021)

*Housing for All*, published in September 2021, is the Government's new housing plan to 2030. It provides an overview of the existing housing scenario as follows:

- There are not enough houses to buy or rent in the private sector.
- There are not enough houses being built by the State for those who need social housing.
- Housing has become increasingly unaffordable for the 'squeezed middle' who would once have expected to be able to purchase their own home.
- Too many people are experiencing homelessness or are unable to access appropriate housing.
- The cost of building housing is too high.
- Too much vacant housing stock remains unused.
- Our housing stock needs to be more environmentally friendly.

The overarching aim of the *Housing for All* plan is that “*Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life*” (p. 17). With a view to achieving this aim, the plan sets out four overarching housing policy objectives as follows:

1. Supporting homeownership and increasing affordability;
2. Eradicating homelessness, increasing social housing delivery and supporting social inclusion;
3. Increasing new housing supply; and
4. Addressing vacancy and efficient use of existing stock.

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A suite of actions are set out under the four above-listed headings. The *Housing for All* plan allocates a housing budget of in excess of €20 bn through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years. According to the plan, this constitutes the largest housing budget in the history of the State.

The plan provides for the following key targets / actions, among others:

- Increased supply of new housing overall, up to an average of at least 33,000 per year to 2030
- An average of 6,000 affordable homes to be made available every year for purchase or for rent
- Provision of more than 10,000 social homes each year, with an average 9,500 new-build Social Housing Homes to 2026
- Increased contribution by developers under Part V, up from 10% to 20%, to include affordable housing and cost rental housing

The estimates of housing demand which form the basis of the *Housing for All* plan's targets have been developed by the Department of Housing, Local Government and Heritage (DHLGH)'s Housing Need and Demand Assessment (HNDA) model, which has been adapted from the Scottish HNDA. The HNDA tool has been used to project the future need for housing in Ireland by tenure type.

The plan seeks to ensure that new housing is delivered in an environmentally sustainable manner, with a greater proportion of residential development in the existing built-up footprint of towns and cities, and all new homes being built to Nearly Zero Energy Building (NZEB) standards, as well as a policy of retrofitting existing housing stock.

With a view to supporting sustainable communities (*"places where people want to live and work"*), the plan states a commitment *"to continuing the policy of having mixed-tenure communities, including through the mechanism of Part V of the Planning and Development Act 2000, to ensure that social and affordable housing are part of the mix across housing developments"*.

It is noted that the plan sets out the Government's intention to replace the SHD process with new planning arrangements for large-scale residential developments (LRD) of 100+ homes (or 200+ student accommodation bed spaces) with a view to maintaining the efficiency of decision-making for developments of this nature, while returning decision-making to the local level and securing associated benefits in terms of public participation. The timeline for these changes, which have not yet come into effect, is identified as Q4 2021 in the plan.

The proposed development is consistent with the Government's new *Housing for All* plan. It will provide approx. 548 new, high-quality homes on lands zoned for residential development. In accordance with Government housing policy, the

units will be of a range of tenure and housing types, including social housing (10% Part V provision) distributed throughout the proposed development.

### 2.1.2 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland is the Government's Action Plan for Housing and Homelessness, launched in 2016. The Plan's aim is to accelerate housing supply by addressing the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector.

The Plan contains five key pillars:

- Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.
- Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State-supported housing.
- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
- Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas.

The proposed development at Hollystown is consistent with Pillar 2, 3 and Pillar 4 as the scheme is proposing to construct 548 no. houses and apartments / duplex units on a public transport accessible site location within the urban fringes of Dublin City. The scheme also includes the provision of 59 no. Part V social housing units as part of this mix.

### 2.1.3 Project Ireland 2040 -National Planning Framework

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

1. Compact Growth

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

The Plan identifies that by 2040 it is expected that an additional one million people will live in Ireland, an additional two-thirds of a million people will work here. These are huge increases: more people will be travelling to work, school and universities, more buildings will be needed to accommodate them, clean water will be needed for homes, farms and industry, more and better care facilities will be required for the elderly.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating *‘strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development’* as a top priority.

With regards to Dublin the NPF identifies that the city needs to *‘accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice’*.

National Policy Objective 3a in this regards states:

*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements*

National Policy Objective 4 in this regards states:

*Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

National Policy Objective 11 in this regards states:

*In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*



National Policy Objective 13 in this regards states:

*In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

National Policy Objective 33 in this regards states:

*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

National Policy Objective 34 in this regards states:

*Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*

The proposed development is broadly consistent with the objectives of the NPF in that it will deliver a high-quality residential development within the Dublin Metropolitan area, in an emerging residential area. While the proposed development will be delivered on a greenfield site at the margin of an existing settlement (as opposed to in-fill / brownfield development), it is situated on lands that have been earmarked by the Local Authority (Fingal County Council) for residential development of this nature. It is also noted that the NPF allows for 60% of new housing to be situated in smaller towns, villages and rural area, including the countryside, “but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably”.

It will provide a mix of units in terms of tenure and housing typology, at a density and massing that are consistent with the existing development pattern at Hollystown, Kilmartin and Tyrrelstown. It will also provide new commercial and community amenities to meet the needs of existing and future residents in the area, including 2 no. crèches a Montessori school and a community hub.

