



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

STATEMENT OF CONSISTENCY & PLANNING REPORT BUILD-TO-RENT RESIDENTIAL & COMMERCIAL DEVELOPMENT

Former Chadwicks Site, Greenhills Road, Walkinstown, Dublin 12

An Bord Pleanála/ South Dublin County Council

MARCH 2022

SUBMITTED ON BEHALF OF:
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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Consistency & Planning Report on behalf of our clients, Steeplefield Limited, 32 Molesworth Street, Dublin 2. The report accompanies a planning application to An Bord Pleanála for a proposed Strategic Housing Development on the former Chadwicks Site, Greenhills Road, Walkinstown, Dublin 12. More specifically, the proposed development, as per the description contained within the statutory planning notices, provides for:

(i) The demolition of the former Chadwicks Builders Merchant development comprising 1 no. two storey office building and 9 no. storage/warehouse buildings ranging in height from 3 m – 9.9 m as follows: Building A (8,764 sq.m.), Building B (1,293 sq.m.), Building C (two-storey office building) (527 sq.m.), Building D (47 sq.m.), Building E (29 sq.m.), Building F (207 sq.m.), Building G (101 sq.m.), Building H (80 sq.m.), Building I (28 sq.m.), and Building J (44 sq.m.), in total comprising 11,120 sq.m.; (ii) the construction of a mixed-use Build-to-Rent residential and commercial development comprising 633 no. build-to-rent apartment units (292 no. one-beds, 280 no. two-beds and 61 no. three-beds), 1 no. childcare facility and 10 no. commercial units in 4 no. blocks (A-D) ranging in height from 5 to 12 storeys as follows: (a) Block A comprises 209 no. apartments (102 no. 1 bed-units, 106 no. 2 bed-units and 1 no. 3-bed units) measuring 5 - 10 storeys in height. (b) Block B comprises 121 no. apartments (53 no. 1 bed-units, 45 no. 2 bed-units and 23 no. 3 bed-units) measuring 8 - 10 storeys in height. (c) Block C comprises 130 no. apartments (38 no. 1-bed units, 71 no. 2-bed units and 21 no. 3-bed units) measuring 8 - 12 storeys in height. (d) Block D comprises 173 no. apartments (99 no. 1 bed-units, 58 no. 2 bed-units and 16 no. 3 bed-units) measuring 6 - 10 storeys in height. All apartments will be provided with private balconies/terraces; (iii) provision of indoor communal residential amenity/management facilities including a co-working space, communal meeting room/ work space, foyer, toilets at ground floor of Block A; gym, changing rooms, toilets, resident's lounge, studio, laundry room, communal meeting room/ work space, multi-function space with kitchen at ground floor of Block B; games room with kitchenette, media room, co-working space, resident's lounge, communal meeting room/ work space, reception area, management office with ancillary staff room and toilets, toilets, parcel room at ground floor of Block C; (iv) the construction of 1 no. childcare facility with dedicated outdoor play area located at ground floor of Block A; (v) the construction of 8 no. commercial units at ground floor level of Blocks A, B and D, and 2 no. commercial units at second floor level (fronting Greenhills Road) of Block C as follows: Block A has 3 no. units at ground floor comprising 79.46 sq.m., 90.23 sq.m., and 121.39 sq.m., Block B has 1 no. unit at ground floor comprising 127.03 sq.m., Block C has two units at second floor comprising 120.85 sq.m. and 125.45 sq.m., and Block D has 4 no. units at ground floor comprising 84.45 sq.m., 149.77 sq.m., 155.48 sq.m. and 275.59 sq.m.; (vi) the construction of 3 no. vehicular entrances; a primary entrance via vehicular ramp from the north (access from Greenhills Road) and 2 no. secondary entrances from the south for emergency access and services (access from existing road to the south of the site) with additional pedestrian accesses proposed along Greenhills Road; (vii) provision of 424 no. car parking spaces comprising 398 no. standard spaces, 21 no. mobility spaces and 5 no. car club spaces located at ground floor level car park located within Block A and accessed via the proposed entrance at Greenhills Road, a two-storey car park located within Blocks C and D also accessed from the proposed entrance at Greenhills Road and on-street parking at ground floor level adjacent to Blocks A and C. Provision of an additional 15 no. commercial/ unloading/ drop-off on-street parking spaces at ground floor level (providing for an overall total of 439 car parking spaces). Provision of 4 no. dedicated motorcycle spaces at ground floor level parking area within Blocks C and D; (viii) provision of 1363 no. bicycle parking spaces comprising 1035 no. residents' bicycle spaces, 5 no. accessible bicycle spaces and 7 no. cargo bicycle spaces in 9 no. bicycle storerooms in ground and first floor parking areas within Blocks A, C and D, and 316 no. visitors' bicycle spaces located externally at ground floor level throughout the development; (ix) provision of outdoor communal amenity space (5,020 sq.m.) comprising landscaped courtyards that include play areas, seating areas, grass areas, planting, and scented gardens located on podiums at first and second floor levels;

provision of a communal amenity roof garden in Block C with seating area and planting (176 sq.m.); and inclusion of centrally located public open space (3,380 sq.m.) adjacent to Blocks B and C comprising grassed areas, planting, seating areas, play areas, water feature, flexible use space; and incidental open space/public realm; (x) development also includes landscaping and infrastructural works, foul and surface water drainage, bin storage, ESB substations, plant rooms, boundary treatments, internal roads, cycle paths and footpaths and all associated site works to facilitate the development. This application is accompanied by an Environmental Impact Assessment Report (EIAR).

The purpose of this report is to provide background information on the site, a description of the proposed development, the planning rationale and justification for the proposed development and the required information set out in the Strategic Housing Development Application Form. This report has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017.

The subject application has been prepared having regard to the feedback received from An Bord Pleanála and South Dublin County Council during pre-planning consultations, the South Dublin County Development Plan 2016-2022; the Draft South Dublin County Development Plan 2022-2028; and the national and regional planning policies.

This report should be read in conjunction with the enclosed documentation prepared by the following design team members:

1. Statement of Response to An Bord Pleanála Pre-Application Consultation Opinion - Hughes Planning & Development Consultants;
2. Material Contravention Statement - Hughes Planning & Development Consultants;
3. Build to Rent Operational Management Plan - Hughes Planning & Development Consultants;
4. Architectural drawings and documentation - C+W O'Brien Architects;
5. Architectural/Urban Design Statement - C+W O'Brien Architects;
6. Housing Quality Assessment - C+W O'Brien Architects;
7. Building Lifecycle Report - Homan O'Brien;
8. Engineering drawings and documentation - Lohan and Donnelly Consulting Engineers;
9. Flood Risk Assessment - Lohan and Donnelly Consulting Engineers;
10. Engineering Services Report (Including Irish Water COF) - Lohan and Donnelly Consulting Engineers;
11. DMURS Compliance Statement - Lohan and Donnelly Consulting Engineers;
12. Traffic and Transport Assessment Report - Martin Rogers Consulting Ltd;
13. Parking and Mobility Management Plan - Martin Rogers Consulting Ltd;
14. Stage 1 Road Safety Audit - Bruton Consulting Engineers;
15. Outline Construction Environmental Management Plan - AWN Consulting Ltd;
16. Outline Construction and Demolition Waste Management Plan - AWN Consulting Ltd;
17. Operational Waste Management Plan - AWN Consulting Ltd;
18. Landscape Architectural drawings and documentation - Parkhood Landscape Architect;
19. Sunlight, Daylight & Shadow Analysis Report - 3D Design Bureau;
20. CGIS and Photomontages - 3D Design Bureau;
21. Screening Report for Appropriate Assessment - Enviroguide Consulting;
22. Bat Survey Report - Ash Ecology;
23. Public Lighting Report and Drawings - Homan O'Brien;

24. Site Utility Services Report - Homan O'Brien;
25. Sustainability Report - Homan O'Brien;
26. Environmental Impact Assessment Report - various consultants;
27. Physical Model Scale 1:1000 - Presentation Models; and
28. Physical Model Scale 1:500 - Crowley Modelmakers.

2.0 Site Location and Description

The subject site comprises a total area of 2.79 hectares, involves the Former Chadwicks builder's yard which is located south of Greenhills Road, Walkinstown, Dublin 12. The subject site forms part of the Greenhill Industrial Estate. There are existing low-rise disused industrial units, comprising an area of 11,120sq.m., featuring on the subject site which are proposed for demolition as part of the subject proposal. The site is currently accessed off a road within the estate, with 3 no. vehicular accesses along the site's southern boundary. The site includes a level difference between the Greenhills Road interface and the subject site's southern boundary of approximately 8m. This will be discussed in more detail later in this report.

The site is located within an area comprising industrial and warehousing land use immediately surrounding the site on all sides. The industrial land immediately surrounding the site to the southeast and west is known as the Greenhill Industrial Estate. The industrial land immediately north of the subject site forms part of the Ballymount Industrial Estate.

As illustrated in Figure 7.0, a Quality Bus Corridor is also proposed to run along Greenhills Road, north of the site, as part of Bus Connects. The Greenhills Road Quality Bus Corridor forms part of the QBC Network linking Tallaght town centre to the city centre and it will also join the South Clondalkin QBC at the Walkinstown Road/Long Mile Road junction.

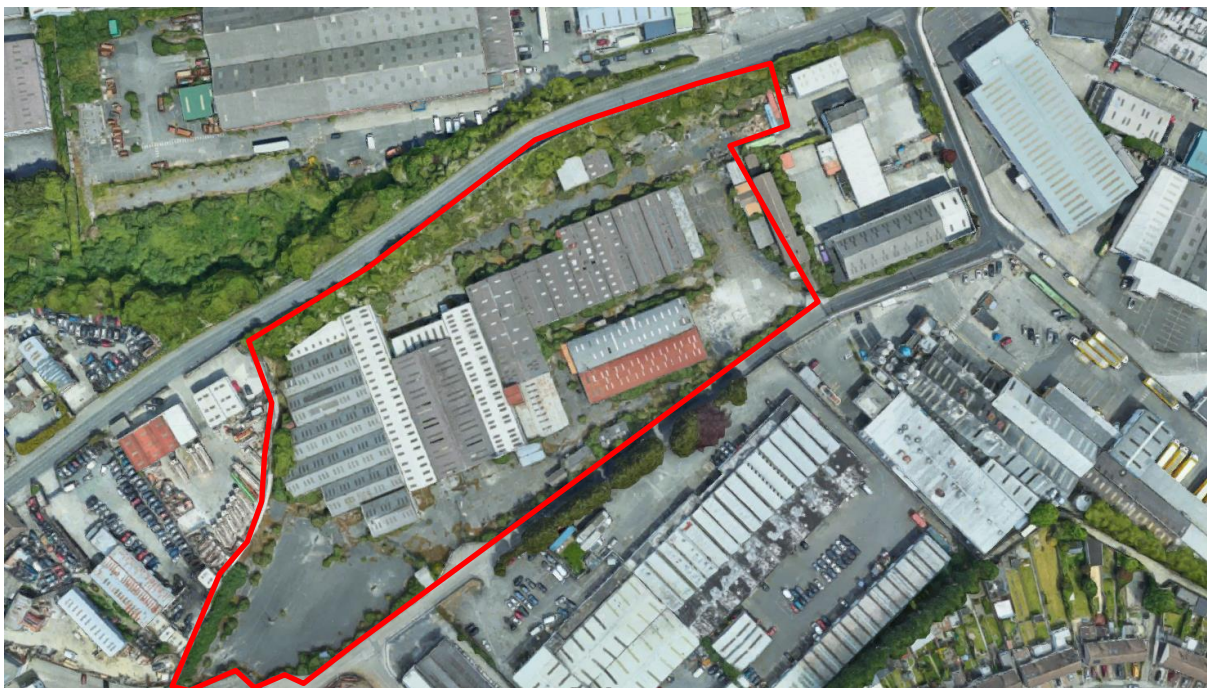


Figure 1.0 Aerial image of subject site

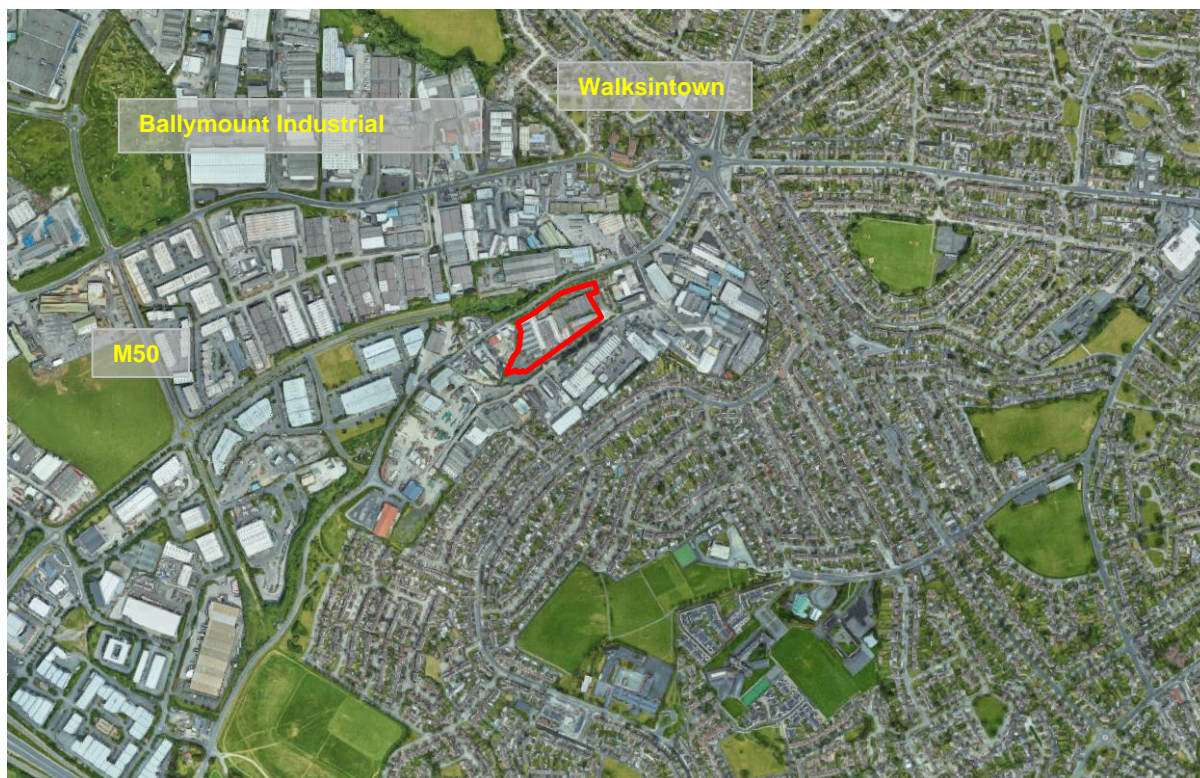


Figure 2.0 Aerial image showing the application site (outlined in red) in the context of the wider area land uses



Figure 3.0 Image of the subject site as viewed from Greenhills Road looking south-west



Figure 4.0 Image of the subject site as viewed from Greenhills Road looking south-east



Figure 5.0 Image of the subject site as viewed from the estate road abutting the site's southern boundary looking north-west



Figure 6.0 Image of the subject site as viewed from the estate road abutting the site's southern site boundary looking north-east

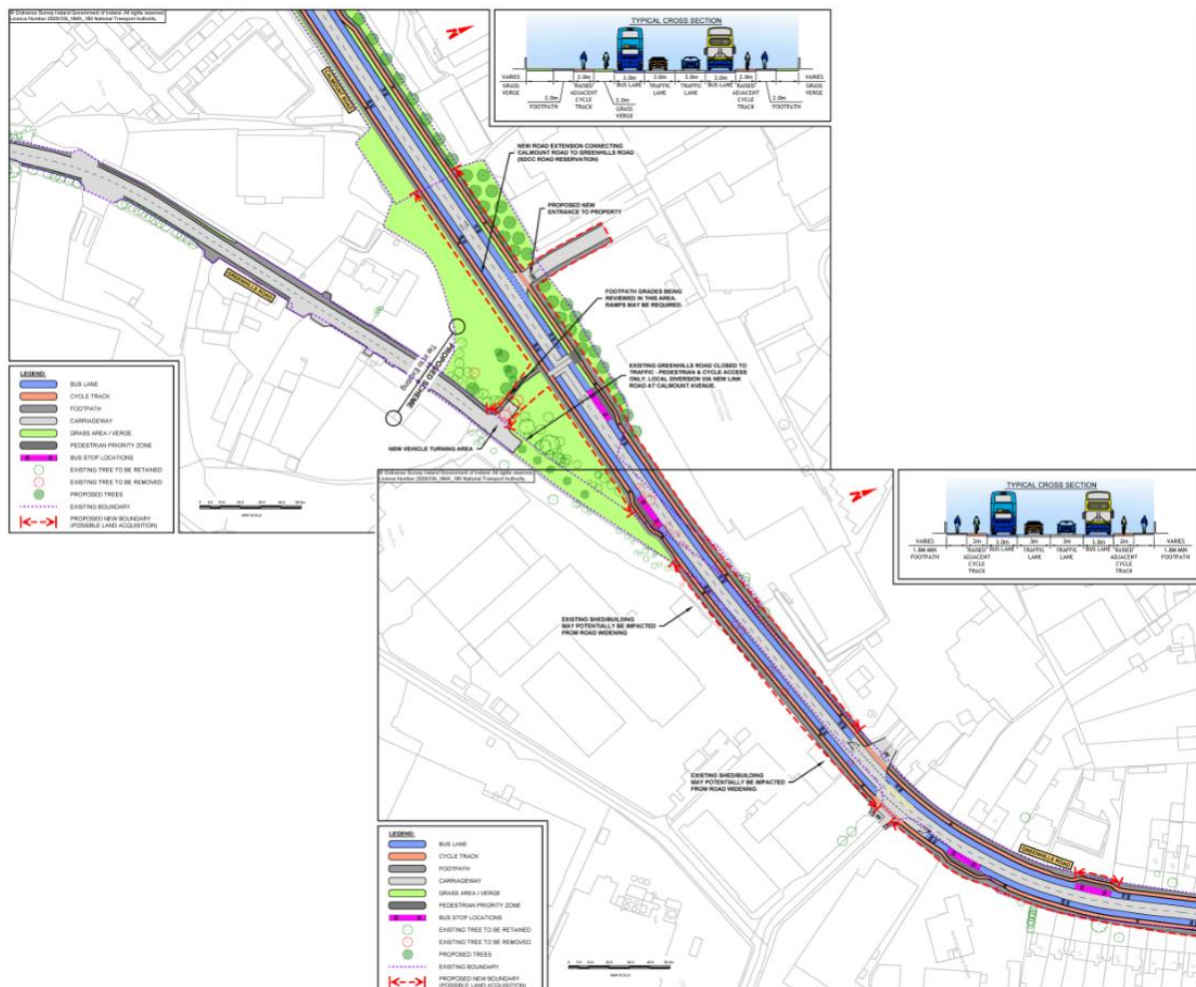


Figure 7.0 Drawing illustrating the proposed Greenhills Road Quality Bus Corridor which will run along the site's northern boundary

Tallaght Town Centre is situated 3.6km south of the subject site. Tallaght's Town Centre is characterised by high rise, high-density mixed-use development. The mix of uses is predominantly residential over ground floor retail/commercial use. Crumlin (2.2km), Terenure (3.3km) and Kimmage (2.8km) are also in close proximity to the site. Crumlin Children's Hospital is situated 28-minute walk to the northwest of the subject site. Tallaght Institute of Technology is situated 2.9km south of the subject site.

The Greenhills Road bus stop is 150m away from the application site and offers an immediate high quality and high frequency public transport services with direct links to Jobstown, Clare Hall, Dublin City and the Dublin Docklands, Citywest Campus and Tallaght. It should also be noted that the LUAS red line stop is situated just a 20-minute walk (1.3km) from the site.

3.0 Pre-planning Consultation

3.1 Consultation with South Dublin County Council

We note that a Section 247 Consultation meeting has taken place with the Planning Authority in relation to this application.

Formal Section 247 Meeting - SHD1SPP002/21

Date: 9th March 2021

Attendees: South Dublin County Council Team:
Eoin Burke (A/Senior Planner),
Tracy McGibbon (A/Senior Executive Planner),
Donal Farrelly (Executive Planner)
Roads Dept- Aws Taki (Assistant Engineer)
Water & Drainage- Brian Harkin (Senior Executive Engineer) & Ronan Toft (Assistant Engineer)
Parks & Landscape- Oisin Egan (Executive Parks Superintendent)
Property Economics- Jason Frehill (Senior Planner) & Deirdre Kirwan (Executive Planner)

Project Team:

Simon English (Applicant Representative),
Gordon Poyntz (Lohan & Donnelly),
Edvinas Valadka (Lohan & Donnelly),
Andrew Bunbury (Park Hood Landscape Architects),
Martin Rogers (Lohan & Donnelly),
William Power (C+W O' Brien Architects),
Andrew Murphy (C+W O' Brien Architects),
Kevin Hughes (Hughes Planning and Development Consultants),
Margaret Commane (Hughes Planning and Development Consultants),
Muireann Coughlan (Hughes Planning and Development Consultants).

C+W O' Brien Architects and Hughes Planning and Development Consultants presented the proposed development, including the site context, zoning and the planning policy context for the Site. The pre-planning meeting revolved around a pre-planning pack circulated prior to the meeting which proposed the construction of a build-to-rent, residential development ranging in height from 5 to 19 storeys including 702 no. apartments, creche, commercial spaces, café/restaurant and internal communal amenity space.



Figure 8.0 3D Sketch of Pre-Planning Scheme submitted to South Dublin County Council



Figure 9.0 Height Strategy of the Pre-Planning Scheme submitted to South Dublin County Council

The following is a summary of the meeting:

Possible Prematurity

- Mr Jason Frehill advised that the site is currently included as part of a large regeneration project. The regeneration plans (SLO), which will form the largest in Europe, will result in a new masterplan for the area. They are being created in conjunction with Dublin City Council.
- There will be 3 no. Land Use areas included in the masterplan; 1. Residentially led, 2. Commercially led and 3. Areas for organic development.
- Given the above, SDCC do not welcome applications at this time. The masterplan is due to be completed by the end of 2021 with a preferred scenario due to be published in June/July 2021. (We note that this has not occurred)
- The Council welcomed the opportunity to discuss the relationship between the Site and the draft masterplan in ongoing conversations.
- Mr Frehil advised that this is a major Site in a great location and he recommended working together and supporting each other in order to bring the Site forward for development. He was unable to recommend which area, of the 3 no. Land Use areas, that the Site is located within.

Layout

- Mr Eoin Burke ideally would like development located up to the northern boundary of the site but did understand that the presence of Irish Water's infrastructure and a wayleave resulted in the proposed scenario.
- There were some concerns regarding the internal layout, especially the 'S'-shaped block.
- With regards to the southern boundary, a portion of the site will likely need to be contributed for the expansion of the existing road and footpath.

Height

- Mr Burke highlighted that the proposed height would be contrary to the Development Plan. Therefore, according to section 28 guidelines (3.2) the height will need to be justified at the next pre-planning meeting with the Board.
- The Council acknowledged that the site is located in a regeneration area and the surrounding sites will likely experience a high level of redevelopment in the near future. However, they advised that the applicant group will also need to view the Site as if it was to be developed in isolation e.g. review connections to Walkinstown, what footpath improvements are necessary, discuss these with SDCC etc.

Transport

- The Council highlighted the need for traffic and transport reports moving forward.
- Mr Martin Rogers, on behalf of the applicant, advised that much of the relevant data has already been gathered. He advised that both neighbouring junctions: Walkinstown and Greenhills/Ballymount Road are currently close to capacity. However, initial analysis of the proposed development result in a quite low traffic impact on these junctions. These impacts measure 2% increase at Walkinstown Roundabout and 4% increase at Greenhills Road/Ballymount Road Upper, which are below the maximum 5% highlighted in relevant guidance.
- Mr Rogers highlighted how the Site is very well connected with the presence of very regular bus routes; 77a and 27. The Site is also in close proximity to Walkinstown roundabout and its connections.

Drainage

- Mr Ronan Toft highlighted the need for a Flood Risk Assessment moving forward.

Open Space

- The Council advised a preference for one large area of open space rather than the divided areas that form part of the current proposals.

3.2 Consultation with An Bord Pleanála

Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted, and a pre-planning consultation meeting was facilitated on 29th April 2021.

An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 10th May 2021, which identified 3 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 3 no. items were as follows:

1. City Edge Masterplan

Further consideration / clarification is required of how the proposed development responds to the preferred scenarios identified for the City Edge Project. Further consideration of this matter may require an amendment to the documents and/or design proposals submitted.

2. Density and Building Height

Further consideration is required of how the proposed development density and building heights up to 19 storeys align with National Planning Policy principles, including those described in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; and Urban Development and Building Heights Guidelines for Planning Authorities. Clarification is specifically required in relation to how the character of the site location and its public transport accessibility meet the criteria set out in those guidelines, both presently, and in the future context, following alterations to the frequency of bus

routes serving the site. Further consideration of this matter may require an amendment to the documents and design proposals submitted.

3. Design Strategy

The prospective applicant should provide further justification and/or detail in relation to the design strategy. In particular, the prospective applicant should provide further justification and/or detail in relation to the following:

- i. The visual impact of the development upon the surrounding area;*
- ii. The elevational treatment of blocks;*
- iii. The mass of development form;*
- iv. The treatment of the frontage to Greenhills Road in both its current and anticipated future form;*
and
- v. Connectivity through the site.*

Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

- 1. Consideration is required of potential impacts upon future residential populations of the site, resulting from the existing uses. Any mitigation should be clearly described alongside any measures to preserve mitigation features.*
- 2. Consideration is required of any matters that have potential to be material contraventions of the Development Plan, with submission of a statement regarding the same if required.*
- 3. Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality / usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.*
- 4. A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required. Consideration of security of access to communal amenity space is also required.*
- 5. Cross sections of the development should be submitted, clearly detailing the change in levels from the site to surrounding areas and how this will be addressed in both the existing and future conditions.*
- 6. The relationship of the proposed development with the development potential of surrounding lands as envisaged as part of the City Edge Project should be described.*
- 7. A plan annotating separation distances between all windows and balconies / terrace areas, to surrounding areas.*
- 8. A Daylight, Sunlight and Overshadowing Assessment is required to demonstrate how the proposed development responds to recommendations in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (the BRE guidelines). The methodology of the BRE guidelines should be followed and clearly stated within the submitted assessment. Analysis of all proposed units on each floor should be provided until it can be demonstrated that all units on a floor meet recommended targets, at which point it can be logically assumed units above will also pass (where a stacked arrangement to room use is proposed). APSH analysis of both the proposed accommodation and existing properties should be provided. Overshadowing analysis of all exterior amenity areas both within the development and in surrounding areas should also be provided. Consideration should include potential impact on future development sites.*
- 9. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.*

10. *Details of waste storage and collection.*
11. *Additional details and/or revised proposals in relation to comments from Transportation Planning at the Planning Authority.*
12. *Additional details and/or revised proposals in relation to comments from the Water Services / Drainage Division at the Planning Authority.*
13. *Additional details and/or revised proposals in relation to comments from the Parks & Landscape Services / Public Realm Department at the Planning Authority.*
14. *A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. The Department of Culture, Heritage and the Gaeltacht
2. Irish Water
3. Transport Infrastructure Ireland
4. National Transport Authority
5. South Dublin Childcare Committee
6. Dublin City Council Planning Department

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the applicable cover letters are enclosed with the application.