#### **2.1.4 Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES)**

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

The Strategy identifies that the region ‘is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued

*growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region’.*

The Strategy is underpinned by key principles that reflect the three pillars of sustainability; Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as ‘quality of life’ encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located within the Dublin Metropolitan Area, as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion. Blanchardstown is located in the North-West Corridor of the MASP.

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *‘the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include; ... large scale urban expansion on the North Fringe of the city...’*,

Policy Objectives relating to Housing Delivery include:

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

As well as calling for increased residential density in the DMA, the RSES emphasises the need for healthy placemaking, i.e. *“integration of better urban design, public realm, amenities and heritage to create attractive places to live, work, visit and invest in”* and *“sustainable communities to support active lifestyles including walking and cycling”*. The proposed development provides a high-quality urban / suburban design, informed by the National Guidelines. It will also include public amenities, including a crèche, Montessori school and café, to support the existing and proposed residential community in the area. The proposed development includes design features promoting walking and cycling, including a high quality public realm incorporating soft landscaping, cycle lanes and secure bike parking facilities.

### 2.1.5 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 *Urban Design Manual: A Best Practice Guide* (the Urban 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’*.

In identifying appropriate locations for increased density the Guidelines note that City and town centres offer *‘the greatest potential for the creation of sustainable patterns of development’* and of which in particular brownfield sites should be promoted.

Having regard to the above, the Core Strategy of the Development Plan promotes the continued consolidation of 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.

To maximise the return on public transport investment the Guidelines identify that it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors- this includes 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station.

This underutilised greenfield site is located proximate to existing facilities including educational and community facilities, an existing Local Centre at Tyrrelstown and a planned extension to that with the Kilmartin Local Centre (in PAC Request stage to An Bord Pleanála), and bus route, connected back to Blanchardstown Town Centre, and Dublin City Centre. The subject lands can reasonably be considered to be a suburban or intermediate location, as per Government guidelines *Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).

The Guidelines set out that densities in the general range of 35-50 dwellings per hectare will provide the greatest efficiency in land usage. The proposed development, proposes a net density of c.40 units/ha, with lower density on the Site 2 & lands (which are restricted by their location within the Airport Public Safety Zone) and higher density on Local Centre lands, which responds to the locational context of these lands, set out further in the Planning Report.

The qualitative standards set out in these Guidelines have been brought through in the Design Manual referenced above, the Fingal County Development Plan, and the Kilmartin Local Area Plan, which have guided the design approach to the scheme. This is set out in detail in the accompanying Design Statement prepared by Deady Gahan / Proctor & Matthews Architects and by O'Mahony Pike Architects.

The Guidelines set out the 12 No. Best Practice Design Manual criteria which are discussed in the following section.

#### **2.1.6 Urban Design Manual – A Best Practice Guide (2009)**

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. These are listed below, with a response to each provided, and should be read in conjunction with the Architect's Design Statement.

##### ***Context: How does the development respond to its surroundings?***

The proposed development has been designed to respond positively to the existing established, and permitted residential communities in the area which comprise a wide mix of housing and apartment types.

In respect of Sites 2 & 3 the streetscape and buildings have been arranged to present a series of character areas moving from the R121 westwards, drawing on the existing landscape character where feasible, addressing boundary conditions and public open space provision, with passive surveillance and overlooking of the public realm. The site is designed to connect to adjacent developments to the south and east, and to educational facilities and Local Centre further south. The proposal provides for enhanced pedestrian and cycle ways encouraging connectivity between areas.

In respect to the Local Centre lands the streetscape and buildings have been arranged to reinforce the Local Centre mixed use nature of this site, addressing the proposed civic plaza, and public space provision, with passive surveillance and overlooking of the public realm. The site is designed to connect to the existing Local Centre to the south, and to integrate with existing educational facilities to the north and west, and proposed new school site immediately adjacent. The proposal provides for enhanced pedestrian and cycle ways encouraging connectivity between areas.

***Connections: How well is the new neighbourhood / site connected?***

The Hollystown – Kilmartin sites are designed to be integrated with and well connected to, its immediate and wider context.

In respect of Sites 2 & 3 the proposed development is designed to link to the south to the ‘under construction’ Bellingsmore development, and subsequently further south to the existing and expanded local centre lands. It is also designed to link to the public open space to the north, including the proposed GAA facilities, and to the planned, existing and under construction residential developments to the east. Furthermore it establishes the context for future delivery of housing on zoned lands to the west of the site.

In respect of the Local Centre lands the site benefits from a number of cycle and pedestrian facilities that are provided around the vicinity of the site. Segregated two-way cycle tracks and footways are provided on both sides of the R121 (towards Tyrrelstown Town Centre) and on the Cherryhound-Tyrrelstown Link Road (eastwards towards the N2).

There are a number of public bus services which currently service Tyrrelstown Town Centre south of the proposed development site and the proposed development include for bus laybys along the Link Road to facilitate buses into the heart of the scheme. These services offer connectivity towards destinations such as Blanchardstown, Dublin City Centre and Broombridge (Luas).

***Inclusivity: How easily can people use and access the development?***

The proposed development will be accessible at multiple locations by a range of transport modes including bus, car, pedestrian and cyclist facilities.

The subject lands will connect to the Hollystown Rd that links the R121 and the educational facilities of the Tyrrelstown Educate Together National School, St. Luke's National School, Le Cheile Secondary School, and Tyrrelstown Community Centre, and connecting south to Tyrrelstown Local Centre. The lands are located to the north and south of Hollystown Road and to the west of the R121 (Church Road) regional road. Church Road runs along the eastern boundary of the subject site, providing links towards the M50, N2 and N3. Travelling in a northeast bound direction along Church Road, the road continues until it meets links towards the N2 and Hollystown. Travelling southwest on Church Road provides connections to Mulhuddart and Blanchardstown via the N3 as well as links to the M50.

The proposed development provides for a mix of cycle paths types which will enable improved connections with the wider Dublin cycle path network including the Tolka Valley Greenway.

The site is within easy access of major employment locations, and national education and health facilities, and the Blanchardstown Centre, providing a large amount of employment, education and commercial activity.

***Variety: How does the development promote a good mix of activities?***

In terms of residential mix, the proposed scheme provides for a good mix of unit types by providing 2-bed, 3- bed and 4-bed units housing units and 1-bed, 2-bed, 3- bed apartment units. The application includes the extension of the existing Local Centre to the south, and to educational and community facilities southwards, and to open space and recreational facilities to the north. The Local Centre lands also provides for 2 no. creches, 1 no. Montessori, 1 no. community hub and a café/retail unit to complement and supplement the existing facilities.

***Efficiency: How does the development make appropriate use of resources, including land?***

It is considered that the site, given its location and context, represents an underutilised greenfield site. The proposed layout, and open space provision proposed correspond with the Kilmartin LAP and the Fingal Development Plan, and the specific requirements of its site constraints and opportunities.

The scheme as proposed will provide 548 no. residential units, in addition to new public open space, and community and commercial uses integrated with its design, and with the site characteristics and adjacent land uses. It extends the existing Tyrrelstown Local Centre to cater to the growing population in this area.

***Distinctiveness: How do the proposals create a sense of place?***

The proposed development contains a variety and mix of building designs, varying heights and materials, which is evidenced by the inclusion of the courtyard house-type, apartments and duplexes, and more traditional family terraced and semi-detached housing. In addition, a variety of public open spaces including urban plaza type spaces, play areas, and a biodiversity corridor linking through the ESB Pylon buffer corridor connecting to adjacent developments along this pylon corridor, and riparian corridors which have been integrated to provide attractive pedestrian and cycle routes, all combine to contribute to creating a distinct sense of place at this important emerging residential area.

Additionally in respect of the Local Centre the streetscape and buildings have been arranged to enhance the sense of connection to the existing Local Centre and education facilities and the surrounding neighbourhoods.

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

Within the proposed development, a range of public open space is proposed, including urban-type plazas, home zones, play areas, and a biodiversity corridor linking through the ESB Pylon buffer corridor, linked by new and enhanced pedestrian and cycle connections, and linking through to riparian corridors which have been activated to include for pedestrian and cycle networks. The main vehicular access routes are designed to be pedestrian and cycle friendly ensuring ease and security of movement for all. Passive surveillance is optimised on streets and spaces.

***Adaptability: How will the buildings cope with change?***

Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of both houses and apartments in 1, 2, 3 and 4-bedroom units that can allow for occupancy as life cycles and personal needs of each resident change. The ground floor commercial uses have been designed to be adaptable to a wide range of uses including retail, services, medical units, café, crèche etc. This type of design and layout lends itself ready to change if required. Flexibility of adaptation is outlined in the Architects Design Statement.

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

***Privacy / Amenity: How do the buildings provide a high-quality amenity?***

The proposed public spaces are critical in successfully linking the proposed residential area with surrounding neighbourhoods and communities and ensuring the scheme is embedded in its context.

In respect of Sites 2 & 3 the network of public spaces are designed to integrate into the proposed building layout and scheme development, ensuring all public spaces are overlooked and are provided with a high level of passive surveillance. The landscape rationale for these spaces has been to provide a range of features to facilitate both active uses i.e. play spaces and more relaxed amenity i.e. seating areas.

In respect of the Local Centre as the scheme is accessed and used by number of users i.e. residents, employees, shoppers and visitors to the Local Centre, the proposed public spaces are the key focus of the scheme as it will be accessed by all the users identified above. As such the spaces must be attractive, flexible, and secure.

In terms of the residential amenity spaces these are centrally located to the residential blocks ensuring a more calm and private space away from the busier public spaces. These spaces have a number of residential blocks overlooking them, and have public routes through them, ensuring a level of security. The landscape rationale for these spaces has been to provide a range of features to facilitate both active uses i.e. play spaces and more relaxed amenity i.e. seating areas. The design ensures privacy in the spaces but allows for passive surveillance from adjoining blocks and entrances, ensuring a sense of security.

***Parking: How will the parking be secure and attractive?***

For Sites 2 & 3 where lower density and housing units are provided, car parking is located at on street either in curtilage or adjacent to residential units. This ensures all units have close proximity to designated parking which are secure in terms of on-street surveillance.

In addition, a significant number of cycle parking spaces are provided. Public cycle parking is located conveniently in the public realm in highly visible, convenient and secure locations. In addition, secure residential cycle parking spaces are provided within the curtilage of the housing units themselves, and additionally at cycle hubs adjacent to housing.