3.3 Consultation with City Edge Team

In September 2021, a large-scale regeneration project was launched by Dublin City Council and South Dublin County Council. The City Edge Project encompasses 700 ha of lands in west Dublin including Ballymount, Naas Road and Park West. The area is well served by public transport and is currently occupied by 1,500 businesses providing 25,000 jobs. The area is also home to 5,000 residents. The City Edge project seeks to develop a new urban area that could accommodate up to 40,000 homes and 75,000 jobs.

Due to the subject site's location within the City Edge area, the design team has engaged the City Edge Team in pre-planning consultation.

29th October 2021

Attendees

SDCC/ City Edge - Mick Mulhern (MM)(SDCC), James Phelan (JP)(SDCC), Tracy McGibbon (TMcG)(SDCC), Barry Coughlan (BC)(SDCC), Andrew Griffin (AG)(Urban Agency), Rory McGuire (RMcG)(Urban Agency)

Project Team - Simon English (SE)(Applicant Representative), William Power (WP)(C+WO'B Architects), Andrew Murphy (AM)(C+WO'B Architects), Margaret Commane (MC)(HPDC), Kevin Hughes (KH)(HPDC), Andrew Annett (AA)(PH Landscape Architects), Edvina Svaladka (ES)(L&D Consulting Engineers), Martin Rodgers (MR)

- MC introduced the applicant and design team members in attendance. SDCC/City Edge Team introduced themselves individually.
- MC went on to briefly discuss the background to the application, where the design team find themselves in the SHD process and how regard was had to the broad principles of the City Edge Project in advance of the consultation material being published.
- SDCC provided some initial comments – JP advised that they were eager to see how the concerns they had raised in their report to ABP on the SHD pre-planning application have been addressed. MM also stated that they won't accept a 'bulldozer' approach, collaboration is needed. SDCC will not be in a position to support our application if we don't take on board the concerns raised in advancing our application.

- WP and AM presented a booklet they had prepared for the meeting (a copy of which is provided under a separate cover) illustrating how the proposal ties in with the City Edge Plan and noted that we are eager to respond to the concerns raised but certain features of the site restrict our ability to do so.
- Following the presentation, MM thanked the design team for the detailed analysis/presentation and went on to raise the below 5 no. concerns:
 1. Land uses proposed. The City Edge area is an important area for economy and business. They have concerns about the lack of meaningful workspaces/large scale commercial uses in the scheme. Creches/coffee shops are not sufficient to satisfy this aspect of the City Edge Plan. We need to think more about where commercial uses can be accommodated on our site and how they will be serviced. When referring to work spaces they are not looking for offices but more so light industrial units.
 2. Consistency with BusConnects plans for Calmont Road (the design team clarified that the proposal is based on most recent BusConnects drawings for this area).
 3. Proposed street edge – a stronger edge is needed to Greenhills Road outside of where a setback is needed in response to the wayleave.
 4. Position of the revised public open space area – the proposed open space area is enclosed to the south by a very tall building. The revision may not in fact be an improvement from the proposal tabled at the tripartite meeting given the potential daylight issue.
 5. Interface with the southern boundary. It is a hard interface to deal with. Work spaces should be considered along this interface.
- MM advised they are open to height being introduced on the site but only if the above issues are addressed.
- TMcG – the site is at the edge of the Walkinstown node so we need to be clever re how the design directs people towards this node.
- AG – appreciates we don't know what's going on behind the scenes. He tabled a very high level drawing showing an indicative layout for the subject site. The key aspects of this draft layout were as follows: - a revised block layout including buildings immediately flanking Greenhills Road, redirection of IW wayleave in the north-eastern corner and employment uses (with generous floor to ceiling height) along the southern boundary.
- MM suggested that the IW pipe could be moved as part of the BusConnects Project. This infrastructure issue needs to be bottomed out before they can decide if our proposal for this corner is appropriate.
- WP provided some background info on the IW pipe – IW not looking at moving it, it is prohibitively expensive for the developer to do it as part of the development and BusConnects highly unlikely to do so given cost and complexity. WP also explained that the project is unviable if industry/commercial land uses need to be incorporated in to the scheme.
- MM requested that the design team prepare and submit an explanatory note on the possibility of relocating the IW pipe. Similarly, a note is also needed on engagement with BusConnects and how the proposal is working with their proposals for this area. Further proposals should also be submitted to SDCC regarding work space provision, open space and permeability.
- TMcG – the Planning Team will be the team assessing the Stage 3 application we lodge with ABP. It is recommended that we look back on the feedback included in their report at Stage 2 when preparing our SHD application.

15th November 2021

Attendees

SDCC/ City Edge – James Phelan (JP)(SDCC), Tracy McGibbon (TMcG)(SDCC), Eoin Burke (EB)(SDCC), Siobhan Duff (SD)(SDCC)

Project Team - Simon English (SE)(Applicant Representative), William Power (WP)(C+WO'B Architects), Andrew Murphy (AM)(C+WO'B Architects), Margaret Commene (MC)(HPDC), Kevin Hughes (KH)(HPDC), Ciaran McIntyre (CMcI)(Applicant Representative)

- JP thanked Design Team for presentation and noted 3 issues previously discussed:
 1. Way leave

2. North west corner interaction with Greenhills Road
3. Boundary with industrial estate

Need to come back with date for pipe relocation – consult with Irish Water and Bus Connects and develop option for its relocation.

- TMcG asked if the building could be cantilevered over the pipe. Noted need to illustrate this part of the discussion with Irish Water in own note on pipe.
- SD raised an issue with the lack of industrial units.
- JP first application is lodged after the draft plan is issued. Need to start a story on this aspect of the plan. We do not want industry leaving Dublin. Need to include analysis justifying position on industrial units within development. Applicant should consider providing residential fronting Greenhills Road and light industry along southern boundary. Need to prepare employment analysis in area.
- KH confirmed that analysis would be included with application regarding employment. Noted that ground floor commercial activity will feature in proposed development.
- JP requested where site levels for Calmont Road came from. Need to be clear if making assumptions about Bus Connects.
- TmcG notes clarity is needed regarding site section on page 8. Queried unit mix. Noted need to soften 6.6m barrier along north. Need to soften links from Greenhills Road to roundabout by providing pedestrian/cycling infrastructure.
- SD noted that universal access was important when designing retaining walls and Greenhills Road access.
- TMcG noted that flexible use buildings are needed along the southern boundary.
- JP said he was yet to be fully convinced on the project.

29th November 2021

A memo, outlining the rationale for retaining the Irish Water water main in situ along the northern boundary of the site, was sent to the City Edge Team on the 29th of November 2021. In summary, the memo noted the following:

- Irish Water confirmed they have no plans to move the pipe and would prefer if it remained where it is.
- Bus Connects confirmed that they will retain the pipe in its current location also.
- O'Byrne Jenkins Quantity Surveyors estimated the cost for removing the pipe would amount to €2.5 – 3 million

4.0 Planning History

4.1 Subject Site

A review of the South Dublin County Council planning register revealed no relevant planning applications for the subject site.

4.2 Surrounding Area

A review of the South Dublin County Council and An Bord Pleanála's planning registers found the following planning applications relating to large infill sites within the surrounding area and within the nearby Cookstown Industrial Estate, which are also zoned for regeneration.

CHM Premises, Ballymount Road Lower, Walkinstown, Dublin 12

Reg. Ref. ABP-309658-21	Permission granted by An Bord Pleanála on 23 rd June 2021 for Demolition of an existing warehouse/factory building and ancillary outbuildings/structures and the construction of a residential development of 171 apartments with supporting tenant amenity facilities (gym, lounges and meeting room), café, creche, landscaping, public realm improvements, and all ancillary site development works. The proposed development will consist of 2 x studio apartments, 59 x
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1-bedroom apartments, 103 x 2-bedroom apartments and 7 x 3-bedroom apartments contained in two apartment blocks ranging in height from 1 to 8 storeys. The proposed development provides for outdoor amenity areas, landscaping, under-podium car parking, bicycle racks, bin stores, ancillary plant, and roof-mounted solar panels.

The approved development ranged in heights from 1 to 8 storeys across the subject site, in contravention of the South Dublin Development Plan 2016-2022. The Inspector's Report, dated 18th June 2021, notes that the county development plan does not provide for buildings more than 5 stories in height in the area in question. The Inspector noted, however, that the proposed 8 storeys were consistent with national policy:

The proposed development is consistent with objectives 33 and 35 of the NPF which encourage increased scale and densities in settlements.

The Inspector tested the scheme against SPPR3 of the Building Height Guidelines and concluded with the following statement:

I consider that the criteria above are appropriately incorporated into the development proposal and on this basis that SPPR3 of the Building Height Guidelines can be applied. I am satisfied that the proposal positively assists in securing National Planning Framework objectives to focus development into key urban centres, fulfilling targets related to brownfield, infill development and to deliver compact growth in our urban centres.



Figure 10.0 Site layout plan of development approved under Reg. Ref. ABP-309658-21



Figure 11.0 Elevation of development approved under Reg. Ref. ABP-309658-21



Figure 12.0 Photomontage of development approved under Reg. Ref. ABP-309658-21

Lands immediately east of the Assumption National School, Long Mile Road, Walkinstown, Dublin 12 (Dublin City Council)

ABP Ref. ABP-304686-19

Permission was granted by An Bord Pleanála on 18th September 2019 for a Strategic Housing Development at Lands immediately east of the Assumption National School, Long Mile Road, Walkinstown, Dublin 12. In summary, the development involved the construction of 153 no. residential units (comprising of 15 no. Duplex/Maisonettes and 138 no. apartments) and associated site works. Of particular note, the development will have 129 no. car parking spaces, 5 no. motorbike parking spaces 198 no. secure bike parking spaces, the majority of which will be at undercroft level, with 2 no. disabled car parking spaces and 4 no. car parking spaces at grade to the front of the development along with some visitor cycle parking spaces.



Figure 13.0 Ground floor plan approved under ABP Ref. ABP-304686-19.



Figure 14.0 Landscape plan, including proposals for first-floor courtyard, approved under ABP Ref. ABP-304686-19

Carragelea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12 (Dublin City Council)

Reg. Ref. 3940/17

Permission was granted by Dublin City Council for amendments to a previously permitted development of 306 units, which comprises of a development of 5 to 7 storeys in height. The description of development was as follows: amendments to previously permitted residential development, Reg. Ref. 4244/15 and Reg. Ref. 2438/17. The proposed amendments comprise of: (i) the provision of an additional floor on permitted Block AC (Reg. Ref. 2438/17) increasing the height of the block from 6 no. storeys with a 7 no. storey pop up corner element to 7 no. storeys on the north-west elevation (ii) the provision of 2 no. additional floors on Block D and L, increasing the height of the Blocks from 5 no. storeys to 7 no. storeys. (iii) the reconfiguration of permitted basement increasing the car parking provision from 316 no. to 346 no. car

parking spaces and 545 no. to 552 no. cycle parking spaces, (iv) Revised hard and soft landscaping masterplan, (v) provision of new balconies to serve each of the proposed 32 no. units; together with all necessary site development work to facilitate the proposed development. The proposed amendments will provide for 12 no. additional units in Block D (8 no. 2 bed, 4 no. 3 bed units), 12 no. additional units in Block L (10 no. 2 bed, 2 no. 3 bed units) and 8 no. additional units in Block AC (1 no. 1 bed, 6 no. 2 bed, 1 no. 3 bed units), increasing the total provision within the development from 306 to 338 no. units comprising of (55 no. 1 bed, 222 no. 2 bed, 61 no. 3 bed units).



Figure 15.0 Site layout plan as approved under Reg. Ref. 3940/17

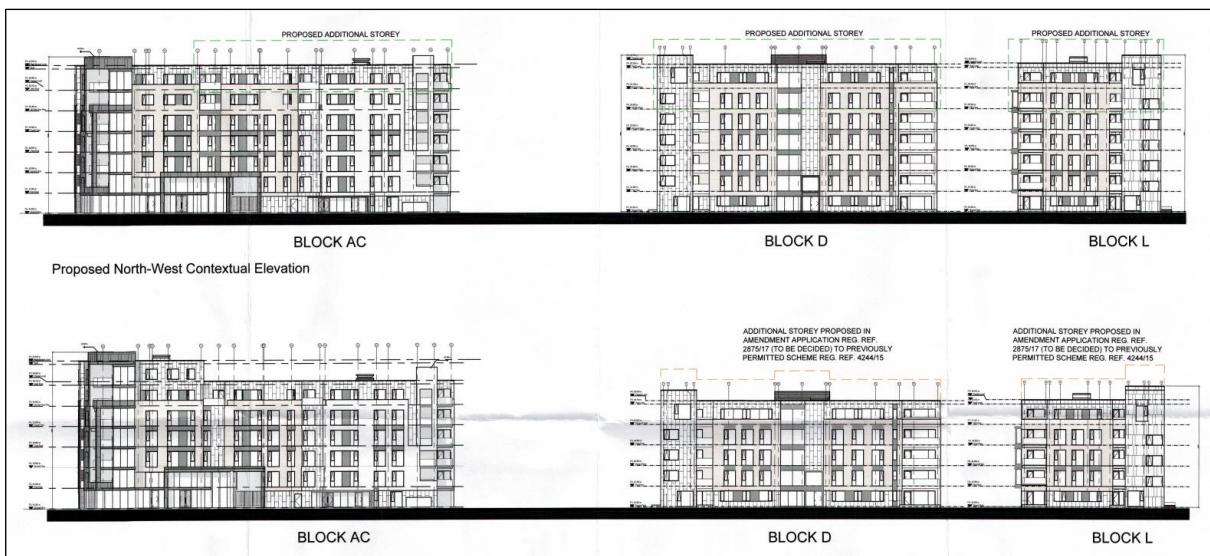


Figure 16.0 Elevations as approved under Reg. Ref. 3940/17

Lands at the Former Concorde Industrial Estate, Naas Road, Walkinstown, Dublin 12 (Dublin City Council)

ABP Ref. ABP- 304383-19 Permission was granted by An Bord Pleanála on 15th August 2019 for a mixed-use development comprising of a Build to Rent Residential Development and commercial units including the construction of 492 residential units (104 no. studios, 136 no. 1 bed units and 252 no. 2 bed units), ranging in height from 4 no. storeys (12 m) to 8 no. storeys (24.1 m) over basement level.

The proposed development with a density of c. 262 units per hectare was considered to be an acceptable level due to the site's zoning and proximity to public transport in the area. Due to the build-to-rent nature of the development, the unit mix and provision of private amenity spaces are offered flexibility due to SPPR 7 and SPPR 8 of the Design Guide for New Apartments. It is considered that this development sets a precedent for suitably designed residential developments in this area. In the Inspector's Report prepared for a review of the application, it is noted that the proposed development with its height and scale, was considered to be acceptable at this site:

'I am satisfied that the integration of the development as proposed and the scale of the apartment blocks is justifiable at this location.'

Further to this, we note the following commentary in the Report which details the positive contributions of the development to the area:

'I am satisfied that the proposed development will enhance the urban form at this location directly overlooking the Naas Road and will result in the removal of low quality and low-intensity commercial units and provide structures of strong architectural merit so as to create a better sense of place at this location. The redevelopment of the site for residential and commercial purposes will also greatly assist in the creation of a more lively and active streetscape along the Naas Road.'

The development with which this Statement of Material Contravention pertains to is submitted to make similar contributions to the Greenhills Road and wider Walkinstown area as the proposal includes a mixed-use development providing much-needed apartments to future occupants as well as commercial units on a site currently underutilised in a high-amenity area. We consider that the proposed development is similar to that as granted under ABP Ref. ABP- 304383-19 and request the Board review the application under similar merit.

It is considered that both proposals contribute to more sustainable and concentrated development within the existing built footprint of Dublin and so, therefore, presents itself as a better land use than which currently is in place as the subject site.



Figure 17.0 Front elevation of development granted under ABP Ref. ABP- 304383-19.



Figure 18.0 Site layout plan of development granted under ABP Ref. ABP- 304383-19.



Figure 19.0 CGI of development granted under ABP Ref. ABP- 304383-19.

The Cuckoo's Nest, Greenhills Road, Tallaght

Reg. Ref. SD19A/0287 Permission was granted by South Dublin County Council for development comprising the demolition of the rear and side extensions of the existing building but retaining the original front part of the existing building to accommodate a cafe (137sq.m) at ground floor level of the existing building & a 2-bed apartment overhead at first floor. The proposed development also provides for the construction of a 3 and 4 storey building to the side and rear of the existing building, accommodating 18 apartments. The proposed residential accommodation consists of 19 apartments in total, comprised of 12 1-bed apartments and 7 2-bed apartments.

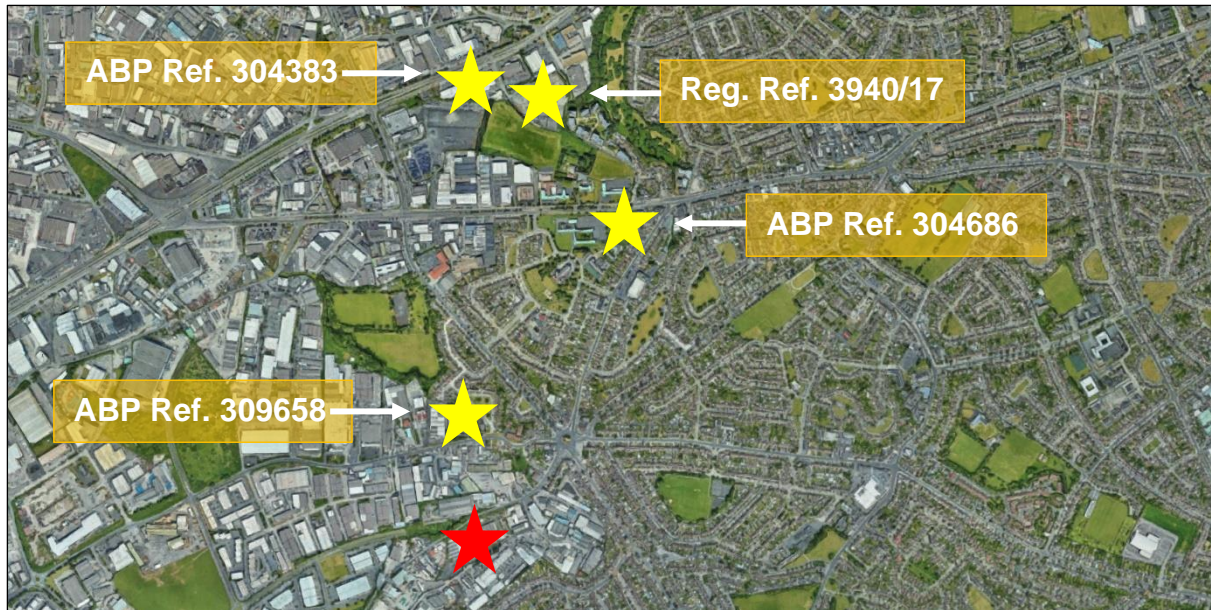


Figure 20.0 Locations of SHD applications (yellow stars) in relation to the subject site (red star) in Dublin 12.

4.3 Wider South County Dublin

Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24

ABP Ref. ABP-303306-18

Permission was granted by An Board Pleanála on 15th April 2019 for a Strategic Housing Development on lands at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (immediately east and south-east of the subject site). In summary, the proposed Strategic Housing Development involves demolition of all existing buildings and construction of a mixed use residential development (total GFA 55,180 sq.m.) comprising a new urban quarter and streets with 5 no. blocks to provide 438 no. apartment units (including live/work units) and associated amenity facilities, a 403 no. bedspace student accommodation scheme and associated amenity facilities, childcare facility (c.380 sq.m.), 6 no. retail / commercial units (c.632 sq.m. in total) and a security room (c.52 sq.m.). This will comprise phase I of the overall development of the c.7.2 ha. site and will be located on a net site area of 3.45 ha. (excluding proposed temporary car park at grade).



Figure 21.0 Site layout plan of development approved under An Bord Pleanála Case No. 303306-18 including the second phase of development which is to follow



Figure 22.0 Site layout plan approved under An Bord Pleanála Case No. 303306-18

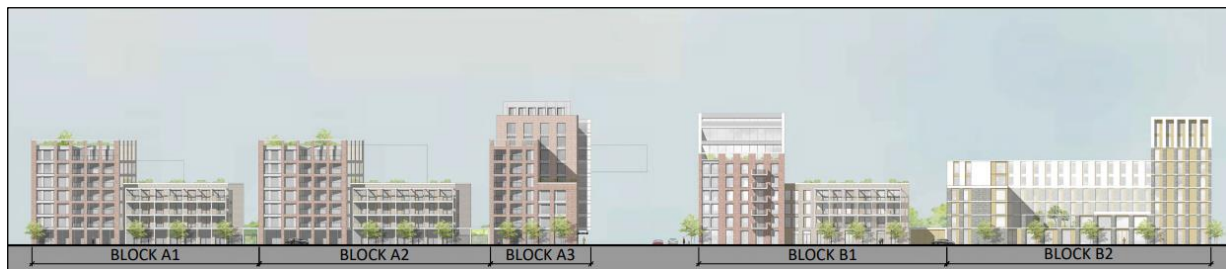


Figure 23.0 South contextual elevation of development proposed under An Bord Pleanála Case No. 303306

The development ranged from 4 to 10 storeys in height. In the Inspector's Report, dated April 2019, it is noted that the site is suitable for the construction of 10 storeys. The Inspector states:

'In relation to urban design, I consider that the site is wholly capable of establishing its own height. It addresses two public roads with suitable separation distances and in addition to the further phase of development, it effectively is a new urban quarter in the area given the size of the site. The higher elements of the proposed scheme are located at pivotal corners and junctions which create a presence for the development and way finding for the wider area. The design of the buildings which is discussed elsewhere provides that the height can be appropriately absorbed into the overall design and into the wider area. I consider therefore that in urban design terms the height strategy for the site is appropriate.'

The Inspector's Report notes that the development was in contravention of the Development Plan regarding the proposed height of the development. Further to this, the report notes that it is also in contravention of the 2006 Tallaght Town Centre Local Area Plan. However, it is noted that the Board is precluded from granting permission for development that is considered to be a material contravention, except in four circumstances. These circumstances, outlined in Section 37(2)(b), are as follows: where development is of strategic or national importance; conflicting objectives in the development plan; regional planning guidelines or guidelines under Section 28 etc. or the pattern of development permissions granted in the area since the adoption of the development plan. The Inspector's Report notes that the development is a Strategic Housing Development Application and is therefore of significant or national importance. It is noted:

'The current application has been lodged under the strategic housing legislation and the proposal is considered to be strategic. Government policy as expressed within Rebuilding Ireland – The Government's Action Plan on Housing and Homelessness and the National Planning Framework – Ireland 2040 fully support and reinforce the need for urban infill residential development such as that proposed on sites in close proximity to quality public transport routes and within existing urban areas. This site would meet these requirements.'

Based on the criteria set out in Section 37(2)(b), the Inspector made the following comment regarding increased height:

'Furthermore, as the applicant points out in their statement, National Policy 13 and 35 refer to building height and car parking being based on performance criteria and increasing density through an area or site-based regeneration and increased building height. Therefore, it is clear that a significant and sustained increase in housing output and apartment type development is not only necessary but is Government Policy in order to meet the need for residential units. Therefore, I consider that the proposal herein would meet the requirements of Section 37(2)(b)(i).'

Regarding the proposed unit mix of the development, the Report notes that a mix submitted of c. 11.5% three-bedroom units with the remaining 88.5% comprising of one and two-bedroom units. The Report states the following in relation to this:

'I would refer the Board to page 20 of the socio-economic assessment where it is stated that two-person families, of which there are 7,866 in the study area, is the largest cohort comprising 38% of the total within the study area with three-person families comprising 26% in total. Furthermore, the average household size in Ireland in 2016 was 2.75 persons.'

‘Notwithstanding the concerns expressed by both observers and the PA I consider that the unit mix and typology of unit proposed is acceptable’.

Similarly, the development proposed at the subject site includes 633 no. units comprising of 292 no. one-beds, 280 no. two beds and 61 no. three beds are an acceptable unit mix based on the availability of housing mix in the area and the existing population demographic both locally and nationally. It is therefore submitted that where the proposal may contravene the objectives of the Development Plan regarding developments requiring a mix of unit typologies, to be acceptable and assessed similarly to that of the development granted under ABP Ref. ABP-303306-18.

Site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24

ABP Ref. ABP-305763-19

Permission was granted by An Board Pleanála on 20th February 2020 for a Strategic Housing Development on a site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves demolition of the existing industrial buildings on site (4,800sq.m) and the construction of 2 no. blocks comprising 328 no. apartments (93 no. 1 bed, 222 no. 2 bed and 13 no. 3 bed), ancillary residential support facilities and commercial floorspace measuring 31,147sq.m gross floor space above a single basement level measuring 5,861sq.m. The development also consists of the provision of a landscaped courtyard; public plaza at the corner of Airton and Belgard Road; pedestrian access from Airton Road to the Technological University campus; 184 no. car parking spaces at basement level including 14 no. club car spaces, 10 no. disabled parking spaces and 4 no. crèche parking spaces; 727 no. basement and surface bicycle parking spaces; 4 no. motorbike parking spaces; bin storage; boundary treatments; green roofs; hard and soft landscaping; plant; lighting; Vodafone cabin sub-station; ESB sub-stations, switch rooms and generators; and all other associated site works above and below ground.

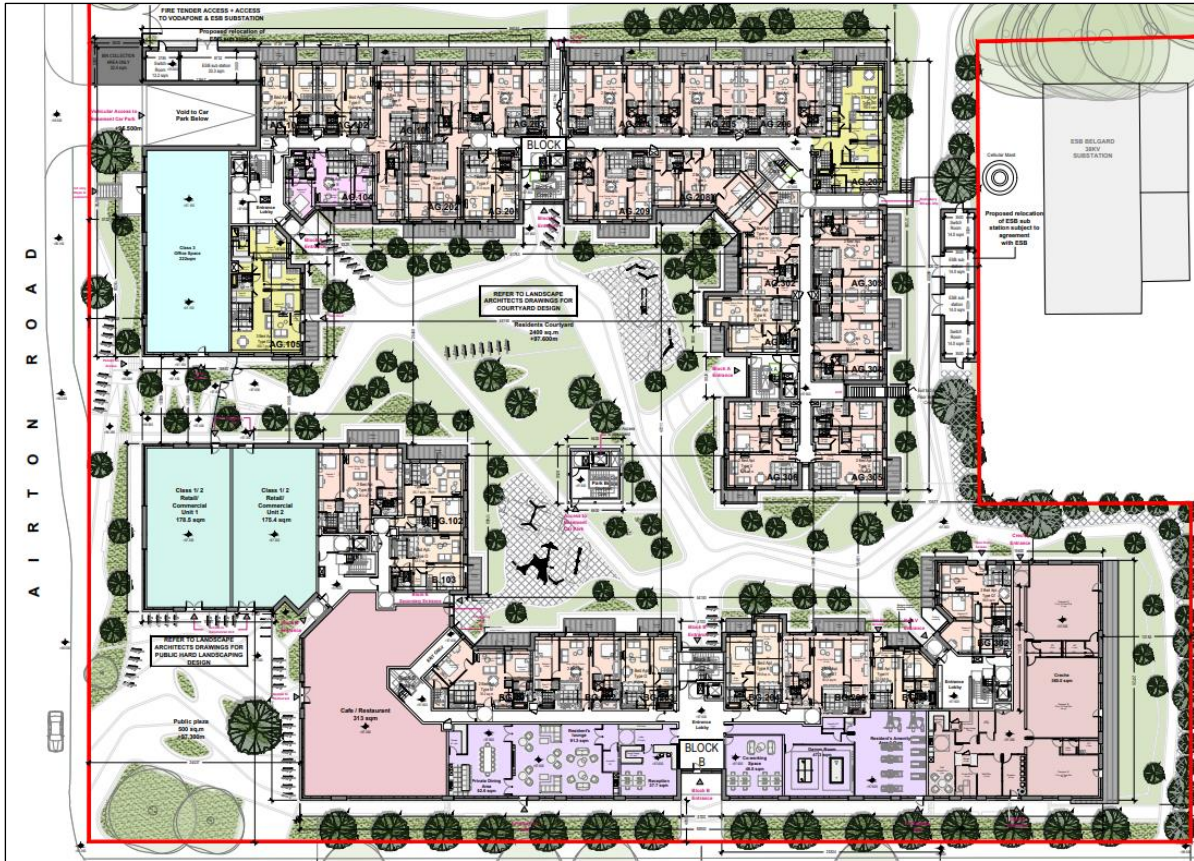


Figure 24.0 Ground floor layout plan approved under ABP Ref. ABP-305763-19

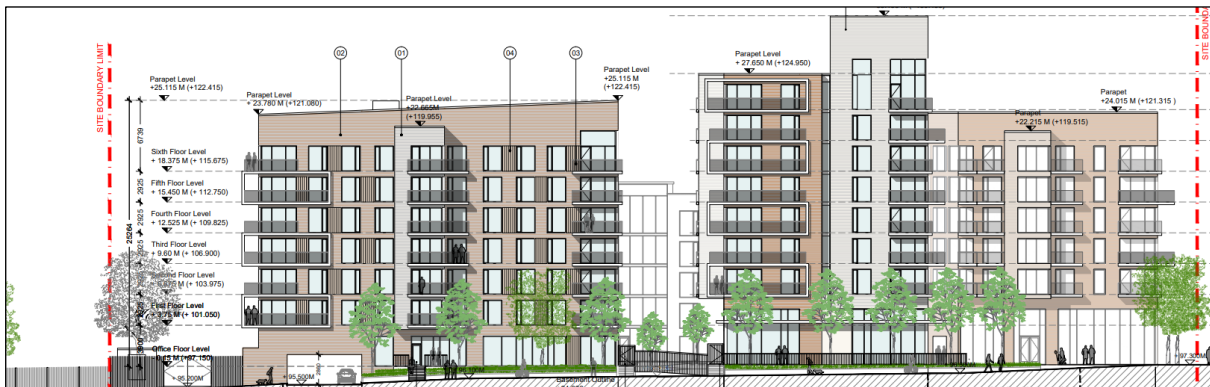


Figure 25.0 Northern elevation (fronting Airton Road) approved under ABP Ref. ABP-305763-19

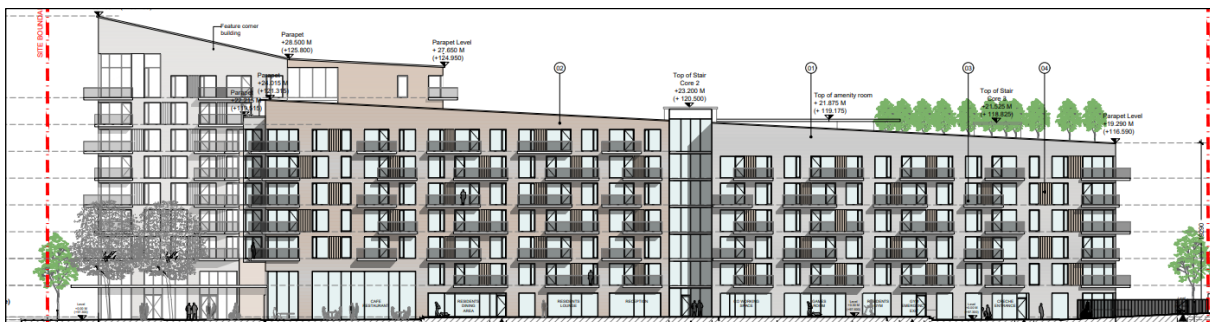


Figure 26.0 Western elevation (fronting Belgard Road) approved under ABP Ref. ABP-305763-19

This planning permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area. This development proposes building heights of 5-9 storeys which exceeds the 3-4 storey height earmarked for the site's eastern boundary, 4-6 storey height earmarked for the site's northern boundary and 6 to 7 storey height earmarked for the site's western boundary, as illustrated in the Overall Urban Structure (Broomhill) Diagram included in Figure 3.13 of the Tallaght Town Centre Local Area Plan 2020-2026.

Furthermore, the proposed development is submitted to contravene the South Dublin County Development Plan 2016-2022 with regard to building heights and density as it is noted that the Planning Authority states the development would constitute '*an overdevelopment of the site, with excessive height, plot ratio and site coverage*'. The proposal is principally 5-7 no. storeys with a 9 no. storey element although contravening the Development Plan was considered to be acceptable due to the surrounding pattern of development and grant of permission for other SHDs in the area of a similar scale. The Inspector's Report prepared for the development noted that although possibly contravening the Development Plan, development which includes increased heights are sometimes essential:

'My view is that, and as per the view of the reporting Inspector in relation to SHD application 303306-18, in order to achieve sustainable densities at locations proximate to town centres adjoining public transport corridors, I would consider that some heights in excess of 5 storeys are required.'

Following, this, the Report refers to Section 32 (2)(b) of the Planning and Development 2000 (as amended) whereby developments that contravene local development plans, regarding context and surrounding development, the Board has the authority to grant permission for such developments. In this regard, this was exercised and an order to grant permission for the development was made.

The proposal included a unit mix of 21.6% one bed, 9.6% two bed (3 no. person), 62.9% two bed (4 no. person) and 5.9% three-bed. Regarding the unit mix of the development, it is noted that the Council raised no objections.

This planning permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area.

Former Gallaher's cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24

ABP Ref. ABP-306705-20 Permission was granted by An Board Pleanála on 16th June 2020 for a Strategic Housing Development at the Former Gallaher's cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involved: demolition of existing factory/warehouse buildings on site (total floor area c.10,076.8 sq.m.); construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations; provision of residential amenity facilities, 3 no. retail units, creche, and services/bin store areas (total non-residential floor area c.1,839 sq.m); a total of 202 no. car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces; vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings; and all associated site development works and services provision.



Figure 27.0 Contextual Site Elevation (Greenhills Road) approved under ABP Ref. ABP-306705-20



Figure 28.0 Contextual Site Elevation (Airton Road) approved under ABP Ref. ABP-306705-20



Figure 29.0 Ground floor layout plan approved under ABP Ref. ABP-306705-20

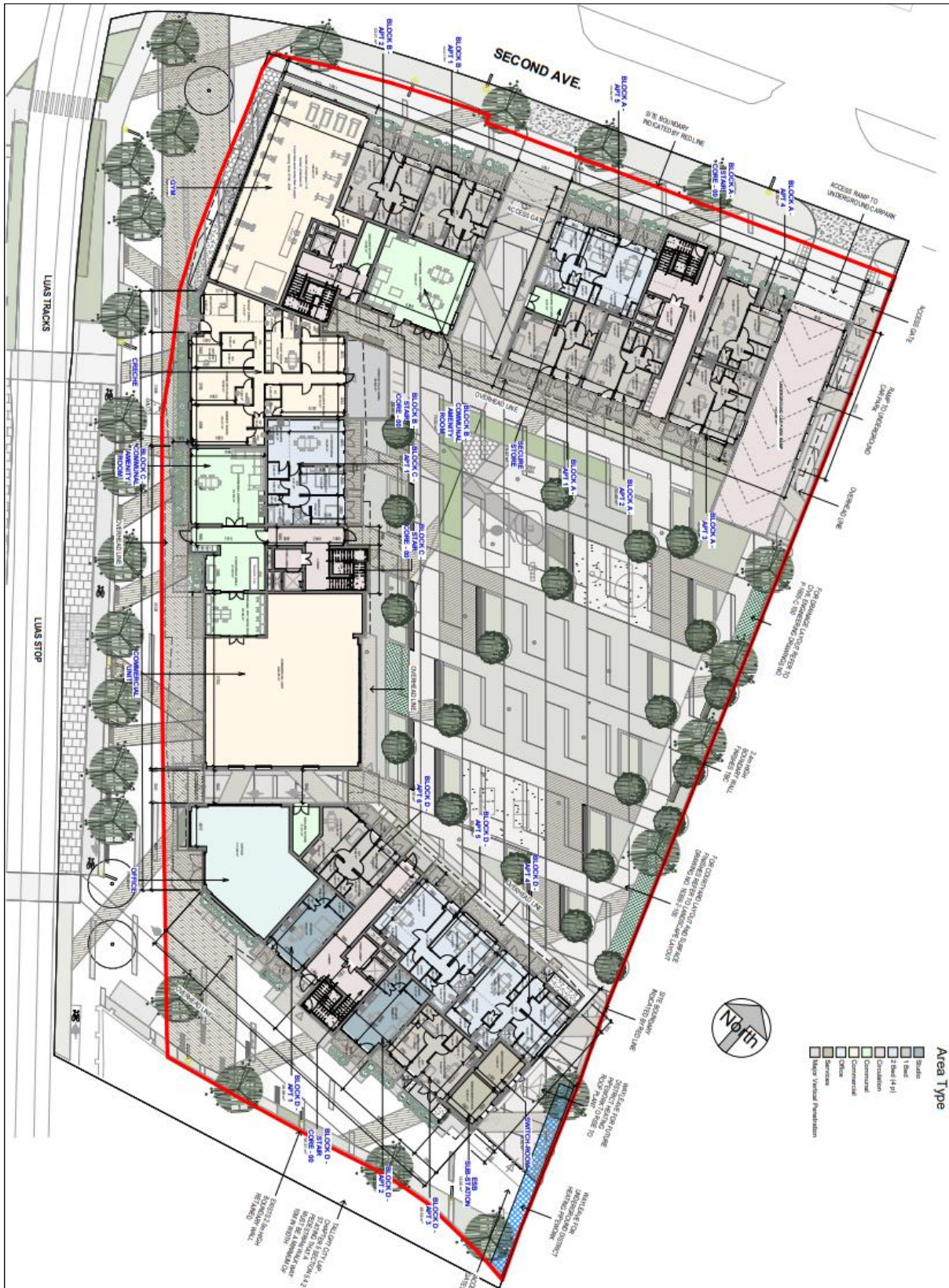


Figure 31.0 Ground floor plan of development approved under ABP Case No. 303803-19



Figure 32.0 Western elevation (fronting onto Cookstown Way) of development approved under ABP Case No. 303803-19



Figure 33.0 Northern elevation (fronting onto Second Avenue) of development approved under ABP Case No. 303803-19

This planning permission remains in force until July 2024 and sets a precedent for the construction of suitably designed residential developments in this area. This development proposes building heights of 6-9 storeys which exceeds the 6 to 7 storey height earmarked for the sites northern, southern and western boundaries, as illustrated in the as shown in the Overall Urban Structure (Cookstown) Diagram included in Figure 3.7 of the Tallaght Town Centre Local Area Plan 2020-2026.

Further to this, the development is considered the be in contravention of the Development Plan with regard to its surrounding context. The Inspector’s Report for the proposed development includes the following comments concerning the proposed height of the development:

‘The overall height is also considered to accord with the provisions of national policies in terms of achieving more compact urban form’.

We note that although in contravention of the Development Plan, the proposal is consistent with the national policy regarding building heights and so can therefore be considered an acceptably scaled development. Similarly to the development proposed with which this report pertains, we could consider the same as the proposed development which includes a total height of 10 no. storeys are consistent with national policy and constitute sustainable development, promoting compact urban form and efficient land use.

With regard to unit mix, the proposal comprises 23% studio, 24.5% one bed and 52.5% two bed. It is submitted that this mix is consistent with local and national demographics with regard to household size and is considered to be acceptable. Commentary provided in the Inspector’s Report regarding unit mix states the following:

‘The proposal by reason of unit mix and tenure will enhance the offering for future residents in the area’.

Similarly to the development proposed, we would request the Board assess the unit mix proposed at the subject site in a similar manner and deem the unit mix as being acceptable for the site based on location, provision of amenities and the nature of the development being build-to-rent.

We would contend that similar merits exist in relation to the subject proposal's exceedance of the recommended building heights.

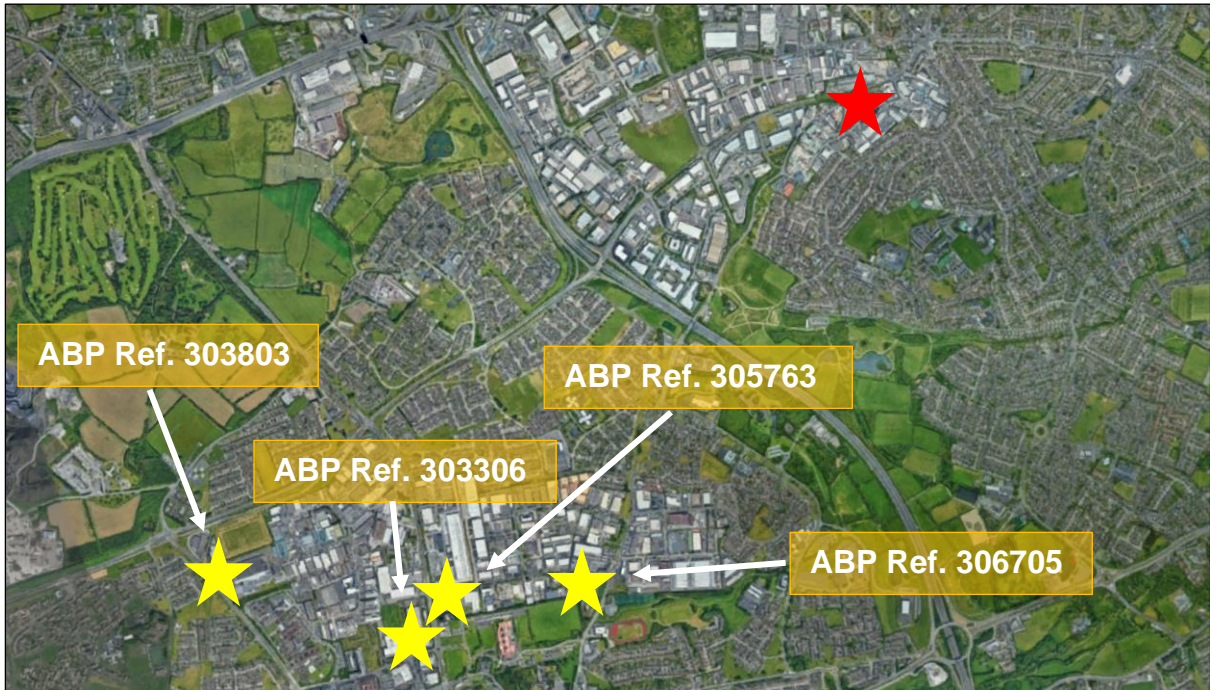


Figure 34.0 Locations of SHD applications (yellow stars) in relation to the subject site (red star).

5.0 Proposed Development

The proposed development comprises the demolition of several existing low-rise disused industrial units on site and the construction of a mixed-use residential Strategic Housing Development comprising 4 no. 5-12 storey blocks accommodating 633 no. Build-to-Rent apartments, a 360sq.m. childcare facility, 1330 sq.m. of commercial space, and 1,293 sq.m. of internal communal amenity space to serve residents of the development.

The 633 no. apartments proposed will be 'Build-to-Rent' and will comprise the following mix: 292 no. 1-bed apartments, 25 no. 2-bed (3 Person) apartments, 255 no. 2-bed (4 Person) apartments, and 61 no. 3-bed apartments. Residents of the development will also have access to 5,196 sq.m. of external communal amenity space as well as a centrally located public park located between Blocks B and C.

The primary vehicular access will be provided off Greenhills Road to the northeast, and secondary access for emergency vehicles and services will be provided off the road to the south of the subject site via newly created vehicular entrances. These entrances will also provide access to ground and 1st-floor car parking areas accommodating 398 no. car parking spaces, 21 no. mobility car parking spaces, 5 no. go-car spaces, and 15 no. commercial/unloading spaces. Resulting in a total of 439 no. car parking spaces. Bicycle parking for 1,035 no. bicycles will be provided in secure parking facilities located within the ground and 1st-floor car parking areas for residents with an additional 316 no. bicycle parking spaces provided for visitors at ground level. The proposed parking areas will be located within Block A and the 2 storey parking area will be located within Blocks C and D.

The proposed scheme has a housing density of 226.9 dwellings per hectare, a plot ratio of 2.61 and site coverage of 52% including undercroft parking areas. The proposed development has been designed having regard to the topography of the subject site which falls almost 8m from its northern boundary with Greenhills Road to its southern boundary, a water main which features in the north-eastern corner of the site, the possible future extension of Calmont Road and the redevelopment of the surrounding industrial estate.



Figure 35.0 Proposed site plan at ground floor level showing public open space and undercroft parking areas



Figure 36.0 Proposed site plan at first-floor level with podium level communal open space at Blocks A, B and C, and first-floor undercroft parking area at Block D



Schedule Accommodation-Block A-Level 02

Name	Area	Area Type
A1-0201	73 m ²	2 BED
A1-0202	47 m ²	1 BED
A1-0203	73 m ²	2 BED
A1-0204	46 m ²	1 BED
A1-0205	46 m ²	1 BED
A1-0206	46 m ²	1 BED
A1-0207	79 m ²	2 BED
A1-0208	46 m ²	1 BED
A1-0209	46 m ²	1 BED
A1-0210	78 m ²	2 BED
A1-0211	72 m ²	2 BED
A1-0212	46 m ²	1 BED
A1-0213	46 m ²	1 BED
A1-0214	73 m ²	2 BED
A1-0215	78 m ²	2 BED
A2-0201	83 m ²	2 BED
A2-0202	49 m ²	1 BED
A2-0203	45 m ²	1 BED
A2-0204	73 m ²	2 BED
A2-0205	46 m ²	1 BED
A2-0206	66 m ²	1 BED (3PI)
A2-0207	78 m ²	2 BED
A2-0208	73 m ²	2 BED
A2-0209	46 m ²	1 BED
A2-0210	46 m ²	1 BED
A2-0211	46 m ²	1 BED
A2-0212	73 m ²	2 BED
A2-0213	46 m ²	1 BED
A2-0214	46 m ²	1 BED
A2-0215	78 m ²	2 BED
A2-0216	72 m ²	2 BED
A2-0217	59 m ²	1 BED
Grand total:	32	1929 m ²

Schedule Accommodation-Block B-Level 02

Name	Area	Area Type
B1-0201	85 m ²	2 BED
B1-0202	108 m ²	3 BED
B1-0203	108 m ²	3 BED
B1-0204	54 m ²	1 BED
B1-0205	85 m ²	2 BED
B2-0201	80 m ²	2 BED
B2-0202	47 m ²	1 BED
B2-0203	80 m ²	2 BED

Figure 37.0 Proposed site plan at first-floor level with podium level communal open space at Block D



Figure 38.0 Proposed site plan at first-floor level

Each block will be detailed below:

Block A

Block A is a U-shaped block that ranges in heights from 5 to 10 storeys comprising 209 no. apartments (102 1-bed, 106 no. 2-bed, and 1 no. 3-bed units). Each apartment will have a kitchen/dining/living area, bedrooms, bathroom and storage space. Private amenity space will be provided in the form of a balcony or terrace.

Block A will also house a creche at ground floor level comprising 360 sq.m., fronting the road to the south. There will also be 3 no. commercial units fronting the internal road connecting the site to Greenhills Road to the north and the industrial estate to the south. Bicycle and car parking will be provided in an undercroft car park providing for 250 no. bicycle spaces and 50 no. car spaces.

Communal amenity spaces will be located at ground floor level on the northern facade of the block and commercial space located along the western facade, providing passive surveillance and activity along

the connecting street through the site. All balconies and terraces will overlook communal outdoor space, which is provided at podium level, thus providing passive surveillance and improving safety and security on the site.

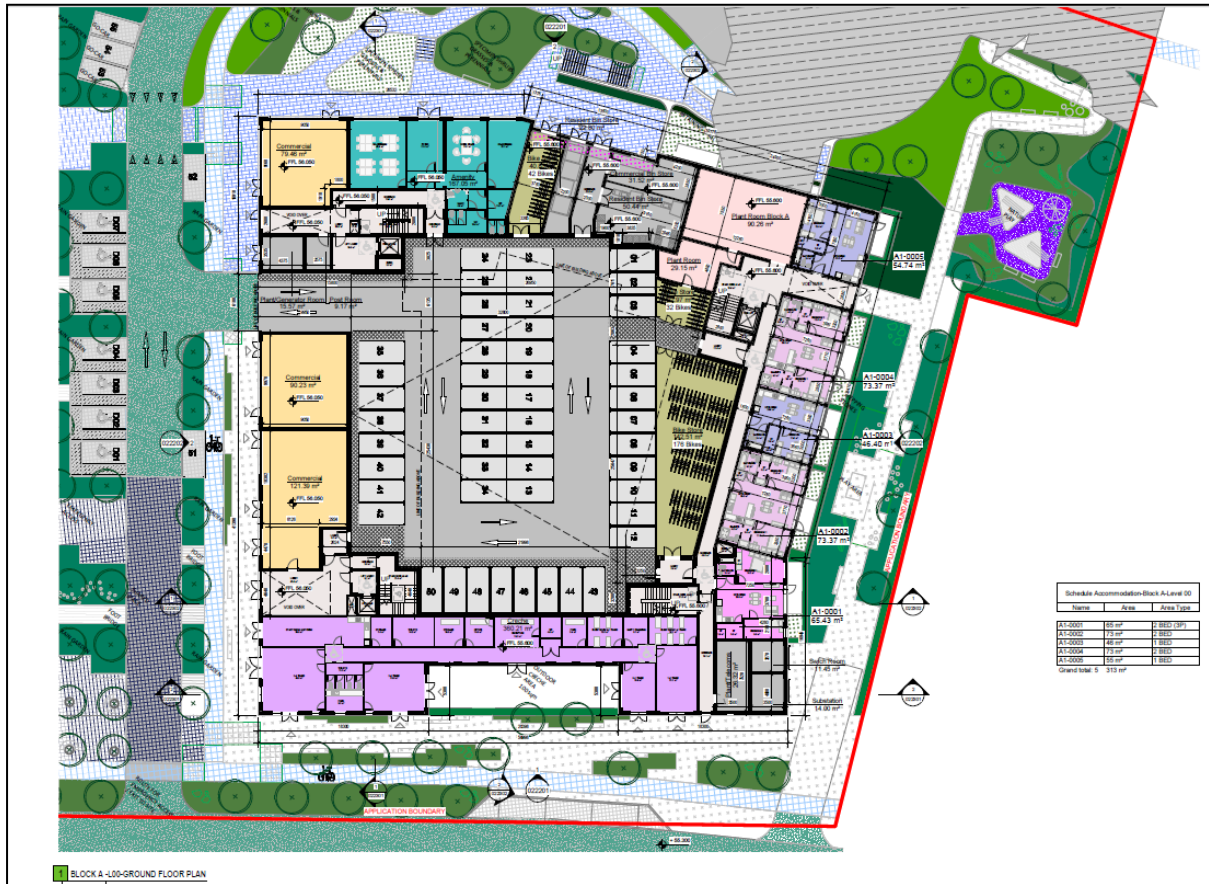


Figure 39.0 Proposed Ground Floor Plan Block A



Figure 40.0 Proposed First Floor Plan Block A

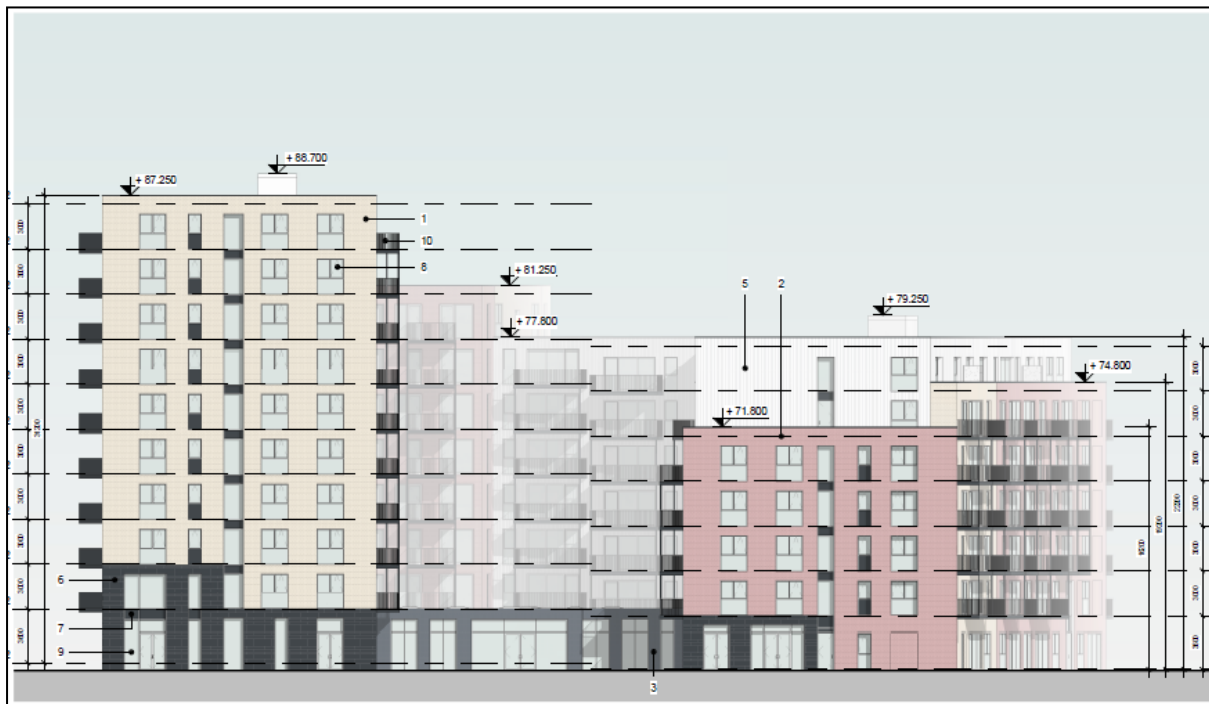


Figure 41.0 Proposed South Elevation Block A

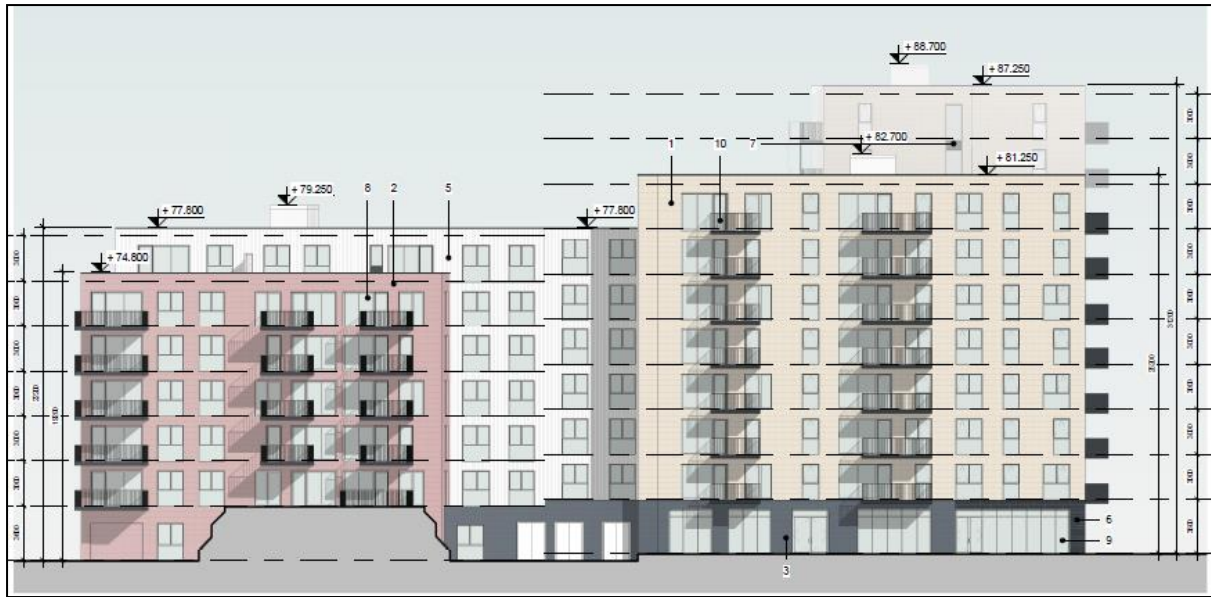


Figure 42.0 Proposed North Elevation Block A

Block B

Block B is an L-shaped block that ranges in heights from 8 to 10 storeys comprising 121 no. apartments (53 no. 1 bed units, 45 no. 2 bed units and 23 no. 3 bed units) and fronts the southern boundary of the site and is bound to the north by the public open space. Each apartment will have a kitchen/dining/living area, bedrooms, bathroom and storage space. Private amenity space will be provided in the form of a balcony or terrace.