For the Local Centre where higher density apartment buildings are provided car parking is primarily located at podium or on street adjacent to residential units. This ensures all units have close proximity to designated parking which are secure in terms of controlled access to the podium spaces, or on-street surveillance.

In addition, a significant number of cycle parking spaces are provided. Public cycle parking is located conveniently in the public realm in highly visible, convenient and secure locations for the various users of the proposed development. In addition, secure residential cycle parking spaces, are provided.

#### ***Detailed Design: How well thought through is the building and landscape design?***

The proposed design of the development has been subject to a pre-application consultation between the design team and the Planning Authority. The proposed development responds to the Fingal Development Plan objectives and the specifics of the Kilmartin Local Area Plan, where applicable. Furthermore the proposed development is subject to a wider master plan approach (see enclosed BSM Master Plan Framework) which ensures a coordinated approach to the site layout, integrating and linking this residential community with adjoining developments. The architectural and urban design rationale is further set out in the Architects Design Statement. The landscape character of the site has informed the urban structure approach to site layout.

Full details on the rationale for the landscaping design can be found in the Landscape Design Rationale and Landscape plans prepared by BSLA which accompanies this Planning Application.

#### **2.1.7 Sustainable Urban Housing: Design Standards for New Apartments (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 NPF 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 subject site represents a significant development on accessible greenfield lands within the urban extent, and as such represents a project that is fully supported by these Guidelines.

The Guidelines identify Intermediate Urban Locations as areas which are suitable for smaller scale higher density developments. The location of the proposed residential development can be classified as an 'Intermediate Urban Location'. Such sites are considered within or close to i.e. within reasonable walking distance of, principal town or suburban centres or employment locations, that may include hospitals and third level institutions. The subject site is located adjacent to the existing Tyrrelstown Local Centre and adjoining educational and community facilities, which it is proposed for expansion under the Kilmartin Local Area Plan, 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.

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, the Guidelines set out that Planning Authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.

This SHD Application is accompanied by a Housing Quality Assessment (HQA),

## LANDS AT HOLLYSTOWN- KILMARTIN

### Statement of Consistency

prepared by Deady Gahan / Proctor & Matthews Architects and O'Mahony Pike Architects which demonstrates the compliance of the apartments proposed in this 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.

As set out in the DBFL Traffic and Transport Assessment Report, a total of 1,057 no. car parking spaces are required by the FCC Development Plan for the proposed quantum of residential development. By comparison, for the apartment element of the scheme the DHPLG standards state that a reduced quantum of car parking should be considered.

Overall, a total of 928 no. car parking spaces will be provided at the proposed development. For the residential development, a total of 869 no. spaces will be allocable to residential units, equating to an overall car parking ratio of 1.6 spaces per unit. With regards to Hollystown Sites 2&3, a total of 790 no. car park spaces will be provided with 761 no. spaces allocated to residents whilst the remaining 29 no. spaces will be provided as visitor car parking spaces. Residential parking as such is provided at 1.9 spaces per unit. All units are provided in compliance with the Fingal County Development.

Whilst within the Kilmartin 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 crèche/Montessori, 10 no. set-down spaces at the crèche/Montessori 6 no. visitor spaces and 9 no. public spaces on the Link Street. Residential apartment parking as such is provided at a rate of 0.9 per unit and as such may be considered to material contravene the Development Plan standards.

In addition high-quality cycle parking and associated facilities are provided in the proposed development with a total of 437 provided for residents and 84 provided for visitors and commercial uses, this excludes parking for proposed houses which is accommodated within each unit. Residents parking is provided in secure locations in addition to visitor spaces located throughout the landscaped open space in the scheme providing easy access for visitors to apartment occupiers. Bicycle parking provision is also in line with Government Guidelines as set out above, exceeding Fingal Development Plan requirements.

The Traffic and Transport Assessment prepared by DBFL provides a justification for the level of cycle parking proposed.

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

The Urban Building Height Guidelines identify that as reflected in *'the National Planning Framework .... that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas'* and that *'securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'*.

The Guidelines reference NPO 13 (from the NPF) which states that *'in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected'*.

The heights proposed are in line with the requirements of the LAP which are considered appropriate with 2-3 storey units located on the Site 2 & 3 lands, adjacent to existing permitted and under construction 2-3 storey housing and increasing to 5 storeys onto the R121 on the Local Centre lands. It is considered that balance has been struck between optimising the sites in terms of height and density and managing the limitations of the sites location in Airport Noise and Safety Zones.

### 2.1.9 Design Manual for Urban Roads and Streets (DMURS) (2019)

The Design Manual for Urban Roads and Streets (DMURS), was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013, and updated in 2019. It sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The DMURS Compliance Statement, prepared by DBFL provides further detail in respect of the compliance of the proposed development with DMURS.

The scheme proposals are the outcome of an integrated urban design and landscaping to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. DBFL Consulting Engineers along with the rest of the design team have interrogated the DMURS principles to ensure the final layout provides a high quality urban residential extension to the Hollystown-Kilmartin area. A DMURS Statement is provided by DBFL as part of the SHD Application.

#### 2.1.10 Guidelines for Planning Authorities on Childcare Facilities (2001)

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 estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

It is considered that the requirements in terms of childcare provision have been exceeded, with provided capacity for future development, by the inclusion of 2 no. crèches and 1 no. Montessori. These are located on the Local Centre lands due to the restriction on them being placed within the Outer Airport Safety Zone.