Bicycle and car parking will be provided in a two-storey undercroft car park adjoining Blocks B, C and D. This will be discussed in more detail further on.

Communal amenity spaces will be located at ground floor level, providing passive surveillance and activity along all frontages. All balconies and terraces will overlook communal outdoor space thus providing passive surveillance and improving safety and security of public/ communal open spaces areas adjacent to Block B. A commercial unit will be provided fronting the road to the south of the development.



Figure 43.0 Proposed Ground Floor Plan Block B

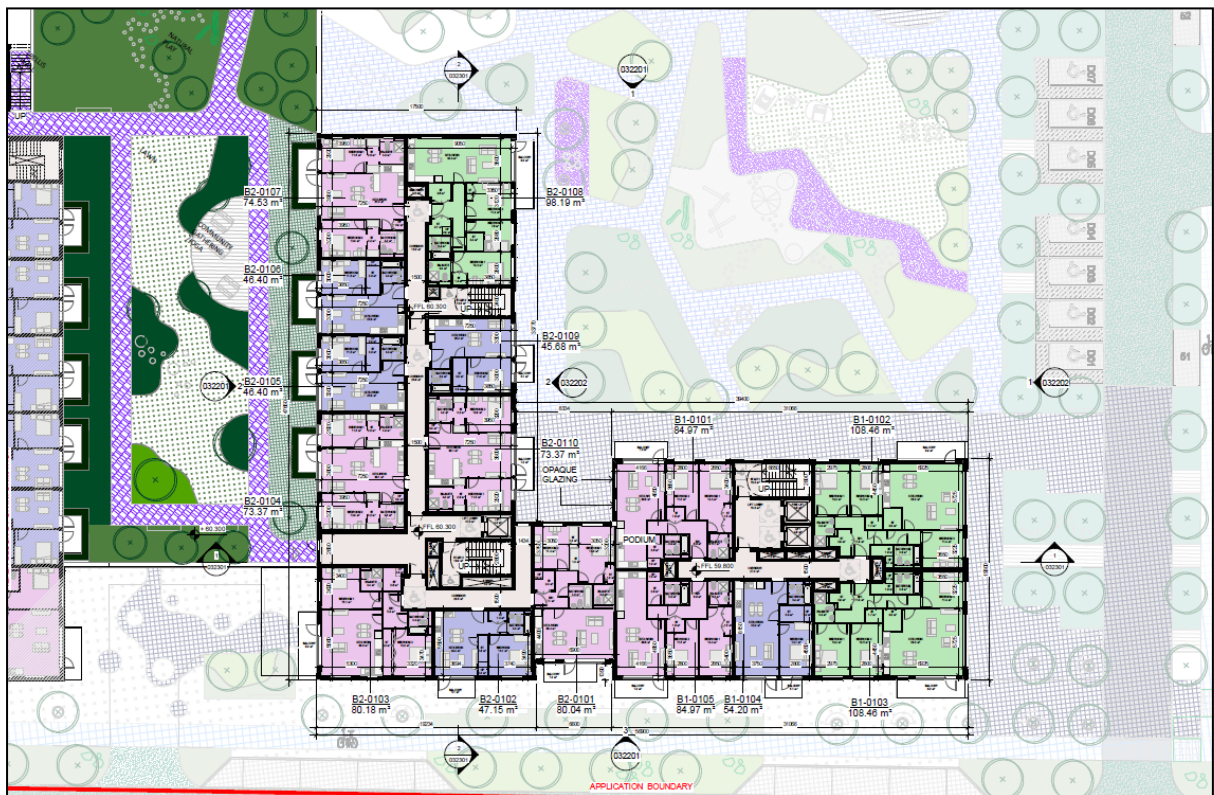


Figure 44.0 Proposed First Floor Plan Block B



Figure 45.0 Proposed South Elevation Block B



Figure 46.0 Proposed North Elevation Block B

Block C

Block C is an L-shaped block that ranges in heights from 8 to 12 storeys comprising 130 no. apartments (38 no. 1 bed units, 71 no. 2 bed units and 21 no. 3 bed units). Each apartment will have a



Figure 49.0 Proposed North Elevation Block C

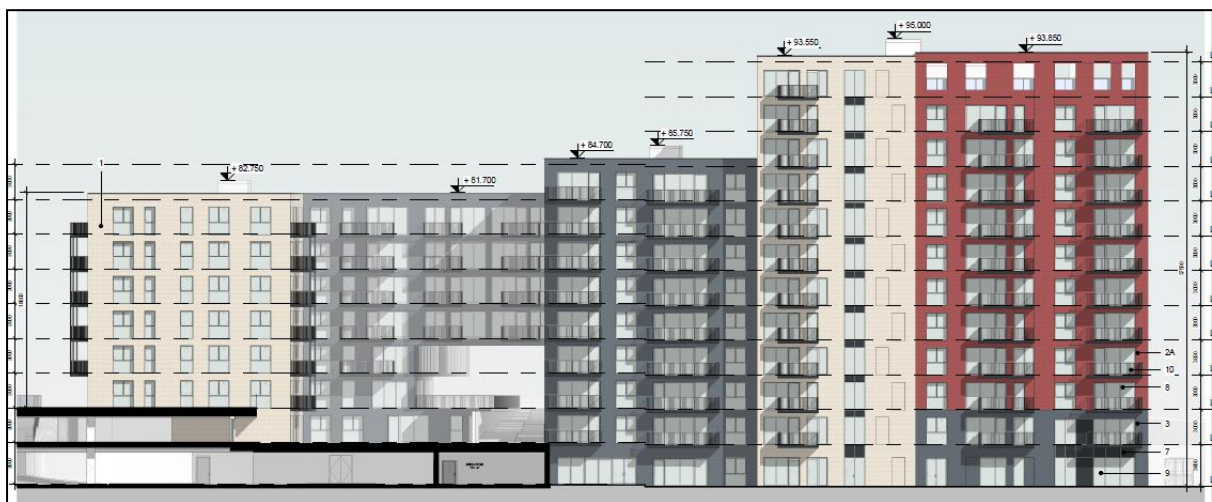


Figure 50.0 Proposed South Elevation Block C

Block D

Block D is an L-shaped block that ranges in heights from 6 to 10 storeys comprising 173 no. apartments (99 no. 1 bed units, 58 no. 2 bed units and 16 no. 3 bed units). Each apartment will have a kitchen/dining/living area, bedrooms, bathroom and storage space. Private amenity space will be provided in the form of a balcony or terrace.

Bicycle and car parking will be provided in an undercroft car park adjoining Blocks B, C and D.

Communal amenity spaces will be located at ground floor level, providing passive surveillance and activity around the building. All balconies and terraces will overlook a podium based communal outdoor space. Commercial units will front the street to the south of the development, thus providing an active and energised frontage.

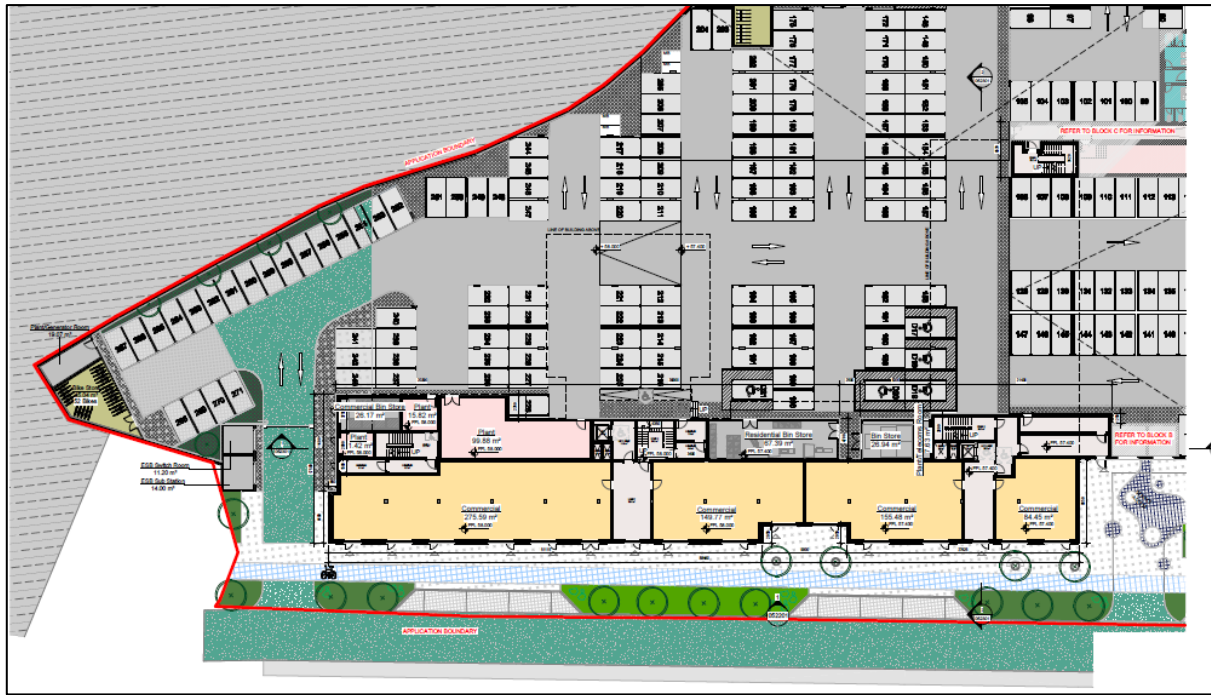


Figure 51.0 Proposed Ground Floor Plan Block D



Figure 52.0 Proposed First Floor Plan Block D

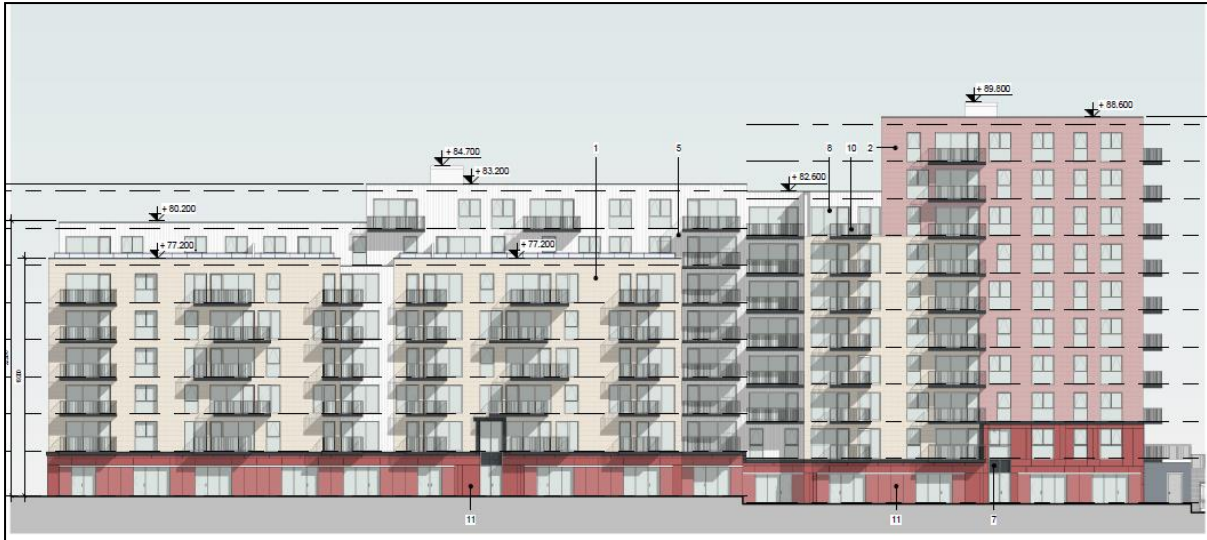


Figure 53.0 Proposed South Elevation Block D

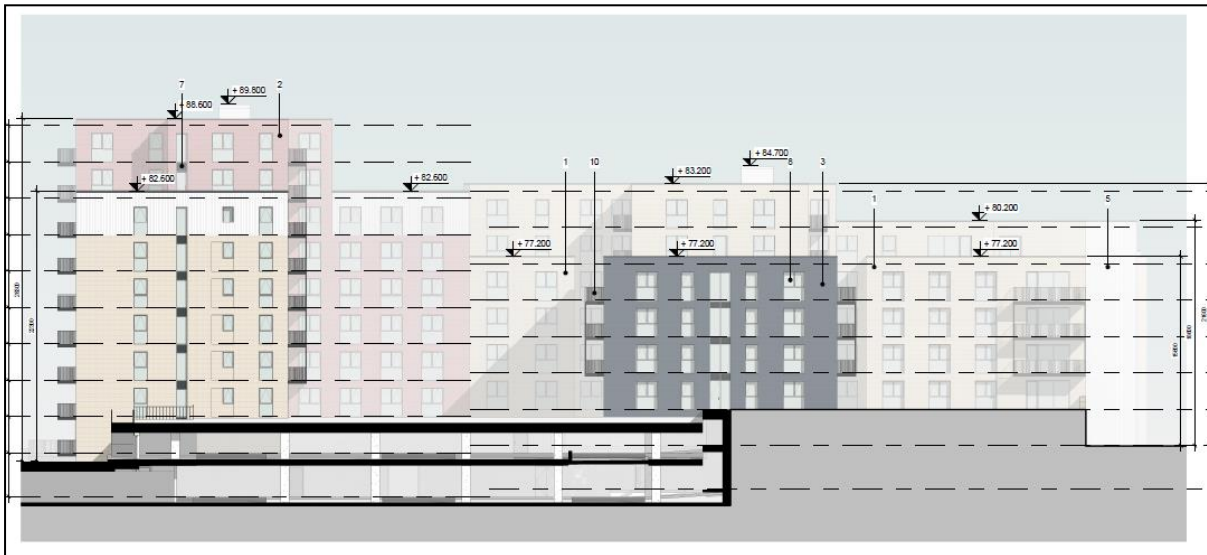


Figure 54.0 Proposed North Elevation Block D

The proposed development will be provided with landscaped communal outdoor space comprising parkland, playgrounds, seating areas, basketball courts, plazas and outdoor dining area to cater to the needs of residents of all ages. An entrance plaza will be provided at the second-floor level of Block C, connecting the site to Greenhills Road as shown in Figure 56.0. The development will have a series of green roofs comprising wildflower planting and biodiversity spaces.

Please refer to the Landscape Plan prepared by Park Hood Landscape Architects for further details.



Figure 55.0 Proposed landscaping scheme for the subject site



Figure 58.0 CGI of the proposed development



Figure 59.0 CGI of the proposed development



Figure 60.0 CGI of the proposed development



Figure 61.0 CGI of the proposed development



Figure 62.0 CGI of the proposed development

Car parking and bicycle parking will be provided at street level and in 2 no. undercroft parking areas located within the blocks. The first is located within Block A and is accessible via Greenhills Road. The second is a two-storey parking area located within Blocks B, C and D. Primary access will be provided via Greenhills Road with a secondary emergency access off the road to the south of the development. Both parking areas will have landscaped communal areas located on top.

The associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

Please also refer to the Design Statement and architectural drawing set, prepared by C+W O'Brien Architects, for further details regarding the above. The subject application has been prepared to have regard to the feedback received from An Bord Pleanála and South Dublin Council during pre-planning consultations.

6.0 Planning Assessment

This section of the statement will examine the planning framework, including national, regional and local, that informs the use and development of the subject land. Documents of note are as follows:

- Project Ireland 2040 – National Planning Framework (2018);
- National Development Plan 2021-2030;
- Housing For All – A New Housing Plan for Ireland (2021);
- Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
- Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
- Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016;
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);

- Urban Design Manual – A Best Practice Guide 2009;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018; as revised 2020);
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, 2019;
- South Dublin County Development Plan 2016-2022; and
- Draft South Dublin County Development Plan 2022-2028

6.1 Project Ireland 2040 – National Planning Framework, 2018

The purpose of the National Planning Framework is to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan, we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seeks to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly-owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

The proposed development is representative of the form of development that is sought as per the provisions of the national planning framework. Moreover, we would note the following national policy objectives as per Project Ireland 2040:

- | | |
|--------------------------------|---|
| National Policy Obj. 3a | <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.</i> |
| National Policy Obj. 3b | <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i> |
| National Policy Obj. 13 | <i>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.</i> |
| National Policy Obj. 35 | <i>Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</i> |

The proposed development is consistent with the above as it involves the re-development of underutilised land which is in close proximity to existing facilities and public transport.

6.2 National Development Plan 2018-2027 & 2021-2030

The National Development Plan 2018—2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

The subject development at Greenhills Road, is considered to aid in meeting the targets and objectives of the National Development Plan through the more efficient use of an underutilised site within an existing built-up area, whilst providing the critical mass required to sustain and support public transport services. The proposed development is considered to reflect the type of sustainable development which is sought throughout National Policy with regards to the appropriate development of under-utilised sites.

6.3 Housing for All – A New Housing Plan for Ireland, 2021

The 'Housing for All - A New Housing Plan for Ireland' was published in September 2021 as part of the 'Our Shared Future' programme for government. The Plan will ensure that a more sustainable housing system with a planning system that is fit for purpose is achieved which will create long-term vibrant communities with the necessary supporting infrastructure. Pathway 3 of the Housing for All plan relates to 'Increasing New Housing Supply'. This pathway contains the following commentary:

'Housing supply is a key focus for the Government. While many housing issues are complex to tackle, a simple lack of supply to meet demand is a significant part of the problem. Research has shown that the State needs an average of 33,000 houses to be built every year to 2030. Therefore, this Pathway is focused on how to move from building approximately 20,000 homes a year to an average of 33,000 homes per annum between now and 2030.'

The Housing for All plan contains various Housing Policy Objectives which will assist the County in meeting national housing targets. The following are of note:

Housing Policy Objective 11.2 *Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.*

Housing Policy Objective 12.2 *Develop proposals for new Urban Development Zones, to deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework*

It is submitted that the proposed development responds to a recognised need, at national level, for residential accommodation and is consistent with policy in this regard, particularly with Housing Policy Objective 12.2 which seeks development of brownfield sites to provide increased densities.

6.4 Action Plan for Housing and Homelessness, July 2016

The 'Action Plan for Housing and Homelessness' was published in July 2016 as part of the Government's Rebuilding Ireland initiative. This is a whole-of-Government plan which seeks to double residential construction output to 25,000 homes per year by 2020; deliver 47,000 units of social housing by 2021; make the best use of existing housing stock; and lay the foundations for a stronger, more stable private rented sector. The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars'. Pillar 4, 'Improving the Rental Sector', includes build-to-rent and encourages "build-to-rent" as a key action. It is stated that a build-to-rent model can deliver additional supply towards the overall target supply of 25,000 units per annum.

We submit that the proposed development responds to a recognised need, at national level, for build-to-rent accommodation and is consistent with policy in this regard.

6.5 Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016

The Department of Housing, Planning, Community and Local Government (DHPCLG) issued a Circular Letter in 2016, states that the emerging Build to Rent (BTR) sector offers significant new opportunities to increase the scale and pace of delivery of housing. Planning authorities are requested to proactively encourage and work with proposers of BTR projects to facilitate their emergence at appropriate locations. The Department is giving active consideration to issuing further guidance in relation to this important new sector of housing provision in the near term.

The proposed development accords with the policy set out in the Circular Letter from DHPCLG.

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

These guidelines as published by the Minister under Section 28 of the Planning and Development Act 2000 (as amended) following a period of public consultation, is intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

These guidelines outline 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. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development.

In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. Specific Planning Policy Requirement 1 and 4 goes on to outline the following in relation to this:

In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

The height and density proposed is consistent with the above the subject site's proximity to the LUAS and bus network serving the Walkinstown area. Further to this, the proposed development scores highly

when assessed against the development management criteria set out in the guidelines as, aside from being well served by public transport, it:

- Enhances the character, built environment and public realm of the area, featuring well considered high quality materials and appropriately responds to the lower scale residential development in the surrounding area;
- Maximises access to natural daylight, ventilation and views due to the positioning of the blocks; and
- Has limited impact in relation to overshadowing and loss of light due to its separation from existing residential developments in the surrounding area.

Section 3.2 of the Building Height Guidelines states that:

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- *Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*
- *In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

The subject application is accompanied by the following reports, consistent with the above requirements:

- An Environmental Impact Assessment Report, inclusive of a micro-climate assessment;
- An Appropriate Assessment Screening Report, prepared by Enviroguide Ecological Consultants;
- A Sunlight, Daylight and Shadow Assessment Report, prepared by 3D Design Bureau.

6.6.1 Development Management Principles

Section 3.1 of the Urban Development and Building Heights Guidelines states that planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

It is noted that the design of the proposed development has been informed by the policies and objectives of both national and local planning policy. The development complies with the policy provided and positively contributes to the development of the area. The subject site is located in close proximity to a large number of public transport routes, including a range of serviced Bus Stops along Greenhills Road and Walkinstown Roundabout, serving route nos. 27, 77A, 9, 56A, and the Kylemore LUAS Stop which within a comfortable walking distance, which results in the site being highly accessible and creates a stronger argument for the positioning of this development at the subject site.



Figure 63.0 Map of the immediate area and the available bus services

6.6.2 Development Management Criteria

The guidelines state that applicants shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the following criteria:

'At the scale of the relevant city/town:

- *The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*

As noted, the proposed development site lies to the south of the Greenhills Road, a main distributor road, connecting Tallaght and Walkinstown. The road is currently served by 2 no. bus routes operated by Dublin Bus, Routes 27 and 77A. Both services provide high frequency and medium frequency services between the city centre and western suburbs including Jobstown, Tallaght and City West. At peak times, Route 27 is served by 6 buses per hour, or 1 bus per 10 minutes. Route 77A is served by 5 buses per hours. These services are further bolstered by routes operating from Walkinstown which is a short walk from the subject site and will facilitate sustainable transport use in the area.

A Traffic and Transport Assessment has been prepared by Dr Martin Rogers Consultancy and accompanies this application, this assessment has found that between the two routes running along Greenhills Road and a second high-frequency route in Walkinstown, there are 14 buses per hour, connecting the site to the city centre with a maximum capacity of 900 passengers. It is assumed that the proposed development will require 12% of that capacity, and therefore it is considered that sufficient capacity exists in the network.

As part of the Bus Connects programme, the area is set to see an increase in both capacity and frequency of public transport. With the aforementioned routes being retained and improved, additional routes will run to the south of the subject site. Bus Connects will allow for faster travel times between destinations.

- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*

A Landscape Visual Impact Assessment has been prepared by Park Hood Landscape Architects and included with this application as part of the Environmental Impact Assessment Report.

- *On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.'*

The proposal is of a high-quality design which will make a positive contribution to the area and create visual interest in the streetscape, which is currently lacking on Greenhills Road. The proposed development has been designed to improve the visual quality and public realm of Greenhills Road, providing safe access into Walkinstown village. The Architectural Design Statement prepared by C+W O'Brien Architects as well as the Photomontage Imagery prepared by 3D Design Bureau provides further details on the design of the proposed development and illustrate how the proposed development will sit comfortably within the existing and evolving streetscape/surrounding area. The scale and form of the proposed development responds to the scale of existing adjacent and planned developments, with the development being appropriately recessed from adjacent lower rise buildings and sensitive interfaces, creating visual interest in the streetscape, with high quality architecture and materials/finishes.

'At the scale of district/neighbourhood/street

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.*

The area is currently characterised by low rise industrial units and warehouse, poor quality public realm, and a lack of diversity in land uses. The proposed development seeks permission for a mixed-use development which introduces residential and commercial elements to this area. Furthermore, the design has been carefully tailored to vastly improve the public realm and streetscape along Greenhills Road and the road to the south of the subject site. The proposal will provide safe footpaths, public spaces, and will add visual interest to this area.

- *The proposal is not monolithic and avoids long, interrupted walls of building in the form of slab blocks with materials/building fabric well considered.*

The proposed development comprises 4 no. distinct blocks: A, B, C and D. The facades have been broken up using a variety of different and high-quality materials including 3 types of brick, steel and glass balconies, Corten steel, stone and glazing throughout, providing visual interest and variety to facades of each block. This avoids a monolithic and overbearing structure. For further details, please refer to the Architectural Design Statement and the elevation drawings prepared by C+W O'Brien Architects.

- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line*

with the requirements of 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009).

In terms of flood risk, a flood risk assessment has been prepared by Lohan & Donnelly Consulting Engineers, which accompanies this application, and which concludes that the site historically has no recorded flood events as noted in the OPW's historical flood maps and, the likelihood of on-site flooding on the site, which is located in Flood Zone C, is deemed to be low. The development has been designed to comply with the *Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009)*.

- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*

Greenhills Road and the surrounding land is dominated by low rise industrial units which are very similar in style, colour and size. The street network lacks permeability and is often not suited to pedestrians and cyclists. The proposed development will result in a landmark building at this location, thus improving the legibility of the street. The proposal will improve the immediate streetscape by providing a strong street frontage on Greenhills Road and the road to the south. Landscaped routes through the site will greatly improve permeability by creating a safe and enjoyable environment for pedestrians. The proposed development integrates well with the surrounding streets by introducing new footpaths and public spaces, improving the public realm overall. For further details, please refer to the Architectural Design Statement and drawings prepared by C+W O'Brien Architects as well as the Landscape Plan prepared by Park Hood Landscape Architects.

- *The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood'*

It is noted that the proposed mixed-use development is located on zoned and serviced suburban lands currently characterised by light industrial and warehouse uses and will provide for the sustainable and active use of a presently underutilised site. The development provides for suitably located residential within proximity to a number of public transport services and will provide for an appropriate mix of unit sizes which including one-, two- and three-bedroom apartments which will cater for the needs of differing household sizes and types. Overall, it is considered that the proposal presents a significant improvement on the site when compared to the existing use of the site and is inconsistent with the surrounding land uses.

On the basis of the above, the proposed building heights are considered appropriate in this instance.

'At the scale of the site/building

- *The form massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*

The proposed development has been reduced in height at design stage to further improve access to natural daylight in each apartment. Taller elements of the buildings have been carefully situated to prevent overshadowing of other sections of the development and adjoining sites. The massing has been assessed to increase the amount of natural light and ventilation circulating between blocks, thus improving the amenity offered to each apartment.

- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority of An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the*

balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution'.

The proposed development has been carefully designed to maximise access to natural daylight, further details in this regard and comprised within the Architectural Design Statement prepared by C+W O'Brien Architects and the Daylight and Sunlight Assessment prepared by 3Design Bureau, which demonstrates that the scheme as presented substantially complies with the relevant BER Guidelines.

The Average Daylight Factor (ADF) results found that the proposed development has a 92.4% compliance rate which is considered substantial.

This is considered appropriate in this instance given the generously sized public and communal open space available on the site, the improved public realm, and the provision of balconies and glazed patio doors to each unit. It is submitted that the shortfall will not result in reduced amenity for future residents.

Furthermore, it is noted that the overall benefits of this proposal outweigh the negatives associated with the shortfall given the major urban regeneration, streetscape renewal and provision of housing that this development will provide.

'Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- *Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*

In response to the above considerations, a microclimate report assessing the cumulative micro-climate effects of the development has been prepared by AWN Environmental Consultants as part of the EIAR. It was found that the proposed development will not result in wind funnels due to the design and siting of the buildings.

- *In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/ or collision.*

A Bat Survey Report prepared by Ash Ecology is enclosed with this application which states that no evidence of bat activity was noted within the buildings. Due to lighting in the industrial estate and the lack of trees, the opportunity for bat foraging is reduced and bats are deterred from the area. Furthermore, the buildings on site were constructed using corrugated steel which lacked roosting suitability for bats.

With regards to bird species, the subject site is not proximate to any Special Areas of Conservation or Special Protection Areas, therefore the risk to bird populations is low. Please refer to the Ecological Impact Assessment within the EIAR prepared by Enviroguide Environmental Consultants for further details.

- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*

Given the height of the existing blocks on site and the relatively conservative increase in building heights that are proposed, it is not considered that the proposed development would have an impact on telecommunication channels.

- *An assessment that the proposal maintains safe air navigation.*

Given the height of the existing blocks on site and the relatively conservative increase in building heights that are proposed, it is not considered that the proposed development would have an impact on air navigation.

- *An urban design statement including, as appropriate, impact on the historic built environment.*

An Urban Design Statement has been included in the Architectural Design Statement as prepared by C+W O'Brien Architects and submitted under a separate leaf.

- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.'*

It is further noted that a Design Statement is enclosed with the application as prepared by C+W O'Brien Architects as well as an EIAR, an AA Screening Report, and Ecological Impact Assessment which are all provided under a separate cover.

SPPR 3

Section 3.2 of the Urban Development and Building Heights Guidelines (2018) states that 'where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).

'It is a specific planning policy requirement that where;

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

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

(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme.

(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.'

In consideration of the above Specific Planning Policy Requirement, it is noted that there are a number of permitted developments within the surrounding area and in the South Dublin County Council administrative area more broadly which adopt increased building heights and densities in line with National and Regional Policy objectives. The proposed development included as part of this application ranges in height from 5 to 12 storeys in height, which is considered appropriate given the site's surrounding context.

Upon review of the above guidelines, there is a strong emphasis on increasing building heights in suitable locations, such as the subject site. We also reiterate that the application site is also within close

proximity to numerous high-capacity, high-frequency public transport facilities, including the Kylemore Luas Stop. Further to this, it is also noted that a number of high-frequency bus services operate along Greenhills Road and the Walkinstown Roundabout. In this context it is considered that the proposal meets the criteria for increased building heights as set out in the Building Heights Guidelines.

6.7 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.

The subject site will be located within 250 metres of the Walkinstown, which is accessible by Greenhills Road to the north of the site. Walkinstown features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated in close proximity to the Kylemore LUAS Stop which provides access to Dublin City Centre and Tallaght which have numerous amenities that can be enjoyed by prospective residents of the scheme.

6.8 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020

The *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*, were published by the Department of the Environment, Community and Local Government in December 2020. They replace the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*. The 2020 Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account the percentage of co-living accommodation that has been built in recent years.

The proposed development has been designed to be fully comply with the standards set out in *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*.

Furthermore, the 2020 Guidelines include guidance specific to the emerging 'build to rent' sector, which did not feature in the previous 2015 Guidelines. These are set out in Section 5.0 and Specific Planning Policy Requirements 7 and 8 included therein relate specifically to build-to-rent developments.

Specific Planning Policy Requirement 7 reads as follows:

Specific Planning Policy Requirement 7

BTR development must be:

- a. Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;*
- b. Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*

i. Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.

ii. Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

In response to the above requirements, the public notices for this application have identified the development as 'Build-to-Rent' development and a draft legal agreement accompanies the application. This agreement states that the development will be owned and operated by the Applicant for a minimum period of 15 years and during that time no units will be sold or rented separately during that time as per the requirements of Specific Planning Policy Requirement 7.



Figure 64.0 CGI of proposed development

The application is also accompanied by a BTR Operational Management Plan, prepared by Hughes Planning and Development Consultants, and a Building Lifecycle Report, prepared by Homan O'Brien Consulting Engineers, consistent with the requirements of Section 6.0 of the guidelines. Further to this, the development has been designed to include resident support facilities and resident services and amenities (totalling 1293sq.m.), including a co-working space, work space, W.C. at ground floor of Block A; gym, resident's lounge, studio, work space, multi-function space at ground floor of Block B; games room, media room, co-working space, resident's lounge, management office, W.C., parcel room at ground floor of Block C; creche facility; and landscaped courtyards including children's play spaces. Please refer to the Architectural Design Statement and drawings prepped by C+W O'Brien Architects for further details.

Specific Planning Policy Requirement 8 read as follows:

Specific Planning Policy Requirement 8

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

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

The proposed developments consistency with the standards applying to 'Build-to-Rent' schemes is discussed below.

Minimum Floor Area

Specific Planning Policy Requirement 3 sets out minimum apartment floor areas. The overall apartment floor area sizes required for apartment units area as follows:

- *Studio apartment* 37sq.m
- *1-bedroom apartment* 45sq.m
- *2-bedroom apartment (3 persons)* 63sq.m
- *2-bedroom apartment (4 persons)* 73sq.m

The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10%, set out in Section 3.8 does not apply to build-to-rent schemes, pursuant to Specific Planning Policy Requirement 8(iv).

All apartments featuring in the proposed development will be fully compliant with the various floor area and floor width standards, and in most instances exceed of the required minimum standards set out in the guidelines for new apartments.

Minimum communal amenity space requirements

The Guidelines provides minimum communal amenity space requirements in new apartments. They are as follows:

- *Studio* 4sq.m.
- *One Bedroom* 5sq.m.
- *Two Bedrooms (3P)* 6sq.m.
- *Two Bedrooms (4P)* 7sq.m.
- *Three or more Bedrooms* 9sq.m.

The communal amenity space requirements for the proposed development are as follows:

Communal Amenity Space Requirements			
Unit Type	Required floor areas for communal amenity space	No. of Apartments	Communal amenity space required
One Bedroom	5sq.m.	292	1,460
Two Bedroom (3P)	6sq.m	25	150
Two Bedroom (4P)	7sq.m.	255	1785
Three Bedroom	9sq.m.	61	549
Total communal amenity space required			3944

Table 1.0 Table showing the Communal Amenity Space Requirements for the development

The guidelines also outline the following in relation to communal amenity space:

Communal amenity space may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year.

The development complies with the above requirements, providing 5,520 sq.m. of communal amenity space in the form of landscaped courtyards plus a further 176 sq.m. roof garden in Block C. Further to this, residents will have access to a public park located centrally on the subject site and 1293sq.m. of internal communal amenity space. For further details of the proposed communal and public outdoor space, please refer to the Landscape Plan prepared by Park Hood Landscape Architects.

Minimum Aggregate Floor Areas and Minimum Widths for Living/Dining/Kitchen

The 2020 Guidelines require the following minimum aggregate floor areas in relation to living/Dining/Kitchen Areas:

- *Studio 30sq.m, minimum width 4m*
- *One Bedroom 23sq.m, minimum width 3.3m*
- *Two Bedroom (3P) 28sq.m, minimum width 3.6m*
- *Two Bedroom (4P) 30sq.m, minimum width 3.6m*
- *Three Bedroom (5P) 34sq.m, minimum width 3.8m*

The proposed development is compliant with the minimum aggregate floor areas and minimum widths for living/dining/kitchen areas, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architects, which accompanies this application.

Minimum Floor Areas, Minimum Widths and Minimum Aggregate Floor Areas for Bedrooms

The 2020 Guidelines require the following minimum aggregate floor areas, minimum widths and minimum aggregate floor areas in relation to bedrooms:

- *Studio 30sq.m, minimum width 4m*
- *Single Bedroom 7.1 sq.m, minimum width 2.1m*
- *Double Bedroom 11.4 sq.m, minimum width 2.8m*
- *Twin Bedroom 13sq.m, minimum width 2.8m*

The overall aggregate bedroom floor areas for apartment unit areas is required as follows:

- *One bedroom - 11.4 sq.m.*
- *Two bedrooms (3 person) - 13 + 7.1 sq.m. = 20.1 sq.m.*
- *Two bedrooms (4 person) - 11.4 + 13 sq.m. = 24.4 sq.m.*
- *Three bedrooms - 11.4 + 13 + 7.1 sq.m. = 31.5 sq.m.*

The proposed development is fully compliant with the minimum aggregate floor areas, minimum widths and minimum aggregate floor areas for bedrooms, as illustrated in the Housing Quality Assessment table, prepared by C+W O'Brien Architects, which accompanies this application.

Minimum Storage Space for Apartments

The 2020 Guidelines require the following minimum storage space requirements in relation to apartments:

- Studio 3sq.m.
- One Bedroom 3sq.m.
- Two Bedrooms (3P) 5sq.m.
- Two Bedrooms (4P) 6sq.m.
- Three or more Bedrooms 9sq.m.

All apartments are provided with appropriately sized storage areas as per the figures listed above. It is submitted that the proposed apartments have been provided with an adequate amount of storage space as per the guidelines.

Private Open Space

The Guidelines provides minimum private open space requirements in new apartments. They are as follows:

- Studio 4sq.m.
- One Bedroom 5sq.m.
- Two Bedrooms (3P) 6sq.m.
- Two Bedrooms (4P) 7sq.m.
- Three or more Bedrooms 9sq.m.

All apartments are provided with balconies as per the figures listed above. It is submitted that the proposed apartments have been provided with an adequate amount of private open space as per the guidelines.

Further to this, all units are provided with a large communal open space area (5,020sq.m.) and public open space (3,380 sq.m.)with playgrounds.

Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance with regards to dual aspect apartments. The minimum number of dual aspect apartments are as follows:

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) *In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

The subject site is considered to be a Central or Accessible location due to its proximity to Walkinstown and the numerous bus services within the immediate area. It is therefore guided by part (i) of SPPR 4, requiring a minimum of 33% dual aspect apartments. The proposed development provides 298 no. dual aspect apartments, accounting for 47% of the 633 no. apartments proposed, which higher than the above requirements.

An SHD development, which was granted permission under ABP. Ref. 309658-21 and is located c. 250m north of the subject site, was also determined to be a Central or Accessible Location. The Inspector's Report notes:

SPPR 4 requires a minimum of 33% dual aspect units for developments in more central and accessible urban locations and a minimum of 50% dual aspect units for developments in suburban or intermediate locations. There are a total of 62 no. dual aspect units within the scheme (documents refer to 63 no. units but this does not accord with submitted plans and particulars). This equates to 36 percent dual aspect units. I consider the site to be within a central and accessible urban location as discussed in Section 11.2 Quantum of Development above. The standard of 33% for central and accessible urban locations detailed in SPPR 4 of the Guidelines is exceeded.

It is considered that this is acceptable given the accessibility of the site and the fact it seeks to regenerate a large, underutilised site. In addition, the proposed single aspect apartment units have been orientated to face in a southern, eastern or western direction and towards the large central courtyards to allow for maximum light exposure for each individual apartment throughout long periods of the daylight hours. This is consistent with the 2020 Guidelines which recommend, in Section 3.18, that single aspect apartments be orientated to face south, east or west, to allow for maximum sunlight exposure.

Floor to Ceiling Height

The Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. All apartments featuring in the proposed development will be fully compliant with the Guidelines in both respects.

Security Considerations

Section 3.40 of the Guidelines recommend that in order to ensure visitor and occupant safety natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks. Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths.

The proposed development has been designed in a manner that allows for maximum natural surveillance throughout the development site, with windows overlooking all internal and external public spaces, whilst also providing terraces to apartments at ground floor level that front onto public footpaths and is therefore consistent with the Guidelines in this regard.

Bicycle Parking

The Guidelines seek that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road / street network. The following requirements are also specified in relation to quantity:

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

Based on the above requirements, the subject scheme requires 1035 no. resident bicycle parking spaces and 316 no. visitor bicycle parking spaces. The development includes the provision of secured bicycle storage at undercroft and surface levels with 1363 no. bike spaces proposed in total. The number of bicycle parking spaces has also been advised by the demand and capacity of the proposed creche.

The proposed development complies with all the required standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

Childcare Facilities

Having regard to the Planning Guidelines for Childcare Facilities (2001), the provision of one child-care facility (equivalent to a minimum of 20 child spaces) for every 75 dwelling units is recommended to be provided. Furthermore, Section 4.7 of the Apartment Guidelines (2018), state that the threshold provision for any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the geographical distribution of childcare facilities and the emerging demographic profile of the area. It is also considered that **one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision.**

Having regard to the above, it is noted that the proposed development provides for a total of 341 no. two and three-bedroom apartment units (excluding one-bedroom units as per the guidance above), and therefore requires the provision of a childcare facility. A 360sq.m. creche with outdoor play area is proposed in Block A.

For further details on the qualitative standards of the proposed development, please refer to the Architectural Design Statement and Housing Quality Assessment prepared by C+W O'Brien Architects.

6.7 Urban Design Manual – A Best Practice Guide 2009

The '*Urban Design Manual – A Best Practice Guide, 2009*' is based around twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are '*a distillation of current policy and guidance and tried and tested principles of good urban design.*'

This report reviews the proposed development in this context in an effort to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent properties.

(i) Context - How does the development respond to its surroundings?

The proposed building will have a prominent position on Greenhills Road which is envisaged will be ceded to the Calmount Road to the north as the main throughfare. The proposed development has taken this into account by ensuring the development will work with an extended Calmount Road. The buildings are designed to have active frontages along both Greenhills Road and the road to the south, servicing Greenhills Industrial Estate, where there will be a high degree of passive surveillance of the public realm from within the building. This area has been identified for considerable change moving forward under the City Edge project which is a collaboration between South Dublin County Council and Dublin City Council. Recently approved developments in and around the Walkinstown and Tallaght area will bring an intensification of residential densities, increased massing and a growth in the scale of buildings. The form and scale of the proposed development has been informed by recent grants of permission in the area plus the site's locational context. The proposed development's design is consistent with current increased density, intensification of use and significant increase in heights encouraged by the National Planning Framework.

This new development will exert its own streetscape presence on Greenhills Road and the road to the south and will generate activity at street level along both frontages due to the proposed commercial units, creche and communal amenity areas as well as the own door apartments and location of terraces and balconies proposed. The proposed residential, commercial and retail uses will enliven the neighbourhood and bring additional footfall to the area.

The proposed development includes a public plaza in the north-western corner of the site which will connect the site to Greenhills Road and form a new public realm.

(ii) Connections - How well connected is the new neighbourhood?

The proposed development scheme has been designed to facilitate quality all-round access, including vehicular, pedestrian and cyclist movement. The site has vehicular access to Greenhills Road that links the site to a number of main arterial routes into Dublin City centre and the M50 motorway thereby providing access to a large extent of the Irish road network. The site is situated c. 2km south of the Kilemore LUAS stop and a number of bus services run along Greenhills Road, immediately adjacent, offering access to and from the city. Cycle lanes can be found in both directions along Greenhills Road. The proposed development will provide new and improved footpaths along the southern side of Greenmount Road, thus improving connectivity.

It is considered that the proposed residential density is appropriate to the site location in transport terms and will help support efficient public transport.

(iii) Inclusivity - How easily can people use and access the development?

The development will benefit residents in the neighbourhood by improving the public realm along Greenhills Road and the road to the south of the site. People will find this section of Greenhills Road more attractive environment to use both during the day and at night-time with new footpaths, public lighting and overlooking from adjoining apartments, providing much safer environment. Within the proposed development all areas are designed with level access throughout the internal accommodation and external garden areas. A wide range of amenity spaces are proposed, and all common facilities are fully accessible. All floors in the building are served by lift, as well as by stairs. The proposed commercial/retail units, creche, communal amenity spaces, own-door apartments and double height openings open up the site providing animation to passers-by through its openness at ground floor level.

(iv) Variety - How does the development promote a good mix of activities?

The proposed development features a mixture of residential accommodation alongside a range of commercial and communal amenity spaces. The site is well positioned within reach of many sources of employment as well as hospitals and third level institutions. In addition, the proposal includes a creche as well as landscaping and seating areas along the street frontages and within the proposed public open space areas. This will provide external animation on the street frontages.



Figure 65.0 CGI of proposed development

(v) Efficiency - How does the development make appropriate use of resources, including land?

The South Dublin County Development Plan 2016-2022 seeks to encourage higher densities at locations such as the application site. Currently on the site are underutilised industrial units. The construction of a new mixed-use development will bring about a significant improvement to the site conditions, bringing the land back into a beneficial use. The redevelopment of this brownfield site for residential accommodation and commercial use will significantly improve the physical environment and provide high-density accommodation on a badly underutilised site.

Open spaces and roofs are designed to incorporate Sustainable Urban Drainage Systems (SUDS). The central courtyards, takes best advantage of the solar orientation. The layout is designed such that all living / dining / kitchen spaces are positioned to front the central courtyard or the outside elevations of the building, thereby offering units which are outward looking, with varied aspects.

The proposed density will make public transport a more viable option at this location and reduce the need for private cars. A car club, operated by Go Car, will be available on site to encourage the sharing of cars when needed. 5 no. cars will be provided.

(vi) Distinctiveness - How do the proposals create a sense of place?

The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of an appropriate scale on a brownfield site which is presently severely underutilised and effectively derelict site.

The proposed group of buildings at this location on Greenhills Road will have a strong identity and become a distinctive and recognisable place. The proposed building adopts a generous setback from the northern site boundary to create a public plaza as well as landscaping and new footpaths along the street.



Figure 66.0 CGI of proposed development

(vii) Layout - How does the proposal create people friendly streets and spaces?

The layout of the proposed building responds to the site context, the position of adjacent buildings and other proposed developments in the vicinity. The development addresses both site frontages with landscaping and active frontage proposed to both Greenhills Road and the road to the south of the subject site, as well as the public open spaces. Commercial units, a public plaza, a creche and communal amenity spaces are also proposed along these street and courtyard frontages. This will create additional activity, footfall and animation to both of these streets and the communal open space areas.

(viii) Public Realm - How safe, secure and enjoyable are the public areas?

The scheme has been designed with extensive landscaping and public realm upgrades along Greenhills Road and the proposed internal streets within the development. A series of courtyards are provided in each block and interfaced with a number of units in the apartment building as well as proposed communal amenity spaces and commercial spaces serving the development which will provide a safe place which benefits from passive surveillance and can be enjoyed by the prospective residents. The public realm around the site will be greatly improved with the setting back of the building to create generously proportioned footpath and a public plaza along Greenhills Road and footpaths to the south.

(ix) Adaptability - How will the buildings cope with change?

Adaptability of the design has been considered and it is proposed that all internal walls be constructed in a non-masonry system, thereby allowing future modifications to layouts to be readily implemented as required or necessary thus providing maximum flexibility and adaptability.

(x) Privacy and Amenity - How does the scheme provide a decent standard of amenity?

The proposed accommodation and the shared amenity spaces are designed to meet current design standards, as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018).

47% of the proposed apartments enjoy dual aspect and all have their living/kitchen spaces on the outer elevations of the building or fronting the central courtyards. Appropriate acoustic insulation will be designed to prevent sound transmission from one unit to another and from areas of non-residential uses to residential uses. All apartments have access to large semi-private central courtyards in each block which features a mix of hard and soft landscaping and amenity spaces, including a children's playground. Each block is also provided with an additional landscaped communal open space area. These terraces are generous in size, have good solar access, provide views of the surrounding area and have been designed so as to reduce potential wind impacts.

The location of the development means that there is no direct overlooking of any other residential properties, with the buildings immediately south, west and east comprising non-residential buildings.

(xi) Parking - How will the parking be secure and attractive?

The development is provided with 439 no. on-site car parking spaces which is considered appropriate given the sites proximity to bus routes, the Luas, and numerous pedestrian and cycle routes. In addition to this, the development is served by 1363 no. bicycle parking spaces. The majority of car and bicycle parking spaces are accommodated in secure undercroft carparks. The remaining car and bicycle parking spaces are provided at ground level throughout the development site which have the benefit of passive surveillance.

(xii) Detailed Design - How well thought through is the building and landscape design?

The proposed buildings range in height from 5 to 12 storeys. The highest built form element has been positioned carefully to avoid overshadowing of other blocks. Generous setbacks from the boundaries are provided to create pedestrian and cycle routes and improve current links to Walkinstown from the subject site. This, in combination with the new roads introduced through site, improves permeability in the surrounding area.

The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance. Care has been taken over the siting of flues, vents, bin storage, etc. to avoid unnecessary impacts on residential amenity. Please refer to the Design Statement, prepared by C+W O'Brien Architects, which accompanies this application for further discussion on the building design.

The proposed development features a variety of communal open space areas across the scheme, as illustrated in Landscape Plan, prepared by Park Hood Landscape Architects. With regards to public open space, the development features a centrally located public park next to Block B and a public plaza next to Block C.



Figure 67.0 CGI image of proposed development



Figure 68.0 CGI image of proposed development



Figure 69.0 CGI image of proposed development



Figure 70.0 CGI image of proposed development

Communal open space is provided in the form of central courtyards provided at podium levels (a minimum of 1 provided per block). The communal courtyards serving contains a range of spaces comprising seating areas, yoga areas, gathering areas, play areas, sports equipment, basketball courts and a bouldering wall. Each courtyard is linked via a linear park which connects the south west of the

site to the north east at Greenhills Road. The roof tops comprise green roofs which will allow for the growth of wildflowers and create biodiversity havens.

The main idea driving the landscape design in these communal open space areas is the use and combination of a floating geometry with strong forms and shapes that repeat throughout. These are carefully placed and manipulated to create a clear overall identity and sense of place. Forms, shapes and spaces will flow logically and will be detailed creatively to provide opportunities for movement, activity and rest resulting in a diverse public realm and series of highly legible amenity open spaces. Please refer to the Landscape Design Rationale, prepared by Park Hood Landscape Architects, which accompanies this application for further discussion on the landscape design.

6.8 Design Manual for Urban Roads and Streets (2019)

The proposed development has been designed having appropriate regard to the Design Manual for Urban Roads and Streets (2013). An assessment against the Design Manual for Urban Roads and Streets (2013) is included in the Transportation Assessment Report, prepared by Lohan and Donnelly Consulting Engineers. This is provided under a separate cover.

6.9 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The proposed development has been designed having appropriate regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). An assessment against these Guidelines features in the Engineering Services Report, prepared by Lohan and Donnelly Consulting Engineers. This is provided under a separate cover.

6.10 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.

The South Dublin County Council Development Plan 2016-2022, in Sections 3.10, includes the following policy and guidance in relation to childcare facilities:

Policy C8 (b) *It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.*

C8 Objective 2 *To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.*

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) also includes the following guidance in relation to childcare facility provision:

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

The total number of residential units within the proposed development is 633 no. units. Excluding the 1 bed units, there are a total of 341 no. units considered appropriate for families. Based on the above requirement, a crèche capable of accommodating 90 no. children is required to serve the subject development.

As set out in the architectural drawings accompanying this application, the proposed childcare facility is c. 360sq.m., with adjacent 100 sq.m. play area. This is considered appropriate for the subject site. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. However, it is estimated that this childcare facility could cater for the in the order of 90-120 children having regard to an accepted industry average of c. 3 to 4 sq.m. gross floor space per child depending on the type of childcare offered by the end user. It is important to note the nature of the proposed development, being Build-to-Rent, which is generally occupied by young professionals and students and therefore, tend to generate a much lower demand for childcare facilities and play equipment than traditional housing or apartment schemes. Given the subject site proximity to a Tallaght Hospital, it is anticipated that this scheme will also accommodate health care staff. Further to this, a commercial unit features at the ground floor of Block A which is capable of accommodating a childcare facility should sufficient demand be generated.

It is envisaged that parents will drop-off children on their way to work within the area or on-route to the public transport linkages available to the proposed development.

6.11 Regional Spatial and Economic Strategy for the Eastern and Midland Region, 2019

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (DRSES) was published in June 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

The RSES states that there is further capacity for regeneration of major brownfield lands in Dublin. It places Walkinstown within the South-West Strategic Corridor (Kildare line-Luas red line) which has a population capacity in the short to medium term of 66,000. A key aim is to unlock the development capacity of strategic development areas within the Dublin metropolitan area. The following Regional Policy Objective supports the proposed development:

'RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.'