#### 2.1.11 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

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

The key targets that the Smarter Travel Policy sets to achieve these goals area:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work. The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

The subject site encourages sustainable and smarter travel by providing high density development on greenfield lands in close proximity to high frequency public transport connecting the site with employment areas within Dublin City. In addition through the reduction of car parking and provision of significant cycle facilities.

Please see DBFL Mobility Management Plan for further detail in relation to meeting Smarter Travel objectives.

#### **2.1.12 Transport Strategy for the Greater Dublin Area 2016 – 2035**

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by developing employment and residential development in proximity to each other and proximate to existing employment and public transport networks thereby reducing the requirement on the car and encouraging a shift to more sustainable transport methods.

#### **2.1.13 Guidelines for Planning Authorities on 'The Planning System and Flood Risk Management (November 2009)'**

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the *Planning System and Flood Risk Management Guidelines a Site-Specific Flood Risk Assessment* (SSFRA) has been prepared by DBFL. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

This Site Specific Flood Risk Assessment was undertaken in accordance with the requirements of the "*Planning System and Flood Risk Management Guidelines for Planning Authorities*", November 2009.

The SSFRA did not find any indicators of the proposed development being at risk from fluvial, pluvial or groundwater flooding; also, the SSFRA did not find any indicators that the proposed development will give rise to flood risk elsewhere.

#### **2.1.14 Birds and Habitats Directive – Appropriate Assessment**

Under Article 6(3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000-2010.

An Appropriate Assessment is required if likely significant effects on Natura 2000 sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

An AA Screening Report is submitted with this SHD Planning Application.

#### **2.1.15 EIA Directive**

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

An EIAR has been submitted with this SHD Planning Application.

## **2.2 Local Planning Policy**

This section provides an overview of consistency with local planning policy. The site is located within the administrative area of Fingal County Council and is therefore subject to the land use policies and objectives of the County Development Plan 2017-2023. In addition, the Kilmartin Local Area Plan 2013 provides specific detail in relation to part of the lands. Where the LAP does not provide detail we have regarded County Development Plan.

### **2.2.1 Fingal County Development Plan 2016-2022**

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.

#### 2.2.1.1 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’.

#### 2.2.1.2 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).

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).

### 2.2.1.3 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.

#### **2.2.1.4 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.*

### 2.2.1.5 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 HOLLYSTOWN- KILMARTIN

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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.

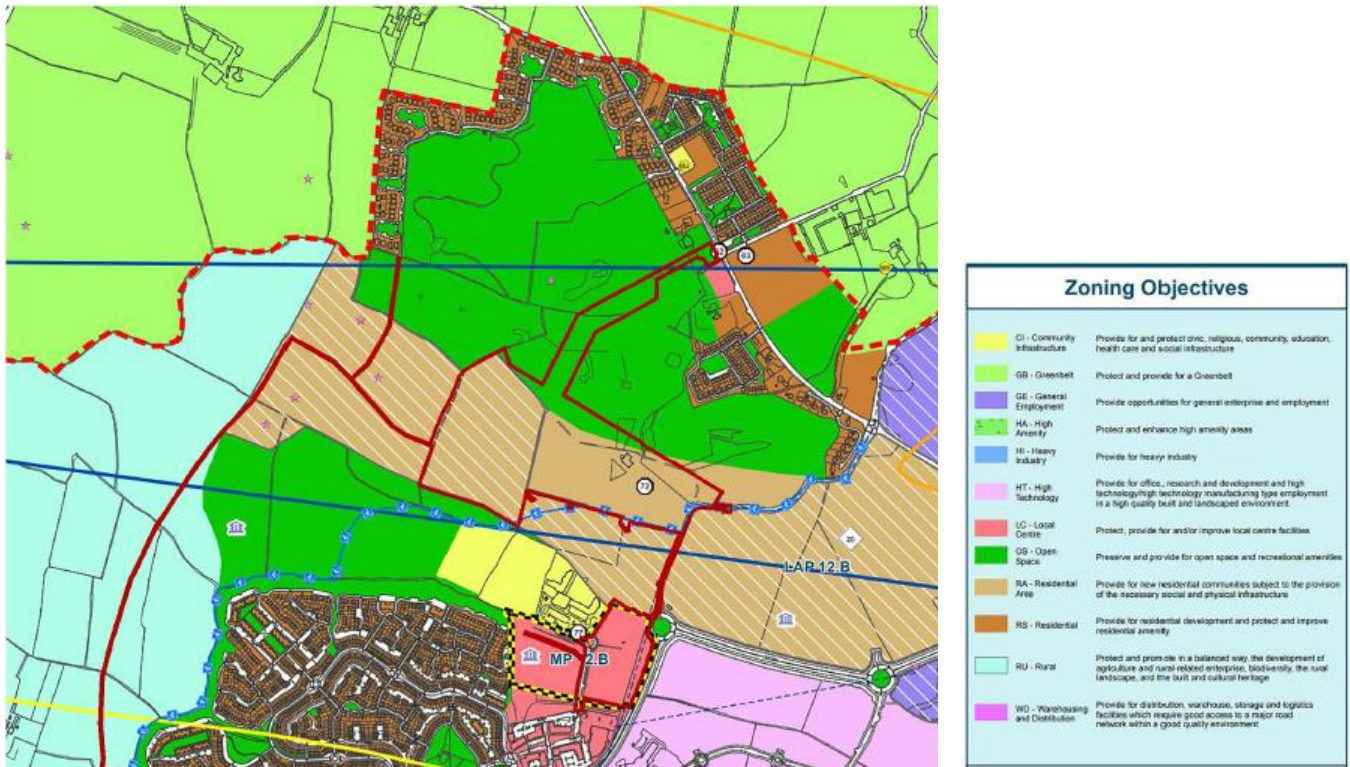


Figure 5.2: Extract from the Fingal Development Plan Zoning Map 12 (Source: FCC)

### Map Based Objectives

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.