The proposed development is consistent with the above as it will provide housing to accommodate the population increase expected in South-West Strategic Corridor, and Walkinstown more specifically,

moving forward. As well as this the proposal will facilitate the consolidation and re-intensification of a brownfield site to provide high density and people intensive uses within an existing built-up area of Dublin.

7.0 South Dublin County Development Plan 2016-2022

The South Dublin County Council Development Plan 2016-2022 is the relevant statutory development plan for the area. This section will discuss in detail the policies which will form part of an argument as to why a development of this scale is acceptable on this site.

7.1 Core Strategy

Set out in Chapter 1 of the South Dublin County Development Plan 2016-2022 is the 'Core Strategy', which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels.

The following policies and objectives set out in the 'Core Strategy' are relevant to the application site:

Policy CS1: *It is policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder.*

CS1 Objective 1: To promote and support high quality infill development.

CS1 Objective 2: To promote and support the regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led development).

Policy CS2: *It is the policy of the Council to support the sustainable long term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.*

CS2 Objective 4: To promote and support the regeneration of underutilised industrial areas within areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led regeneration).

CS2 Objective 6: To promote higher residential densities at appropriate locations, adjacent to town centres or high-capacity public transport nodes (Luas/Rail).

The objective of the 'Core Strategy' is to focus residential-led development to areas with capacity to absorb more intensified forms of development that support the long-term growth of consolidation areas within the Gateway of which Walkinstown has been identified as. The 'Core Strategy' makes particular reference to regeneration of underutilised industrial lands being supported at appropriate locations in close proximity to town centres or high-capacity public transport nodes, noting underutilised lands, adjacent to LUAS and Rail services as priority sites.

The proposed development will provide for the intensification of an otherwise underutilised industrial site that is zoned as 'RES' – Residential in the Development Plan and is well served by high-capacity public transport services, in terms of the Kylemore LUAS stop, which is north of the site. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the South Dublin County Development Plan 2016-2022.

7.1.2 Zoning

The subject site is zoned 'REGEN' in the South Dublin County Council Development Plan 2016-2022, the objective of which is to '*facilitate enterprise and/or residential-led regeneration*'.

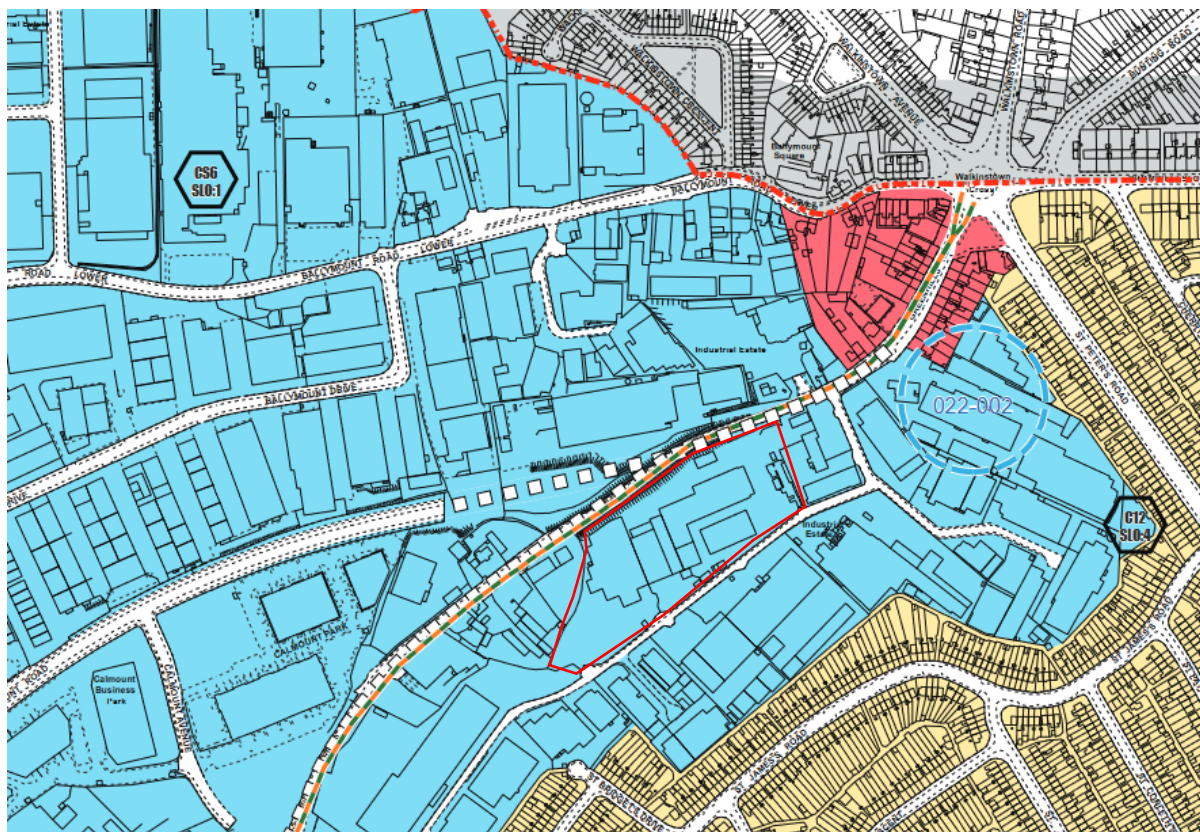


Figure 71.0 Extract from Map 5 of the South Dublin County Council Development Plan 2016-2022, with subject site outlined in red. The land is located in Walkinstown and is zoned as being within Objective 'REGEN'

The 'REGEN' zone is a new addition to the land-use zoning classifications, in the recently adopted South Dublin County Development Plan 2016-2022 and is aimed at supporting and facilitating the regeneration of underutilised industrial lands that are within close proximity to town centres and/or public transport nodes, with a particular emphasis on more intensive enterprise and residential led development. The 'REGEN' zone is a relatively broad zoning designation under which a wide range of uses may be permitted.

Section 4.3.2 'Employment and residential in Regeneration Zones' set out in the South Dublin County Development Plan 2016-2022 outlines how the Council recognises that there are a high level of vacant lands of poor environmental quality throughout the county, and will seeks to support and facilitate a more intensive mix of enterprise and/or residential led development in 'REGEN' zoned lands, in particular in instances where the regeneration relates to underutilised industrial lands that are in close proximity to town centres and public transport nodes.

Policy ET2

It is the policy of the Council to facilitate and support the regeneration of underutilised industrial areas that are proximate to urban centres and transport nodes and to promote and support more intensive compatible employment and/or residential led development in regeneration zones.

ET2 Objective 2

To support proposals for more intensive compatible enterprise and/or residential led development on lands designated with Zoning Objective 'REGEN', subject to appropriate design safeguards and based on a traditional urban form that adhere to urban design criteria.

The development proposed is a mixed-use residential development, on an otherwise underutilised industrial site that is well served by public transport services, which include the Greenhills / Mulcahy Keane Estate Dublin bus stop, south of the application site offering direct links to Dublin City Centre

and the wider Dublin area. there is a variety of recreation, education, commercial, employment and retail facilities in the surrounding areas of Crumlin, Kimmage, Terenure, Kilmainham and Tallaght.

The zoning matrix included in Schedule 5 of the Development Plan indicates 'permitted' and 'open for consideration' uses in various zones. Permitted in principle uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Plan. The permitted in principle uses outlined for the 'REGEN' zoning include the following:

*Advertisements and Advertising Structures, **Childcare Facilities**, Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, Offices 100 sq.m – 1,000 sq.m, Offices over 1,000 sq.m, Open Space, Petrol Station, Public Services, Recreational Facility, **Residential**, Restaurant/Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club/Facility, Stadium, Traveller Accommodation.*

The construction of a mixed-use development, featuring apartments, commercial space and a creche on the subject site is consistent with the land use zoning for the site.

7.2 Housing Policies

As set out in Chapter 2 of the South Dublin County Development Plan 2016-2022, a core objective is to provide new housing of good quality, with a focus on the creation of sustainable new communities at locations that can be well served by high quality public transport, with a particular focus on the intensification of infill and brownfield lands with links to existing transport services. It is noted in this section of the development plan that South Dublin County Council will require 32,132 additional housing units over the period from 2015 to 2022, and the 'Interim Housing Strategy' forecasts that 8,303 social housing units will be required during this period as well, with approximately 2,000 housing units being delivered through Part V of the Planning and Development Act 2000 (as amended).

The following development plan policies (see overleaf) are relevant to the proposal on the subject site:

- Policy H2** *It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*
- Policy H6** *It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.*
- Policy H7** *It is the policy of the Council to ensure that all new residential development within the County is of high-quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).*
- Policy H8** *It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.*
- Policy H9** *It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County.*
- Policy H11** *It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*

Policy H13 *It is the policy of the Council to ensure that all dwellings have access to high quality private open space (inc. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.*

Policy H14 *It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.*

Policy H15 *It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.*

The objective for housing in the South Dublin County Council administrative area is provide high-quality residential development that contributes to the communities. In this regard housing in 'REGEN' zoned lands at higher density will be supported where it respects the residential development established in the surrounding area and comply with the Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance. Higher buildings will also be supported in such areas, however, varied heights are preferable.

The proposal for the site is to construct a mixed-use development, featuring 633 no. apartments, in 4 no. blocks varying in height from 5 to 12 stories. The proposed 4 no. blocks have been designed and scaled to respond to the slope of the site, whilst providing a layout that allows an adequate provision of surveillance over public spaces and road within and surrounding the application site. Furthermore, the proposed apartment units have been designed to comply with the varying quantitative standards for residential schemes set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018), as updated in 2020.

7.3 Density

The Development Plan states that in determining appropriate densities, regard should be given to Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual to allow higher densities at appropriate locations. The application site is considered to be a location with significant potential for the creation of sustainable patterns of development and is considered to be an infill site. Section 5.9 states that '*The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure*'. With regards to density, this document states that '*In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.*'

Relevant objectives with regard to density as contained in the Development Plan are listed below:

Policy H8 Objective 2 *To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

Policy H8 Objective 2 *To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

Although the site is currently surrounded by two-storey warehouse developments, the Greenhills and Ballymount Industrial Estates are zoned for regeneration, and, therefore, the building densities and heights are expected to change, and therefore the proposed density of 226.9 dwellings per hectare is considered acceptable.

7.4 Building Height

It is stated in Section 5.1.5 of the South Dublin County Development Plan 2016-2022 that varied building heights are supported for proposed developments within urban centres and regeneration zones and are recognised as playing a key role in creating a sense of place, urban legibility and visual diversity. It is noted in this section of the development plan that proposals for building in excess of five-storeys in height will only be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones in accordance with Local Area Plans or SDZ Planning Schemes. The following policies and objectives are outlined regarding building height.

Policy H9 Objective 1 *To encourage varied building heights in new residential development to support compact urban form, sense of place, urban legibility and visual diversity.*

Policy UC6: *It is policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.*

UC6 Objective 1: *To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.*

UC6 Objective 2: *To ensure that higher buildings in established areas take account of and respect the surrounding context.*

UC6 Objective 3: *To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.*

The subject site is the ideal starting point for the regeneration of the northern part of the Greenhills Industrial Estate due to its proximity to Greenhills Road and transport links and it being a large parcel of land capable of establishing a self-sustaining neighbourhood with its own character and featuring buildings of varying height, including landmark components. It is considered that the proposed height strategy of the proposed development is acceptable.

The proposal involves 4 no. blocks varying in height from 5 to 12 storeys. The 12-storey built form element is confined to the northern boundary of the site which provides a suitable landmark component. Where the building is proximate to abutting lots, to the east and west, the proposed development steps down to 5 and 6 storeys. This provides an appropriate transition from the existing built form in the surrounding area.



Figure 72.0 Proposed Contextual Elevation East to West across the development



Figure 73.0 CGI of proposed development



Figure 74.0 CGI of proposed development



Figure 75.0 CGI of proposed development

7.5 Apartment Standards

Dwelling Standards

Section 11.3.1 of the development plan requires All apartments must accord with or exceed the open space and floor area standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2015) and the minimum floor areas set out in Table 11.21 of the development plan, a snippet of which is included below.

TYPE OF UNIT	APARTMENTS	PRIVATE OPEN SPACE	COMMUNAL OPEN SPACE	STORAGE
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7sq.m	6 sq.m
Three Bedrooms	90 sq.m	9 sq.m	9 sq.m	9 sq.m

Figure 76.0 Minimum space standards for apartments

The proposed development meets the spaced standards outlined above. Please refer to the Architectural Design Statement and Housing Quality Assessment prepared by C+W O'Brien Architects for further details.

Mix of Dwellings

The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality. With the exception of student accommodation, proposals that include a high proportion of one-bedroom dwellings (more than 10%) shall be required

to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. Design Statements for residential or mixed-use development proposals with a residential element will be required to address the mix of dwelling types. A BTR Justification Report has been prepared by JLL and an Architectural Design Statement has been designed by C+W O'Brien Architects.

Residential Densities

Section 2.2.2 of the South Dublin Development Plan 2016-2022 has regard to *Residential Densities* recognises that land needs to be used efficiently. Housing (H) Policy 8 includes the following objectives:

H8 Objective 1 *To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

H8 Objective 2 *To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) context.*

The site is currently underutilised. Higher density development is promoted near services and public transport, in line with current national planning policy (which will be discussed in greater detail in the subsequent sections) which encourages intensification of development on central sites such as this. Section 11.3.1 of the development plan requires densities of 35 dwellings per hectare or greater. The proposed density (226.9 units per hectare) is more than 35 units per hectare. The proposed density is considered acceptable in this location given the sites access to numerous public transport services, its prominent Greenhills Road frontage, and the limited impact the proposed development has on the amenity of abutting properties.

7.6 Bicycle Parking

The South Dublin County Development Plan 2016-2022 requires that developments provide bicycle parking spaces in accordance with Table 11.22, which requires 1 no. long term bicycle parking space per 5 apartments and 1 no. short term parking space per 10 apartments. This would equate to a requirement for 126 no. long term bicycle parking spaces and 63 no. short term parking spaces in the context of the proposed development. The development includes a provision of 1034 no. resident and 316 visitor bicycle parking spaces which complies with and **substantially exceeds** the above requirements.

7.7 Car Parking and Vehicular Access

Car Parking

The South Dublin County Development Plan 2016-2022 requires any new development provide a maximum of car parking spaces depending on the location of the development. The maximum parking rates for residential development are divided into 2 no. categories, which are as follows:

- **Zone 1:** *General rate applicable throughout the County.*
- **Zone 2 (Non-Residential):** *More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).*
- **Zone 2 (Residential):** *More restrictive rates for application within town and village centres, within 400 metres of a high-quality public transport service 5 (includes a train station, Luas station or bus stop with a high quality service)'.*

The maximum parking rates associated with new residential developments, as set out in Table 11.24 of the South Dublin County Development Plan 2016-2022, are as follows:

- 1 no. space per 1 bed apartment in Zone 1 and 0.75 spaces in Zone 2;
- 1.25 spaces per 2 bed apartment in Zone 1 and 1 space in Zone 2; and
- 1.5 spaces per 3 bed apartment in Zone 1 and 1.25 spaces in Zone 2.

The proposed development, on the basis of its proximity to the Greenhills Road bus stop is situated in Zone 2, is therefore required to provide 0.75 spaces per studio and 1 bed apartments; 1 space per 2 bed apartments; and 1.25 spaces per 3 bed apartments. The following table provides a breakdown of parking spaces required for the proposed development scheme.

	No. of 1 Bed Apartments	No. of 2 Bed Apartments	No. of 3 Bed Apartments	Total No. of Spaces Required
Proposed Development	292	280	61	575.25

Table 2.0 Table showing the breakdown of car parking spaces required to serve the proposed development scheme

It is noted in Section 11.4.2 'Car Parking Standards' that the number of spaces set out above are not to be exceeded, and in some instances a lower rate of parking may be acceptable subject to the following:

- *The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),*
- *The proximity of the development to services that fulfil occasional and day to day needs*
- *The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,*
- *The ability of people to fulfil multiple needs in a single journey,*
- *The levels of car dependency generated by particular uses within the development,*
- *The ability of residents to live in close proximity to the workplace,*
- *Peak hours of demand and the ability to share spaces between different uses,*
- *Uses for which parking rates can be accumulated, and*
- *The ability of the surrounding road network to cater for an increase in traffic.*

Furthermore, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018, as updated in 2020) outline that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria. The following guidance is provided with regards to Central and/or Accessible Urban Locations:

In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations located in close proximity.

These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.

More specifically, the following guidance is set out regarding car parking for build-to-rent developments in Specific Planning Policy Requirement 8:

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

.....

- (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*

The proposed development includes, at undercroft and surface level, a total of 439 no. car parking spaces, inclusive of 5 no. go-car spaces and 21 no. limited mobility car parking spaces.

The proposed car parking provision is considered appropriate having regard to the fact that it includes 633 no. build-to-rent apartments and the subject site's proximity to the Greenhills Road bus stop which is to form part of the Greenhills Road Quality Bus Corridor, located immediately north-east of the subject site as well as Kylemore LUAS Stop. Furthermore, the subject development will feature ample bicycle parking spaces in accordance with the requirements of the South Dublin County Development Plan 2016-2022 and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

Vehicular Access

Primary vehicular access is proposed to be provided off Greenhills Road via a new vehicular access located in the north-eastern corner of the site. 2 no. secondary vehicular accesses, providing access for emergency and servicing vehicles, feature along the site's southern boundary. Provision has also been made for the possible future extension of Calmont Road to the north of the site.

7.7.1 Car Parking for Electric Vehicles

Section 11.4.3 of the development plan provides guidance on car parking for electric vehicles. The development seeks to promote the use of electric cars and bicycles and requires new developments to provide a minimum of 105 facilities for the charging of battery-operated cars at a rate of up to 10% of the total car parking spaces. The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.

The proposed development comprises 44 no. electric charging points which comply with the development plan.

7.7.2 Car Parking Design and Layout

Section 11.4.4 provides guidance on car parking design and layout. The development plans seeks on-street parking for the following reasons:

- *Traffic calming - on-street increases driver caution by visually narrowing the vehicular carriageway and reducing forward visibility,*
- *Efficiency - On-street parking allows for a greater turnover of spaces and caters for visitors,*
- *Pedestrian comfort - the need for vehicular crossovers and the temptation for drivers to kerb mount and block footpaths is significantly reduced, and*
- *Streetscape - extensive parking to the immediate front of dwellings (where landscaping could be provided) will dominate the appearance of the houses and detract from the visual qualities of the area.*

The proposed development provides for car parking at the side of the internal roads as well as the road

to the south. The proposed development therefore complies with section 11.4.4.

The section also requires that all on-street car parking complies with the Design Manual for Urban Roads and Street, and the National Cycle Manual.

For residential densities of 40-50 dwellings per hectare and within town and village centres, a combination of on-street parking and supplementary off-street parking will be required. For large commercial developments or residential developments of over 50 dwellings per hectare, large areas of off-street parking will be required as follows:

Parking Courts: *To ensure surface parking does not dominate the urban landscape parking courts, that are highly visible from the public domain, should be restricted in size (with no more than 40 spaces per court) and well landscaped. Where larger areas of surface parking are proposed they should be located behind buildings, and/or in the centre of blocks, so that they are obscured from view.*

Basements: *To ensure a safe and secure environment basement should be well lit and well ventilated. Basement car parks that protrude above the ground level as a street interface will generally not be acceptable in town and village centres due to their visually obtrusive and inactive nature. A protrusion of up to 1.2m may be acceptable in residential areas provided the facade is screened with planting and it does not inhibit levels of passive surveillance from residences or the formation of 'own door' access from the street.*

Multi-Storey Car Parks: *To ensure that an attractive interface is created large areas of blank façade should be avoided. In town and village centres car park structures should be wrapped with, or placed over retail and commercial units. Upper storeys should be suitably treated to ensure they make a positive contribution to the public domain.*

The proposed development seeks to provide undercroft parking, one of which will be two storeys in height. These car parks will be hidden from view from street level and from above. Landscaped courtyards, to serve as communal open space, will be placed on top of each undercroft parking area. The car parks will be located centrally among blocks, and therefore will not be visible from the street. All car parking areas have been appropriately designed to ensure secure parking for cars and bicycles and adequate ventilation has been provided. For further details, please refer to the architectural and engineering drawings prepared by C+W O'Brien Architects and Lohan and Donnelly Consulting Engineers for further details.

7.7.3 Traffic and Transport Assessments

Section 11.4.5 of the development plan states the following:

Traffic Impact Statements will be required for all major traffic generating development as defined by Transport Assessment Guidelines (2014) published by the National Roads Authority. The Planning Authority may also require such assessments where a particular development may have a significant impact on the County road network. All such statements should be prepared in accordance with the Traffic and Transport Assessment Guidelines (2014).

Traffic Impact Assessments will be required to demonstrate that sufficient, realistic and verifiable levels of public transport carrying capacity and road capacity will be provided for, in a sustainable, phased manner, so as to cater for all new trips to be generated by the development.

Traffic Impact Assessments will be required to take account of up-to-date traffic surveys (within six months of date of application) and of the cumulative quantum of traffic to be generated as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed or which may be permitted in line with an approved plan) which would result in traffic using the same immediate road network and junctions as the development which is the subject to the Traffic Impact Assessment.

As part of this planning application, a Traffic and Transport Assessment has been prepared by Dr Maretin Rogers Consultancy and submitted under a separate leaf. The Traffic and Transport Assessment complies with the criteria listed above and provides a thorough assessment of the proposed development and its impact on traffic in the area.

7.7.4 Travel Plans

Section 11.4.6 of the development plan requires a Mobility Management Plan for larger sized developments as listed in Table 11.25 of the plan. The purpose of such plans is to outline a series of measures to encourage sustainable travel modes and reduce car borne traffic within a development. Those developments are as follows:

Land Use	Workplace Travel Plan Statement	Indicative Number of Jobs	Standardised Workplace Travel Plan	Indicative Number of Jobs
Offices/Financial	>500sqm	25-100	>2,000sqm	>100
Retail/Shops	>600sqm	25-100	>2,500sqm	>100
Industrial	>2,500sqm	25-100	>6,000sqm	>100
Leisure		25-100		>100 or >100,000 visitors per annum
Hospitals/Medical Centres		25-100		>100 or >100,000 visitors per annum
Warehousing	>2,500sqm	25-100	>10,000sqm	>100

Figure 77.0 Snippet from Table 11.25 of the South Dublin County Development Plan 2016-2022

Given the size of the proposed mixed-use development which will include 633 no. apartments as well as commercial space, a Mobility Management Plan has been prepared by Dr Maretin Rogers Consultancy and submitted under a separate leaf. The plan provides a detailed outline of sustainable travel modes available to future occupants of the site, both residential and commercial.

7.8 Bicycle Parking

Section 11.4.1 provides guidance on bicycle parking in the county. Table 11.22 sets out the minimum bicycle parking rates for all new development, with developments divided into two categories.

- **Long Term:** These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- **Short Stay:** These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.

Table 11.22 requires the following minimum bicycle parking rates.

CATEGORY	LAND USE	LONG TERM	SHORT STAY
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per 5 apartments	1 per 10 apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms

Figure 78.0 Extract from Table 11.22 of the South Dublin County Development Plan 2016-2022 which provides bicycle parking rates for new developments

The proposed development comprises 633 no. apartments, therefore a minimum of 126 short-term and 63 long-term bicycle parking spaces.

Bicycle parking for 1,035 no. bicycles parking spaces will be provided in secure parking facilities located within the undercroft parking areas for residents with an additional 316 no. bicycle parking spaces provided for visitors at ground level. This is far in excess of the minimum requirements as set out in Table 11.22.

7.9 Childcare Facilities

The Guidelines for Planning Authorities on Childcare Facilities, 2001, indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.

The South Dublin County Council Development Plan 2016-2022, in Sections 3.10, includes the following policy and guidance in relation to childcare facilities:

Policy C8 (b) *It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.*

C8 Objective 2: *To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning Schemes.*

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) also includes the following guidance in relation to childcare facility provision:

Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to

the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.

The total number of units within the proposed development is 633 no. units. Excluding 1 bed apartments (292 no.), there are a total of 341 no. units considered appropriate for families. Based on the above requirement, a crèche capable of accommodating 90 no. children is required to serve the subject development.

Having regard to the above, it is noted that the proposed development provides for a total of 341 no. two and three-bedroom apartment units (excluding one bedroom units as per the guidance above), and therefore requires the provision of a childcare facility. A 360sq.m. creche with outdoor play area is proposed in Block A.

This is considered appropriate for the subject site. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. However, it is estimated that this childcare facility could cater for the in the order of 90-120 children having regard to an accepted industry average of c. 3 to 4 sq.m gross floor space per child depending on the type of childcare offered by the end user. This is generally consistent with the minimum place requirements set out in the abovementioned guidelines.

7.10 Landscaping / Public Open Space / Children's Play

Section 11.3.1 of the South Dublin County Development Plan 2016-2022 requires that a detailed landscape plan be provided that outlines the extent of open space and treatments within residential and mixed-use developments of 10 units and above. In this regard we would note that a Landscape Masterplan has been prepared by Park Hood Landscape Architects, to accompany this planning application. The Masterplan provides comprehensive detailing of the proposed landscaping and treatment for the proposed development site.

In addition, the development plan requires that 10% of the total site area for residential developments in 'REGEN' zoned lands are to be allocated to public open space, and in the case of residential developments exceeding 50 units provisions for children's play areas will be required. The application site extends to an area of 27,900sq.m and therefore the minimum open space required on the site is 2790sq.m. 3,380 sq.m (12% of the site) of public open space is provided which substantially exceeds the minimum requirements. This public open space, as illustrated in Drawing No. PE18001-CWO-ZZ-ZZ-DR-A-001020 prepared by C+W O'Brien Architects, comprises a courtyard styled space between blocks B and C. A public plaza is provided at street level fronting Greenhills Road at Block C. And public routes which have been landscaped have been provided through the site, providing permeability. These spaces contain a variety of amenities including children's play areas, seating, and tables. In addition to the public open space, the development is provided with 5,020sq.m. of communal open space and 176 sq.m. roof garden for residents. These opens spaces are located at Block A, between Block C and D at podium level.

Please refer to the Landscape Master Plan and Landscape Strategy and Design Report, prepared by Park Hood Landscapes Architects, for comprehensive detailing in regard to the open space provisions, landscaping treatment and furniture, and details regarding the proposed play spaces.

The proposed development has also been guided by and complies with the following objectives:

H12 Objective 1 *To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

H12 Objective 2: *To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.*

H12 Objective 3: *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments.*

H12 Objective 4: *To develop agreed infill schemes throughout the County while ensuring that no further infill schemes occur within existing estates in the RAPID areas of West Tallaght other than those agreed prior to this Plan save for when a specific extraordinary need can be identified.*

The proposed development complies with the objectives of the county development plan as evidenced in the Landscape Master Plan and Landscape Strategy and Design Report, prepared by Park Hood Landscapes Architects.



Figure 79.0 CGI image of proposed development



Figure 80.0 CGI image of proposed development



Figure 81.0 CGI image of proposed development



Figure 82.0 CGI image of proposed development

7.11 Housing Standards

Section 2.3.0 of the South Dublin Development Plan 2022-2016 provides guidance on the quality of residential development in the county. This section has regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) which advise that residents are entitled to expect that new homes offer a high level of amenity, privacy, security and energy efficiency. The following objective are relevant to the subject site.