#### 2.2.1.6 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:

<b>Objective PM37</b>	<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>
<b>Objective PM38</b>	<i>Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.</i>
<b>Objective PM39</b>	<i>Ensure consolidated development in Fingal by facilitating residential development in existing urban and village locations.</i>
<b>Objective PM40</b>	<i>Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.</i>
<b>Objective PM41</b>	<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.

#### 2.2.1.7 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.*

<b>Biodiversity Theme</b>	<p><b>Objective GI24</b> <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><b>Objective GI25</b> <i>Integrate provision for biodiversity with public open space provision and sustainable water management measures (including SuDS) where possible and appropriate.</i></p>
<b>Parks, Open Space and Recreation Theme</b>	<p><b>Objective GI26</b> <i>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.</i></p> <p><b>Objective GI27</b> <i>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.</i></p> <p><b>Objective GI28</b> <i>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</i></p>



	<p><i>of new green infrastructure provision, where appropriate and feasible.</i></p> <p><b>Objective GI29</b> <i>Provide opportunities for food production through allotments, community gardens and permaculture food forests in new green infrastructure proposals where appropriate.</i></p> <p><b>Objective GI30</b> <i>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.</i></p>
<b>Sustainable Water Management Theme</b>	<p><b>Objective GI31</b> <i>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.</i></p> <p><b>Objective GI32</b> <i>Seek the creation of new wetlands and/or enhancement of existing wetlands through provision for Sustainable Drainage Systems (SuDS).</i></p> <p><b>Objective GI33</b> <i>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.</i></p>
<b>Archaeological and Architectural Heritage Theme</b>	<p><b>Objective GI34</b> <i>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.</i></p> <p><b>Objective GI35</b> <i>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.</i></p>
<b>Landscape Theme</b>	<p><b>Objective GI36</b> <i>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.</i></p>

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

## LANDS AT HOLLYSTOWN- KILMARTIN

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

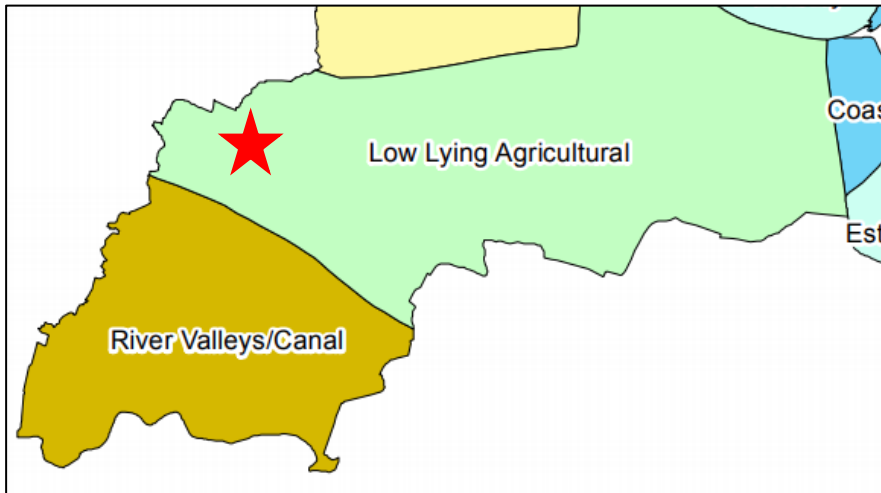


Figure 5.3: Extract from Fingal Green Infrastructure Map 1. (Source: Fingal Development Plan 2017-2023.) (Red star indicates subject lands)

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:

<b>Map 14</b>	The road to the south of the lands is considered a 'Rural Route' within the GDA Cycle Network
<b>Map 15</b>	<p>The objective GIM 31 located to the West of the lands (Map Sheet 15) aims: <i>"Seek the establishment of a wetland corridor between the Tolka and Ward Rivers via the Pinkeen stream"</i></p> <p>The site is located within a 'Nature Development Area' (Map Sheet 15).</p>
<b>Map 16</b>	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.