Residential Layout and Design

H11 Objective 1 *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation.*

H11 Objective 2 *To promote new residential developments taking account of energy efficiency, prioritising passive house construction standards, as well as renewable energy opportunities, including solar energy where appropriate, in accordance with Part L of the Building Regulations*

H14 Objective 1 *To ensure that all residential units and residential buildings are designed in accordance with the relevant quantitative standards, qualitative standards and recommendations contained in Sustainable Urban Housing: Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual and have regard to the standards and targets contained in Quality Housing for Sustainable Communities (2007), particularly the standards and recommendations that relate to internal amenity/layout, overall unit size, internal room sizes, room dimensions, aspect, sound insulation, communal facilities, storage, sustainability and energy efficiency.*

H14 Objective 2 *To support adaptable housing layouts that can accommodate the changing needs of occupants, through extension or remodelling.*

The proposed development complies with national guidelines in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020). It is therefore submitted that the proposal also complies with the above objectives.

7.12 Landscape

Section 9.2.0 of the development plan provides guidance on the landscapes of South Dublin County. A Landscape Character Assessment of South Dublin County (2015) has been prepared in conjunction with the review of the County Development Plan. The Landscape Character Assessment of South Dublin County, 2015 is a separate document to be read in parallel with this Plan. Informed by GIS mapping, GIS analysis and fieldwork together with a broad strategic review of the Historical Landscape Character of the County, the Landscape Character Assessment defines five Landscape Character Areas, as follows:

- **Urban**
- **Dodder and Glenasmole**
- **Athgoe and Saggart Hills**
- **Newcastle Lowlands**
- **Liffey Valley**

Each Landscape Character Area is assessed against a set of criteria to determine the capacity of the landscape to accommodate change based on landscape sensitivity and landscape value. The assessment has been used to inform policies and objectives of the Development Plan for each area and to ensure that future development reinforces the distinctiveness and sense of place identified by the historic landscape character types.

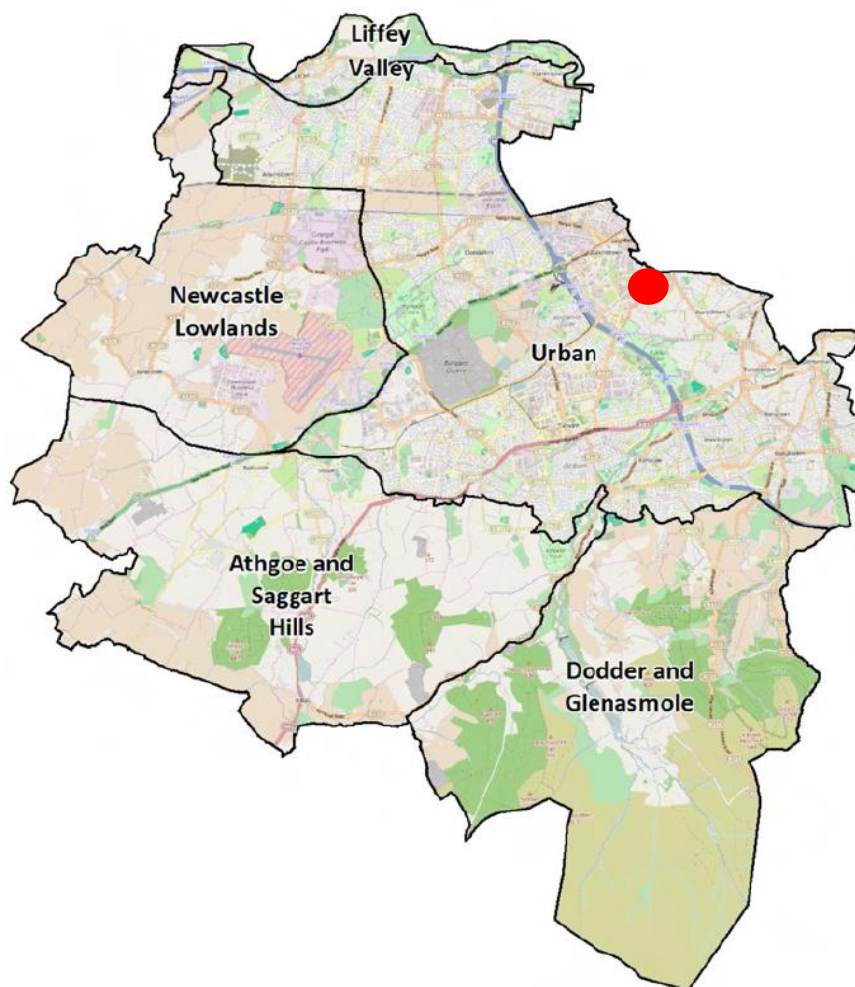


Figure 83.0 Landscape character map of South Dublin County shows the subject site (red circle) located within the Urban Landscape Character Area

The following objectives are relevant to the subject site:

HCL7 Objective 1 *To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2015).*

HCL7 Objective 2 *To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2015) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy.*

As part of this application, a Landscape and Visual Impact Assessment has been prepared by Park Hood Landscape Architects. This assessment forms part of the EIAR. The Assessment found that the proposed development, while substantial in scale, would not have a negative impact on the landscape of the area. It concludes as follows:

While substantial, the new facades, architecture, building form, usage and enhanced urban realm will be positive and significant contributions to the townscape character of this area. Further the active frontages at ground level will equate to a significantly improved architectural relationship with the adjacent streetscape and reinvigorate use

and activity on giving it a more productive and appropriate land-use for this nodal and gateway point.

The proposed development will be significantly taller than the existing buildings in this part of Greenhills and have landmark status in this area and on this route to and from Walkinstown. The broad width of Greenhills Road in conjunction with the generally large scale of adjacent townscape ensure that this development, while higher, can be accommodated and absorbed without detriment or adverse character effects. This proposal will be a notable departure from the normal architecture having high level of design and façade detail which will mark it out in architectural terms as locally distinct. **Such an introduction would enhance the existing non-descript townscape character and have positive effects on this part of the city.**

The proposal will be a prominent and a significant addition to the local skyline and townscape that is likely to influence and instigate further(cumulative) changes that will have substantial and positive contribution to character of this part of Dublin. While effects are categorised as significant to areas on and aside the proposed development site, the baseline setting ensures it can be successfully absorbed into this area without causing any adverse townscape / landscape effects and it will serve this part of the city in a positive way as a building with landmark and notable architectural status.

7.13 Heritage

Section 9.3.0 of the development plan provides guidance on natural heritage in the county. The county is home to three Natura 2000 sites.

Site Code	Site Name	European Site Type
001209	Glenasmole Valley	SAC
002122	Wicklow Mountains	SAC
004040	Wicklow Mountains	SPA

Figure 84.0 List of Natura 2000 sites located within South Dublin County

The following objectives pertain to the subject site:

HCL12 Objective 1 To prevent development that would adversely affect the integrity of any Natura 2000 site located within and immediately adjacent to the County and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive.

HCL12 Objective 2 To ensure that projects that give rise to significant direct, indirect or secondary impacts on Natura 2000 sites, either individually or in combination with other plans or projects, will not be permitted unless the following is robustly demonstrated in accordance with Article 6(4) of the Habitats Directive and S.177AA of the Planning and Development Act (2000 – 2010) or any superseding legislation:

1. There are no less damaging alternative solutions available; and
2. There are imperative reasons of overriding public interest (as defined in the Habitats Directive) requiring the project to proceed; and
3. Adequate compensatory measures have been identified that can be put in place.

As part of this application, an Appropriate Screening Report has been prepared by Enviroguide Consulting. A chapter has also been provided on Biodiversity in the EIAR. It was found that the proposed development would not result in a significant impact on the Natura 2000 sites listed above.

7.14 Energy

The development seeks to reduce reliance on carbon intensive sources of energy. Section 10 of the development plan provides guidance on the council's goals to reduce energy usage through sustainable design in the county. South Dublin County Council signed up to the EU Covenant of Mayors in June 2012. The Covenant of Mayors is an initiative of the European Commission that brings together Mayors from across Europe, in a shared voluntary commitment to reducing CO2 emissions by a minimum of 20% by 2020. The following objectives are relevant to the proposed development:

E3 Objective 1 *To ensure that medium to large scale residential and commercial developments are designed to take account of the impacts of climate change, including the installation of rainwater harvesting systems and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidelines.*

E4 Objective 1 *To ensure that medium to large scale residential and commercial developments are designed to take account of the impacts of climate change, including the installation of rainwater harvesting systems, and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidelines.*

E4 Objective 2 *To support the passive house standard or equivalent for all new build in the County.*

E7 Objective 1 *To encourage and support the development of solar energy infrastructure for on-site energy use, including solar PV, solar thermal and seasonal storage technologies.*

E7 Objective 2 *To encourage and support the development of solar energy infrastructure for local distribution, including solar PV, solar thermal and seasonal storage technologies.*

The proposed development will contain solar PV panels on the rooftops of each block. SUDS measures will be implemented on the site including green roofs, rain gardens, and tree pits. All apartments will be constructed to the highest quality having regard to energy ratings. A Sustainability Report has been prepared by Homan O'Brien which found that the proposed development would have an energy rating of A2 which is considered a high result in energy ratings.

The proposed development complies with the objectives set out in Section 10 of the development plan.

7.15 Infrastructure and Environmental Quality

Section 7 of the development plan provides guidance on infrastructure and environmental quality, specifically, water supply, wastewater and surface water. This application is accompanied by an Engineering Services Report which has regard to Section 7 of the development plan. Please refer to the Engineering Services Report prepared by Lohan and Donnelly Consulting Engineers for further details.

7.15.1 Flood Risk Management

Section 7.3 of the development plan is concerned with Flood Risk Management. The EU Floods Directive and the recommendations of the 2004 National Flood Policy Review Report are driving forces behind flood management in Ireland. The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and DECLG Circular P12/2014 address the interface between flood risk management and the planning system. The guidelines state that the steps in the development plan process and its Strategic Environmental Assessment need to be supported by an appropriate analysis of flood risk.

A Strategic Flood Risk Assessment (SFRA) of the County has been prepared to support the Strategic Environmental Assessment of the County Development Plan. The assessment was carried out in

accordance with the requirements of the Flood Risk Management Guidelines. The SFRA Report is a separate document to be read in parallel with this Plan.

The following objective is relevant to the subject site:

IE3 Objective 3

To manage flood risk in the County in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014), in particular when preparing plans and programmes and assessing development proposals. For lands identified as being at risk of flooding in (but not limited to) the Strategic Flood Risk Assessment, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these Guidelines, paying particular attention to residual flood risks and any proposed site specific flood management measures.

The application is accompanied by a Flood Risk Assessment prepared by Lohan and Donnelly Consulting Engineers. Please refer to this report for further details. It is submitted that the proposed development complies with section 7 of the development plan.

7.16.2 Utilities

There is Eir Gas Networks Ireland and ESB Infrastructure within the vicinity of the development site. As part of the development, utility infrastructure will be provided to serve the subject site. Consultations at detailed design stage will need to be undertaken with the relevant utility providers.

8.0 Draft South Dublin County Development Plan 2022-2028

Stage 2 of consultation on the Draft South Dublin County Development Plan concluded in September 2021. It is anticipated this new development plan will be adopted in 2022. The Draft Development Plan is relevant to this report as it gives an indication of the zoning objectives and planning policies applicable to the subject site over the next 6 years. The application may be decided after the draft plan has been implemented.

8.1 Core Strategy

Set out in Chapter 2 of the Draft South Dublin County Development Plan 2022-2028 is the 'Core Strategy', which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels.

Regarding the subject site, the draft development plan notes that a significant land bank exists on lands between Naas Road and Ballymount, of which the subject site forms part. The development of the Naas Road lands, as noted under the RSES, is a medium to long-term infrastructure sequence with potential for residential development and more intensive employment/mixed uses. The development of this area requires significant investment and site assembly to enable the full development potential and is subject to a Strategic Framework Plan in collaboration with Dublin City Council. The full build out of these lands will take time, and ensuring it is plan-led is central to the successful development of the County and the wider region.

The following policies and objectives set out in the 'Core Strategy are relevant to the application site:

Policy CS1: *Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.*

- CS1 Objective 1:** *To ensure a sustainable and plan led allocation of housing and employment growth within the strategic development areas of South Dublin County in line with the provisions of the MASP.*
- CS1 Objective 2:** *To support continued collaboration between infrastructure providers, state agencies and local authorities to inform cross sectoral investment plans and capital spending plans to accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area – consistent with RPO 5.1.*
- CS1 Objective 3:** *To seek funding from appropriate sources, including central government funding mechanisms, to secure the delivery of National Strategic Outcomes for the strategic development areas under the National Planning Framework.*
- Policy CS2:** Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.
- CS2 Objective 1:** *To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place.*
- CS2 Objective 6:** *To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.*

The objective of the 'Core Strategy' is to focus residential-led development to areas with capacity to absorb more intensified forms of development that support the long-term growth of consolidation areas within the Gateway of which Walkinstown has been identified as. The 'Core Strategy' makes particular reference to regeneration of underutilised industrial lands being supported at appropriate locations in close proximity to town centres or high-capacity public transport nodes, noting underutilised lands, adjacent to LUAS and Rail services as priority sites. This includes the subject site which is located in a landbank identified as being the Naas Road/ Ballymount Landbank.

The proposed development will provide for the intensification of an otherwise underutilised industrial site that is zoned as 'REGEN' – Regeneration in the Development Plan and is well served by high-capacity public transport services, in terms of the Kylemore LUAS stop, which is north of the site. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the Draft South Dublin County Development Plan 2022-2028.

8.1.2 Zoning

The subject site is zoned 'REGEN' in the South Dublin County Council Development Plan 2016-2022, the objective of which is *to facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.*

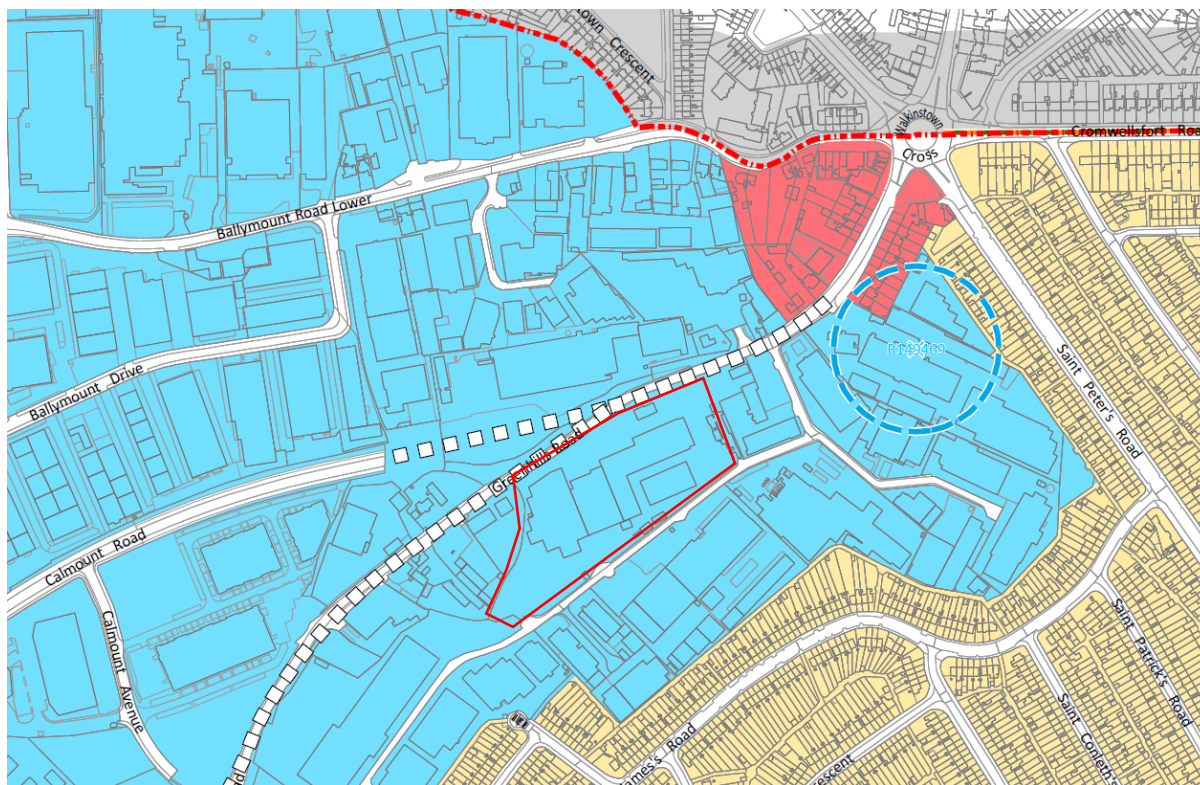


Figure 85.0 Extract from Map 5 of the Draft South Dublin County Council Development Plan 2022-2028, with subject site outlined in red. The land is zoned as being within Objective 'REGEN'

From a zoning perspective, the construction of a mixed-use development, featuring apartments, commercial space and a creche on the subject site is consistent with the land use zoning applying to the site.

8.2 Housing Policies

As set out in Chapter 2 of the Draft South Dublin County Development Plan 2022-2028, a core objective is to provide new housing of good quality, with a focus on maximising the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands.

It is noted in the housing target for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is 17,817 homes up to 2028. Of this there are currently 4,557 homes under construction, thereby reducing the need to 13,260 homes up to 2028.

The following development plan policies (see overleaf) are relevant to the proposal on the subject site:

- Policy CS1** *Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan*
- Policy CS2** *Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.*
- Policy CS4** *Facilitate the re-use and regeneration of vacant sites and landbanks through various measures to promote compact urban growth in line with the Core Strategy.*
- Policy CS6** *Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.*

The proposed development seeks to develop underutilized brownfield lands and provide 633 no. apartments and 10 no. commercial units. The provision of additional housing and the reuse of a large vacant site is consistent with the objectives listed above.

Chapter 6 of the draft development plan also provides guidance on housing in the county. The following development plan policies are relevant to the proposal on the subject site:

- Policy H2** *Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*
- Policy H7** *Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*
- Policy H8** *Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.*
- Policy H9** *Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.*
- Policy H10** *Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.*
- Policy H12** *Ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.*
- Policy H13** *Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.*

The objective for housing in the South Dublin County Council administrative area is to provide high-quality residential development that contributes to the communities. In this regard housing in 'REGEN' zoned lands at higher density will be supported where it respects the residential development established in the surrounding area and comply with the Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance. Higher buildings will also be supported in such areas, however, varied heights are preferable.

The proposal for the site is to construct a mixed-use development, featuring 633 no. apartments, in 4 no. blocks varying in height from 5 to 12 stories. The proposed 4 no. blocks have been designed and scaled to respond to the slope of the site, whilst providing a layout that allows an adequate provision of surveillance over public spaces and road within and surrounding the application site. Furthermore, the proposed apartment units have been designed to comply with the varying quantitative standards for residential schemes set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

8.3 Car Parking Standards

Tables 13.25 and 13.26 in the draft development plan set out the Maximum Parking rates for non-residential and residential development. Parking rates are divided into two main categories:

Zone 1:

General rate applicable throughout the County.

Zone 2 (Non-Residential):

More restrictive rates for application within town and village centres, within 800 metres of a train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).

The provision of parking spaces for car sharing/pooling will be encouraged and will not impact on the maximum rates in Table 13.25.

Zone 2 (Residential):

More restrictive rates for application within town and village centres, within 400 metres of a high-quality public transport service⁵ (includes a train station, Luas station or bus stop with a high quality service).

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Figure 86.0 Maximum parking rates at residential developments in the county

The proposed development, on the basis of its proximity to the Greenhills Road bus stop is situated in Zone 2, is therefore required to provide 0.75 spaces per studio and 1 bed apartments; 1 space per 2 bed apartments; and 1.25 spaces per 3 bed apartments. The following table provides a breakdown of parking spaces required for the proposed development scheme.

	No. of 1 Bed Apartments	No. of 2 Bed Apartments	No. of 3 Bed Apartments	Total No. of Spaces Required
Proposed Development	292	280	61	575.25

Table 3.0 Table showing the breakdown of car parking spaces required to serve the proposed development scheme

It is noted in Section 11.4.2 'Car Parking Standards' that the number of spaces set out above are not to be exceeded, and in some instances a lower rate of parking may be acceptable subject to the following:

- The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),
- The proximity of the development to services that fulfil occasional and day to day needs,
- The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,
- The ability of people to fulfil multiple needs in a single journey,
- The levels of car dependency generated by particular uses within the development,

- *The ability of residents to live in close proximity to the workplace, Peak hours of demand and the ability to share spaces between different uses,*
- *Uses for which parking rates can be accumulated, and*
- *The ability of the surrounding road network to cater for an increase in traffic.*
- *These criteria should be addressed as part of any Traffic and Transport Assessment and/or Workforce Plan in order to provide full justification for the number of spaces proposed.*
- *The maximum parking standards may also be varied in particular areas by the Planning Authority through planning mechanisms such as SDZ Planning Schemes, Local Area Plans or Movement Framework Plans and Area Access Studies.*

The proposed development includes, at undercroft and surface level, a total of 439 no. car parking spaces, inclusive of 5 no. go-car spaces and 21 no. limited mobility car parking spaces.

The proposed car parking provision is considered appropriate having regard to the fact that it includes 633 no. build-to-rent apartments and the subject site's proximity to the Greenhills Road bus stop which is to form part of the Greenhills Road Quality Bus Corridor, located immediately north-east of the subject site as well as Kylemore LUAS Stop. Furthermore, the subject development will feature ample bicycle parking spaces in accordance with the requirements of the Draft South Dublin County Development Plan 2022-2028.

8.3.1 Car Parking for Electric Vehicles

Section 13.8.3 of the draft development plan provides guidance on car parking for electric vehicles as follows:

- EV charging shall be provided in all residential, mixed use and commercial development and shall comprise 15% - 20% of the total parking spaces provided, with higher provision within this range required in urban areas.
- The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.
- In residential and mixed-use schemes EV charging should be provided in blocks or pods unless it can be satisfactorily demonstrated that it can be provided in a more satisfactory and efficient manner.
- It should be designed and located in such a way as to ensure passive surveillance and avoid anti-social behaviour.
- The applicant should indicate the mechanism for EV charging and payment (e.g. fob/credit card or other means) and should ensure that it is available to residents and visitors.
- EV charging facilities should not impinge on shared parking allocation.
- EV charging facilities should not obstruct or impinge on walking or cycling paths.
- Charge points should avoid areas which are already restricted by existing street furniture e.g. bollards, road signs, benches, bike racks.
- Charge points should not impede lower carbon forms of passenger transport.
- Charge points should not be located at the back of the footpath (i.e. side furthest from the road) to avoid cables becoming a trip hazard.
- For residential multi-unit buildings, the necessary ducting for all car parking spaces should be installed, allowing provision for additional electrical infrastructure.
- For new dwellings with in-curtilage parking, appropriate infrastructure should be provided to

allow for installation of a charging point at a later date.

The proposed development comprises 44 no. electric charging points (10% of all spaces) which comply with the current development plan. The plans prepared by Loan and Donnelly Consulting Engineers also confirm that an additional 10% of spaces can be upgraded to accommodate electric vehicles if required.

8.3.2 Car Parking Design and Layout

Section 13.8.4 of the draft development plan provides guidance on car parking design and layout. The development plans seeks on-street parking for the following reasons:

- *Traffic calming - on-street increases driver caution by visually narrowing the vehicular carriageway and reducing forward visibility,*
- *Efficiency - On-street parking allows for a greater turnover of spaces and caters for visitors,*
- *Pedestrian comfort - the need for vehicular crossovers and the temptation for drivers to kerb mount and block footpaths is significantly reduced, and*
- *Streetscape - extensive parking to the immediate front of dwellings (where landscaping could be provided) will dominate the appearance of the houses and detract from the visual qualities of the area.*

The proposed development provides for car parking at the side of the internal roads as well as the road to the south. The proposed development therefore complies with section 11.4.4.

The section also requires that all on-street car parking complies with the Design Manual for Urban Roads and Street, and the National Cycle Manual.

For large commercial developments or residential developments of over 50 dwellings per hectare, large areas of off-street parking will be required as follows:

Parking Courts: *To ensure surface parking does not dominate the urban landscape parking courts, that are highly visible from the public domain, should be restricted in size (with no more than 40 spaces per court) and well landscaped. Where larger areas of surface parking are proposed they should be located behind buildings, and/or in the centre of blocks, so that they are obscured from view.*

Basements: *To ensure a safe and secure environment basement should be well lit and well ventilated. Basement car parks that protrude above the ground level as a street interface will generally not be acceptable in town and village centres due to their visually obtrusive and inactive nature. A protrusion of up to 1.2m may be acceptable in residential areas provided the facade is screened with planting and it does not inhibit levels of passive surveillance from residences or the formation of 'own door' access from the street.*

Multi-Storey Car Parks: *To ensure that an attractive interface is created large areas of blank façade should be avoided. In town and village centres car park structures should be wrapped with, or placed over retail and commercial units. Upper storeys should be suitably treated to ensure they make a positive contribution to the public domain.*

The proposed development seeks to provide undercroft parking, one of which will be two storeys in height. These car parks will be hidden from view from street level and from above. Landscaped courtyards, to serve as communal open space, will be placed on top of each undercroft parking area. The car parks will be located centrally among blocks, and therefore will not be visible from the street. All car parking areas have been appropriately designed to ensure secure parking for cars and bicycles and adequate ventilation has been provided. For further details, please refer to the architectural and engineering drawings prepared by C+W O'Brien Architects and Lohan and Donnelly Consulting Engineers for further details.

8.3.3 Traffic and Transport Assessments

Section 13.8.5 of the draft development plan states the following:

Traffic Impact Statements will be required for all major traffic generating development as defined by Transport Assessment Guidelines (2014) published by the National Roads Authority. The Planning Authority may also require such assessments where a particular development may have a significant impact on the County Road network. All such statements should be prepared in accordance with the Traffic and Transport Assessment Guidelines (2014).

Traffic Impact Assessments will be required to demonstrate that sufficient, realistic and verifiable levels of public transport carrying capacity and road capacity will be provided for, in a sustainable, phased manner, so as to cater for all new trips to be generated by the development.

Traffic Impact Assessments will be required to take account of up-to-date traffic surveys (within six months of date of application) and of the cumulative quantum of traffic to be generated as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed or which may be permitted in line with an approved plan) which would result in traffic using the same immediate road network and junctions as the development which is the subject to the Traffic Impact Assessment. Where travel to school has an impact on traffic, assessments should be done during school term time when movements are at a maximum.

As part of this planning application, a Traffic and Transport Assessment has been prepared by Dr Martin Rogers Consultancy and submitted under a separate leaf. The Traffic and Transport Assessment complies with the criteria listed above and provides a thorough assessment of the proposed development and its impact on traffic in the area.