#### 2.2.1.8 Noise Zones

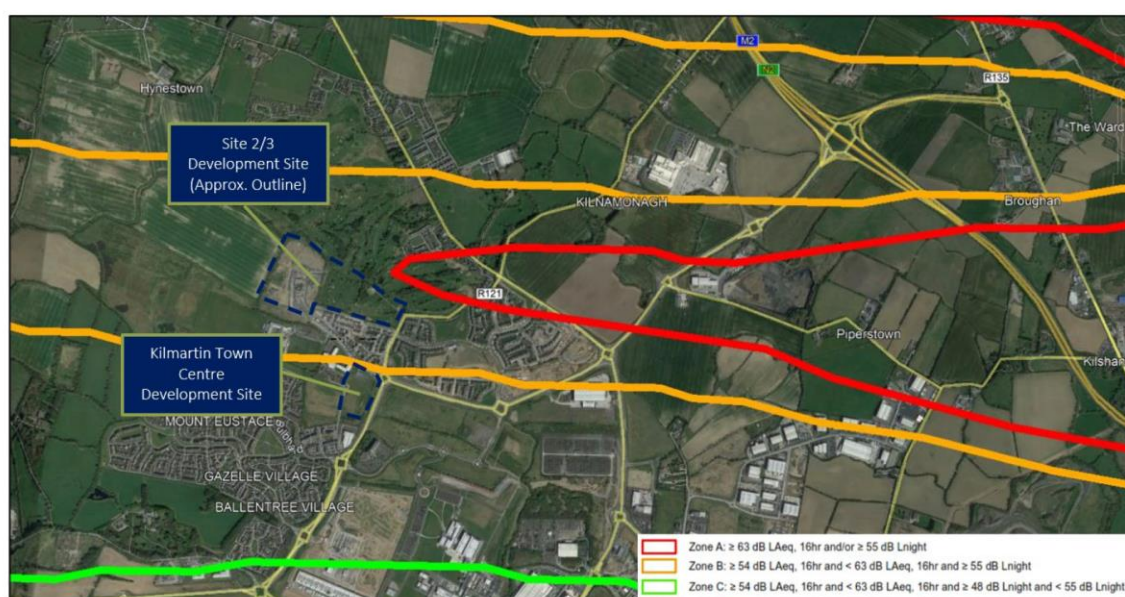
The subject site is within Noise Zone B and C. The Council will restrict inappropriate development in order to minimise the adverse impact of noise without placing unreasonable restrictions on development and to avoid future conflicts between the community and the operation of the airport. The layout 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.

#### 2.2.1.9 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)
		<b>Outer PSZ</b>
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
<b>No restrictions on development beyond Outer PSZ</b>		
<b>Notes</b>		
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.

#### 2.2.1.10 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, except where otherwise indicated for specific design reasons. 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.



<b>Objective DMS28</b>	<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>
<b>Objective DMS29</b>	<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>
<b>Objective DMS31</b>	<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.

<b>Objective DMS30</b>	<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 and in the EIAR for further details of same.

#### 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 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.

<b>Objective DMS33</b>	<i>Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents.</i>
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<b>Objective DMS34</b>	<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>
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### 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.

<b>Objective DMS35</b>	<i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i>
<b>Objective DMS36</b>	<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>
<b>Objective DMS37</b>	<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.

<b>Objective DMS56</b>	<i>Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.</i>
<b>Objective DMS57</b>	<i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this</i>

	<i>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>
<b>Objective DMS57A</b>	<i>Require a minimum 10% of a proposed development site area be designated for use as public open space.</i>

### 2.2.2 Kilmartin Local Area Plan (2013 Extended)

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 13<sup>th</sup> 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
- 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.