8.7.4 Travel Plans

Section 13.8.6 of the draft development plan requires a Mobility Management Plan for larger sized developments as listed in Table 11.25 of the plan. The purpose of such plans is to outline a series of measures to encourage sustainable travel modes and reduce car borne traffic within a development. Those development are as follows:

Land Use	Workplace Travel Plan Statement	Indicative Number of Jobs	Standardised Workplace Travel Plan	Indicative Number of Jobs
Offices/ Financial	>500sqm	25-100	>2,000sqm	>100
Retail/Shops	>600sqm	25-100	>2,500sqm	>100
Industrial	>2,500sqm	25-100	>6,000sqm	>100
Leisure		25-100		>100 or>100,000 visitors per annum
Hospitals/ Medical Centres		25-100		>100 or>100,000 visitors per annum
Warehousing	>2,500sqm	25-100	>10,000sqm	>100

Figure 87.0 Snippet from Table 13.27 of the Draft South Dublin County Development Plan 2022-2028

Given the size of the proposed mixed-use development which will include 633 no. apartments as well as commercial space, a Mobility Management Plan has been prepared by Dr Martin Rogers Consultancy and submitted under a separate leaf. The plan provides a detailed outline of sustainable travel modes available to future occupants of the site, both residential and commercial.

8.8 Bicycle Parking

Section 13.8.1 of the draft development plan provides guidance on bicycle parking in the county. Table 13.24 sets out the minimum bicycle parking rates for all new development, with developments divided into two categories.

- **Long Term:** These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- **Short Stay:** These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.

Table 13.24 requires the following minimum bicycle parking rates.

Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms

Figure 88.0 Extract from Table 13.24 of the Draft South Dublin County Development Plan 2022-2028 which provides bicycle parking rates for new developments

The proposed development comprises 633 no. apartments, comprising 1,035 bedrooms, therefore a minimum of 316 short-term and 1,035 long-term bicycle parking spaces.

Bicycle parking for 1,035 no. bicycles parking spaces will be provided in secure parking facilities located within the undercroft parking areas for residents with an additional 316 no. bicycle parking spaces provided for visitors at ground level. This meets the minimum requirements as set out in Table 13.24.

8.8.1 Bicycle Parking Design

Section 13.8.1 of the draft development plan provides guidance on bicycle parking design. All parking areas should comply with the requirements of the National Cycle Manual, NTA (2011).

Bicycle parking/storage associated with residential apartments shall comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the 'Apartment Guidelines') in relation to design and provision of facilities, including the following:

Location: Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road

The proposed bicycle parking areas will be located in the undercroft parking areas and will be accessible via lift and stairwells. Access to the public road will be provided via the main road in and out of the site.

Quantity: A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the

discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc.

The proposed development will meet the minimum requirements for bicycle parking spaces by providing 316 short-term and 1,035 long-term bicycle parking spaces.

Design: *Cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Refer to the Apartment Guidelines for further details on design requirements.*

The bicycle parking has been placed in dedicated storage rooms within the undercroft parking areas beneath the blocks. They are easily accessed via stairwells and lifts.

Management: *An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking. Refer to the Apartment Guidelines for further details on management.*

A management plan will be in operation once the building is completed and will include the management of bicycle parking areas as per the draft development requirements.

8.9 Childcare Facilities

Section 13.6.1 of the Draft South Dublin County Council Development Plan 2022-2028, provides guidance on childcare facilities. It requires childcare facilities to be provided at ground floor level or in stand-alone buildings. Facilities will be assessed on the following:

- *Nature of the facility (full day care, sessional, after school, etc.);*
- *Number of children to be catered for;*
- *Number of full-time and part-time staff;*
- *Intended hours of operation;*
- *Impact on residential amenity, taking into account factors such as noise, traffic and parking;*
- *Suitability of the site for the type and size of facility proposed;*
- *Availability of indoor and outdoor play space;*
- *Accessibility to public transport, walking and cycling routes;*
- *Local traffic conditions;*
- *Access, car parking and drop off facilities for staff and customers.*

The total number of units within the proposed development is 633 no. units. Excluding 1 bed apartments (292 no.), there are a total of 341 no. units considered appropriate for families. Based on the national requirements, a crèche capable of accommodating 90 no. children is required to serve the subject development.

Having regard to the above, it is noted that the proposed development provides for a total of 341 no. two and three-bedroom apartment units (excluding one-bedroom units as per the guidance above), and therefore requires the provision of a childcare facility. A 360sq.m. creche with an outdoor play area is proposed in Block A.

This is considered appropriate for the subject site. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to the operator's particular requirements and will be dependent on what types of childcare facilities are already available in the area. However, it is estimated that this childcare facility could cater for them in the order of 90-120 children having regard to an accepted industry average of c. 3 to 4 sq.m gross floor space per child depending on the type of childcare offered by the end-user. This is generally consistent with the minimum place requirements set out in the abovementioned guidelines.

8.10 Landscaping / Public Open Space / Children's Play

Section 13.5.11 of the Draft South Dublin County Development Plan 2022-2028 requires that 15% of the total site area for residential developments in 'REGEN' zoned lands are to be allocated to public

open space, and in the case of residential developments exceeding 30 units provisions for children's play areas will be required. The application site extends to an area of 27,900sq.m and therefore the minimum open space required on the site is 2790sq.m. 3,380 sq.m (12% of the site) of public open space is provided with an additional 5,020 sq.m. of communal amenity space. This public open space, as illustrated in Drawing No. PE18001-CWO-ZZ-ZZ-DR-A-001020 prepared by C+W O'Brien Architects comprises a courtyard styled space between blocks B and C. A public plaza is provided at street level fronting Greenhills Road at Block C. And public routes which have been landscaped have been provided through the site, providing permeability. These spaces contain a variety of amenities including children's play areas, seating, and tables. In addition to the public open space, the development is provided with 5520sq.m. of communal open space for residents. These open spaces are located at Block A, between Block C and D at podium level.

The proposed amount of public open space does not meet the 15% requirement in the draft development plan, however, it is noted that the proposed development also contains large amounts of communal open space for residents. The communal amenity space over provided by a minimum of 1,076 sq.m. which combined with the public open space provides for 4,456 sq.m. of open space which exceeds 15%.

Please refer to the Landscape Master Plan and Landscape Strategy and Design Report, prepared by Park Hood Landscapes Architects, for comprehensive detailing in regards to the open space provisions, landscaping treatment and furniture, and details regarding the proposed play spaces.

The provision and design of open space shall incorporate the following considerations:

Access

- *All neighbourhood areas should have access to a range of formal and informal public open spaces for amenity, recreation, sports and play.*

The proposed development contains a large centrally located public open space in addition to three communal open space areas for residents. Each space provides for amenities, recreation, sports and play. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Open spaces should be designed and located to be publicly accessible by sustainable means such as walking, cycling and public transport depending on the type of open space, and should be usable by all residents of the County.*

The public open space is located centrally in the development at street level and is easily accessible to all members of the public from Greenhills Road and the road to the south. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Adequate access points should be provided to open spaces to minimise distances to the areas they serve.*

Each block has been provided with multiple access points to the open space areas provided. Please refer to the site plans prepared by C+W O'Brien Architects for further details.

- *Insofar as possible, open spaces should be linked to one another to increase their amenity value, encourage active travel between them and to facilitate the green infrastructure network. Continuous walls and other barriers between open spaces should be avoided.*

The majority of open space is connected in the proposed development. Please refer to the Landscaped Plan prepared by Park Hood for further details.

Recreation Facilities

- *Open space should be designed to offer a variety of both active and passive recreation which is accessible to all regardless of age or ability.*

The proposed open space provides for a range of activities both active and passive serving all ages and abilities. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Children's play areas should be provided as an integral part of the design of new residential and mixed-use developments and addressed as part of a landscape plan. Refer to section below on Children's Play Areas.*

The proposed open spaces contain a range of children's play areas. Please refer to the Landscaped Plan prepared by Park Hood for further details.

Green Infrastructure, Biodiversity and Sustainable Water Management

- *Parks and open spaces should be located to connect with each other so as to create green corridors and optimise their green infrastructure function.*

Open spaces are connected for the most part. The proposed roads and paths though the site are landscaped with trees and grasses to further enhance the green corridors. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Existing trees, hedgerows and watercourses should be retained to maximise the natural setting of parks and open spaces.*

The site comprises disused warehouses and does not contain any vegetation of note.

- *Planting should comprise native and pollinator-friendly species.*

The use of natural flowers and planting has been implemented where possible, including the use of pollinator friendly plants. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Sustainable water management in the form of features such as integrated constructed wetlands, ponds, swales and basins should be incorporated within public open spaces and add to the amenity and biodiversity value of the spaces (appropriate to level within the open space hierarchy).*

The proposed development contains rain gardens in open space areas. Please refer to the Landscaped Plan prepared by Park Hood for further details.

Accessibility

- *Age friendly and disability friendly measures should be incorporated into the overall design and layout of public open spaces, such as the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops.*

The proposed open spaces are suitable to people of all ages and abilities. Universal access is provided to each open space within the development. Please refer to the Landscaped Plan prepared by Park Hood for further details.

- *Facilities, equipment and information materials should be accessible for all regardless of age or ability.*

The proposed open spaces contain facilities and equipment to suit people of all ages and abilities. Universal access is provided to each open space within the development. Please refer to the Landscaped Plan prepared by Park Hood for further details.

Safety

- *Public open space should feel safe to the user and have adequate supervision by way of passive surveillance (e.g. windows overlooking the space; footpaths, cycleways and streets running through or beside the space, etc.)*

All public and communal open spaces are overlooked by balconies and terraces of the adjoining apartments. Please refer to the Architectural Drawings prepared by C+W O'Brien Architects for further details.

- *Smaller parks and open spaces should be visible from and accessible to the maximum number of residential units.*

All public and communal open spaces are overlooked by balconies and terraces of the adjoining apartments. Please refer to the Architectural Drawings prepared by C+W O'Brien Architects for further details.

- *Boundary treatment, public lighting and planting should be designed carefully to create a sense of security and to avoid opportunities for anti-social behaviour.*

Adequate public lighting and landscaping has been provided to boundaries throughout the site. Please refer to the Architectural Drawings prepared by C+W O'Brien Architects and the Public Lighting Plan prepared by Homan O'Brien for further details.

- *Access points to parks should be maximised to increase use and thereby improve safety. Inhospitable and inaccessible open space comprising narrow tracts, backlands, incidental or 'left-over' strips of land should be designed out of all schemes.*

Adequate access points into the open space areas has been provided throughout the development. Incidental open space has been designed out of the scheme. Please refer to the Architectural Drawings prepared by C+W O'Brien Architects for further details.

- *Incidental areas of open space will not be accepted as part of functional open space for the purposes of calculations.*

Incidental open space has been designed out of the scheme. Please refer to the Architectural Drawings prepared by C+W O'Brien Architects for further details.

8.10.1 Children's Playspaces

Section 13 of the draft development plan requires children's play areas to be provided as an integral part of the design of new residential and mixed-use developments, to be addressed as part of a landscape plan. The minimum requirements for the provision of play facilities are as follows:

- *All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play spaces.*
- *Residential developments of 30 units or over shall include provision for children's play in semi-private or public open spaces, at the discretion of the Planning Authority, through the provision of a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority. Where developments are predominantly 3 beds or greater, the provision will be required for 10 units or over.*
- *New play spaces should generally be based on the principles of natural play.*
- *More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities.*
- *Play spaces should be carefully sited within residential and built-up areas generally so that they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residents.*
- *Play spaces should be designed to enhance the visual appearance of an area.*

- *Robust natural materials that are less susceptible to vandalism should be used wherever possible.*
- *Play spaces should cater for a wide range of age groups and abilities and be universally accessible.*
- *Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), (or any superseding document).*

The proposed play areas comply with the criteria listed above. Please Incidental open space has been designed out of the scheme. Please refer to the Landscape Plan and the Design Statement prepared by Park Hood Landscape Architects for further details.



Figure 89.0 CGI of proposed development



Figure 90.0 CGI of proposed development

8.11 Housing Standards

Section 6.0 of the Draft South Dublin Development Plan 2022-2028 provides guidance on the quality of residential development in the county. This section has regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) which advise that residents are entitled to expect that new homes offer a high level of amenity, privacy, security and energy efficiency. The following objectives are relevant to the subject site.

Residential Layout and Design

- H7 Objective 1** *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and Chapter 13 Implementation and Monitoring.*
- H7 Objective 2** *To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.*
- H7 Objective 3** *To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary.*

The proposed development complies with national guidelines in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020). It is therefore submitted that the proposal also complies with the above objectives.

8.12 Landscape

Section 3.0 of the draft development plan provides guidance on the landscapes of South Dublin County. The Landscape Character Assessment identifies Several Landscape Character Types within the County as follows and as identified on Figure 3.2 below:

- River Valley
- Canal
- Agricultural Lowlands
- Low Foothills
- Foothills
- Mountains
- Transport Corridors
- Green Space
- Urban
- Historic Urban
- Urban Fringe.

The capacity of each Landscape Character Type to absorb new development will largely depend on the sensitivity of the landscape. Landscape capacity means the ability of a landscape to accommodate different amounts of change for a development of a specific type without adversely affecting the intrinsic character of the landscape. Assessment of sensitivity takes account of the overall landscape character, quality and condition of the landscape and considers its potential ability to adapt to change without losing its intrinsic character. Sensitivity is classed as Low, Moderate or High. Thus, a high sensitivity landscape would have a low capacity, but the level of the capacity will vary according to the type of development concerned.

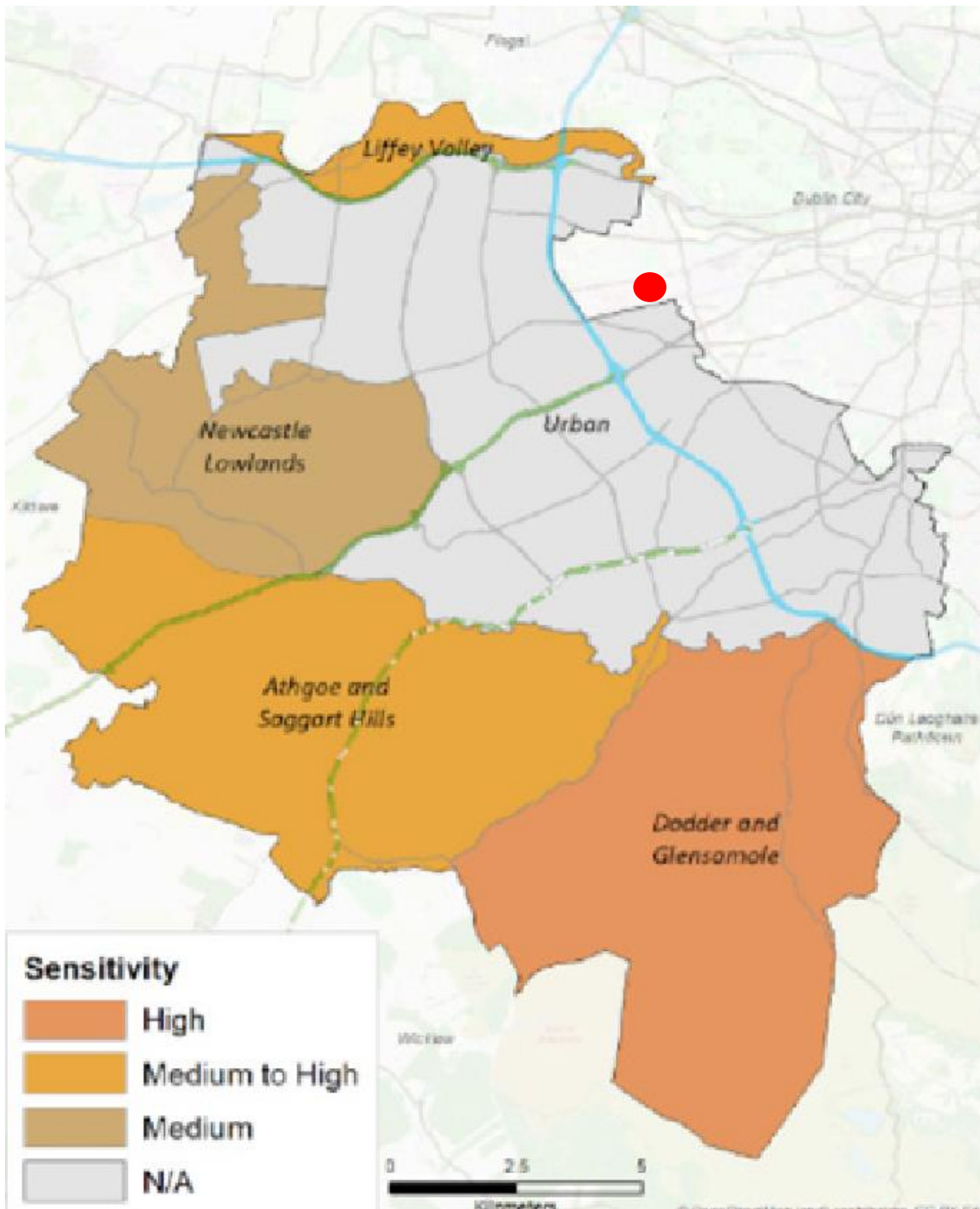


Figure 91.0 Landscape character map of South Dublin County shows the subject site (red circle) located within a non-sensitive area

The following objectives are relevant to the subject site:

NCBH14 Objective 1 *To protect and enhance the unique landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2021).*

NCBH14 Objective 2 *To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2021) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy 2015-2025.*

NCBH14 Objective 4 *To require a Landscape/Visual Impact Assessment to accompany all planning applications for significant proposals, located within or adjacent to sensitive landscapes and to provide mitigation measures to address any likely negative impacts.*

As part of this application, a Landscape and Visual Impact Assessment has been prepared by Park Hood Landscape Architects. This assessment forms part of the EIAR. The Assessment found that the proposed development, while substantial in scale, would not have a negative impact on the landscape of the area. It concludes as follows:

While substantial, the new facades, architecture, building form, usage and enhanced urban realm will be positive and significant contributions to the townscape character of this area. Further the active frontages at ground level will equate to a significantly improved architectural relationship with the adjacent streetscape and reinvigorate use and activity on giving it a more productive and appropriate land-use for this nodal and gateway point.

*The proposed development will be significantly taller than the existing buildings in this part of Greenhills and have landmark status in this area and on this route to and from Walkinstown. The broad width of Greenhills Road in conjunction with the generally large scale of adjacent townscape ensure that this development, while higher, can be accommodated and absorbed without detriment or adverse character effects. This proposal will be a notable departure from the normal architecture having high level of design and façade detail which will mark it out in architectural terms as locally distinct. **Such an introduction would enhance the existing non-descript townscape character and have positive effects on this part of the city.***

The proposal will be a prominent and a significant addition to the local skyline and townscape that is likely to influence and instigate further(cumulative) changes that will have substantial and positive contribution to character of this part of Dublin. While effects are categorised as significant to areas on and aside the proposed development site, the baseline setting ensures it can be successfully absorbed into this area without causing any adverse townscape / landscape effects and it will serve this part of the city in a positive way as a building with landmark and notable architectural status.

8.13 Heritage

Section 3.0 of the draft development plan provides guidance on natural heritage in the county. The county is home to three Natura 2000 sites.

Site Code	Site Name	European Site Type
001209	Glenasmole Valley	SAC
002122	Wicklow Mountains	SAC
004040	Wicklow Mountains	SPA

Figure 92.0 List of Natura 2000 sites located within South Dublin County

The following objectives pertain to the subject site:

NCBH3 Objective 1 *To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote*

the favourable conservation status of the habitats and species integral to these sites.

NCBH3 Objective 2 *To ensure that plans, including land use plans, will only be adopted, if they either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a plan is likely or might have such a significant effect (either alone or in combination), South Dublin County Council will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the plan will not adversely affect the integrity of any European site, will South Dublin County Council adopt the plan, incorporating any necessary mitigation measures. A plan which could adversely affect the integrity of a European site may only be adopted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.*

NCBH3 Objective 3 *To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.*

As part of this application, an Appropriate Screening Report and an Ecological Impact Assessment (within EIAR) have been prepared by Enviroguide Consulting. A chapter has also been provided on Biodiversity in the EIAR. It was found that the proposed development would not result in a significant impact on the Natura 2000 sites listed above.

8.14 Energy

The 'Climate Action Plan 2019 - To Tackle Climate Breakdown' represents the Government's all of society approach, aimed at enabling Ireland to meet its EU targets to reduce carbon emissions by 30 per cent between 2021 and 2030, and lays the foundations for achieving net zero carbon emissions by 2050. Within that context South Dublin County Council through its strategic County Development Plan seeks to exceed those targets or meet them earlier, creating reliable, robust and efficient energy systems which enable growth across all sectors, and which supports the future development of the County. In line with the LGMA's Delivering on Climate Action 2030, the Council will continue to make every effort to increase energy efficiency and unlock renewable energy potential in the County.

E3 Objective 3 *To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.*

Policy E4 *Promote the delivery of EV charging facilities in accordance with relevant regulations and national and regional policy and guidance. (see also Chapter 7, Sustainable Movement)*

Policy E7 *Promote the development of solar energy infrastructure in the County, including the building of integrated and commercial-scale solar projects subject to a viability assessment and environmental safeguards including the protection of natural or built heritage features, biodiversity and views and prospects.*

The proposed development will contain solar PV panels on the rooftops of each block. SUDS measures will be implemented on the site including green roofs, rain gardens, and tree pits and wildflowers will be planted throughout the site. All apartments will be constructed to the highest quality having regard to energy ratings. A Sustainability Report has been prepared by Homan O'Brien which found that the proposed development would have an energy rating of A2 which is considered a high result in energy ratings.

The proposed development complies with the objectives set out in Section 10 of the draft development plan.

8.15 Infrastructure and Environmental Quality

Section 11 of the draft development plan provides guidance on infrastructure and environmental quality, specifically, water supply, wastewater and surface water. This application is accompanied by an Engineering Services Report which has regard to Section 11 of the draft development plan. Please refer to the Engineering Services Report prepared by Lohan and Donnelly Consulting Engineers for further details.

8.15.1 Flood Risk Management

Section 11.3 of the draft development plan is concerned with Flood Risk Management. The EU Floods Directive and the recommendations of the 2004 National Flood Policy Review Report are driving forces behind flood management in Ireland. The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and DECLG Circular P12/2014 address the interface between flood risk management and the planning system. The guidelines state that the steps in the development plan process and its Strategic Environmental Assessment need to be supported by an appropriate analysis of flood risk.

A Strategic Flood Risk Assessment (SFRA) of the County has been prepared to support the Strategic Environmental Assessment of the County Development Plan. The assessment was carried out in accordance with the requirements of the Flood Risk Management Guidelines. The SFRA Report is a separate document to be read in parallel with this Plan.

The following objective is relevant to the subject site:

Policy IE4 *Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.*

The application is accompanied by a Flood Risk Assessment prepared by Lohan and Donnelly Consulting Engineers. Please refer to this report for further details. It is submitted that the proposed development complies with section 11 of the development plan.

9.0 Social and Affordable Housing

9.1 Part V, Section 96 of the Planning and Development Act

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to applications for development in excess of 4 no. dwellings and development of dwellings on land of more than 0.1 hectare. Therefore, the proposed residential development would be required to comply with these provisions.

New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1st September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

Circular Housing 33 of 2015 of 31 August 2015 - Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.

Circular PL 10/2015 and Housing 36/2015 of 30 November 2015 - Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.

Guidelines on Application of Part V of the Planning and Development Act 2000, after 1 September 2015, to developments granted permission prior to 1 September 2015, May 2016.

9.2 South Dublin County Development Plan 2016-2022

The following policies included in the South Dublin County Development Plan 2016-2022 have specific regard to the provision of social and affordable housing:

Policy H1: *It is the policy of the Council to implement the Interim South Dublin County Council Housing Strategy 2016-2022 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two Year Development Plan review.*

H1 Objective 1: To significantly increase the stock of social housing in the direct control of South Dublin County Council in order to meet the long-term housing needs of those households on the local authority housing list.

H1 Objective 2: To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted).

H1 Objective 4: To promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing in a balanced way in all Local Electoral Areas of the County.

H1 Objective 7: To meet the County's need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, leasing, Housing Assistance Payment (HAP) scheme, Rental Accommodation Schemes (RAS) and the utilisation of existing housing stock. This should include for the provision of one-bedroom units for homeless housing need.

9.3 Part V Proposal

The applicants propose to fulfil their Part V obligations through entering into a lease agreement with the Planning Authority for 10% of the housing units pursuant to Section 96(3) paragraph (b)(iv) of the Act.

The applicant confirms their willingness to enter into an agreement with South Dublin County Council in respect of Part V (Social and Affordable Housing) should a grant of planning permission be forthcoming at the subject site, in accordance with the relevant provisions of Planning and Development Act 2000 (as amended). The applicant intends to engage in discussions with the Housing Department of South Dublin County Council in respect to Part V shortly. Please refer to the Part V drawings prepared by C+W O'Brien Architects and the Part V validation letter from South Dublin County Council for further details.

10.0 Environmental Assessment

In accordance with Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended), an Environmental Impact Assessment Report is required for infrastructural projects comprising of:

- *Construction of more than 500 dwelling units;*
- *Construction of a shopping centre with a gross floorspace exceeding 10,000 square metres;*
and
- *Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up areas and 20 hectares elsewhere*

The development proposed for the subject site as part of this application comprises 633 no. accommodation units and is therefore above the threshold.

A full Environmental Impact Assessment Report accompanies the planning application. An AA Screening Report, Ecological Impact Assessment and Bat Survey, created by Enviroguide Consulting are provided with this submission.



Figure 93.0 CGI of proposed development

11.0 Conclusion

In conclusion, we submit that the proposal for the construction of 4 no. blocks varying in height from ten to twelve storeys, accommodating 633 no. Build-to-Rent apartments, childcare facility, commercial units, and communal amenity spaces at the Former Chadwick's Site, Greenhill Road, Walkinstown, Dublin 12 is considered to be acceptable and compliant with the policies and objectives as set out in the applicable national, regional and local planning policy context.

At a national and regional level, this statement has demonstrated consistency with the following:

- Project Ireland 2040 – National Planning Framework (2018);
- National Development Plan 2018—2027;

- Housing For All, 2021
- Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
- Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
- Department of Housing, Planning and Local Government Circular PL 8/2016 APH 2/2016;
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);
- Urban Design Manual – A Best Practice Guide 2009;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020);
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009); and
- Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, June 2019.

Consistency is also demonstrated with the policies and provisions of the South Dublin County Development Plan 2016-2022, as well as the Draft South Dublin County Development Plan 2022-2028, which is the key planning policy document at a local level.

It is considered that the proposed mixed-use development comprising 633 no. residential units, creche and commercial units at this application site present an appropriately scaled residential development on residentially zoned land.

It is considered that the application site, located within close proximity to Walkinstown and strong public transport links to Dublin city centre, has the capacity to accommodate additional residential accommodation and respond to the current housing shortage.

The development has been designed to an exceptionally high standard to contribute to the urban form of the area and it is considered that the proposal will not give rise to any undue impacts on the amenity of any adjacent properties. We are of the opinion that the development is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plans and other national guidance documents.



Kevin Hughes MIPI
MRTPI Director
for HPDC.