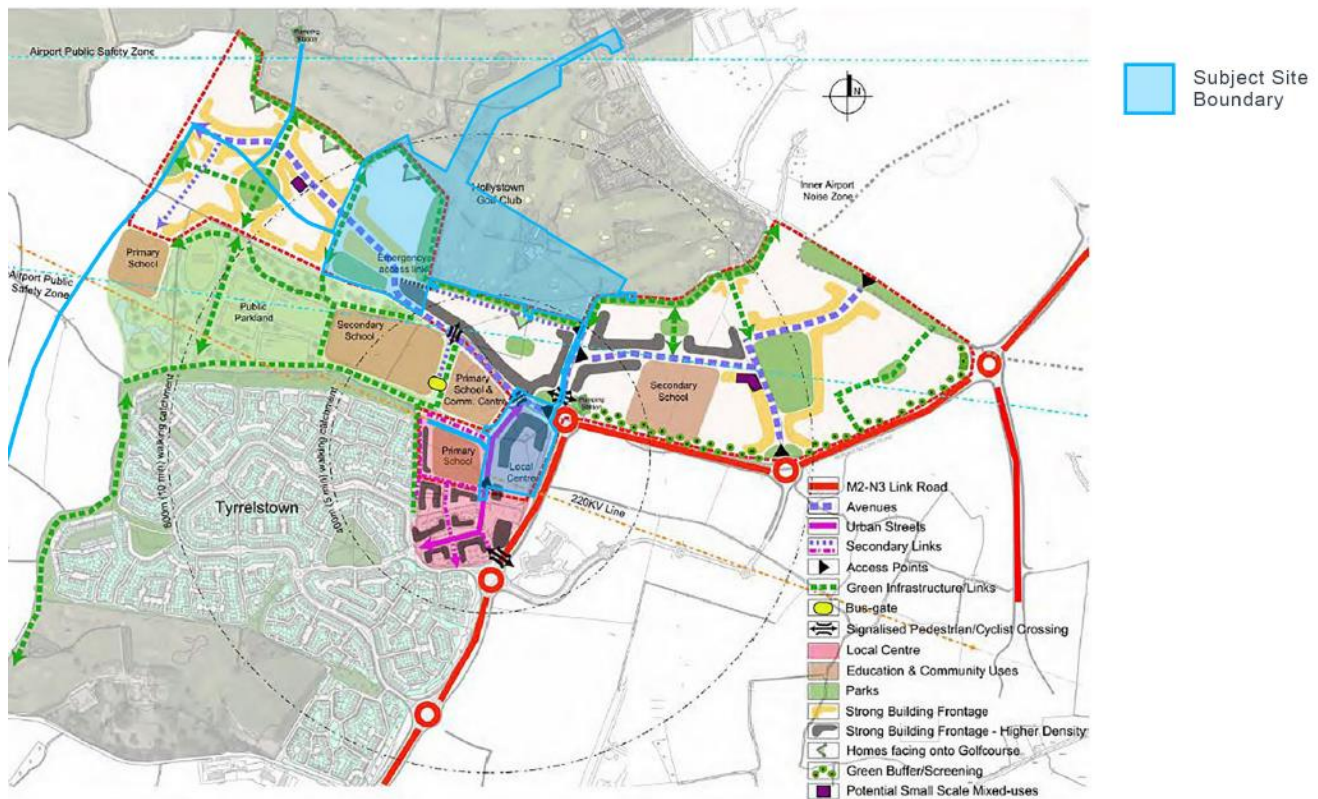


Figure 5.6: Extract from Kilmartin LAP Urban Structure Plan (Source: FCC, 2021).

#### 2.2.2.1 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 Tyrrilstown 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 Tyrrilstown, 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.

#### 2.2.2.2 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.

### 2.2.2.3 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.

## LANDS AT HOLLYSTOWN- KILMARTIN

### Statement of Consistency

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.*

#### 2.2.2.4 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.*

#### 2.2.2.5 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.

#### 2.2.2.6 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.

#### 2.2.2.7 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.

#### 2.2.2.8 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.

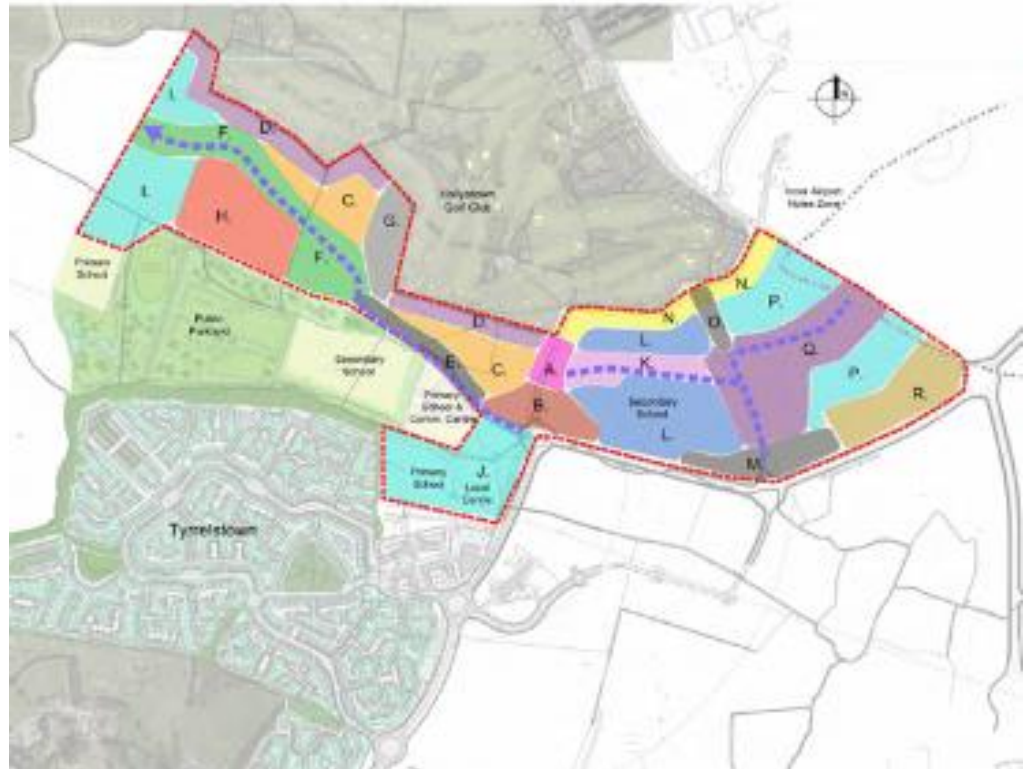


Figure 5.7: Extract from Kilmartin LAP County Council character areas (Source: FCC, 2021)

The following Character Area are of key 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/ parcours. 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.

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.

#### **2.2.2.9 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.

#### **2.2.2.10 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.

### 3 CONCLUSION

The Statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context.

At a national and regional level, this statement and accompanying submission documentation has demonstrated the consistency of the proposed development with National and Local Planning Guidelines and Policy as outlined in this report.

Consistency with the policies and provisions of the Fingal County Development Plan 2017-2023 and the Kilmartin LAP (where relevant) which are the key planning policy documents at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential development for these under-utilised sites. This Statement of Consistency, accompanying this SHD Application, demonstrates that the proposed development is consistent with the national, regional and local planning policy framework, except where identified in the Material Contravention Statement, and that the proposal will provide for an effective and efficient use of this highly accessible site.

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 should be permitted by An Bord Pleanála.